MKA
ECOLOGY

Ecological Impact Assessment

1 and 2 Longwalk Road

Site	*1 and 2 Longwalk Road, Uxbridge*
Project number	*181725*
Client name / Address	*Royal UK Property Holdings LLP*

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Declaration of compliance

The information which we have provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

This Ecological Impact Assessment has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development", CIEEM's 'Guidelines for Ecological Impact Assessment (CIEEM, 2018) and CIEEM's 'Guidelines for Ecological Report Writing' (CIEEM, 2017a). A review of this report against CIEEM's EcIA Checklist is provided in Appendix 6.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 24 months from the date of surveys. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

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1. EXECUTIVE SUMMARY

This Ecological Impact Assessment was commissioned on behalf of Royal UK Property Holdings LLP to provide information on the potential ecological impacts of the proposed redevelopment of 1 & 2 Longwalk Road, Hayes, Uxbridge, UB11 1DB and UB11 1BA. The assessment is informed by a Preliminary Ecological Appraisal and Preliminary Roost Assessment undertaken in August 2025 and a Bat Emergence Survey undertaken in September 2025, both by MKA Ecology Ltd (2025a and 2025b). A Biodiversity Net Gain Assessment was produced by Trium Environmental Consulting LLP in 2026 (Trium Environmental Consulting LLP, 2026)

The Proposed Development involves the demolition of the existing buildings and redevelopment of the Site to provide up to approximately 11,006 m² Gross Internal Area (GIA) of industrial, storage and distribution uses, with associated parking, landscaping and other works. The proposals will result in the removal of 51 trees, approximately 260m of non-native ornamental hedgerow, areas of introduced shrub and modified grassland. The majority of existing trees and the western boundary hedgerow will be retained, with the proposals also including the creation of new sections of native hedgerow, native groundcover planting, and the planting of 63 trees.

The ecological surveys conducted between August and September 2025 (MKA Ecology Ltd, 2025a and 2025b) highlighted a number of potential ecological constraints within the Site. Ecological features that were within the scope of the assessments, with associated mitigation measures where relevant, are as follows (residual effects in bold):

- *Designated sites:* Several designated sites are located within 2km of the Site, however, only Stockley Park Business Park Lakes & Meadows SINC, approximately 100m east of the Site, falls within the zone of influence. There is the potential for indirect impacts to occur as a result of construction activity. Such impacts will be avoided with the implementation of a Demolition Method Statement. **A neutral effect at a Metropolitan scale is anticipated**.
- *Trees:* The proposals will require the removal of 51 trees, with the remaining 144 existing trees to be retained and protected during construction. The planting of 63 trees will increase the overall number of trees within the Site. However, a net loss of individual tree units is expected. Although these will be replaced with off-site units, the location of unit delivery is not yet known. **A long-term minor negative effect at the Site level is anticipated**.
- *Hedgerows:* The proposals will require the removal of 260m of ornamental hedgerows. However, the landscape proposals will deliver a net increase in extent of hedgerow (+276m) and a significant increase in hedgerow units (+133%). **A long-term minor positive effect at the Site level is anticipated**.
- *Introduced shrub:* The proposals will require the removal of 1,445m² of introduced shrub, and under the landscape proposals, a net loss of urban units is precited. Although these will be

replaced with off-site units, the location of unit delivery is not yet known. **A long-term minor negative effect at the Site level is anticipated**.

- *Invasive species – Willow-leaved Cotoneaster:* Willow-leaved cotoneaster was identified onsite during the August 2025 PEA/PRA (MKA Ecology Ltd, 2025a). As works are not anticipated to commence until 2027, a pre-commencement site walkover will confirm whether the species remains present. Where present, it will be appropriately removed and disposed of to prevent further spread. **A long-term minor positive effect at the Site level is anticipated**.
- *Roosting bats:* Bat emergence surveys were undertaken on Buildings B3, B4 and B5, with no bats recorded emerging from or re-entering these buildings. Bat emergence surveys were not undertaken on Buildings B1 and B2, as the Preliminary Roost Assessment assessed these buildings as having very low potential to support roosting bats. Demolition of B1 and B2 will therefore be undertaken using appropriate soft-stripping methods under ecological supervision. A pre-commencement walkover, of the whole Site and all buildings, will also confirm whether previously identified potential roost features remain present and, where necessary, updated surveys will be undertaken. At least four bat boxes and/or integrated bat bricks will be provided post-development. **A long-term minor positive effect at the Local level is anticipated**.
- *Commuting and foraging bats:* The western boundary hedgerow and the eastern tree line will be retained, maintaining important ecological connectivity. New native hedgerow and 63 trees will provide additional foraging and commuting habitat, supported by a sensitive lighting strategy for the Site to be implemented during both the construction and operational phases. **A long-term minor positive effect at the Local level is anticipated**.
- *Nesting birds:* Vegetation clearance will be undertaken outside the main bird breeding season (March to August inclusive) or preceded by a nesting bird check where clearance outside this period cannot be avoided. Existing vegetation will be retained where possible, with new native hedgerow and tree planting providing additional nesting habitat for common species of birds. Six swift boxes and two generalist bird boxes will also be provided. **A long-term minor positive effect at the Local level is anticipated**.

The construction-phase mitigation for the protection of retained trees, the removal of Willow-leaved Cotoneaster and the soft stripping of buildings B1 and B2, should be secured through a Demolition Method Statement (DMS).

The Biodiversity Net Gain Assessment predicts a 14.12% net loss in habitat units and a 133.08% net gain in hedgerow units. The Proposed Development therefore does not achieve the 10% Biodiversity Net Gain requirement through onsite measures alone. A requirement for 1.58 off-site habitat units has been identified, which will be secured through an appropriate registered off-site biodiversity units provider or, where this is not feasible, through Statutory Biodiversity Credits. The final approach will be confirmed through the Biodiversity Gain Plan.

Further ecological enhancements include the provision of bird and bat nesting/roosting features, deadwood features and log piles. The creation and management of these enhancement features should be secured through a Landscape and Ecological Management Plan (LEMP).

Subject to the implementation of the recommended mitigation, compensation and enhancement measures, the Proposed Development is not anticipated to result in significant residual adverse effects on the ecological features considered within this assessment.

2. INTRODUCTION

2.1. Aims and scope of Ecological Impact Assessment

In August 2026, MKA Ecology Ltd was commissioned on behalf of Royal UK Property Holdings LLP to undertake an Ecological Impact Assessment (EcIA) for a planning application for the demolition of the existing buildings onsite and construction of two large warehouses.

The EcIA is based upon the results of a Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025a; see Appendix 3), the Bat Emergence Survey (MKA Ecology Ltd, 2025b, see Appendix 4) conducted in 2025 and the Biodiversity Net Gain Assessment (Trium Environmental Consulting LLP, 2026). The aims of this assessment are:

- To establish baseline ecological conditions at the Site;
- To identify and describe all potentially significant ecological effects associated with the Proposed Development;
- To set out the mitigation measures required to ensure compliance with nature conservation legislation and to address any potentially significant ecological effects;
- To identify how mitigation measures will be secured;
- To provide an assessment of the significance of any residual effects;
- To identify appropriate enhancement measures; and
- To set out any requirements for post-construction monitoring.

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or 1 and 2 Longwalk Road, Uxbridge. The Site covers an approximate area of 2.53 ha, is located in 1 & 2 Longwalk Road, Hayes, Uxbridge UB11 1DB and UB11 1BA (central grid reference: TQ 07787 80238) and falls under the authority of the London Borough of Hillingdon. The Site comprises of two large two-storey office buildings (B1 and B2), one single storey building (B5), two brick-built utility buildings (B3 and B4) and associated parking areas and access roads. There are lines of trees, hedgerow, shrub and grassland that border the buildings and parking areas. See Figure 1 building locations. Photographs of the Site are shown in Appendix 2.

2.3. Legislation and planning policy

This Ecological Impact Assessment has been made with reference to relevant wildlife legislation and planning policy. Relevant legislation considered within the scope of this document includes the following:

- The Wildlife and Countryside Act 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Natural Environment and Rural Communities (NERC) Act 2006;
- The Countryside and Rights of Way (CRoW) Act 2000;
- Wild Mammals (Protection) Act 1996.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 17 August 2026 requires planning decisions to contribute to conserving and enhancing the local environment. Further details are provided in Appendix 1.

Given that the Site is located within London, consideration of the London Plan (2021) has been given. The London Plan contains a number of policies relating to biodiversity, a brief summary of which is set out below:

- Policy G1 Green infrastructure;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodlands; and
- Policy G8 Food growing.

The London Borough of Hillingdon has adopted the Local Plan: Part 1 (2012) and Local Plan: Part 2 (2020) which include the following policies relating to biodiversity:

Local Plan: Part 1 – Strategic Policies:

- Policy EM7 Biodiversity and Geological Conservation

Local Plan: Part 2 – Development Management Policies

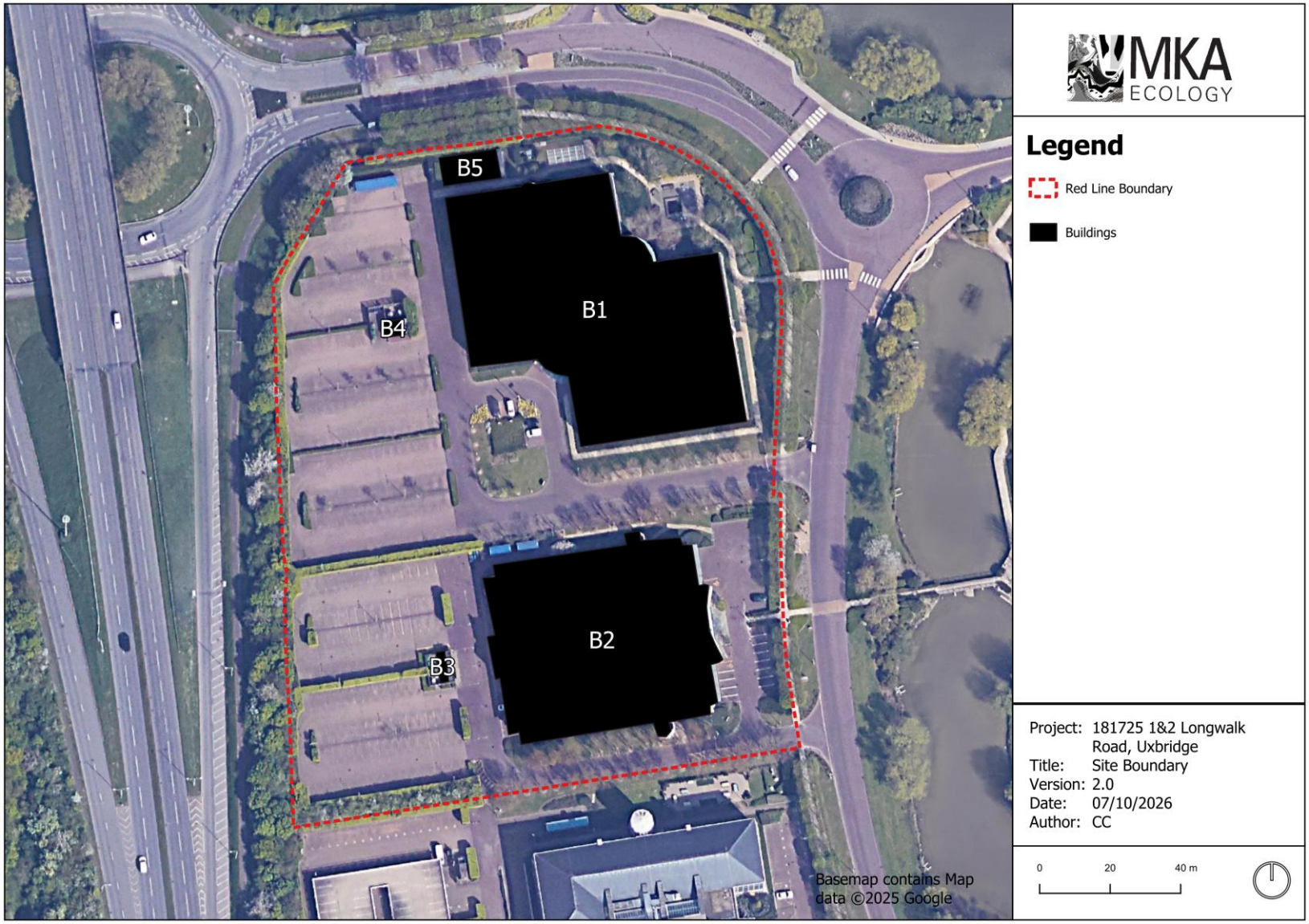
- DMEI 1 Living walls and Roofs and Onsite Vegetation
- DMEI 7 Biodiversity Protection and Enhancement

Further details are provided in Appendix 1, Section 10.1.1.

2.4. Author and reviewer

This report has been prepared by Hammaad Zubair-Sheikh, Ecologist at MKA Ecology Ltd. Hammaad has over one year experience as an ecological consultant. The report has been reviewed by Liam Price MCIEEM, Principal Ecologist at MKA Ecology Ltd. Liam has over eight years' experience as a consultant ecologist.

Figure 1: Red line boundary at 1 and 2 Longwalk Road, Uxbridge



3. METHODOLOGIES

3.1. Scope of the assessment

This Ecological Impact Assessment has been undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in UK and Ireland (CIEEM, 2018).

Following the results of the Preliminary Ecological Appraisal conducted in August 2025, the scope of this assessment is largely based on the Site's value within the Local area. As such the zone of influence is considered to be at a site level with regards to ecological effects.

Protected and notable habitats, species or species groups which were scoped out at the Preliminary Ecological Appraisal (MKA Ecology Ltd., 2025a) stage are listed below and are not considered further within the scope of this assessment. These receptors were scoped out due to a likely absence in light of the limited suitability of the habitats present onsite, which were considered to provide negligible potential to support these receptors.

- **Protected or notable plants and fungi species**: No protected or notable plant or fungi species were identified onsite and there is an absence of suitable habitat to support protected or notable species.
- **Invertebrates**: Absence of suitable habitat to support protected species, or important assemblages of invertebrates.
- **Fish**: The small artificial, ornamental pond in the north-east corner of the site is not a suitable habitat for supporting notable fish species.
- **Amphibians**: The introduced shrub and ornamental hedgerow onsite provides some limited shelter, however these habitats are largely surrounded by car parking and/or buildings which act as barriers for amphibian movement and so limits their suitability. Therefore, the onsite habitats are considered unsuitable for supporting amphibian species.
- **Reptiles**: Absence of suitable habitat to support reptile species.
- **Schedule 1 listed bird species**: Absence of suitable habitat to support species listed under Schedule 1 of The Wildlife and Countryside Act 1981 (as amended) (note that nesting birds are considered separately).
- **Badger**: Absence of suitable habitat to support Badger *Meles meles.*
- **Other mammals**: Absence of suitable habitat for Water Vole *Arvicola amphibius* or any other protected mammal species (except for Hedgehog *Erinaceus europaeus*).
- **Hedgehog:** The data search returned 52 records of Hedgehog within 2 km of the Site, with the closest record located approximately 823m east of the Site and dating from 2019. The Site comprises areas of grassland, shrub and hedgerow which provide some opportunities for hedgehog foraging and shelter; however, connectivity with suitable habitat within the wider

landscape is limited. Due to the low suitability of the Site for Hedgehog, the PEA (MKA Ecology Ltd, 2025a) recommended that further habitat enhancements are implemented post-development to improve the Site's suitability for Hedgehog. This includes the creation of log piles and deadwood features, which would provide additional foraging resources and suitable shelter while also benefiting a range of other wildlife.

A number of ecological features identified at 1 and 2 Longwalk Road, Uxbridge require specific measures to be put in place during the works period to ensure compliance with legislation and policy. These are regularly encountered ecological constraints with standardised mitigation measures. These are discussed further in Section 6. It is considered that the ecological features to which the development is expected to impact upon are those pertaining to:

- Designated sites
- Onsite habitats;
- Invasive species;
- Roosting bats;
- Commuting and foraging bats; and
- Nesting birds.

The assessment therefore only considers these groups from this point onwards.

3.2. Desktop study

A data search was commissioned in August 2025. The study area comprised the Site and a 2km radius for nationally designated sites and records of protected and notable species, including Species of Principal Importance listed under Section 41 of the NERC Act (2006) and Red and Amber-listed Birds of Conservation Concern (BoCC), as per Stanbury et al. (2021). A 10km radius was used to identify internationally designated sites. The organisations listed in Table 1 were contacted with regard to biodiversity data. The details of the original desktop study are provided in the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025a).

Table 1: Organisations providing biodiversity data

Organisation	Data collected	Date collected
Multi-agency Geographic Information for the Countryside (MAGIC) www.magic.gov.uk	Information on local, national and international statutory protected areas.	15/08/2025
Greenspace Information for Greater London CIC (GiGL)	Information on protected and notable sites and species within 2km of the Site (TQ 07787 80238).	15/08/2025

Organisation	Data collected	Date collected
Ordnance Survey maps and aerial photography	Information on habitats and connectivity between the Site and the surrounding landscape	15/08/2025
Plantlife Important Plant Areas Buglife Important Invertebrate Areas	Information on hotspots of diversity for invertebrates and populations of internationally threatened species.	15/08/2025

3.3. Field surveys and assessments

The following field surveys were conducted.

- ***Preliminary Ecological Appraisal and Preliminary Roost Assessment (PEA and PRA) (August 2025):*** The Preliminary Ecological Appraisal was conducted in accordance with survey guidelines from CIEEM (2017) and included a desktop study, a UK Habitat Classification survey (UK Hab Ltd, 2023) and protected species scoping survey. The Preliminary Roost Assessment was comprised an external inspection of buildings and trees at the Site and was undertaken following guidelines set out in Bat Surveys for Professional Ecologists – Good Practice Guidelines (4th edition) (Collins, 2023). The site visit was undertaken by Hammaad Zubair-Sheikh (Ecologist, MKA Ecology Ltd) and Max Ellis (Consultant Ecologist, MKA Ecology Ltd) on 11 August 2025. Hammaad has over one years' experience as a consultant ecologist and Max has over three years' experience as a consultant ecologist and holds a Natural England level 2 Bat Licence (CL18).
- ***Bat Emergence Survey (September 2025):*** A single emergence survey was conducted on Buildings B3, B4 and B5 at the Site, as the PEA and PRA (MKA Ecology Ltd, 2025) assessed these buildings as having low potential to support roosting bats. The surveyors were Hammaad Zubair-Sheikh, Max Ellis and Izzy Clarke (Ecologist, MKA Ecology Ltd) on 24 September 2025. Izzy has over one years' experience as a consultant ecologist. The survey was undertaken in accordance with the good practice guidelines set out in Bat Surveys for Professional Ecologists – Good Practice Guidelines (4th edition) (Collins, 2023).

3.4. Constraints

Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025a)
A single visit cannot always ascertain the presence or absence of a protected species. However, an assessment is made of the likelihood for protected species to occur based on habitat characteristics and the ecology of each species. Where there is potential for protected species, additional survey work may be required to ascertain their presence or absence.

Data on species records obtained from local biological records centres are sometimes only available at low spatial resolutions and are constrained by the voluntary nature of the contributions and what has been chosen to be submitted as records. While these records provide a useful indication of species recorded in the local area, in particular protected or notable species, the data is not necessarily an accurate reflection of species assemblages or abundance in the vicinity.

Due to access issues, only an external inspection was carried out on buildings B1 and B2. However, large windows on buildings B1 and B2 allowed for a comprehensive observation of the interiors, which comprise of offices and no features that could support bat roosts were observed. Additionally, there are no loft spaces present and therefore it is considered that the interiors of B1 and B2 are not likely to support roosts. Furthermore, there were no access points observed on the exterior of B1 and B2 that could be used by bats to enter the buildings. Therefore, the lack of an interior inspection of B1 and B2 is not considered a significant constraint. Although access into the interior of buildings B3, B4 and B5 was not possible during the site visit on 11 August 2025, an internal inspection was conducted immediately prior to the subsequent Emergence Survey on 24 September 2025 (MKA Ecology Ltd, 2025).

Bat Emergence Survey (MKA Ecology Ltd, 2025b)

The results taken from bat detector recordings are biased towards bats that use louder echolocation calls. Therefore, quiet bats, such as brown long-eared bat, may be under-recorded due to the limited recording range of the equipment. This was not considered to present a significant constraint as surveyors were vigilant to ensure that visual cues indicating the presence of quiet species were recorded.

In some circumstances it is not possible to confirm that species of bat with absolute confidence using sound analysis techniques. In particular some calls of common pipistrelle and soprano pipistrelle overlap making species identification difficult. In these circumstances the bat can be identified as a *Pipistrellus* sp. only. Within this report where *Pipistrellus* sp. is used this refers only to common pipistrelle and soprano pipistrelle. This should not be interpreted as other species of the *Pipistrellus* genus, such as Nathusius' pipistrelle *Pipistrellus nathusii* which, although it occurs relatively frequently within the UK is not commonly recorded. Where Pipistrelle species other than common or soprano pipistrelle are suspected this will be directly referenced and discussed within the report. Similarly calls of *Myotis* species can demonstrate a large number of overlapping parameters making identification difficult. Where this is the case, a bat has been identified as *Myotis* sp.

September is considered a sub-optimal month for conducting bat emergence surveys. However, the weather conditions during the survey were favourable for bat activity—dry with low wind speeds, and temperatures ranged between 16°C and 14°C. As such, the timing is not considered a significant constraint.

3.5. Assessment

Ecological features are evaluated and assessed following the guidelines from the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment (EcIA, CIEEM, 2018). The evaluation and assessment process adopted within this Ecological Assessment is set out below.

Establishing potentially important ecological features

Potentially important ecological features of relevance to the development are determined in accordance with current CIEEM guidelines. Table 2 below lists examples of ecological features that are typically considered, along with examples.

Table 2: List of Ecological Features considered for importance

Potentially Important Ecological Features	Examples
Statutory nature conservation designations	SSSIs, SACs, SPAs, Ramsar sites, LNRs, NNRs
Non-statutory nature conservation designations	Local Wildlife Sites (LoWS); County Wildlife Sites (CWS)
Protected Species	European Protected Species
International, National or local priority habitats	S41 priority habitats and species; Annex I Habitats; County/Local BAP habitat
Notable species or sub-species	Individual red-listed species
Notable or large population or assemblage of species	Diverse bird assemblage; exceptional numbers of common amphibians
Habitats which form diverse mosaics, create important connection and/or have synergistic attributes	Riparian habitat corridors; hedgerow network utilised by important bat population
Habitats of potential or supplementary importance (for the expansion, restoration or creation of S41 or SSSI quality habitats)	Shrub buffer zones; land used for foraging bird assemblage for which a SSSI is designated.

Establishing likely zone of influence

For the purposes of this assessment, the Site is considered to be inside the 'zone of influence' of:

- Internationally important designations within 10km of the Site boundary.
- Nationally important designations within 2km of the Site boundary.
- Locally important designations within 2km of the Site boundary.
- Non-statutory designations within 2km of the Site boundary.

These distances identified set out above are considered sufficient for identifying the majority of designations which may be affected by the proposals. However, it is acknowledged that in certain circumstances effects beyond these distances are possible and are considered for each case.

It should also be noted that certain ecological features have smaller 'zones of influence' than those mentioned above. For such features the appropriate zone of influence is described and justified as appropriate within the report, depending on their respective sensitivity to an environmental change.

The results of professionally accredited or published scientific studies have been used and referenced, where available, to establish the spatial and temporal limits of the changes likely to be caused by development activities and to justify decisions about the zone of influence.

Determining importance of ecological features

In determining the importance of ecological features, a range of guidelines and reference materials have been utilised, including:

- Criteria against which statutory and non-statutory nature conservation designations are selected (e.g. SSSI designation criteria; LWS selection criteria).
- Definitions for national and priority habitats.
- Publications and guidelines against which to establish the importance of particular populations or assemblages of species groups, e.g.:
    - Bats: Wray *et al,* (2010) for evaluating bat populations and roosts.
- Publications describing the conservation status of individual species (e.g. Red-data books).
- The Hedgerows Regulations to assess the importance of hedgerows.
- National, regional and local species Atlases.
- Species/group population trends.

It should be noted that the legal protection which some species and their habitats receive are considered separately from 'importance' within this assessment as not all legally protected species are necessarily rare (e.g. common pipistrelle bat). Legal issues and the appropriate mechanism for dealing with any such constraint are addressed in the report.

It should also be noted that the social, community, economic or multifunctional importance attributed to ecological features are not assessed as they fall out of the scope of this Ecological Assessment.

Geographic frame of reference

In assigning importance to an ecological resource, the following geographic frames of reference are used:

- International
- National (i.e. England/Northern Ireland/Scotland/Wales);
- Metropolitan;
- Borough;
- Local (or Parish)
- Site

The size, conservation status and the quality of features or species are all relevant in determining importance. Furthermore, the importance of a species and/ or habitat may vary depending on its geographical location.

Characterising effects and their significance

Effects of the proposed project or operation are characterised using the framework listed below, as appropriate. These terms are set out in section 5.9 of CIEEM's guidelines for Ecological Impact Assessment (CIEEM, 2018). This guidance is shown in Appendix 5. Due to the small and urban nature of this site, an explicit categorisation was not made for each receptor for each of the terms listed below. Rather, key characterisations were made in each case, informed by professional judgement. This approach is appropriate and sufficient given the nature of the site, project, significance of the ecological receptors and scale of the impacts.

- Direct or indirect
- Positive of negative
- Magnitude and/or extent
- Duration
- Reversibility
- Timing and frequency

4. BASELINE CONDITIONS

This section describes the ecological baseline and assesses the importance of ecological features relevant to the assessment for the designated sites, habitats and species recorded in this area. It includes summarised field survey data and relevant existing information gathered from the key documents relating to the Site.

4.1. Designated sites

As detailed within the PEA (MKA Ecology Ltd., 2025a), there is a single statutory designated site (South-west London Waterbodies Ramsar and SPA) and several non-statutory designated sites within 10km and 2km of the site, respectively. The SPA is approximately 6.6km to the south and provides internationally important habitat for overwintering and migratory waterbirds. The nearest non-statutory designated sites are Stockley Business Park Lakes & Meadows Site of Importance for Nature Conservation (SINC), approximately 100m to the east, and woodland to the south associated with London's Canals SINC.

South-west London Waterbodies Ramsar and SPA is valued at **International** level, whereas the non-statutory designated sites are valued at **Metropolitan** level.

4.2. Onsite habitats

Numerous scattered trees are present throughout the Site, including numerous Lime *Tilia* sp. and Beech *Fagus sylvatica* trees. These trees provide a range of ecological functions, including nesting and foraging opportunities for birds, foraging and commuting opportunities for bats, and habitat for invertebrates within features such as bark, branches and foliage. The presence of trees across the Site also provides some habitat connectivity for mobile species, such as bats and birds, within the urbanised landscape, linking the Site with larger areas of green space to the north, including golf courses and parks, and with woodland habitat associated with the Grand Union Canal to the south.

Hedgerows and areas of introduced shrub are also present throughout the Site. These habitats provide nesting and foraging opportunities for birds and support invertebrates through the provision of shelter, foliage and other structural features. The hedgerows and shrub also provide shelter and foraging resources for other species, including hedgehogs. However, as the hedgerows and shrub onsite are ornamental hedgerows and introduced shrub, rather than native species-rich habitats, they are considered to be of lower ecological value than hedgerows and shrub comprising predominately of native species. Much of their ecological value is associated with their structural function, providing shelter, foraging resources and connectivity within an otherwise highly urbanised Site. They also contain a range of niche microhabitats for invertebrates, including bark, foliage, stems and other vegetative structures.

The trees, hedgerows and areas of shrub provide a range of ecological functions within the Site, including nesting and foraging opportunities for birds, foraging and commuting opportunities for bats, and habitat and shelter for invertebrates and other species. The trees are considered the most important of these habitats, given their extent, structural complexity and greater range of habitat opportunities, particularly within an otherwise highly urbanised setting. Overall, the habitats onsite are valued at the **Site** level. While the trees are of higher value than the other habitats, they are not of higher value than Site level.

4.3. Invasive species

The non-native Willow-leaved Cotoneaster *Cotoneaster salicifolius* is present within the Site. Plantlife (2010) identifies this species as requiring a 'critical' priority approach to limit its spread, due to its potential to become invasive. Although willow-leaved cotoneaster is not currently subject to specific legal controls, its presence within the Site represents a potential risk of further spread, if it is not appropriately removed and disposed of. Although not a positive ecological receptor, it is relevant at a **Site** level.

4.4. Nesting birds

A total of eight bird species were recorded during the Site visit, The data search further returned records of 58 bird species within 2km of the Site, including several species of conservation concern, such as Herring Gull *Larus argentatus*, Spotted Flycatcher *Muscicapa striata* and House Sparrow *Passer domesticus*.

The hedgerows and numerous scattered trees within the Site, provide suitable nesting and foraging habitat for a range of common bird species.

Additionally, birds that are dependent on buildings for nesting, including Swift *Apus apus*, House Sparrow and House Martin *Delichon urbicum*, are of particular relevance within the urban environment. London Plan Policy G6 (GLA, 2021) supports the protection and conservation of priority species and promotes opportunities for the creation of features such as artificial nest sites in urban environments.

Given the suitability of the Site for nesting and foraging by a range of common bird species typical of Greater London, and the presence of suitable trees and hedgerows throughout the Site, nesting birds are valued at the **Site** level.

4.5. Bats

The Preliminary Roost Assessment identified a number of Potential Roost Features on buildings B3, B4 and B5. All three buildings were assessed as having low potential to support roosting bats and, as

such, each building was subject to a single emergence survey. No bats were recorded emerging from or re-entering buildings B3, B4 or B5 during the surveys. Common pipistrelle *Pipistrellus pipistrellus* was the only bat species recorded during the survey, and overall bat activity was very low.

During the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025), a small number of features with very low bat roost potential were also identified on buildings B1 and B2. These included crevices of a suitable size for use by roosting bats, however, the construction materials and nature of these features mean that they are considered to have very low potential. Furthermore, no evidence of roosting bats was identified within these features at the time of survey.

The data search returned records of Common Pipistrelle, Soprano Pipistrelle *Pipistrellus pygmaeus*, Brown Long-eared Bat *Plecotus auritus* and Noctule *Nyctalus noctula* within 2km of the Site. All four species are relatively widespread and are commonly recorded within Greater London. The majority of records returned by the data search were for Common Pipistrelle and Soprano pipistrelle. A search of Defra's MAGIC website returned no European Protected Species Licences granted for bats within 2km of the Site.

The Site is predominantly comprised of hardstanding and built structures. However, the hedgerows, shrub and lines of trees provide low suitability for bat foraging and commuting activity. In particular, the hedgerow along the western boundary provides a continuous link with woodland and the Grand Union Canal to the south, which provide further opportunities for bat foraging. The line of trees along the eastern boundary also provides a linear feature of potential use for commuting bats. However, the surrounding business park and major roads generate relatively high levels of noise and artificial lighting, which mean the overall suitability for commuting bats is low. This aligns with the findings of the bat emergence survey, which found bat activity to be very low, with only Common Pipistrelle recorded.

Given the absence of evidence of roosting bats in buildings B3, B4 and B5, the very low roost potential of features identified on buildings B1 and B2, and the very low levels of bat activity recorded during the surveys, together with the relatively low suitability of the Site for bat foraging and commuting, bats are valued at the **Site** level.

5. DESCRIPTION OF THE PROPOSALS

The Proposed Development involves the redevelopment of the Site to provide up to approximately 11,006 m² Gross Internal Area (GIA) of new industrial, storage and distribution uses, with associated parking, landscaping and associated works. The proposals will result in the loss of areas of baseline habitat, including urban trees, modified grassland, introduced shrub and non-native ornamental hedgerow.

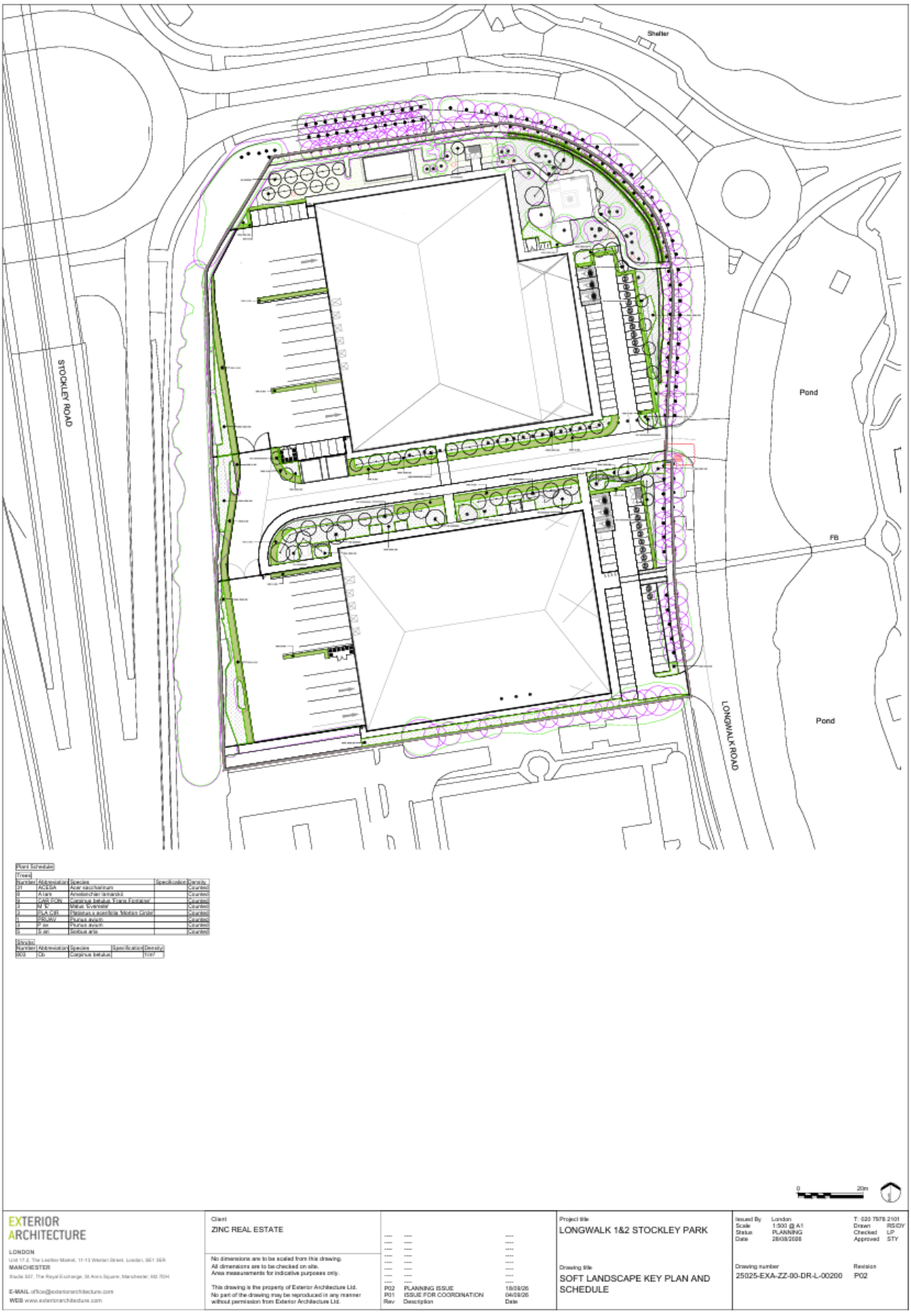
The Proposed Development requires the removal of 51 individual trees across the Site, comprising 20 silver maple/wild cherry trees and a further 30 trees. All other trees and tree groups are to be retained. Approximately 260m of non-native ornamental hedgerow will also be removed, primarily within the central car park areas, while the majority of the hedgerow along the western boundary will be retained.

Although the proposals include the retention and/or reinstatement of some areas of modified grassland, given the limited extent of these areas and the potential for them to be affected by the development, the full baseline extent of modified grassland is considered lost as per the purposes of the Biodiversity Net Gain Assessment (Trium Environmental Consulting LLP, 2026). Some areas of introduced shrub will also be removed, with approximately 1,425m² retained along the eastern and northern Site boundaries.

The proposed landscaping will incorporate retained and new landscape features as part of the redevelopment, including drought-tolerant evergreen groundcover, native hedgerow planting, new tree planting, and the creation of hibernacula and log piles to provide opportunities for wildlife. Landscape masterplans have been provided by Exterior Architecture (2026), which are shown in Figure 2.

Based on the current project programme, demolition and construction works are anticipated to commence in Summer 2027, with construction expected to be completed by June 2028 and the development operational from July 2028.

Figure 2: Soft Landscape Key Plan and Schedule (Exterior Architecture, 2026)



6. ASSESSMENT OF EFFECTS AND MITIGATION

The following assessment is based on combined information from the suite of ecological surveys undertaken by MKA Ecology Ltd between August 2025 and September 2025. An assessment of the significance of residual effects is provided only where the ecological feature or species is confirmed to be present onsite.

6.1. Designated sites

Potential impacts

The only designated site considered to be suspectable to indirect effects from the Proposed Development is Stockley Business Park Lakes & Meadows SINC, located approximately 100m east of the Site. No direct habitat loss or physical disturbance to the SINC will occur. The Flood Risk Assessment (Howard Ward Associates Ltd, 2026) indicates that surface water runoff from the Site will discharge to balancing ponds to the east of the Site, which are within the Stockley Business Park Lakes & Meadows SINC. However, this is consistent with the existing drainage strategy, where runoff from the Site and other buildings within Stockley Business Park already discharges to these ponds. Therefore, the Proposed Development is not expected to result in a significant change in the runoff associated with the Site and hence no impacts are expected to the Stockley Business Park Lakes & Meadows SINC .

Potential indirect effects during demolition and construction include temporary dust deposition, noise and vibration and disturbance associated with artificial lighting.

Given the 100m distance between the Site and the Stockley Business Park Lakes & Meadows SINC, these effects are expected to be limited in extent and magnitude. Dust generated during demolition and construction could potentially be deposited on vegetation within the SINC, although this is expected to be highly localised and temporary. Similarly, construction noise and vibration would be expected to diminish with distance from the Site and are not anticipated to result in a significant adverse effect on the ecological features within the SINC. Potential light spill towards the SINC could also affect nocturnal wildlife if lighting is poorly designed or directed towards the SINC. This risk can be minimised through the use of directional lighting and avoidance of unnecessary lighting along the eastern Site boundary.

Overall, the potential indirect effects on Stockley Business Park Lakes & Meadows SINC are expected to be temporary, localised and of low magnitude during construction, with no direct loss or physical disturbance to the SINC. In the absence of mitigation, the potential effects are therefore assessed as a long-term minor negative effect at a Metropolitan scale.

Effects on Stockley Business Park Lakes & Meadows SINC in absence of mitigation: Long-term minor negative effect at a Metropolitan scale.

The South-west London Waterbodies Ramsar site and Special Protection Area (SPA) is located approximately 6.6km south of the Site. Given the distance from the Proposed Development and the absence of any direct or indirect impact pathways, no effects on the internationally designated site are anticipated.

Other designated sites within a 2km radius of the Site include London's Canals (Metropolitan SINC), located approximately 320m south, Stockley Park Country Park (Borough Grade 2 SINC), approximately 300m north-west, Iron Bridge Road Railsides (Borough Grade 2 SINC), approximately 320m west, Carp Ponds and Broads Dock (Metropolitan SINC), approximately 515m south, Bolingbroke Way Sunken Pasture (Borough Grade 2 SINC), approximately 900m east, Lake Farm Country Park (Borough Grade 1 SINC), approximately 1km east, Stockley Road Rough (Local SINC), approximately 1km south, St Mary's, Wood End (Local SINC), approximately 1.5km north-east, Uxbridge Road Shrub, Hayes (Borough Grade 2 SINC), approximately 1.8km north, Lower Colne (Metropolitan SINC), approximately 2km west, Wall Garden Farm Sand Heaps (Borough Grade 2 SINC), approximately 2km south, and River Pinn and Manor Farm Pastures (Borough Grade 2 SINC), approximately 2km north.

These designated sites are sufficiently distant from the Site, with no direct habitat loss or physical disturbance anticipated, and there are no anticipated pathways for indirect impact arising from the Proposed Development. The works are therefore not anticipated to adversely affect these designated sites.

Effects on all other designated sites in absence of mitigation: Neutral effect at a Metropolitan scale.

Mitigation measures

A Demolition Method Statement (DMS) should be prepared prior to commencement of works. This should include measures to ensure Stockley Business Park Lakes & Meadows SINC is not impacted by construction activities related to dust deposition, noise and vibration and disturbance associated with artificial lighting.

Compensation/enhancement measures

No compensation is required or proposed, as there are no expected direct impacts upon any designated sites.

Significance of residual effects

Subject to the implementation of a DMS, no significant residual effects are anticipated.

Effects on all designated sites with mitigation and compensation: Neutral effect at a Metropolitan scale.

6.2. Habitats

Potential impacts

There are currently 206 individual trees (all early-mature or semi-mature) present within the Site, together with ornamental hedgerows and areas of introduced shrub. The trees comprise 121 specimens recorded during the Preliminary Ecological Appraisal (MKA Ecology Ltd, 2025a) and 20 wild cherry (*Prunus avium*). The Proposed Development will require the removal of 51 trees, with the majority of the remaining trees retained within the proposed plans.

Trees

The trees provide the most important ecological habitat within the Site, offering opportunities for nesting birds, invertebrates and foraging and commuting bats. The scattered trees provide some habitat opportunities for nesting birds and invertebrates, although their ecological function is limited by their isolation from other habitats and the extent of surrounding hardstanding.

The line of trees along the eastern and southern boundaries provides greater potential for ecological connectivity due to its linear nature, especially in regard to commuting bats. However, this function is limited by the surrounding context, with the trees largely flanked by pedestrian pathways, roads and small areas of shrub, and further affected by artificial lighting and road noise. The line of trees may therefore provide some limited opportunities for wildlife movement. Their removal would result in a localised loss of habitat and a reduction in these limited opportunities for ecological connectivity.

The removal of 51 established trees would therefore result in a loss of habitat and associated ecological function. Although the majority of trees will be retained within the Proposed Development, the unmitigated effects on these retained trees associated from construction works (including accidental physical damage from vehicle movements and heavy machinery and the reduction of habitat suitability through increased artificial lighting) would result in adverse impacts on the ecological function of tree habitat within the Site.

Effects on trees in absence of mitigation: Long-term moderate negative effect at a Local scale.

Hedgerows

The hedgerows provide nesting and foraging opportunities for birds, shelter and foraging resources for invertebrates, and additional cover and foraging opportunities for other wildlife. The Proposed Development will require the removal of 260m of ornamental hedgerow from the central car park areas. As these habitats are predominantly ornamental hedgerows, their ecological value is lower than that of native species-rich habitats. Their loss would nevertheless result in a localised reduction in the extent of these habitats and the associated ecological functions.

Effects on hedgerows in absence of mitigation: Long-term minor negative effect at a Site scale.

Introduced shrub

The introduced shrub provides nesting and foraging opportunities for birds, shelter and foraging resources for invertebrates, and additional cover and foraging opportunities for other wildlife. The Proposed Development will require the removal of 1,445m² of introduced shrub adjacent to buildings B1 and B2. As this habitat is predominantly introduced shrub, its ecological value is lower than that of native species-rich habitats. Its loss would nevertheless result in a localised reduction in the extent of this habitat and the associated ecological functions.

Effects on introduced shrub in absence of mitigation: Long-term minor negative effect at a Site scale.

Mitigation measures

144 existing trees will be retained as part of the Proposed Development, including the majority of the trees within the line of trees along the eastern boundary of the Site. A Demolition Method Statement (DMS) should be prepared prior to commencement of works. This should include measures to protect retained trees and other retained vegetation during the construction phase. Retained trees will be protected during demolition and construction in accordance with arboricultural best practice, including the establishment of root protection zones (RPZs).

The loss of trees will be addressed through the landscaping proposals and assessed through the BNG assessment. The development will incorporate 63 new trees alongside other habitat creation and enhancement measures. While the newly planted trees will result in an overall increase in the number of individual trees across the Site, the time required for these trees to develop comparable ecological value to the established trees will result in a net loss of 0.82 individual tree units. The proposed planting will, however, establish a new line of trees through the centre of the Site and a larger area of tree planting in the north-east. Once established, these areas are likely to provide more continuous and structurally connected habitat than the existing scattered trees, providing more favourable opportunities for species such as bats and birds.

The loss of tree units that cannot be compensated for within the Site will be addressed through the provision of offsite units. The location of these off-site units has not yet been confirmed and may be outside the local borough. These offsite units will be secured to deliver a net gain in habitat units, including ensuring the trading rules are met.

The proposed landscaping will also retain and incorporate sections of existing hedgerows and shrub, with additional planting of both habitat types providing replacement and enhanced habitat opportunities. These habitats will be planted with largely native species, which will provide greater ecological value than the existing ornamental and introduced vegetation.

Compensation/enhancement measures

The retention of the majority of existing trees, together with the planting of 63 new trees, will maintain tree cover within the Site. However, the BNG assessment identifies a net loss of 0.82 individual tree units, reflecting the time required for newly planted trees to develop comparable ecological value to the established trees. Furthermore, the loss of tree units will be compensated through the provision of offsite units, however, as the location of these units has not yet been confirmed and they cannot be considered to replace the loss of tree ecological value within the Site or the local borough. Overall, this means that there will be a reduction in the biodiversity value of tree habitat within the Local in the long term. Similarly, there is predicted to be a net loss of units associated with urban habitats (to be replaced with off-site units), so a Local reduction in the biodiversity value in the long term is predicted.

Effect on trees with mitigation and compensation: Long-term minor negative effect at a Local scale.

Effect on introduced shrub with mitigation and compensation: Long-term minor negative effect at a Site scale.

The retention and creation of hedgerows, including the creation of new native-species planting, will increase the extent and ecological value of these habitats within the Site. These habitats will provide additional opportunities for nesting birds, foraging and commuting bats, invertebrates and other wildlife.

Effect on hedgerows with mitigation and compensation: Long-term minor positive effect at a Site scale.

6.3. Invasive species – Willow-leaved Cotoneaster

Potential impacts

Willow-leaved Cotoneaster was identified within the Introduced shrub at the Site during the PEA/PRA visit undertaken on 11 August 2025 (MKA Ecology Ltd, 2025a). The species is considered a high-risk invasive non-native species (Plantlife, 2010), although it is not currently subject to specific legal controls. Construction activities could result in its further spread if present at the time of works.

Effect of invasive species in absence of mitigation: Long-term minor negative effect at a Local scale.

Mitigation measures

A DMS should detail suitable control measures to ensure the construction activities do not cause this species to spread. This should include a pre-commencement site walkover to confirm the location of any willow-leaved cotoneaster present within the Site. The DMS should include working practices setting out how the plant should be appropriately removed and disposed of. This is likely to include the following actions:

- If present, all instances should be appropriately removed and disposed of prior to or during construction to prevent further spread.

- Stems should be cut as close to ground level as practicable, preferably before fruits ripen, and all cut material removed from the area.
- Where fruits are present, these should be carefully collected and securely contained to prevent seed dispersal.
- The stumps and root systems should then be excavated to prevent regrowth.
- Care should be taken to prevent the spread of seeds, plant fragments and contaminated soil.
- All arisings should be securely contained during handling and transportation, with tools and footwear cleaned and checked for plant material.

Compensation/enhancement measures

No specific compensation or enhancement measures are required in relation to willow-leaved cotoneaster.

Significance of residual effects

Subject to the removal of any willow-leaved cotoneaster identified during the pre-commencement walkover, no significant residual effects are anticipated.

Effect of invasive species with mitigation and compensation: Long term minor positive at a Site scale.

6.4. Roosting bats

Potential impacts

The two large, metal-clad buildings, B1 and B2, were assessed during the PRA as having very low potential to support roosting bats.

The Bat Emergence Survey undertaken by MKA Ecology Ltd (2025b) recorded no bats emerging from or re-entering buildings B3, B4 or B5 during the survey on 24 September 2025. Therefore, no impacts on roosting bats are anticipated in relation to buildings B3, B4 and B5.

All trees within the Site were assessed as having negligible bat roost potential during the Preliminary Roost Assessment (PRA) undertaken by MKA Ecology Ltd (2025a). Therefore, no impacts on roosting bats are anticipated in relation to the removal of any trees onsite.

All bat species are 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 (as amended). Bats are also Species of Principal Importance listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

Bats are a highly mobile species and may use roosting features intermittently and can move between locations depending on seasonal conditions and roost requirements. Therefore, although no bats were recorded during the emergence survey of buildings B3, B4 and B5, and buildings B1 and B2 were

assessed as having very low roost potential, occasional use by individual bats cannot be entirely ruled out. In the absence of mitigation, there is a risk that the demolition of buildings B1 to B5 could result in damage to potential roosting features, potentially causing injury or mortality to individual bats should they be present. Demolition activities could also result in disturbance from noise, vibration and dust. In addition, increases in artificial lighting associated with the construction and operation of the Proposed Development have the potential to disturb bats and reduce the suitability of roost locations.

Effect on roosting bats in absence of mitigation: Long-term minor negative effect at a Local scale.

Mitigation measures

A DMS should incorporate a method statement detailing the proposed soft stripping of buildings B1 and B2. The method statement should set out the measures to be followed during the removal of the areas containing potential roosting features, under the supervision of a suitably qualified ecologist. If bats are found during the demolition works to B1 to B5, all work must immediately cease and an ecologist should be contacted.

It is likely that the Proposed Development will incorporate external lighting during both the construction and operational phases. Lighting should be designed and managed appropriately to minimise disturbance to bats. The lighting design should be developed with consideration given to the guidelines of the Institute of Lighting Professionals (ILP, 2023).

Given that the proposed works may not commence until 2027, a pre-commencement site walkover should be undertaken to assess whether the potential roosting features identified within buildings B3, B4 and B5 remain present and suitable.

If the potential roosting features within B3, B4 and B5 remain present and suitable, updated bat emergence surveys should be undertaken prior to commencement of works, in accordance with current best-practice guidelines, to confirm the continued absence of roosting bats.

The site walkover should also include buildings B1 and B2, which were previously assessed as having very low potential for roosting bats. If the features identified within B1 and B2 remain present and the buildings continue to be assessed as having very low potential, the recommended soft-stripping approach will remain applicable.

Compensation/enhancement measures

A minimum of four bat boxes and/or integrated bat bricks will be installed as part of the Proposed Development. These should either be integrated into the new buildings or mounted on suitable retained trees, where appropriate. The location, orientation and specification of the boxes/bricks should be selected to provide suitable conditions for roosting bats and should avoid being directly lit.

Significance of residual effects

With the provision of new roosting features, together with the implementation of appropriate demolition procedures, ecological supervision and sensitive lighting during both the construction and operational phases, there will be no residual adverse effects on roosting bats.

Effect on roosting bats with mitigation and compensation: Long-term minor positive effect at a Local scale.

6.5. Commuting and foraging bats

Potential impacts

The hedgerows and scattered trees across the Site, together with the lines of trees along the eastern and southern boundaries, provide opportunities for bats to forage and commute across the Site. The western boundary hedgerow and eastern line of trees provide the greatest ecological value for bats, as they form relatively continuous linear features that can facilitate movement through the Site. Additionally, the hedgerow along the western boundary provides an ecological corridor between the Site and the woodland area and London's Canals SINC to the south. However, the suitability of these features is considered low due to the Site's urban setting, with surrounding roads, footpaths and buildings, as well as existing noise and artificial lighting, reducing their suitability for bats.

Furthermore, the majority of the existing trees within the line of trees along the eastern boundary will be retained. In addition, the hedgerow along the western boundary will also be retained, maintaining its existing functions as an ecological corridor between the woodland and the London's Canals SINC to the south. These habitats currently provide key opportunities for bats to commute and forage throughout the Site, and their retention will help maintain these ecological functions during and following the development of the Site.

The Proposed Development includes the removal of 260m of hedgerow within the car park and the removal of approximately 51 trees across the Site. The western boundary hedgerow and eastern line of trees will largely be retained, with the majority of removed trees comprising scattered trees. Therefore, the principal areas of suitable commuting and foraging habitat on Site will largely be retained. In the absence of mitigation, increased artificial lighting associated with the Proposed Development and disturbance during construction, including potential physical damage to retained trees and hedgerow vegetation, could further reduce the suitability of retained features for commuting and foraging bats.

Effect on commuting and foraging bats in absence of mitigation: Long-term minor negative effect at a Local scale.

Mitigation measures

The hedgerow along the western Site boundary will be retained and protected throughout the construction phase, maintaining established nesting habitat. In addition, the majority of the trees currently present onsite will be retained and protected throughout the construction phase. Retained trees will be protected during demolition and construction in accordance with arboricultural best practice, which includes the establishment of root protection zones (RPZ) during the construction phase.

Artificial lighting will also be designed and managed sensitively to minimise potential impacts on bat commuting and foraging activity. Lighting should be designed with consideration given to best-practice guidelines (ILP, 2023), with particular consideration given to retained boundary vegetation and newly planted hedgerows and trees. This will help to maintain dark corridors through and around the Site and minimise disturbance to bats using these features.

Compensation/enhancement measures

The Proposed Development will result in a net increase of 0.74 hedgerow habitat units through the creation of additional native hedgerow. This will increase the extent of suitable habitat a variety of species across the Site, while the retention of the majority of the existing eastern line of trees and western boundary hedgerow will maintain established linear habitat and ecological connectivity.

Although the planting of 63 trees will result in an overall increase in the number of individual trees within the Site, the time required for newly planted trees to develop comparable ecological value to established trees will result in a net loss of 0.82 individual tree units (Off-site units will be secured to deliver a net gain in habitat units ensuring a net positive biodiversity benefit). It is important to note, however, that the majority of trees to be removed comprise scattered trees within the car park and some trees within the southern line of trees. The proposed planting will instead establish a new line of trees through the centre of the Site and a larger area of tree planting in the north-east. Once established, these areas are likely to provide more continuous and structurally connected habitat than the existing scattered trees, providing more favourable opportunities to support bat foraging and commuting activity.

Overall, the proposed landscape scheme will maintain and enhance the availability and connectivity of suitable habitat for bats within the Site.

Significance of residual effects

The retention of key existing habitats (line of trees along the eastern boundary and the hedgerow along the western boundary) and creation of additional native hedgerow and 63 trees will increase suitable commuting and foraging habitat within the Site, in the long term. While vegetation establishes and develops, a short-term negative effect is anticipated.

Effect on commuting and foraging bats with mitigation and compensation: Long-term minor positive effect at a Local scale.

6.6. Nesting birds

Potential impacts

The Site provides suitable nesting habitat for common bird species, primarily within the numerous scattered trees, areas of shrub and sections of ornamental non-native hedgerow. The PEA (MKA Ecology Ltd, 2025a) identified a moderate likelihood of common species of nesting birds being present onsite. The Proposed Development will require the removal of 51 trees and sections of the ornamental non-native hedgerow, resulting in the temporary loss of nesting habitat. Vegetation clearance during the breeding season could also result in the disturbance or destruction of active nests, eggs or dependent young.

Effect on nesting birds in absence of mitigation: Long-term minor negative effect at a Local scale.

Mitigation measures

To avoid impacts on nesting birds, vegetation clearance should be undertaken outside the main bird breeding season, which runs between March and August inclusive. Where clearance during the breeding season cannot be avoided, all vegetation proposed for removal should be subject to a nesting bird check by a suitably experienced ecologist immediately prior to works. Where an active nest is identified, an appropriate buffer should be established around the nest and maintained until the nesting attempt has been completed and the nest is no longer active.

The hedgerow along the western Site boundary will be retained and protected throughout the construction phase, maintaining established nesting habitat. In addition, the majority of the trees currently present onsite will be retained and protected throughout the construction phase. Retained trees will be protected during demolition and construction in accordance with arboricultural best practice, which includes the establishment of root protection zones (RPZ) during the construction phase.

Compensation/enhancement measures

The proposed landscape proposals will provide additional opportunities for nesting birds. These include the planting of new sections of native hedgerow and 63 trees. These habitats will provide suitable nesting habitat, as well as additional food and shelter resources for birds.

The proposed planting will increase the availability of suitable nesting habitat across the Site compared with the existing baseline once the new habitats have become established. In the short-term, the loss of existing vegetation and the time required for the new planting to mature will result in a limited temporary reduction in the availability of suitable nesting habitat.

Significance of residual effects

Following implementation of the proposed mitigation, retention and protection of existing vegetation, and delivery of new tree and hedgerow planting, bird boxes (minimum of six Swift boxes and two generalist boxes), grassland and planted areas, the Site post-development will provide an increased area and diversity of suitable habitat for common bird species to nest once the proposed planting has become established.

Effect on nesting birds with mitigation and compensation: Long-term minor positive effect at a Local scale.

6.7. Cumulative effects

Given the low potential impacts of the Proposed Development and absence of residual impacts, a cumulative impacts assessment was not conducted for this scheme.

6.8. Summary of assessment, mitigation, enhancement and compensation measures

Table 3: Summary of mitigation and compensation measures for 1&2 Longwalk Road, Uxbridge

Ecological feature	Significance of residual effect	Mitigation measures	Secured by	Compensation/enhancement measures	Secured by
Designated sites	Neutral at a Metropolitan level.	DMS detailing measures to control impacts related to dust deposition, noise and vibration and disturbance associated with artificial lighting.	Planning condition (DMS).	None proposed.	N/A
Habitat	Trees minor negative at Local level. Hedgerows minor positive at Site level. Introduced shrub minor negative at Site level.	Retention and protection of existing trees and hedgerows during demolition and construction, including establishment of root protection zones.	Planning condition (DMS).	Planting of 63 trees, alongside retention of the majority of existing trees. Planting of native hedgerow and shrub species. Delivery of off-site habitat units.	Planning condition (HMMP) and Biodiversity Gain Plan
Invasive species – Willow-leaved Cotoneaster	Minor positive at Site level.	Site walkover prior to commencement of works to establish presence or absence. If present, all instances to be removed and disposed of appropriately.	Planning condition (DMS).	None proposed.	N/A

Ecological feature	Significance of residual effect	Mitigation measures	Secured by	Compensation/enhancement measures	Secured by
Roosting bats	Minor positive at Local level.	Soft stripping of B1 and B2 under ecological supervision. Designing a sensitive lighting strategy. Pre-commencement walkover and, where necessary, updated bat emergence surveys.	Planning condition (DMS).	Minimum 4 bat boxes and/or integrated bat bricks incorporated into the new buildings or mounted on suitable retained trees.	Planning condition (LEMP and DMS)
Commuting and foraging bats	Minor positive at Local level.	Retention of the western boundary hedgerow and majority of the eastern boundary trees. Designing a sensitive lighting strategy.	Planning condition (DMS).	Creation of native hedgerow and planting of 63 trees.	Planning condition (HMMP).
Nesting birds	Minor positive at Local level.	Vegetation clearance outside the main breeding season (March–August). or Nesting bird check by a suitably experienced	Planning condition (DMS).	New native hedgerow and 63 trees and Installation of 6 swift boxes and 2 generalist bird boxes.	Planning condition (LEMP, DMS and HMMP).

Ecological feature	Significance of residual effect	Mitigation measures	Secured by	Compensation/enhancement measures	Secured by
		ecologist where clearance during the breeding season cannot be avoided. Retention and protection of existing trees and western boundary hedgerow.			

7. ECOLOGICAL ENHANCEMENTS/COMPENSATION

7.1. Compensation

A Biodiversity Net Gain Assessment has been prepared for 1 and 2 Longwalk Road, Uxbridge (Trium Environmental Consulting LLP, 2026) using the Defra Statutory Biodiversity Metric (Defra, 2024), which identifies a baseline value of 6.54 habitat units and 0.56 hedgerow units, with no watercourse units present.

The Proposed Development will result in the loss of 2.12 habitat units and 0.26 hedgerow units, including the loss of 51 individual trees, 1,260m² of modified grassland, areas of introduced shrub and 260m of non-native ornamental hedgerow. The proposed landscape scheme includes the retention of some existing habitats and creation of 1,160m² of modified grassland, 1,320m² of ground-level planters, 63 individual trees and approximately 536m of native hedgerow.

Overall, the proposals are predicted to result in a 14.12% net loss in habitat units (-0.92 units), but a 133.08% net gain in hedgerow units (+0.74 units). The Site therefore does not achieve the 10% biodiversity net gain requirement. The trading rules are also not met, as the loss of 0.82 habitat units associated with individual trees is not adequately compensated for by the proposed on-site habitat creation, with a further 0.08 habitat unit shortfall associated with the loss of low-distinctiveness habitats.

To address the shortfall, the BNG Assessment (Trium Environmental Consulting LLP, 2026) identifies a requirement for 1.58 off-site habitat units, which will be secured through an appropriate registered off-site biodiversity net gain provider or, where this is not feasible, through Statutory Biodiversity Credits. The final off-site compensation strategy will be confirmed through the Biodiversity Gain Plan.

7.2. Other ecological enhancements

In addition to the habitat creation measures outlined above to deliver Biodiversity Net Gain, further ecological enhancements are proposed at the Site. The Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025a) identified opportunities to enhance nesting and roosting provision for birds and bats. A minimum of six swift boxes and two generalist bird boxes will be incorporated into the Proposed Development, providing a total of eight bird nesting features. These will be integrated into the new buildings and/or mounted on suitable retained trees in appropriate locations.

Provision for roosting bats will also be incorporated into the development in accordance with the recommendations of the Bat Emergence Survey (MKA Ecology Ltd, 2025b), comprising four bat boxes/bricks integrated into or mounted on the new buildings and/or suitable retained trees.

Deadwood features and log piles will also be incorporated within suitable areas of the Site to provide additional shelter, foraging and breeding opportunities for invertebrates and other wildlife such as hedgehog.

The locations and specifications of these ecological enhancement features should be provided within a Landscape and Ecological Management Plan (LEMP), which will be secured by planning condition.

8. CONCLUSIONS

The Ecological Impact Assessment has identified the ecological constraints associated with the proposed redevelopment of 1 and 2 Longwalk Road, Uxbridge. The Site is of ecological value primarily through its numerous trees and hedgerows, which provide habitat and connectivity for nesting birds, bats and other wildlife.

The Proposed Development will result in the loss of 51 trees, approximately 260m of non-native ornamental hedgerow and areas of modified grassland and introduced shrub. However, the majority of existing trees and the western boundary hedgerow will be retained and protected during the construction phase. The proposed landscape scheme will provide 63 new trees and new areas of native hedgerow and native species groundcover planting, together with additional wildlife features. Despite these enhancements, the loss of established trees and potential impacts on retained trees will result in a minor negative long-term effect on trees. However, minor positive long-term effects are anticipated for nesting birds and commuting and foraging bats.

The presence of Willow-leaved Cotoneaster identified during the 2025 PEA/PRA (MKA Ecology Ltd, 2025a) will be addressed through a pre-commencement site walkover prior to works commencing in 2027. If the species remains present, it will be appropriately removed and disposed of to prevent further spread. A pre-commencement walkover will also confirm whether potential bat roost features identified during the previous surveys remain present and suitable for bats, with updated surveys undertaken where required.

Construction-phase risks to nesting birds, bats and retained trees should be appropriately managed through measures detailed within a Demolition Method Statement (DMS). Ecological enhancements, including bird and bat boxes, deadwood features and log piles, should be secured through the Landscape and Ecological Management Plan. The DMS will also safeguard against impacts to local designated sites.

The Biodiversity Net Gain Assessment (Trium Environmental Consulting LLP, 2026) predicts a 14.12% net loss in habitat units and a 133.08% net gain in hedgerow units. The Proposed Development therefore does not achieve the 10% Biodiversity Net Gain requirement through onsite measures alone. The identified shortfall of habitat units will need to be addressed through the purchase of registered off-site biodiversity units or, where this is not feasible, Statutory Biodiversity Credits, with the final approach secured through the Biodiversity Gain Plan.

Subject to the recommended mitigation, compensation and enhancement measures being secured and implemented, the Proposed Development is not anticipated to result in significant residual adverse effects on the ecological features assessed. The measures proposed will maintain ecological connections through the Site and provide additional habitat opportunities.

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10. APPENDICES

10.1. Appendix 1: Relevant wildlife legislation and planning policy

10.1.1. *National Legislation and planning policy*

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

Full legislation text available at: http://www.legislation.gov.uk/uksi/2019/579/contents/made

The Wildlife and Countryside Act 1981 (as amended)

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1981/69/contents.

Countryside and Rights of Way Act 2000

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2000/37/contents

Section 41 of Natural Environments and Rural Communities (NERC) Act 2006

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2006/16/section/41

Section 41 (S41) of the Natural Environment and Rural Communities (NERC Act 2006) requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn up in consultation with Natural England and draws upon the UK Biodiversity Action Plan (BAP) List of Priority Species and Habitats.

The S41 list should be used to guide decision-makers such as local and regional authorities to have regard to the conservation of biodiversity in the exercise of their normal functions – as required under Section 40 of the NERC Act 2006. The duty applies to all local authorities and extends beyond just conserving what is already there, to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

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

In addition to affording protection to some species, The Wildlife and Countryside Act 1981 (as amended) also names species which are considered invasive and require control. Section 14 of the Act prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed in Schedule 9 to the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated.

Wild Mammals (Protection) Act 1996

Full legislation text is available at: http://www.legislation.gov.uk/ukpga/1996/3/contents

Under this legislation it is an offence to cause unnecessary suffering to wild mammals, including by crushing and asphyxiation. It largely deals with issues of animal welfare and covers all non-domestic mammals including commonly encountered mammals on development sites such as rabbits, foxes and field voles.

Birds of Conservation Concern (BoCC)

This is a quantitative assessment of the status of populations of bird species which regularly occur in the UK, undertaken by the UK's leading bird conservation organisations. It assesses a total of 245 species against a set of objective criteria to place each on one of three lists – Green, Amber and Red – indicating an increasing level of conservation concern. There are currently 70 species on the Red list, 103 on the Amber list and 72 on the Green list. The classifications described have no statutory implications and are used merely as a tool for assessing scarcity and conservation value of a given species.

National Planning Policy Framework (NPPF)

Full text is available at: https://www.gov.uk/guidance/national-planning-policy-framework

The revised NPPF was published on 17 August 2026 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies N1 to N6, within Chapter 19 of the NPPF, address conserving and enhancing the natural environment, with their objective being to influence the design and location of new development to help drive nature's recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth.

Plan-making policies

N1: Identifying environmental opportunities and safeguards

1. Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level to:

a. Set out the hierarchy of international, national and locally designated sites and areas of importance for their landscape, geodiversity or biodiversity value in the plan area, and identify other features which require particular consideration in managing development due to their environmental value such as chalk streams;

b. Identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and priority or threatened species, including through habitat restoration, the use of nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures (including opportunities which exist at a catchment or landscape scale across plan boundaries);

c. Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within Protected Landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available and avoiding and minimising harm to designated sites of importance for nature. Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account as opportunities to integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development; and

d. Set out standards for green infrastructure provision, in a way which complements and/or incorporates those for recreational land (as set out in policy HC1). These should draw upon Natural England's Green Infrastructure Standards for England58, tailored as necessary to local circumstances.

2. Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.

National decision-making policies

N2: Improving the natural environment

1. To contribute positively to the natural environment, and support nature's recovery, development proposals should:

a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);

b. Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;

c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;

d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;

e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;

f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and

g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.

2. If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.

3. Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.

N3: Trees in new development

1. In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should:

a. Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards;

b. Ensure that the selection of species and their placement is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits. Suitable arboricultural advice should be sought, and proposals discussed with highways and trees officers where necessary, so that the right trees are planted in the right places; and

c. Make provision for the long-term maintenance of both existing and newly-planted trees which form part of the development.

N4: Protected Landscapes

1. Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.

2. Proposals for major development within Protected Landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. To inform a decision about whether exceptional circumstances exist, consideration of such proposals should include an assessment of:

a. The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;

b. The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development in some other way; and

c. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.

3. Where, exceptionally, proposals for major development are approved within Protected Landscapes, steps should be taken to mitigate potential adverse impacts on their special qualities and statutory purposes60, including on features such as tranquillity and dark skies.

4. Development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.

N5: Maintaining the character of the coast

1. Development proposals should maintain the character of undeveloped areas of coast, including land designated for its landscape, habitat or heritage value, while improving public access to it where appropriate. They should not hinder the completion and maintenance of a continuous signed and managed route around the coast (the King Charles III England Coast Path National Trail).

2. Development proposals in areas defined as Heritage Coast (and which do not already fall within a Protected Landscape) should be consistent with the special character of the area and the importance of its conservation. Major development within areas defined as Heritage Coast should not be supported, unless the development is compatible with the special character of the area.

3. If located within a Coastal Change Management Area, development proposals should also be considered against policy F9.

N6: Areas of particular importance for biodiversity and geodiversity

1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:

a. A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:

i. An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or the proposal can satisfy the derogation tests61; and/or

ii. The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

b. A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:

i. There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest; or

ii. The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or

iii. The impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

c. A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:

i. There would not be a significant adverse effect on the integrity of the site; or

ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.

2. Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons62 and a suitable compensation strategy exists.

3. This policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned.
58 Natural England's Green Infrastructure Standards for England published in: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx

59 For the purpose of this policy and policy N5 only, whether a proposal is 'major development' is a matter for the decision-maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the statutory purposes for which the area has been designated or defined.

60 Where significant harm cannot be mitigated, it may be appropriate to consider whether suitable compensation would be acceptable.

61 These being that there are no feasible alternative solutions to the proposal which are less damaging, there are imperative reasons of overriding public interest for it to proceed, and compensatory measures are secured to ensure that the overall coherence of the network of habitats sites is maintained.

62 For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of the relevant habitats.

10.1.2. *Metropolitan Planning Policies*

Given that the Site is located within London, consideration of the London Plan (2021) has been given. The London Plan contains a number of policies relating to biodiversity, a brief summary of which is set out below:

Policy G1 Green infrastructure:

A. London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.
B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.
C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:
    1) identify key green infrastructure assets, their function and their potential function
    2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
D. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening:

A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).
C. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B).

Policy G6 Biodiversity and access to nature:

A. Sites of Importance for Nature Conservation (SINCs) should be protected.
B. Boroughs, in developing Development Plans, should:

1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
   1) avoid damaging the significant ecological features of the site
   2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
   3) deliver off-site compensation of better biodiversity value.
D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands:

A. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
B. In their Development Plans, boroughs should:
   a. protect 'veteran' trees and ancient woodland where these are not already part of a protected site[139]
   b. identify opportunities for tree planting in strategic locations.
C. Development proposals should ensure that, wherever possible, existing trees of value are retained.[140] If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy G8 Food growing:

A. In Development Plans, boroughs should:
    a. protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites
    b. identify potential sites that could be used for food production.

The London Borough of Hillingdon has adopted the Local Plan: Part 1 (2012) and Local Plan: Part 2 (2020) which include the following policies relating to biodiversity:

Local Plan: Part 1 – Strategic Policies:

Policy EM7 Biodiversity and Geological Conservation:

The Council will review all the Borough grade Sites of Important Nature Conservation. Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2 - Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

1. The conservation and enhancement of the natural state of:
    - Harefield Gravel Pits
    - Colne Valley Regional Park
    - Fray's Farm Meadows
    - Harefield Pit
2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.
3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.
4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation (SINCs) in close proximity to development and to deliver/assist in the delivery of actions within the Biodiversity Action Plan.

5. The provision of biodiversity improvements from all development, where feasible.
6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

Local Plan: Part 2 – Development Management Policies

DMEI 1 Living walls and Roofs and Onsite Vegetation:

All development proposals are required to comply with the following:

i) All major development6 should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and

ii) ii) Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.

DMEI 7 Biodiversity Protection and Enhancement:

A. The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.
B. If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.
C. All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.
D. Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

10.2. Appendix 2: Site photographs

Photograph 1: Example of developed land; sealed surface (u1b) – Car park in north-west



Photograph 2: Example of ornamental non-native hedgerow (h2b5) – Hedgerow along western red line boundary



Photograph 3: Example of ornamental non-native hedgerow (h2b5) – Hedgerow in north-west car park



Photograph 4: Example of ornamental non-native hedgerow (h2b5) – Hedgerow in south-west car park



Photograph 5: Example of modified grassland (g4) – grassland to the south of B1



Photograph 6: Example of introduced shrub (847) – area of introduced shrub to the north of B2



Photograph 7: Other standing water (r1g) – ornamental pond



Photograph 8: PRF1 – Gap under soffit



Photograph 9: PRF2 – Gaps leading to suitable sized space behind cladding (western aspect of B2)



Photograph 10: PRF2 – Gaps leading to suitable sized space behind cladding (northern aspect of B2)



Photograph 11: PRF2 – Gaps leading to suitable sized space behind cladding (southern aspect of B1)



Photograph 12: PRF3 – Weep vents



Photograph 13: PRF4 – Space between wooden beams provides access for bats into interior of building



Photograph 14: PRF5 – Cavities within door frame



Photograph 15: PRF6 – wooden beams creating gaps and crevices

10.4. Appendix 3: Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025a)

As attachment



MKA
ECOLOGY

Preliminary Ecological Appraisal and Preliminary Roost Assessment

1 and 2 Longwalk Road, Uxbridge

Site	*1 and 2 Longwalk Road, Uxbridge*
Project number	*181725*
Client name / Address	*Trium Environmental Consulting LLP*

Version number	**Date of issue**	**Revisions**
1.0	*22 October 2025*	*Original*

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Declaration of compliance

This Preliminary Ecological Appraisal has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development". The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 24 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

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1. EXECUTIVE SUMMARY

In August 2025 MKA Ecology Limited was commissioned to undertake a Preliminary Ecological Appraisal and Preliminary Roost Assessment of 1 and 2 Longwalk Road, Uxbridge. The appraisal included a habitat survey, protected species scoping survey and desktop study of protected and notable sites and species in the area. A site visit was undertaken on 11 August 2025.

The Site comprises of three main buildings (two large two-storey office buildings (B1, B2) and one single-story office building (B3)), two brick-built utility buildings (B4, B5) and associated parking areas and access roads. There are areas of hedgerow, numerous trees, shrub and grassland that border the buildings and parking areas. The proposed development involves the demolition of all existing buildings onsite and the construction of two warehouses, with associated parking areas and access roads.

The following ecological constraints were identified at the Site with recommendations made as follows:

- **Habitats:** There are a number of scattered trees present within the Site, which are of ecological value in the site context and should be retained where feasible.
- **Invasive Species:** Willow-leaved cotoneaster is preset onsite. Although not subject to legal parameters, it is considered a high-risk invasive species (Plantlife, 2010). Therefore, it is recommended all instances of this species are appropriately removed.
- **Bats:** Buildings B3, B4 and B5 have low potential for supporting roosting bats. In line with best practice guidelines (Collins, 2023), a minimum of one emergence survey should be conducted on buildings B3, B4 and B5 to determine the presence/likely absence of bats. Emergence surveys must be conducted between May and September inclusive. A few Potential Roost Features were identified on buildings B1 and B2. However, due to the building material, these features are of very low potential**.** It is recommended the demolition of buildings B1 and B2 should be carried out under ecological supervision and potential roost features should be removed through soft stripping. A CEMP will outline the sensitive working measures to be followed to ensure that adverse impacts are avoided during the construction phase and that any roosts that may be identified are protected throughout the development work.
- **Birds:** The hedgerow, shrubs and numerous scattered within the Site provide habitat for nesting birds and consideration would need to be given to this during the future Site preparation works. Should removal of these habitats be required, it is recommended that this be undertaken outside of the breeding bird season (February to August). If this is not possible, clearance works should be proceeded by a nesting bird check.

Enhancements have been suggested for the proposed development in order to promote biodiversity at the Site. Recommendations include native, nectar-rich and night-flowering species planting, green roofs and walls, the creation of log piles and deadwood features, and the integration of eight bird boxes within

the final development designs. Provisions for roosting bats should also be included within the final design, with the suitable number and type of bat boxes being recommended following the bat emergence survey.

A Biodiversity Net Gain (BNG) assessment will be undertaken to ensure that the proposed development is able to demonstrate a significant increase in biodiversity and green infrastructure provision within the Site. It is recommended that a subsequent Habitat Monitoring and Management Plan (HMMP) is created, to ensure that the proposed development is able to demonstrate a significant increase in biodiversity within the Site and to ensure the successful establishment and long-term management of newly created habitats. Additionally, an Urban Greening Factor assessment should be undertaken and submitted as part of the planning submission

2. INTRODUCTION

2.1. Aims and scope of Preliminary Ecological Appraisal

In August 2025 MKA Ecology Limited was commissioned to undertake a Preliminary Ecological Appraisal and Preliminary Roost Assessment at 1 and 2 Longwalk Road, Uxbridge by Trium Environmental Consulting LLP in order to support a planning application for the demolition of the existing buildings onsite and construction of two large warehouses.

The aims of the Preliminary Ecological Appraisal were to:

- Undertake a desktop study to identify the extent of protected and notable species and habitats within close proximity of the Site;
- Prepare a habitat map for the Site;
- Identify evidence of protected species/species of conservation concern at the Site;
- Assess the potential impacts of the proposed development, using existing plans;
- Outline recommendations for further survey effort where required; and
- Outline recommendations for biodiversity enhancements.

The aims of the Preliminary Roost Assessment were to:

- Undertake a desktop study to identify the locations of known bat roosts and activity records within 2km of the Site;
- Assess the suitability of the buildings and trees at the Site for roosting bats, and record any evidence of bat presence;
- Identify likely ecological impacts relating to the proposed development;
- Assess the need for further survey effort, a European Protected Species Licence (EPSL) or mitigation, if required; and
- Propose any suitable habitat enhancements for bat species, if required.

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or 1 and 2 Longwalk Road, Uxbridge. The Site covers an approximate area of 2.2 ha, is located in Stockley Park, West London (central grid reference: TQ 07787 80238) and falls under the authority of the London Borough of Hillingdon. The Site comprises of three main buildings (two large two-storey office buildings and one single-story office building), two brick-built utility buildings and associated parking areas and access roads. There are lines of trees, hedgerow, shrub and grassland that border the buildings and parking areas.

2.3. Proposed development

The proposed development involves the demolition of all existing buildings onsite and the construction of two warehouses, with associated parking areas and access roads.

2.4. Legislation and planning policy

This Preliminary Ecological Appraisal and Preliminary Roost Assessment have been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document includes the following:

- The Environment Act 2021;
- The Wildlife and Countryside Act 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Natural Environment and Rural Communities (NERC) Act 2006;
- The Countryside and Rights of Way (CRoW) Act 2000;
- Protection of Badgers Act 1992; and
- Wild Mammals (Protection) Act 1996.

Further information is provided in Appendix 1, including levels of protection granted to the species considered in Section 3.3.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 12 December 2024 requires planning decisions to contribute to conserving and enhancing the local environment. Further details are provided in Appendix 1.

Given that the Site is located within London, consideration of the London Plan (2021) has been given. The London Plan contains a number of policies relating to biodiversity, a brief summary of which is set out below:

- Policy G1 Green infrastructure;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodlands; and
- Policy G8 Food growing.

The London Borough of Hillingdon has adopted the Local Plan: Part 1 (2012) and Local Plan: Part 2 (2020) which include the following policies relating to biodiversity:

Local Plan: Part 1 – Strategic Policies:

- Policy EM7 Biodiversity and Geological Conservation

Local Plan: Part 2 – Development Management Policies

- DMEI 1 Living walls and Roofs and Onsite Vegetation
- DMEI 7 Biodiversity Protection and Enhancement

3. METHODOLOGIES

This Preliminary Ecological Appraisal has been undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisal, 2nd edition (CIEEM, 2017).

3.1. Desktop study

A data search was conducted for the Site and the surrounding area within 2km. The search was extended to 10km for internationally designated sites. Data was retrieved from the sources listed in Table 1.

Table 1: Sources of data for desktop study

Organisation	Data collected	Date collected
Multi-agency Geographic Information for the Countryside (MAGIC) www.magic.gov.uk	Information on local, national and international statutory protected areas.	15/08/2025
Greenspace Information for Greater London CIC (GiGL)	Information on protected and notable sites and species within 2km of the Site (TQ 07787 80238).	15/08/2025
Ordnance Survey maps and aerial photography	Information on habitats and connectivity between the Site and the surrounding landscape	15/08/2025
Plantlife Important Plant Areas Buglife Important Invertebrate Areas	Information on hotspots of diversity for invertebrates and populations of internationally threatened species.	15/08/2025

3.2. UK Habitat Classification

Habitats were surveyed using the standardised UK Habitat classification and mapping methodology (UKHab Ltd, 2023). Data were recorded onto a Samsung Tablet in a Geographic Information System (GIS), in this instance QField, following a modified UK Habs colour mapping palette. Dominant plant species were observed and recorded within each habitat type. The plant species nomenclature follows that of Stace (2019).

The DAFOR scale is used to describe the relative abundance of species. The scale is shown in Table 2. It is important to note that where a species is described as rare this description refers to its relative abundance within the Site and is not a description of its abundance within the wider landscape.

Therefore, a species with a rare relative abundance within the Site may be common within the wider landscape.

Table 2: DAFOR scale

DAFOR code	Relative abundance
D	Dominant
A	Abundant
F	Frequent
O	Occasional
R	Rare

In order to assess grassland habitats a series of 1m by 1m quadrats are used to understand species composition. Within each quadrat the percentage cover of each species is recorded. The number of quadrats used varies depending on grassland complexity. Low complexity grasslands, such as amenity grasslands, have fewer quadrats. Neutral, acidic and calcareous grasslands have at least five quadrats to ensure the habitat types are correctly assigned.

3.3. Protected and notable species scoping survey

As part of the Preliminary Ecological Appraisal, an assessment of the potential for the habitats on site, or within the zone of influence of the proposed development, to support protected or notable species was made. This assessment was based on the quality, extent and interconnectivity of suitable habitats, along with the results of the desktop study detailed in Section 3.1. This includes Species of Principal Importance as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, and Red and Amber listed Birds of Conservation Concern (BoCC) as per Stanbury *et al.*, 2021 (see Appendix 1).

Protected and notable species considered within the protected species scoping survey for 1 and 2 Longwalk Road, Uxbridge include the following:

- Plants and fungi: Pheasant's-eye *Adonis annua,* tower mustard *Arabis glabra* and service-tree *Sorbus domestica.*
- Invertebrates: Stag beetle *Lucanus cervus,* small heath *Coenonympha pamphilus,* white-letter hairstreak *Satyrium w-album* and cinnabar moth *Tyria jacobaeae.*
- Fish: European eel *Anguilla anguilla*, river lamprey *Lampetra fluviatilis*, brown trout *Salmo trutta subsp. fario*.
- Amphibians: Natterjack toad *Epidalea calamita*, great crested newt *Triturus cristatus* and common toad *Bufo bufo*.

- Reptiles: Adder *Vipera berus*, common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, grass snake *Natrix helvetica helvetica*.
- Birds: With special reference to species listed under Schedule 1 of The Wildlife and Countryside Act, 1981, Species of Principal Importance and BoCC species.
- Mammals: Badger *Meles meles*, bats (all species), water vole *Arvicola amphibius*, otter *Lutra lutra*, hazel dormouse *Muscardinus avellanarius*, hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus*, harvest mouse *Micromys minutus*, polecat *Mustela putorius* and European beaver *Castor fiber*.

In each case the likelihood of presence of these protected species in the zone of influence of the proposed development was classified as being either confirmed, high, moderate, low or negligible.

- **Confirmed**: The species is confirmed during the Preliminary Ecological Appraisal, previous survey effort or recent records.
- **High:** Habitats are available which are highly suitable for this species and there are records within the desktop study. The surrounding areas also provide widespread opportunities for the species which are well connected to the Site.
- **Moderate:** Some suitable habitat available for the species although not of optimum quality. Species is present with the desktop study.
- **Low:** Some suitable habitat available for the species but this is low value and possibly of small scale or with poor connectivity. No, or very few, records returned in the desktop study.
- **Negligible**: No suitable habitat available for the species, or very little poor-quality habitat.

This protected species scoping survey is designed to assess the *potential* for presence or absence of a particular species or species group, and does not constitute a full survey for these species.

3.4. Preliminary Roost Assessment

An external inspection of the buildings and trees within the Site was undertaken following guidance set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines (4th edition)* (Collins, 2023). All buildings within the Site were inspected and the locations of these are shown in Figure 2.

The following features were recorded for buildings:

- Location;
- Type;
- Construction materials; and
- Current use.

Descriptions of potential and actual access points and roosting places were recorded (including height above ground level and aspect), as well as descriptions of evidence of bats found. The following types of evidence of use by bats were recorded:

- Location and number of any live bats;
- Location and number of any bat corpses or skeletons;
- Locations and number of bat droppings;
- Notes on relative freshness, shape and size of bat droppings;
- Location and quantity of any bat feeding remains;
- Location of clean, cobweb-free timbers, crevices and holes;
- Location of characteristic staining from urine and/or grease marks;
- Location and quantity of bat-fly (Nycteribiidae) pupal cases;
- Location of known and potential access points to the roost; and
- Location of the characteristic smell of bats.

The following features were recorded for trees:

- Species; and
- Diameter at breast height.

Descriptions of suitable and actual roost features were recorded (including height above ground level and aspect), as well as descriptions of evidence of bats found.

Potential roost features recorded were:

- Woodpecker holes;
- Rot holes;
- Hazard beams;
- Other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached plately bark;
- Knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
- Man-made holes (e.g. cavities that have development from flush cuts) or cavities created by branches tearing out from parent stems;
- Cankers (caused by localised bark death) in which cavities have developed;
- Other hollows or cavities, including butt-rots;
- Double-leaders forming compression forks with included bark and potential cavities;
- Gaps between overlapping stems or branches;
- Partially detached ivy with stem diameters in excess of 50mm; and

- Bat, bird or dormouse boxes.

The following types of evidence of use by bats were recorded for trees:

- Presence of bats;
- Bat droppings in, around or below a potential roost feature;
- Odour emanating from a potential roost feature;
- Audible squeaking at dusk or in warm weather; and
- Staining below the potential roost feature.

Buildings and trees were assessed for their bat roost suitability according to the scheme presented in Collins (2023). These categories are shown in Table 3, Table 4 and Table 5 .

Table 3: Categories to assess roost suitability in buildings (adapted from Collins, 2023)

Roost suitability	Description
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 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 hibernation site).
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 – the assessments in this table are 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 potential for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have potential to support high conservation status roosts e.g., maternity or classic hibernation site.

*For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

The guidelines for categorisation of bats in England by distribution and rarity (adapted from Reason and Wray 2023) are shown in the tables below.

Table 4: Categories to assess roost suitability in trees (adapted from Collins, 2023)

Roost suitability	Description
None	Either no potential roost features in the tree or highly unlikely to be any
FAR	Further assessment required (FAR) to establish if potential roost features (PRFs) are present in the tree
PRF	A tree with at least one potential roost feature present

Where potential roost features were identified in trees, these were further categorised as follows.

Table 5: Guidelines for categorising the potential suitability of PRFs in trees (adapted from Collins, 2023)

Roost suitability	Description
PRF-I	The potential roost feature is only suitable for individual bats or very small number of bats either due to size or lack of suitable surrounding habitat.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Table 6: Categorising bats by rarity (South-eastern/East Anglia to The Wash)

Rarity within England	Species
Rarest Annex II species and very rare	• Alcathoe's bat *Myotis alcathoe* • Barbastelle *Barbastella barbastellus*
Rarer or restricted distribution	• Whiskered bat *Myotis mystacinus* • Brandt's bat *Myotis brandtii* • Leisler's bat *Nyctalus leisleri* • Nathusius' pipistrelle *Pipistrellus nathusii* • Serotine *Eptesicus serotinus*
Widespread in many geographies, but not abundant in all	• Noctule *Nyctalus noctula* • Daubenton's bat *Myotis daubentonii* • Natterer's bat *Myotis nattereri*
Widespread	• Common pipistrelle *Pipistrellus pipistrellus* • Soprano pipistrelle *Pipistrellus pygmaeus* • Brown long-eared bat *Plecotus auritus*

Table 7: Level of importance of roost type

Geographic frame of reference	Roost type
Site, District, Local or Parish	Feeding perches Non-breeding day roosts Mating sites (excluding individual trees and swarming sites) Small numbers of hibernating bats Larger transitional roosts Maternity sites (for widespread species, unless colony atypically large)
County	Hibernation sites (excluding rarest Annex II species) Maternity sites (for widespread but not abundant in all geographies species unless colony atypically large) Autumn swarming sites (can reach regional importance depending on assemblage)
Regional	Maternity sites (depending on rarity and value of assemblage) Hibernation sites (for rarest Annex II species, depending on assemblage and size)
National/UK	Sites meeting SSSI guidelines*
International	SAC sites

*Sites meeting SSSI (Sites of Special Scientific Interest) selection guidelines include Barbastelle maternity roosts and mixed species hibernacula assemblages

3.5. Equipment

The inspection of buildings was conducted using a variety of equipment including binoculars, high-powered torch and a digital camera.

3.6. Surveyor, author and reviewer

The survey was undertaken by Hammaad Zubair-Sheikh, Graduate Ecologist at MKA Ecology Ltd and Max Ellis, Consultant Ecologist at MKA Ecology Ltd. Hammaad is within his first year as a consultant ecologist. Max has over three years' experience as an ecologist and holds a Natural England level 2 Bat Licence (CL18).

The report was written by Hammaad and reviewed by Felix Bird, Senior Ecologist at MKA Ecology Limited. Felix has seven years' experience as a consultant ecologist.

3.7. Date, time and weather conditions

See Table 8 below for details of the date, time and prevailing weather conditions recorded during the site visit for the Preliminary Ecological Appraisal.

Table 8: Date, time and weather conditions of survey visit

Date	Time of survey	Weather conditions*
11/08/2025	10:00	Wind: 2 Cloud: 1 Temp: 24°C Rain: 1

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

3.8. Constraints

A single visit cannot always ascertain the presence or absence of a protected species. However, an assessment is made of the likelihood for protected species to occur based on habitat characteristics and the ecology of each species. Where there is potential for protected species, additional survey work may be required to ascertain their presence or absence.

Data on species records obtained from local biological records centres are sometimes only available at low spatial resolutions and are constrained by the voluntary nature of the contributions and what has been chosen to be submitted as records. While these records provide a useful indication of species recorded in the local area, in particular protected or notable species, the data is not necessarily an accurate reflection of species assemblages or abundance in the vicinity.

Due to access issues, only an external inspection was carried out on buildings B1 and B2. However, large windows on buildings B1 and B2 allowed for a comprehensive observation of the interiors, which comprise of offices and no features that could support bat roosts were observed. Additionally, there are no loft spaces present and therefore it is considered that the interiors of B1 and B2 are not likely to support roosts. Furthermore, there were no access points observed on the exterior of B1 and B2 that could be used by bats to enter the buildings. Therefore, the lack of an interior inspection of B1 and B2 is not considered a significant constraint. Although access into the interior of buildings B3, B4 and B5 was not possible during the site visit on 11 August 2025, an internal inspection was conducted immediately prior to the subsequent Emergence Survey on 24 September 2025 (MKA Ecology Ltd, 2025).

4. RESULTS

4.1. Desktop study

An ecological desktop study was completed for the Site and the surrounding 2km (for nationally designated sites) and 10km (for internationally designated sites). Data provided by Greenspace Information for Greater London identified some UK and European protected species, Species and Habitats of Principal Importance (as listed under Section 41 of the NERC Act 2006), and species of conservation concern within 2km of the Site. It should be noted that this is not a comprehensive list of the distribution or extent of the local flora and fauna of conservation importance. These species records are discussed in greater detail in the protected species scoping survey section (Section 4.3 below).

The data search identified one internationally designated site (South-west London Waterbodies – designated as both a Ramsar site and Special Protection Area (SPA)) within a 10km radius of 1 and 2 Longwalk Road, Uxbridge. Details of this site are displayed in Table 9 below.

Table 9: Intentional designated sites within 10km of 1 and 2 Longwalk Road, Uxbridge

Site name	Area (ha)	Distance and direction	Reasons for selection
South-west London Waterbodies (Ramsar and SPA)	828	6.6km S	The site provides internationally important habitat for overwintering and migratory waterbirds, particularly gadwall *Mareca strepera* and shoveler *Spatula clypeata*. The network of reservoirs, gravel pits, and wetlands supports large waterbird populations during winter and migration periods, offering essential feeding and roosting sites within an urban landscape. The site's ecological value lies in its combination of open water, marginal vegetation, and surrounding habitats, which together sustain significant biodiversity and contribute to the conservation of wetland-dependent species in the Thames Valley.

No statutorily designated sites were identified within a 2km radius of 1 and 2 Longwalk Road, Uxbridge.

Details of non-statutorily designated sites identified are displayed in Table 10 below. These consist of 13 Sites of Importance for Nature Conservation (SINC), with differing levels of importance. Three Sites

are of Metropolitan Importance (M), eight Sites of Borough Importance (Borough Grade 1 and Borough Grade 2 (HiB1 and HiB2) and two Sites of Local Importance (HiL).

Table 10: Non-statutorily designated sites within 2km of 1 and 2 Longwalk Road, Uxbridge

Site name	Area (ha)	Distance and direction	Reasons for selection
London's Canals (M)	187.50	320m S	London's canals support a wide range of aquatic flora, amongst which are found a number of locally uncommon species. These include narrow-leaved water plantain *Alisma lanceolatum*, rigid hornwort *Ceratopyllum demersum* and shining pondweed *Potomageton lucens.* The canals also support an important invertebrate fauna (including several species of dragon/damselflies), a diverse fish community, and breeding waterfowl.
Carp Ponds and Broads Dock (M)	3.49	515m S	Three waterbodies and a length of canal dock which support a diverse assemblage of aquatic and emergent plants. Plant species preset include great yellow-cress *Rorippa amphibia*, lesser water-parsnip *Berula erecta* and lesser reedmace *Typha angustifolia*. Kingfisher *Alcedo atthis* are also known to be present.
Lower Colne (M)	140.69	2km W	Comprises of chalk streams that collectively support a diverse aquatic and marginal flora, including several plants with a restricted London distribution. Among these are the nationally declining river water-dropwort *Oenanthe fluviatilis*, unbranched bur-reed *Sparganium emersum*, great yellow-cress *Rorippa amphibia*, bladder-sedge *Carex vesicaria*, arrowhead *Sagittaria sagittifolia*, narrow-leaved water-plantain *Alisma lanceolatum* and common water-crowfoot *Ranunculus aquatilis*. Important invertebrate fauna includes banded demoiselle damselfly *Calopteryx splendens* and breeding bird populations include kingfisher and grey wagtail *Motacilla cinerea.* Water vole is also known to be present.

Site name	Area (ha)	Distance and direction	Reasons for selection
Lake Farm Country Park (HiB1)	24.24	1km E	An extensive formerly agricultural area managed principally for nature conservation. The bulk of the grassland comprises false oat-grass *Arrhenatherum elatius* and perennial rye-grass *Lolium perenne.* Grassland wild flowers include red clover *Trifolium pratense,* scentless mayweed *Tripleurospermum inodorum.* The grassland edges are inhabited by kestrels *Falco tinnunculus*, and seasonal flocks of goldfinches *Carduelis carduelis*.
Stockley Park Country Park (HiB2)	17.78	300m NW	This large, hilly country park contains extensive grassland and other habitats including tall herbs, scrub, trees and hedgerows, much of which has been planted. The grasslands include perennial rye-grass, barren brome *Anisantha sterilis*, couch *Elytrigia repens*, creeping bent *Agrostis stolonifera* and Yorkshire fog *Holcus lanatus*. The site is good for invertebrates including the localised species Roesel's bush-cricket *Metrioptera roeselii*.
Iron Bridge Road Railsides (formerly The Piggeries) (HiB2)	1.02	320m W	The site is on an area of railway lineside that used to be grazed. The lack of grazing has resulted in the development of dense scrub. Species include bramble *Rubus fruticosus* agg. and common hawthorn *Crataegus monogyna* dominate, along with elder *Sambucus nigra* and extensive ivy *Hedera helix* cover. Dog rose *Rosa canina*, common nettles *Urtica dioica* and common ragwort *Senecio jacobaea* are interspersed.
Bolingbroke Way Sunken Pasture (HiB2)	2.29	900m E	This lightly horse-grazed meadow is surrounded on all sides by roads and has good vegetation diversity and structure, with open scrub and some decaying timber near its south end. Common species include perforate St John's wort *Hypericum perforatum*, weld *Reseda luteola,* common poppy *Papaver rhoeas* and hemlock *Conium maculatum*.

Site name	Area (ha)	Distance and direction	Reasons for selection
Uxbridge Road Scrub, Hayes (HiB2)	1.00	1.8km N	An inaccessible area of impenetrable scrubland, likely to provide shelter for a range of birds and mammals, and a breeding site for shade loving insects such as certain craneflies and ground beetles. There are a number of ash trees *Fraxinus excelsior* and there is dense ivy cover on the ground and on shaded tree-trunks.
Wall Garden Farm Sand Heaps (HiB2)	13.11	2km S	A series of large sand heaps associated with adjacent active gravel workings. These support a breeding colony of sand martins *Riparia riparia.*
River Pinn and Manor Farm Pastures (HiB2)	33.42	2km N	This stretch of the River Pinn is bordered on both sides by open grassland, much of which comprises rank grasses and tall herbs with scattered scrub. The river is generally lined by trees and shrubs such as alder *Alnus glutinosa*, crack willow Salix fragilis, ash *Fraxinus excelsior*, hawthorn and blackthorn *Prunus spinosa* but open areas of the banks are smothered in bramble and nettle *Urtica dioica*.
Stockley Business Park Lakes & Meadows (HiB2)	6.59	100m E	This site consists of well-managed habitats in the grounds of a business park. The grassland is dominated by false oat-grass and red fescue *Festuca rubra*, and contains a good diversity of wild flowers, including red clover, wild carrot *Daucus carota*, narrow-leaved ragwort and small-flowered cranesbill *Geranium pusillum*. The undulating terrain provides shelter for invertebrates under breezy conditions. Scattered trees include aspen *Populus tremula* and crack willow *Salix fragilis*. Birds regularly seen in the grassland include green woodpecker *Picus viridis* and linnet *Linaria cannabina*.

Site name	Area (ha)	Distance and direction	Reasons for selection
Stockley Road Rough (HiL)	1.75	1km S	This sliver of roughland is squeezed between Stockley Road (A408), Heath Park Golf Course and a development area. The site is a mixture of scrub, tall herbs and grasses. The scrub consists of osier *Salix viminalis*, grey willow *Salix cinerea* and hawthorn, plus dense patches of bramble.
St Mary's, Wood End (HiL)	6.82	1.5km NE	A complex mix of open spaces around St Mary's Church, the Beck Theatre and Grassy Meadows Day Centre. The rough edges of the amenity grassland to the east of Grassy Meadows Day Centre include a variety of plants such as wall lettuce *Mycelis muralis* and common knapweed *Centaurea nigra*, growing among tall perennial rye-grass, barren brome *Anisantha sterilis* and false oat-grass. A belt of dense scrub and trees north of the day centre contains a number of young aspen trees *Populus tremula*.

No Plantlife Important Plant Areas were identified as part of the desktop study. The Site falls under the Thames Basin Heath and Woodland Important Invertebrate Area (IIA), meaning that it sits within an area that has been identified as supporting populations of nationally or internationally significant invertebrates and their habitats. Habitats to note within the IIA are heathland, which is absent from the Site and surrounding area, and woodland, which is absent from the Site but does exist in close proximity to the north and north-west, albeit separated by roads.

The Site is located within a highly built environment, within a business park. The Site lies adjacent to buildings and a car park to the south and an access road to the north and east. The A408 runs adjacent to the western boundary of the Site. Stockley Golf Course and Stockley Country Park, which contain woodland, grassland, scrub and ponds, are located to the to the immediate north and north-west of the Site. However, they are separated from the Site by an access road to the north and by the A408 to the north-west, creating a significant barrier for land dwelling wildlife. However, the habitats present in the two aforementioned areas are suitable for supporting populations of bats and birds and the Site may fall under their foraging and commuting zones. There are two large, man-made ponds in close proximity to the north and east of the Site, however the access road running in between acts as a significant barrier to any wildlife. The hedgerow which forms the western boundary of Site, connects with an area of woodland and the Grand Union Canal to the south. This provides a potential wildlife corridor between the Site and woodland and canal habitats within the wider area.

The Site lies within a Natural England SSSI Impact Risk Zone (Natural England, 2019). The following planning applications listed will require LPA consultation with Natural England on the likely ecological risks associated with the development including:

- Infrastructure: Airports, helipads and other aviation proposals.
- Air Pollution: Livestock & poultry units with a floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500 tonnes.
- Combustion: General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.

The proposed development does not fall within these categories and due to the type and scale of development, the risk of impacts upon designated sites is considered **negligible**. As a consequence, designated sites are not considered further in this report.

4.2. UK Habitat Classification

The Site was found to comprise of two large office buildings and three smaller buildings with associated car parks and access roads. Lines of trees dominate the eastern boundary of the Site, whilst a non-native hedgerow dominates the western boundary. Small areas of scrub, grassland and hedgerow are situated around the buildings and car parks. There are numerous scattered individual trees throughout the Site, with the highest density being in the northeast. More detailed species lists, along with their relative abundance, can be found in Appendix 2. The UK habitat classification survey map is provided in Figure 1, at the end of this section. Descriptions of the habitat types present along with dominant species compositions are provided below.

Buildings (u1b5)
There are five buildings onsite. B1 and B2 are large two-storey office buildings and are located in the east of the Site. B3 and B4 are small brick-built utility buildings situated in the car parks to the west of B1 and B2. B5 is a smaller, one-storey office building in the north of the Site. More detailed descriptions are provided in the Preliminary Roost Assessment results, in Section 4.4.

Developed land; sealed surface (u1b) (Photograph 1, Appendix 3: Site photographs)
The majority of the Site comprises car parks and access roads.

Ornamental non-native hedgerow (h2b5) (Photograph 2, Photograph 3, Photograph 4, Appendix 3: Site photographs)
There is long section of ornamental non-native hedgerow running along the western boundary of the Site. The most abundant species within the hedgerow are non-native firethorn species *Pyracantha sp*, hornbeam *Carpinus sp* and yew *Taxus sp*. There are short sections of ornamental non-native hedgerow

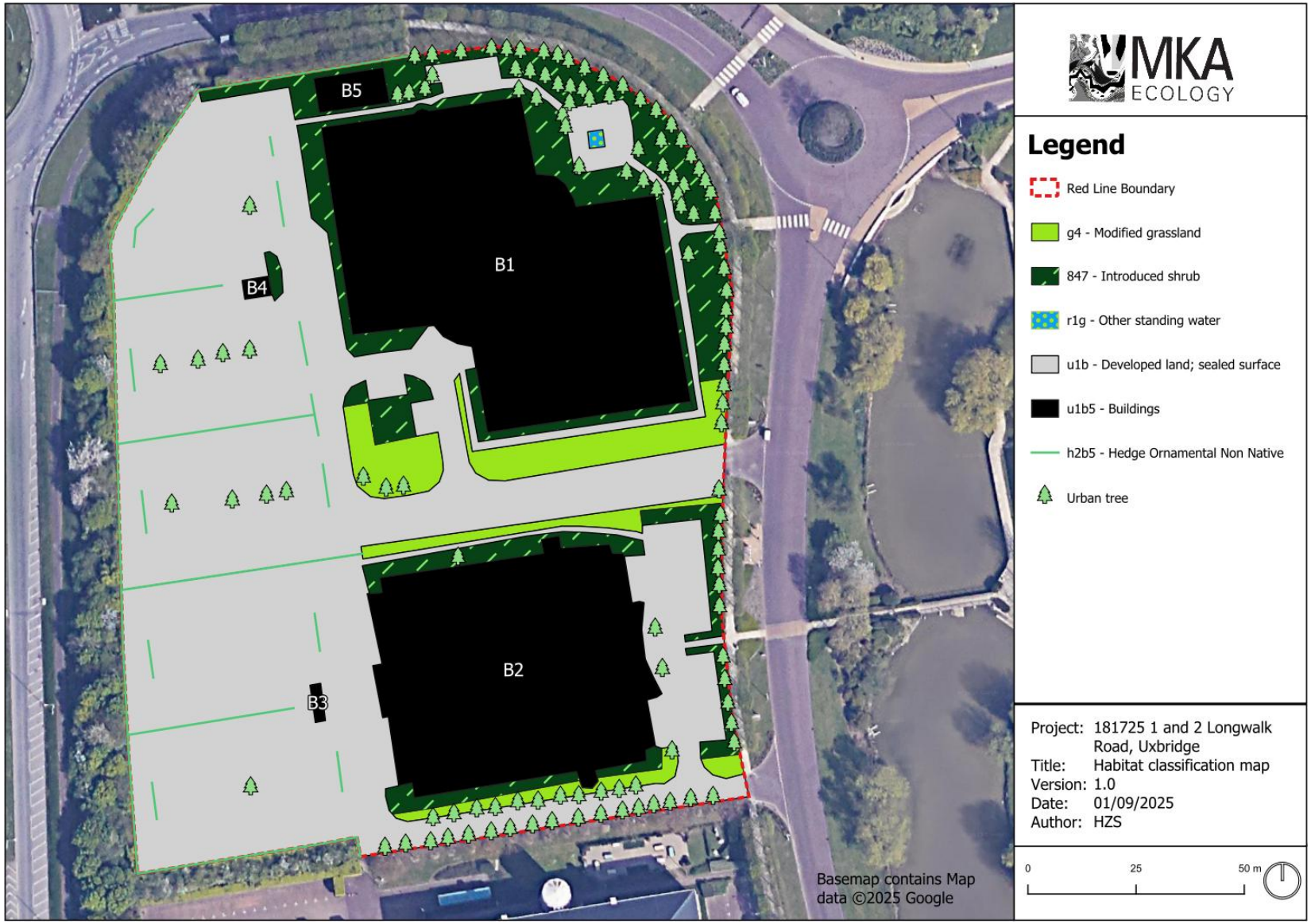
present around the car park area. These comprise mostly of non-native firethorn species, with some hornbeam also being present. These small sections of hedgerow are surrounded by the hardstanding of the car park and are regularly managed.

Modified grassland (g4) (Photograph 5, Appendix 3: Site photographs)
There are small parcels of modified grassland around the two large office buildings and a small section in the middle of the Site. All areas are regularly mown and are cut very short. The grassland is dominated by red fescue *Festuca rubra,* with some bindweed *Calystegia* and daisy *Bellis perennis* also present.

Urban - Introduced shrub (u 847) (Photograph 6*,* Appendix 3: Site photographs)
Areas of introduced shrub are present around the two large office buildings and along the eastern boundary of the Site. The scrub seems well managed and is regularly cut. Dominant species include non-native firethorn and willow-leaved cotoneaster *Cotoneaster salicifolius,* as well as some field maple *Acer campestre* and viburnum species *Viburnum sp.*

Other standing water (r1g) (Photograph 7, Appendix 3: Site photographs)
There is small artificial pond in the northeast of the Site. The pond is raised and surrounded by wooden panels which act as a significant barrier to any wildlife.

Figure 1: UK Habitat Classification map of 1 and 2 Longwalk Road, Uxbridge



4.3. Protected species scoping survey

Plants and fungi

The data search returned records of only a few species listed as Section 41 Species under the NERC Act 2006. These included pheasant's-eye, tower mustard and interrupted brome *Bromus interruptus.* The records were all from over 1km from the Site.

The data search returned some records of invasive non-native species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) within 2km of the Site boundary. Species included: Himalayan balsam *Impatiens glandulifera*, Japanese knotweed *Fallopia japonica* and species within the genus *Cotoneaster*. No Schedule 9 invasive species were identified onsite.

The non-native willow-leaved cotoneaster *Cotoneaster salicifolius* is present onsite, this species is ranked by Plantlife (2010) as requiring a 'critical' priority approach to limit its spread as it is very likely to become invasive.

No protected or notable plant species were identified onsite. The Site is dominated by either by hardstanding and built structures, or small areas of regularly managed grassland, scrubs and hedgerow which do not have high species-richness. Overall, the likelihood of protected or notable plant species being present is considered to be **negligible**. This species group is not discussed further within this report.

Invertebrates

The data search returned records of two invertebrate species protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) which included stag beetle *Lucanus cervus* and white-letter hairstreak *Satyrium w-album*. However no suitable habitat for either of these species is present onsite.

No protected or notable invertebrate species were identified onsite. The Site comprises some areas of scrub, grassland and hedgerow which could provide some suitable habitat for common species of invertebrates. However, due to the lack of flora species diversity and the fact that all suitable habitats onsite are largely surrounded by built structures and hardstanding, the likelihood of protected invertebrate species being present is deemed as **negligible**. Therefore, this species group is not discussed further within this report.

Fish

The small artificial pond onsite is present for ornamental reasons and is not a suitable habitat for supporting notable fish species. There is no other suitable habitat on or immediately adjacent to the Site to support species of fish. Therefore, the likelihood of protected or notable species being present at the Site is considered to be **negligible**. This species group is not considered further in this report.

Amphibians

The data search returned records of common frog *Rana temporaria*, common toad and great crested newt. Only one record of great crested newt was returned within 2km of the Site; from an area 1.3km north of the Site, in 2020. A search of Defra's MAGIC website returned no European Protected Species Licences granted for great crested newt within 2km of the Site

There are several ponds and waterbodies within 500m of the Site in all directions, with the closest two ponds being approximately 40m to the east and 40m to the northeast. These ponds are part of the landscaping of the wider business park and have vertical embankments for a large proportion of the pond edge, making them significantly less suitable for amphibians. All of the surrounding waterbodies are isolated from the Site by access roads, dual carriageways and large areas of hardstanding and built structures which act as significant barriers to any potential amphibian movement.

The small ornamental pond onsite is isolated from the surrounding vegetation by several metres of wood panel flooring. Furthermore, it has raised edges and is lined by vertical wooden panels. This setting makes it very difficult for any amphibians to colonise the pond from the surrounding area, and also making it difficult for them to enter and exit the pond. Hence this pond is not considered a suitable habitat for amphibians.

The ornamental shrub and ornamental hedgerow onsite provides some limited shelter, however these habitats are largely surrounded by car parking and/or buildings which act as barriers for amphibian movement and so limits their suitability.

The overall likelihood of protected amphibians being present on-site is considered **negligible.**

Reptiles

The data search returned three records of slow-worm, with the most recent record being from 2020 in an area 1.6km north of the Site. No other reptile records were returned.

The artificial, sealed surfaces onsite are not suitable to support reptiles. Despite the presence of areas of small area of managed scrub and hedgerow, there is little habitat connectivity between these areas and the size of the suitable habitats are not large enough to support isolated populations of reptiles.

Therefore, the likelihood of presence onsite is deemed as being **negligible** and reptiles are therefore not considered further within this report.

Birds

Eight species were recorded during the site visit. These species are shown in Table 11 together with their conservation status. It is important to note that this is not a full inventory of species for the site.

Table 11: Bird species recorded during site visit at 1 and 2 Longwalk Road, Uxbridge

Common name	Systematic name	S1 W&CA[1]	BoCC[2] Status	S41 SPI[3]
Woodpigeon	*Columba palumbus*	-	Amber	-
Herring gull	*Larus argentatus*	-	Red	Yes
Sparrowhawk	*Accipiter nisus*	-	Amber	-
Red kite	*Milvus milvus*	Yes	Green	-
Jay	*Garrulus glandarius*	-	Green	-
Wren	*Troglodytes troglodytes*	-	Amber	-
Robin	*Erithacus rubecula*	-	Green	-
Goldfinch	*Carduelis carduelis*	-	Green	-

[1] Schedule 1 of The Wildlife and Countryside Act 1981 (see Appendix 1)
[2] Birds of Conservation Concern (see Appendix 1)
[3] Section 41 (NERC Act 2006) 'Species of Principal Importance' (see Appendix 1)

The data search returned 58 species of bird within 2km of the Site. Notable species include red kite, black redstart *Phoenicurus ochruros* and redwing *Turdus iliacus,* all listed as Schedule 1 species of the Wildlife and Countryside Act 1981. Some red list species of conservation concern such as herring gull, spotted flycatcher *Muscicapa striata* and house sparrow *Passer domesticus* were also recorded in the data search. However, the risk of red kite, or any other species listed on Schedule 1 of the Wildlife and Countryside Act 1981 breeding onsite is considered to be **negligible** due to the lack of suitable habitats.

The hedgerows and numerous scattered trees (especially the area of beech trees in the northeast of the Site) provide suitable nesting habitat for common species of bird. The risk of nesting birds being present is considered to be **moderate**, but the risk of a notable species breeding assemblage being present within the Site is **negligible**.

The hedgerows offer food sources for common and expected wintering birds; however, the overall suitability of the Site is low. The likelihood of a notable overwintering assemblage of birds being present is considered to be **negligible**.

Bats

An assessment of the suitability of the Site for bats is provided in Section 4.4 below.

Hedgehog

The data search returned 52 records of hedgehog *Erinaceus europaeus* within 2km of the Site, with the closest record 823m east of the Site in 2019. The comprises areas of grassland, scrub and hedgerow which provide foraging opportunities and shelter for hedgehog. There is some habitat connectivity

through the hedgerow along the western red line boundary, which connects with areas of woodland to the south. However, the setting of the Site within a business park, surrounded by built structures and hard standing, lower the suitability of the Site for hedgehog. Overall, the likelihood of hedgehog presence onsite is considered to be **low.**

Water vole

One record of water vole *Arvicola amphibius* was returned from the data search from an area 809m east of the Site in 2008. However, there is no suitable habitat onsite to support populations of water vole and the risk of presence is considered **negligible** and they are not considered further within this report.

Badgers

No records of badgers were returned from the data search and there is no suitable habitat onsite to support populations of badgers. Therefore, the risk of presence is considered **negligible** and they are not considered further within this report.

Other mammals

The habitats present on Site are not considered suitable to support any other protected mammal species. Therefore, the risk of presence is considered **negligible** and they are not considered further within this report.

4.4. Preliminary Roost Assessment

Desktop study

The data search returned records of common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus* and noctule *Nyctalus noctula*. These species are listed in Table 12. All four species are common within the UK and are typical of the bat species commonly found within Greater London. It should be noted that this is not a comprehensive list of the distribution or extent of the local bat species.

Table 12: Bat species records returned by the data search for 1 and 2 Longwalk Road, Uxbridge

Common name	Systematic name	Date of nearest record	Date of most recent record	Section 41 species*	Local priority species**
Brown long-eared bat	*Plecotus auritus*	2019	2019	Yes	Yes
Common pipistrelle	*Pipistrellus pipistrellus*	2015	2019	-	Yes
Noctule	*Nyctalus noctula*	2015	2015	Yes	Yes
Soprano pipistrelle	*Pipistrellus pygmaeus*	2019	2019	Yes	Yes

*Section 41 (species of principal importance for the purpose of conserving biodiversity) under the Natural Environment and Rural Communities Act 2006

**London Priority Species (2019)

The majority of records returned by the data search are from common pipistrelle and soprano pipistrelle. Pipistrelle species are commonly found roosting in crevices under roof tiles, lead flashing and behind weather boarding. Noctules are primarily tree dwellers and found many in tree rot holes and woodpecker holes. They are commonly known to hibernate in buildings and other man-made structures. Brown long-eared bats roost in holes in trees and old buildings, and feed in gardens and woodland.

A search of Defra's MAGIC website returned no European Protected Species Licences granted for bats within 2km of the Site.

The Site comprises largely of hardstanding and built structures. However, the hedgerows, scrub and lines of trees present onsite provide suitable foraging and commuting opportunities for bats. The hedgerow along the western boundary of the Site provides a continuous link with an area of woodland and the Grand Union Canal to the south, habitats which are also suitable for foraging However, due to the noise and light pollution from the surrounding business park and major roads, this suitability is

reduced. Therefore, the potential for the Site to support foraging and commuting bats is considered **low.**

Preliminary Roost Assessment

No direct evidence of roosting bats was found during the survey. However, some Potential Roost Features (PRF) were identified on the buildings at the Site. These include small gaps in the brickwork and weep vents (B4), a gap underneath the soffit (B5), cavities above the wooden door/gate, potential access points through the door on the northern aspect and wooden beams creating numerous crevices and gaps within the interior of B3. The aforementioned features are considered as having low potential for roosting bats. A few PRFs were identified on buildings B1 and B2, which include crevices of suitable size for bat roosts. However, due to the building material, these features are of very low potential.

Table 13 below outlines the results of the Preliminary Roost Assessment in more detail.

Table 13: Building inspection results

Building	Roost suitability	Description	Bat roost evidence and potential
B1 and B2	Very Low	Both buildings are two storey commercial units. Tiled pitched roof with flat sections. Brick and breeze block construction, covered in metal cladding. Some areas are glass fronted. Flat windows within metal frames. Both buildings are partially in use.	No direct evidence of bats was recorded. Both buildings are covered in metal cladding. The gaps in the cladding (PRF2, Photograph 9Photograph 10 Photograph 11) are of a suitable size for common species of bats to roost within, or to gain access into the area behind the cladding. However, the material of cladding and the surrounding metal frames reduce the suitability of these features. This is due to the temperature fluctuations which may make these features become too hot or cold for bats. Although it is very unlikely that both buildings will support bat roosts, there is enough potential in the features present for them to be taken into consideration.
B3	Low	One storey, brick-built utility building with flat roof.	No direct evidence of bats was recorded. PRF4 (Photograph 13): The wooden panels on the northern aspect door provide access points into the

Building	Roost suitability	Description	Bat roost evidence and potential
			interior of the building. The interior has potential to support roosts of pipistrelle species and brown long-eared bats. PRF5 (Photograph 14): There are cavities of a suitable size to support bat roosts on both sides of the upper door frame on the eastern aspect of the building. PRF6 (Photograph 15): Wooden beams along the ceiling of the interior of the building create crevices and gaps of suitable size for bat roosts.
B4	Low	One storey, brick-built utility building with flat roof.	No direct evidence of bats was recorded. PRF3 (Photograph 12): There are weep vents and small gaps of suitable bat roost potential between the brickwork on all sides of the building.
B5	Low	One storey building with flat roof. Covered in plastic cladding.	No direct evidence of bats was recorded. PRF1 (Photograph 8): There is a gap under the soffit on the north side of buildings. The gap is of a suitable size to the support the roosts of pipistrelle bat species and it may also provide access into the interior roof space, which is a common roosting habitat for brown long-eared bats.

Table 14: Tree inspection results

Tree	Species	Roost suitability	Descriptions of potential/actual roost features
1	*Acer sp.*	Negligible	Early-mature with a height of 10m in height trunk diameter of 20cm. No potential bat roost features observed.
2	Hornbeam *Carpinus betulus*	Negligible	Early-mature with a height of 10m in height trunk diameter of 15cm. No potential bat roost features observed.
3	Hornbeam	Negligible	Early-mature with a height of 10m in height trunk diameter of 25cm. No potential bat roost features observed.

Tree	Species	Roost suitability	Descriptions of potential/actual roost features
4	*Prunus sp.*	Negligible	Early-mature with a height of 10m in height trunk diameter of 35cm. No potential bat roost features observed.
5, 11, 12, 13, 15 and 18	Non-native species	Negligible	All young with a height of 5m in height trunk diameter of 10cm. No potential bat roost features observed.
6-8	*Prunus sp.*	Negligible	All young with a height of 6m in height trunk diameter of 8cm. No potential bat roost features observed.
9, 10, 14 and 16	Turkey oak *Quercus cerris*	Negligible	All early-mature with a height of 7m in height trunk diameter of 20cm. No potential bat roost features observed.
19, 20, 24	Silver birch *Betula pendula*	Negligible	All early-mature with a height of 10m in height trunk diameter of 12cm. No potential bat roost features observed.
21 – 35, 38 - 49	*Tilia sp*.	Negligible	All early-mature with a height of 10m in height trunk diameter of 15cm. No potential bat roost features observed.
36	*Acer sp.*	Negligible	Early-mature with a height of 10m and trunk diameter of 20cm. No potential bat roost features observed.
37	Non-native birch species *Betula sp.*	Negligible	Early-mature with a height of 15m and trunk diameter of 25cm. No potential bat roost features observed.
50 - 77	*Acer sp.*	Negligible	All early-mature with a height of 15m and trunk diameter of 25cm. No potential bat roost features observed.
78 - 121	*Tilia sp*.	Negligible	All early-mature with a height of 15m in height trunk diameter of 30cm. No potential bat roost features observed.

Figure 2: Preliminary Roost Assessment results at 1 and 2 Longwalk Road, Uxbridge

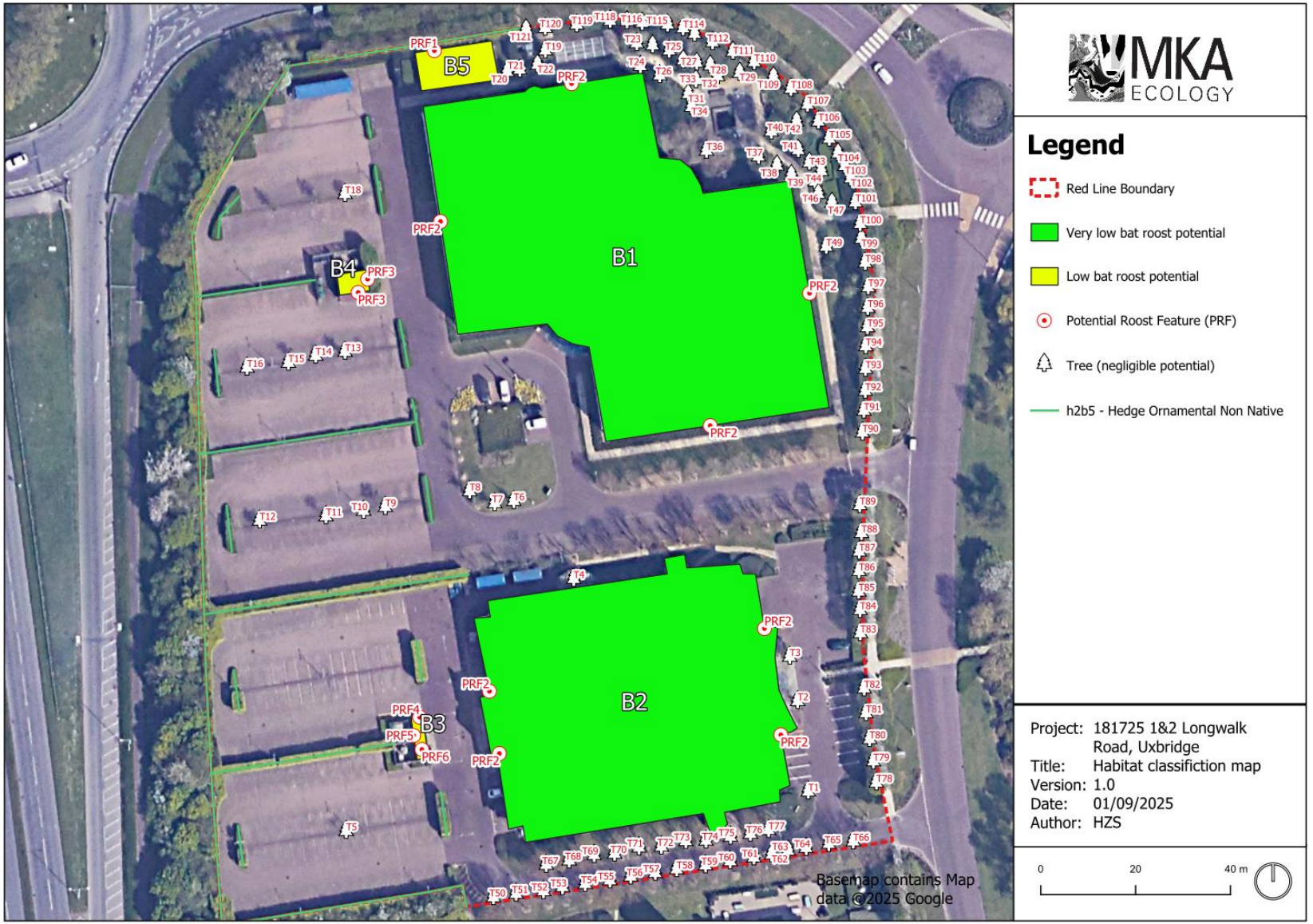


Table 15: Points for Figure 2:

Potential Roost Features (PRF)	Description	Photographs (Appendix 3)
PRF1	Gap under soffit.	Photograph 8
PRF2	Gaps leading to suitable sized space behind cladding.	Photograph 9Photograph 10 Photograph 11
PRF3	Weep vents.	Photograph 12
PRF4	Space between wooden panels provides access for bats into interior of building.	Photograph 13
PRF5	Cavities within door frame.	Photograph 14
PRF6	Wooden beams within B3 create gaps and crevices of suitable size for bat roosts.	Photograph 15

5. ECOLOGICAL CONSTRAINTS, OPPORTUNITIES AND RECOMMENDATIONS

This section outlines key ecological issues for consideration, recommendations for further work and ecological enhancements where appropriate.

On-Site habitats

There are numerous scattered trees within the Site which are considered to be of ecological value and as such, it is recommended that these trees be retained, where possible. This is in line with Policy G7 of the London Plan (GLA, 2021). Retained trees should be protected during demolition and construction using root protection fencing around the root zones in accordance with British Standards BS 5837 2012: Trees in Relation to Construction.

Recommendation 1

Retain and protect the scattered trees within the Site, where possible. Retained trees should be protected during works using root protection fencing.

Willow-leaved cotoneaster is an invasive species and although not subject to legal parameters, it is considered a high-risk invasive species (Plantlife, 2010). Therefore, as a precautionary measure, it is recommended all instances of willow-leaved cotoneaster are removed appropriately to prevent the species spreading further.

Recommendation 2

All instances of willow-leaved cotoneaster should be appropriately removed during construction.

Birds

The hedgerows and numerous scattered trees onsite provide suitable habitat for common species of nesting birds. All wild birds, their active nests and eggs are protected under The Wildlife and Countryside Act 1981 (as amended), which makes it an offence deliberately, or recklessly, to kill or injure any wild bird or damage or destroy any active birds' nest or eggs.

Scheduling vegetation removal and building demolition works between the months of September and February inclusive (i.e. outside of the bird season) would avoid impacts on breeding birds.

Where vegetation removal and building demolition works are required during the breeding bird season (between the months of March and August inclusive), such works can only proceed following the completion of a nesting bird check undertaken by an experienced ornithologist. Any active birds' nest identified during this check must be protected from harm until the nesting attempt is complete. This will

require a buffer to be left around the nest, the size of which will depend upon the species involved (as a general rule, this will be 10m in all directions around the nest). Any buffers established as a result of the initial nesting bird check must be subjected to a second check after the original nesting attempt is completed, before such areas can be removed during the breeding bird season.

Recommendation 3

Schedule vegetation clearance and building demolition works between the months of September and February inclusive to avoid impacts on breeding birds. Where this timing is not feasible works should be preceded by a nesting bird check.

It is strongly recommended that any potential nesting bird habitat is cleared outside the breeding bird season in order to avoid potentially lengthy delays if nests are found during nesting bird checks.

Bats

Buildings B3, B4 and B5 have low potential for supporting roosting bats. If roosts are present, the proposed development may cause impacts upon individual bats or the roost directly. Indirect impacts are also possible through increased lighting, noise, dust or vibration.

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of Conservation of Habitats and Species Regulations 2017 (as amended). Bats are also Species of Principal Importance listed on Section 41 of the NERC Act 2006. It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

According to Best Practice Guidelines (Collins, 2023), buildings with low risk of supporting roosting bats require a minimum of one bat emergence survey to prove likely absence. Should bats be found to be roosting at the Site during the recommended survey effort, additional surveys may be required in order to obtain sufficient information to support a Natural England bat licence application (usually three surveys are sufficient). It will be necessary to identify all species of bats using the site, their population sizes and gather detailed information on how they are using the buildings (for example, locations of roosts and access points). It will then be necessary to produce a method statement to show how bats will be protected during development works and how provision for roosting will be made during and after development. Should these additional surveys be required, they would have to be undertaken in the survey season of 2026. Table 16 summarises the suitability for roosting bats in each building and the number of bat emergence surveys required.

Table 16: Bat roost suitability for buildings and number of emergence surveys required

Building name	Bat roost suitability	Number of bat emergence surveys required
B3	Low	1
B4	Low	1
B5	Low	1

It is recommended that best practice guidelines are followed with a minimum of one emergence survey conducted for B3, B4 and B5 (Collins, 2023). Emergence surveys must be conducted between May and September inclusive.

Recommendation 4

Undertake bat emergence surveys at 1 and 2 Longwalk Road, Uxbridge. Following best practise guidelines, a minimum of one emergence survey will be required to ascertain the presence of absence of roosting bats and any mitigation measures required.

A few Potential Roost Features were identified on buildings B1 and B2. However, due to the building material, these features are of very low potential**.** It is recommended that the demolition of buildings B1 and B2 should be carried out under ecological supervision and Potential Roost Features should be removed through soft stripping. It is recommended that the mitigation measures to be adopted throughout the construction phase of the development should be documented within a Construction and Environmental Management Plan (CEMP). The CEMP will outline the sensitive working measures to be followed to ensure that the very low risk of adverse impacts are avoided during the construction phase. If a roost is discovered during the supervised soft strip, works must stop and a licence sought from Natural England.

Recommendation 5

Produce a Construction Environmental Management Plan (CEMP) detailing measures by which the proposed works will minimise disturbance to any bat roosts identified during the construction phase.

The numerous trees onsite and the presence of multiple hedgerows provides suitable habitat for commuting and foraging activity for bats. Bat roosting behaviour, commuting and foraging activity can be dramatically affected by artificial lighting (Institution of Lighting Professionals, 2023). It is strongly recommended that any proposed exterior lighting on the new buildings and access roads is designed and managed appropriately to ensure that the area remains suitable for foraging bats. A sensitive lighting scheme should be developed to allow suitable roosting and foraging areas for bats. The sensitive lighting strategy should be developed following the guidelines set out by the Institution of Lighting Professionals Guidance Note 08/23 (2023). These measures should be secured through a planning condition.

Recommendation 5

Light pollution from any lighting should be minimised both during and after the construction phase. A sensitive lighting scheme should be developed and secured through a planning condition to allow for suitable roosting and foraging areas for bats within the site.

The creation of log piles and deadwood features at the Site, post development, will be valuable for a wide range of wildlife including hedgehogs, invertebrates and reptiles, by providing foraging resources and suitable places to shelter. Deadwood features could include rotting roots or tree stumps spread around various locations. Drilling holes into the deadwood features will further attract a wide diversity of invertebrates, which would in turn benefit a range of other species such as reptiles and hedgehogs.

Recommendation 6

Incorporate the provision of log piles and deadwood features onsite to provide suitable habitat for a wide range of species.

Opportunities for biodiversity enhancement

Following the issue of the National Planning Policy Framework (NPPF; see Appendix 1), all planning decisions should aim to maintain and enhance, restore or add to biodiversity and geological conservation interests. Ecological enhancements should aim to deliver biodiversity gains for the proposed development site. The Environment Act 2021 requires developments to deliver a demonstrable increase in biodiversity value of at least 10%. A Biodiversity Net Gain Assessment in line with the Defra Statutory Metric is recommended to inform the site design and ensure sufficient gains are achieved.

Recommendation 7

Undertake a Biodiversity Net Gain Assessment of 1 and 2 Longwalk Road, Uxbridge

The Environment Act 2021 states that all Biodiversity Net Gain assessments must be accompanied by an appropriate thirty-year management plan, outlining how the habitats will be created and managed over that time period. This serves to ensure that all proposed habitats achieve the desired ecological value used in net gain calculations. It is recommended that a Habitat Management and Monitoring Plan (HMMP) is produced in order to ensure legislative compliance.

Recommendation 8

Produce a Habitat Management and Monitoring Plan post- planning permission outlining the means of delivery of the net gain proposals developed within a 30-year management plan.

The London Plan also sets out targets for green infrastructure value in new urban developments. Predominantly commercial developments must achieve an Urban Greening Factor (UGF) score of at least 0.3. A UGF assessment should be undertaken and submitted as part of the planning submission.

Recommendation 9

A UGF assessment should be undertaken for the proposed development at the Site.

Green infrastructure including green roofs and green walls has become a fundamental part of urban site and building design, creating floral and faunal opportunities in otherwise ecologically featureless areas of hardstanding. It is strongly recommended that all green infrastructure to be created is designed with maximum biodiversity value in mind. Such green infrastructure features have been identified as an opportunity to maximise biodiversity within urban and sub-urban areas within Policies G1 and G5 within the London Plan.

Green roofs can be installed on any flat, or slightly sloping, roof surface and can be beneficial for a wide variety of species. The provision of a green roof would be an attractive option for both increasing biodiversity and providing an attractive feature within the development.

Green walls are essentially walls with living plants growing on them, enhancing otherwise featureless areas. The process of allowing and encouraging plants to grow on and up walls allows the natural environment to be extended into urban areas. Green walls that comprise climbers and light weight support structures such as wires and trellis are relatively cheap to develop and maintain. Creating green walls by allowing climbing species to attach themselves to the actual structure of existing walls or fences is also a viable option.

The inclusion of green roofs and green walls is in line with Local Policy DMEI1 of the London Borough of Hillingborough Local Plan Part 2 which states:

'All development proposals are required to comply with the following:

i. All major development6 should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided;…'

Recommendation 10

Include green infrastructure provision within the development designs in order to ensure biodiversity gains for local priority species and biodiversity in general. The provision of green roofs and green walls will address both national and local policy and help to deliver UGF and BNG targets.

Planting of native species or those with a known attraction or benefit to local wildlife is recommended in landscape proposals. This will help to increase native plant species diversity, provide more ecologically valuable habitats, and result in a greater diversity of other dependent taxonomic groups. It is recommended nectar-rich and night-flowering species are included to attract a wide diversity of invertebrates.

Recommendation 11

It is recommended that native British species are incorporated within the planting scheme for the final landscaping design in order to enhance the overall value of the site for biodiversity, in line with the requirements of the NPPF.

Enhanced opportunities for breeding birds should be incorporated into the design scheme. Bird boxes should be mounted on trees, fences and built structures at the site. It is recommended that a focus be placed on notable building dependant species such as swift *Apus apus* as well as the provision of generalist boxes. Examples of suitable boxes are shown in Appendix 4 together with information concerning the correct siting of these enhancement features.

Recommendation 12

A minimum of six swift boxes and two generalist species boxes should be installed at the Site.

The wider landscape has the potential for use by foraging bats. With this in mind, enhanced opportunities for roosting bats should also be provided at the site through installation of bat boxes.

Recommendation 13

Provisions should be made for roosting bats at the site post-development, to include integrated or wall mounted bat bricks/boxes and bat boxes mounted on trees. The box specifications will be detailed following the further emergence surveys.

Summary of recommendations

Table 17 below summarises the recommendations made within this report and specifies the stage of the development at which action is required. Colour coding of cells within the table is as follows:

Key:

No action required for this species group at this stage

Action required (see notes for details)

Level of action required will be determined following the further survey work

Table 17: Summary of recommendations at 1 and 2 Longwalk Road, Uxbridge

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Habitats	Produce a BNG and UGF and retain trees where possible	No	Protection of retained trees	Native, nectar-rich and night-flowering planting and replacement of any lost trees with native species. Log piles, deadwood features.
Invasive species	No	No	Appropriate removal of all instances of willow-leaved cotoneaster	Native planting
Birds	No	No	Timing of works for vegetation removal	Incorporate integrated/mounted bird

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
				boxes into new buildings and existing trees onsite
Bats	Further survey work and produce a sensitive lighting scheme	TBC for B3, B4 and B5 Produce a CEMP for the demolition of buildings B1 and B2	TBC	Incorporate bat boxes into new buildings and trees

6. CONCLUSIONS

In August 2025 MKA Ecology Limited undertook a Preliminary Ecological Appraisal and Preliminary Roost Assessment at 1 and 2 Longwalk Road, Uxbridge, in order to support a planning application for the demolition of the existing buildings onsite and construction of two large warehouses. The Site comprises of three main buildings (two large two-storey office buildings and one single-story office building), two brick-built utility buildings and associated parking areas and access roads. There are areas of hedgerow, lines of trees, shrub and grassland that border the buildings and parking areas.

Ecological constraints associated with the Site include the roosting bat potential identified on the buildings at the Site. Buildings B3, B4 and B5 have low potential to support roosting bats and will require a single bat emergence survey to determine presence/likely absence of bats. The bat emergence survey should be undertaken between the months of May and September inclusive. A few features of very low potential were identified on buildings B1 and B2. The demolition of these buildings should be carried out under ecological supervision, details of which should be produced in a CEMP.

The hedgerows and numerous scattered trees onsite provide suitable habitat for common species of nesting birds. There are ecological timing constraints going forward relating to breeding birds; vegetation clearance at the Site should ideally avoid the nesting bird season (March-August inclusive). The Site contains numerous scattered trees and these should be retained where possible. Where it is not possible to retain the trees, they should be replaced with the planting of native species. All retained trees should be protected during works using root protection fencing. Willow-leaved cotoneaster is an invasive species which is present onsite and although not subject to legal parameters, it is recommended all instances of willow-leaved cotoneaster are appropriately removed as a precautionary measure.

A number of biodiversity enhancements are proposed as part of this development in order to address the local and national planning policy targets. This includes the planting of native species, nectar-rich and night flowering species, the installation of eight bird boxes, and the creation of log piles and deadwood features . Incorporating green roofs/walls into the site design is also recommended to help deliver biodiversity targets.

A UGF assessment should be undertaken and submitted as part of the planning submission, in order confirm the targets set out by The London Plan are met. A BNG Assessment will also be undertaken to ensure the proposed development provides a significant increase in biodiversity and green infrastructure provision, which should be updated following any revisions. A HMMP should be produced as to ensure the successful creation and long-term management of all habitats to be created at the Site.

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8. APPENDICES

8.1. Appendix 1: Relevant wildlife legislation and planning policy

Please note that the following is not an exhaustive list, and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant prohibited actions
Amphibians		
Great crested newt *Triturus cristatus* Natterjack toad *Epidalea calamita*	Schedule 2 of Conservation of Habitats and Species Regulations (2017) Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Deliberately capture or kill, or intentionally injure; • Deliberately disturb or recklessly disturb them in a place used for shelter or protection; • Damage or destroy a breeding site or resting place; • Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection; and • Possess an individual, or any part of it, unless acquired lawfully.
Reptiles		
Common lizard *Zootoca vivipara* Adder *Vipera berus* Slow-worm *Anguis fragilis* Grass snake *Natrix helvetica helvetica*	Part of Sub-section 9(1) of Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill or injure individuals of these species (Section 9(1)).

Subject	Legislation (England)	Relevant prohibited actions
Sand lizard *Lacerta agilis* Smooth snake *Coronella austriaca*	Full protection under Section 9 of Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Deliberately or intentionally kill, capture (take) or intentionally injure; • Deliberately disturb; • Deliberately take or destroy eggs; • Damage or destroy a breeding site or resting place or intentionally damage a place used for shelter; or • Intentionally obstruct access to a place used for shelter.
Birds		
All wild birds	Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure, or take any wild bird or their eggs or nests.
'Schedule 1' birds	Schedule 1 of the Wildlife and Countryside Act 1981 (as amended)	• Disturb any wild bird listed on Schedule 1 whilst it is building a nest or is in, on, or near a nest containing eggs or young; or • Disturb the dependent young of any wild bird listed on Schedule 1.
Mammals		
Bats (all UK species)	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Deliberately capture, injure or kill a bat; • Deliberately disturb a bat (disturbance is defined as an action which is likely to: (i) Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; (ii) Impair their ability to hibernate or migrate; or (iii) Affect significantly the local

Subject	Legislation (England)	Relevant prohibited actions
	Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	distribution or abundance of the species); • Damage or destroy a bat roost; • Intentionally or recklessly disturb a bat at a roost; or • Intentionally or recklessly obstruct access to a roost. In this interpretation, a bat roost is "*any structure or place which any wild [bat]...uses for shelter or protection*". Legal opinion is that the roost is protected whether or not the bats are present at the time.
Badger *Meles meles*	Protection of Badgers Act 1992	Under Section 3 of the Act: • Damage a sett or any part of it; • Destroy a sett; • Obstruct access to, or any entrance of, a sett; or • Disturb a badger when it is occupying a sett. A sett is defined legally as any structure or place which displays signs indicating current use by a badger (Natural England 2007).
Hazel dormouse *Muscardinus avellanarius*	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Intentionally or deliberately capture or kill, or intentionally injure;

Subject	Legislation (England)	Relevant prohibited actions
	Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Deliberately disturb or intentionally or recklessly disturb them in a place used for shelter or protection; • Damage or destroy a breeding site or resting place; • Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection; and • Possess an individual, or any part of it, unless acquired lawfully.
Otter *Lutra lutra*	Schedule 2 of Conservation of Habitats and Species Regulations (2017) Section 9(4)(b) and (c) of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Deliberately capture, injure or kill an otter; • Deliberately disturb an otter in such a way as to be likely to significantly affect the local distribution or abundance of otters or the ability of any significant group of otters to survive, breed, rear or nurture their young; • Intentionally or recklessly disturb any otter whilst it is occupying a holt; • Damage or destroy or intentionally or recklessly obstruct access to an otter holt.
Water vole *Arvicola amphibius*	Section 9 of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure or take water voles; • Possess or control live or dead water voles or derivatives; • Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection; or • Intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

Subject	Legislation (England)	Relevant prohibited actions
Crustaceans		
White-clawed crayfish *Austropotamobius pallipes*	Section 9(1) of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure or take white-clawed crayfish by any method.

The Environment Act 2021

Full legislation text available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted

The Environment Act 2021, sets out key legislation after the UK's exit from the European Union. With the largest changes to green regulations in decades, the Act includes the establishment of an Office for Environmental Protection, targets on air pollution, water quality and biodiversity, and the enshrinement of the 25 Year Environment Plan in law. The Act also makes provisions for a mandatory 10% net gain in biodiversity for all developments covered by the Town and Country Planning Act and it also introduces a statutory requirement for Local Nature Recovery Strategies.

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

Full legislation text available at: The Conservation of Habitats and Species Regulations 2017 (as amended) (legislation.gov.uk)

The Wildlife and Countryside Act 1981 (as amended)

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1981/69/contents.

Countryside and Rights of Way Act 2000

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2000/37/contents

Protection of Badgers Act 1992

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1992/51/contents

Section 41 of Natural Environments and Rural Communities (NERC) Act 2006

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2006/16/section/41

Many of the species above, along with a host of others not afforded additional protection, are listed on Section 41 of the NERC Act 2006.

Section 41 (S41) of the Natural Environment and Rural Communities (NERC Act 2006) requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn

up in consultation with Natural England and draws upon the UK Biodiversity Action Plan (BAP) List of Priority Species and Habitats.

The S41 list should be used to guide decision-makers such as local and regional authorities to have regard to the conservation of biodiversity in the exercise of their normal functions – as required under Section 40 of the NERC Act 2006. The duty applies to all local authorities and extends beyond just conserving what is already there, to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

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

In addition to affording protection to some species, The Wildlife and Countryside Act 1981 (as amended) also names species which are considered invasive and require control. Section 14 of the Act prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed in Schedule 9 to the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated.

Wild Mammals (Protection) Act 1996

Full legislation text is available at: http://www.legislation.gov.uk/ukpga/1996/3/contents

Under this legislation it is an offence to cause unnecessary suffering to wild mammals, including by crushing and asphyxiation. It largely deals with issues of animal welfare, and covers all non-domestic mammals including commonly encountered mammals on development sites such as rabbits, foxes and field voles.

Birds of Conservation Concern (BoCC)

This is a quantitative assessment of the status of populations of bird species which regularly occur in the UK, undertaken by the UK's leading bird conservation organisations. It assesses a total of 245 species against a set of objective criteria to place each on one of three lists – Green, Amber and Red – indicating an increasing level of conservation concern. There are currently 70 species on the Red list, 103 on the Amber list and 72 on the Green list. The classifications described have no statutory implications, and are used merely as a tool for assessing scarcity and conservation value of a given species.

National Planning Policy Framework (NPPF)

Full text is available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2.

The revised NPPF was updated on 12 December 2024 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 187 to 201 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
- Recognise the wider benefits of ecosystem services; and
- Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in and around National Parks, Sites of Specific Scientific Interest, the Broads, and National Landscapes other than in exceptional circumstances.

Where possible, planning policies should also:

- 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; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; 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.

8.2. Appendix 2: UK Habitat Classification species list

Please note that these lists are intended to be incidental records and do not constitute a full botanical survey of the site. Relative abundance is given using the DAFOR scale. Please see Table 2 for details.

Ornamental non-native hedgerow (h2b5)

Common Name	Systematic Name	Relative abundance
Firethorn	*Pyracantha sp*	A
Hornbeam	*Carpinus sp*	A
Yew	*Taxus sp*	A
Ivy	*Hedera sp*	F

Modified grassland (g4)

Common Name	Systematic Name	Relative abundance
Red fescue	*Festuca rubra*	A
Bristly ox-tongue	*Picris echioides*	F
Buttercup	*Ranunculus*	F
Daisy	*Bellis perennis*	F
Dandelion	*Taraxacum*	F
Ground-ivy	*Glechoma hederacea*	F
Hawkbit	*Leontodon hispidus x saxatilis*	F
Selfheal	*Prunella vulgaris*	F
Speedwell	*Veronica*	F
Thistle	*Cirsium*	F
Borage	*Borago officinalis*	O
Tall fleabane	*Erigeron elatior*	O
Bindweed	*Calystegia sp.*	R

Introduced shrub (847)

Common Name	Systematic Name	Relative abundance
Beech	*Fagus sylvatica*	F
Cherry laurel	*Prunus laurocerasus*	F

Common Name	Systematic Name	Relative abundance
Field maple	*Acer campestre*	F
Firethorn	*Pyracantha sp*	F
Garden privet	*Ligustrum ovalifolium*	F
Hornbeam	*Carpinus sp*	F
Ivy	*Hedera sp*	F
Lime	*Tilia sp*	F
Maple	*Acer sp*	F
Yew	*Taxus sp*	F
Lavender	*Lavandula*	O
Viburnum	*Viburnum sp*	O
Willow-leaved cotoneaster	*Cotoneaster salicifolius*	O

8.3. Appendix 3: Site photographs

Photograph 1: Example of developed land; sealed surface (u1b) – Car park in north-west



Photograph 2: Example of ornamental non-native hedgerow (h2b5) – Hedgerow along western red line boundary



Photograph 3: Example of ornamental non-native hedgerow (h2b5) – Hedgerow in north-west car park



Photograph 4: Example of ornamental non-native hedgerow (h2b5) – Hedgerow in south-west car park



Photograph 5: Example of modified grassland (g4) – grassland to the south of B1



Photograph 6: Example of introduced shrub (847) – area of introduced scrub to the north of B2



Photograph 7: Other standing water (r1g) – ornamental pond



Photograph 8: PRF1 – Gap under soffit



Photograph 9: PRF2 – Gaps leading to suitable sized space behind cladding (western aspect of B2)



Photograph 10: PRF2 – Gaps leading to suitable sized space behind cladding (northern aspect of B2)



Photograph 11: PRF2 – Gaps leading to suitable sized space behind cladding (southern aspect of B1)



Photograph 12: PRF3 – Weep vents



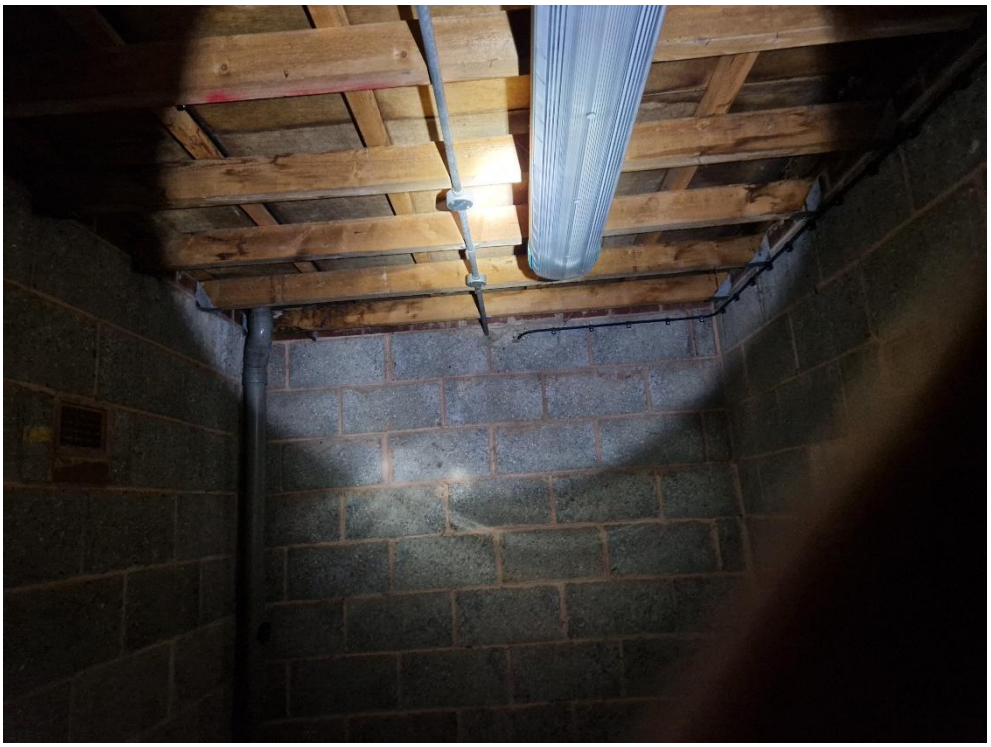
Photograph 13: PRF4 – Space between wooden beams provides access for bats into interior of building



Photograph 14: PRF5 – Cavities within door frame



Photograph 15: PRF6 – wooden beams creating gaps and crevices



8.4. Appendix 4: Bird box recommendations

A large number of bird boxes are available, designed for the specific needs of individual species. These are normally either designed to be mounted onto trees, external walls or integrated into a building. In general, bird boxes should be mounted out of direct sunlight and prevailing winds, out of reach of predators, with suitable foraging habitat for the subject species close by. Bird boxes should also be left up over winter as they can provide useful roosting sites for birds in bad weather.

Nest boxes should be cleaned at the end of each bird breeding season. All nesting material and other debris should be removed from the box. It should then be scrubbed clean with boiling water to kill any parasites (avoid using any chemicals). Once the box is clean, it should be left to dry out thoroughly. Under the Wildlife and Countryside Act 1981 it is an offence to disturb breeding birds and therefore annual cleaning is best undertaken from October to January when there is no risk of disturbing breeding birds.

Generalist boxes

Boxes to attract garden birds and woodland breeding species such as tits, nuthatch, redstart and pied flycatcher can be placed in gardens, orchards, woodlands and a wide variety of other habitats. The species of birds attracted to the box will depend upon the size of the entrance hole (see table below).

Boxes should be fixed two to five metres up a tree or wall, out of the reach of predators such as domestic cats. Unless there are trees or buildings, which give permanent shelter, it is best facing between north and east.

General		
Example	**Description**	**Picture**
Bird Brick Houses Integrated bird box	http://www.birdbrickhouses.co.uk/brick-nesting-boxes/integrated-bird-box/ Integrated into outside skin of 75mm and most 3” brickwork courses. Comes with a variety of hole sizes to suit particular bird species.	
Entrance Hole	**Species**	

34mm	Great-, Blue-, Marsh-, Coal- and Crested Tit, Nuthatch, Pied Flycatcher, House Sparrow	
40mm	Redstart and Black Redstart	
Schwegler No. 1B General Purpose Nest box	www.schwegler-nature.com Suitable for various garden and woodland birds, created with different sized entrance holes to avoid competition between species. Other variations (e.g. 2M) can be free hanging, to deter predators.	
Entrance Hole	**Species**	
32 mm	Great-, Blue-, Marsh-, Coal- and Crested Tit, Redstart, Nuthatch, Pied Flycatcher, Tree and House Sparrows.	
Oval	Redstart; also used by species that nest in the diameter 32 mm boxes. However, because more light enters the brood chamber, it is preferred by Redstarts.	

Swift boxes

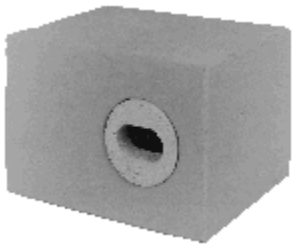
Swifts are colonial nesters and it is important to have several nest sites in one area. It is recommended that most buildings should have between 4 and 10 nest provisions. Swifts also feed almost exclusively on the aerial plankton of flying insects and airborne spiders of small to moderate size, so therefore require habitats which support these invertebrates.

Nest boxes designed for swifts should be installed at least 5m high, around the eaves of the building or under deeply overhanging eaves to allow swifts to drop into the air to forage. The boxes should be positioned away from climbing plants to avoid access for predators such as rodents.

Swifts typically nest in flat spaces within buildings or within a crevice or cavity. The ideal nest box should have an oval or rectangular hole around 30mm (h) x 65mm (w). The internal dimensions of the box should be approximately 400mm (w) x 200mm (d) x 150mm (h).

Swifts can be attracted to areas that they have not previously colonised using 'swift response calls'. Audio CDs are available for this purpose and are available on the Schwegler website (www.schwegler-nature.com).

Swift		
Example	**Description**	**Picture**
Swift S Brick	Introduction — S Brick (actionforswifts.com) Swift S bricks provide excellent nesting opportunities for swifts whilst fitting into the brickwork seamlessly without compromising the appearance of the building. The swift boxes will likely require an attraction call system for swifts. This can be set on timer and replays the tape of birds calling to attract them to the nest site, There is no set system for this, but assembly of parts can be achieved quite easily as outlined at this website: http://actionforswifts.blogspot.com/p/attraction-call-systems-for-swifts.html. The system can be purchased for about £30.	 
Ibstock Swift Box	www.Ibstock.com This swift brick can be built into a wall on new buildings.	

Swift		
Example	**Description**	**Picture**
Woodstone Build-in Swift Box	https://gardenature.co.uk This nest box is made from a concrete and wood fibre mix. It can be mounted on a wall, or it can be built into the fascia of a wall. The front of the Woodstone swift box can be removed for cleaning. It should be fitted at least 5 metres above the ground ensuring there is an unobstructed flight path for birds entering and leaving the box.	
Schwegler Brick Box Type 25	www.schwegler-nature.com This brick design can be built into the wall of the new development and the external surface, excluding the hole, can be rendered to match the surrounding wall.	
Triple Genesis Swift Nest Box	https://www.wildcare.co.uk/ It can be mounted on an external wall to provide three swift nesting sites.	
Swift box model 30	http://actionforswifts.blogspot.com/p/diy-swift-box-designs.html This box is suitable for any location as it has a double thickness, waterproof roof (made of uPVC). The 30° sloping roof should deter predators.	

Swift		
Example	**Description**	**Picture**
Schwegler Swift Box Number 18	www.schwegler-nature.com This Swift Box No. 18 is ideally suited for creating Swift colonies under overhanging eaves.	



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10.5. Appendix 4: Bat Emergence Survey (MKA Ecology Ltd, 2025b)

As attachment

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Bat Emergence Survey

1 and 2 Longwalk Road, Uxbridge

Site	*1 and 2 Longwalk Road, Uxbridge*
Project number	*181725*
Client name / Address	*Trium Environmental Consulting LLP*

Version number	**Date of issue**	**Revisions**
1.0	*22 October 2025*	*Original*

Author(s)	*Hammaad Zubair-Sheikh*	
Surveyor(s)	*Hammaad Zubair-Sheikh* *Max Ellis* *Izzy Clarke*	
Reviewed by	*Felix Bird*	
Contact	*MKA Ecology Limited, 01763 262211, info@mkaecology.co.uk*	

Declaration of compliance

This Bat Emergence Survey has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development".

The information which we have provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

For sites that require a European Protected Species Licence in respect of bats, the licensing authority in England (Natural England) will expect data from the most recent survey season. Where an absence of roosting bat is indicated, data will be valid for a maximum of 12 months (CIEEM, 2019).

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1. EXECUTIVE SUMMARY

In September 2025 MKA Ecology Ltd was commissioned to undertake a Bat Emergence Survey at 1 and 2 Longwalk Road, Uxbridge. Buildings B3, B4 and B5 were identified as having low bat roost suitability during the Preliminary Ecological Appraisal and Preliminary Roost Assessment undertaken in August 2025 (MKA Ecology Ltd, 2025). A single Bat Emergence Survey was undertaken at the Site on 24 September 2025 to determine the presence or likely absence of roosting bats.

The Site comprises of three main buildings (two two-storey office buildings (B1, B2) and one single-story office building (B3)), two brick-built utility buildings (B4, B5) and associated parking areas and access roads. There are areas of hedgerow, lines of trees, scrub and grassland that border the buildings and parking areas. The proposed development involves the demolition of all existing buildings onsite and the construction of two warehouses, with associated parking areas and access roads.

The purpose of the survey was to confirm the presence or likely absence of roosting bats, to evaluate likely ecological impacts, to assess requirements for the need for a European Protected Species Licence, and to describe likely mitigation and/or habitat enhancement requirements.

Bat activity was very low during the survey, common pipistrelle *Pipistrellus pipistrellus* was the only bat species recorded. No bat emergences or re-entries were recorded during the survey effort, indicating a likely absence of roosting bats at the time of the survey. In relation to buildings B3, B4 and B5, no impacts are anticipated from the proposed works on roosting bats and no further survey work is required.

However, during the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025), a few features of very-low bat roost potential were identified on buildings B1 and B2. It is recommended that the demolition of buildings B1 and B2 should be carried out under ecological supervision and that mitigation measures during the construction phase should be detailed in a CEMP.

Pursuant to the requirements of the NPPF, it is recommended that four bat boxes be integrated into the new building and/or mounted on the trees onsite post-development. Furthermore, a sensitive lighting scheme should be in place to ensure suitability for commuting bats both during and after the construction phase. With these measures in place, the Site can play a role in enhancing local bat populations.

2. INTRODUCTION

2.1. Aims and scope of the report

In September 2025 MKA Ecology Ltd was commissioned to undertake a Bat Emergence Survey at 1 and 2 Longwalk Road, Uxbridge by Trium Environmental Consulting LLP in order to support a planning application for the demolition of the existing buildings onsite and construction of two warehouses. The survey was commissioned following recommendations arising from a Preliminary Ecological Appraisal and Preliminary Roost Assessment completed in August 2025 (MKA Ecology, 2025).

The aims of the Bat Emergence Survey were to:

- Undertake one emergence survey on buildings B3, B4 and B5 at the Site to confirm the presence/likely absence of roosting bats;
- Where roosting bats are present, identify the species involved, and, where possible, the population size, the type of roost and access points used;
- Assess the need for a European Protected Species Licence;
- Outline a suitable mitigation strategy for bats at the site, if required; and
- Propose any suitable habitat enhancements for bat species, if required.

This report must be read in conjunction with the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025). With respect to bats, this report supersedes the findings and recommendations given in the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025).

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or 1 and 2 Longwalk Road, Uxbridge. The Site covers an approximate area of 2.2 ha, is located in Stockley Park, West London (central grid reference: TQ 07787 80238) and falls under the authority of the London Borough of Hillingdon. The Site comprises of three main buildings (two two-storey office buildings and one single-story office building), two brick-built utility buildings and associated parking areas and access roads. There are areas of hedgerow, lines of trees, scrub and grassland that border the buildings and parking areas.

The Site is located within a highly built environment, within a business park. The A408 runs adjacent to the western boundary of the Site. Stockley Golf Course and Stockley Country Park, which contain woodland, grassland, scrub and ponds, are located to the to the immediate north and north-west of the Site. The hedgerow which forms the western boundary of Site, connects with an area of woodland and

the Grand Union Canal to the south. This provides a potential wildlife corridor between the Site and woodland and canal habitats within the wider area.

2.3. Proposed development

The proposed development involves the demolition of all existing buildings onsite and the construction of two warehouses, with associated parking areas and access roads.

2.4. Previous survey effort

A data search, carried out by Greenspace Information for Greater London, was completed for the Site and the surrounding 2km, as part of the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025). The data search returned records of common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus* and noctule *Nyctalus noctula*. These species are listed in Table 1. All four species are common within the UK and are typical of the bat species commonly found within Greater London. It should be noted that this is not a comprehensive list of the distribution or extent of the local bat species.

Table 1: Bat species records returned by the data search for 1 and 2 Longwalk Road, Uxbridge

Common name	Systematic name	Section 41 species*	Local priority species**
Brown long-eared bat	*Plecotus auritus*	Yes	Yes
Common pipistrelle	*Pipistrellus pipistrellus*	-	Yes
Noctule	*Nyctalus noctula*	Yes	Yes
Soprano pipistrelle	*Pipistrellus pygmaeus*	Yes	Yes

*Section 41 (species of principal importance for the purpose of conserving biodiversity) under the Natural Environment and Rural Communities Act 2006

**London Priority Species (2019)

The majority of records returned by the data search are from common pipistrelle and soprano pipistrelle. Pipistrelle species are commonly found roosting in crevices under roof tiles, lead flashing and behind weather boarding. Noctules are primarily tree dwellers and found mainly in tree rot holes and woodpecker holes. They are commonly known to hibernate in buildings and other man-made structures. Brown long-eared bats roost in holes in trees and old buildings, and feed in gardens and woodland.
A search of Defra's MAGIC (2025) website returned no European Protected Species Licences granted for bats within 2km of the Site.

An inspection of the buildings at the Site was undertaken during the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025). Although no direct evidence of bats was observed, features with a low potential to support roosting bats were identified on buildings B3, B4 and B5.

2.5. Legislation and planning policy

This Bat Emergence Survey has been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document comprised the following:

- The Environment Act 2021;
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act 1981 (as amended); and
- Natural Environment and Rural Communities (NERC) Act 2006.

Further information is provided in Appendix 1.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 12 December 2024 requires planning decisions to act towards conserving and enhancing the local environment. Further details are provided in APPENDICES 1.

Given that the Site is located within London, consideration of Policy G6 of the London Plan (2021) has been given.

Policy G6 relates to Biodiversity and access to nature. The policy states:

A Sites of Importance for Nature Conservation (SINCs) should be protected.

B Boroughs, in developing Development Plans, should:

1) *use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks*
2) *identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC and seek opportunities to address them*
3) *support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans*

4) *seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context*

5) *ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*

C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1) *avoid damaging the significant ecological features of the site*
2) *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*
3) *deliver off-site compensation of better biodiversity value.*

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E Proposals which reduce deficiencies in access to nature should be considered positively

The London Borough of Hillingdon has adopted the Local Plan: Part 1 (2012) and Local Plan: Part 2 (2020) which includes the following policies relating to biodiversity:

Local Plan: Part 1 – Strategic Policies:

- Policy EM7 Biodiversity and Geological Conservation

Local Plan: Part 2 – Development Management Policies

- DMEI 1 Living walls and Roofs and Onsite Vegetation
- DMEI 7 Biodiversity Protection and Enhancement

3. METHODOLOGY

3.1. Bat Emergence Survey

Surveys were undertaken following guidance set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines (4th edition)* (Collins, 2023).

The design of the survey was informed by the results of the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025). A total of three buildings within the Site were considered to have a low potential to support roosting bats. Table 2 below describes the roost suitability of each building included within the assessment, along with the number of surveys undertaken and equipment used. As per the *Good Practice Guidance*, one survey is required on buildings with low roost suitability. Locations of buildings are shown in Figure 1.

Table 2: Buildings surveyed

Building number	Bat roost suitability	Number of bat emergence surveys required	Number of cameras/torches used per survey
B3	Low	1	2/6
B4	Low	1	2/6
B5	Low	1	1/3

Infrared cameras, bar detectors and torches were positioned around buildings B3, B4 and B5 so that all potential roosting features fell within the field of view. Cameras were set to record from 15 minutes before sunset and continued for 90 minutes after sunset. Bat detectors were used to record bat calls during the surveys. A map showing locations of cameras and bat detectors is shown in Figure 2. Screenshots taken from the footage of each camera from the darkest point of each of the surveys are provided in Appendix 3. These screenshots are provided as evidence that the infrared cameras were able to successfully capture clear images and that the potential roost features were highly visible.

Three ecologists were present on site to set up the recording equipment and monitor general bat activity levels. The ecologists recorded start and finish times of the survey visits, as well as the date, wind direction and force, temperature, precipitation, and cloud cover for each visit. A map of the area to be surveyed was used by each surveyor to show general bat activity, and locations of infrared cameras and associated equipment were noted.

3.2. Equipment and analysis

Infrared video recorders (Sony FDR AX53) were used in conjunction with Nightfox infrared torches to record bats emerging from the potential roost features which were identified during the Preliminary Roost Assessment.

Footage was reviewed following the survey on a desktop computer to identify emerging bats. Footage was analysed by Wildlife Imaging Systems where all movement events recorded were identified. These events were then analysed by an ecologist to determine whether the movement was made by bats and whether the bats were emerging from the relevant structure. Bat detectors were set up around the buildings (Songmeter Minibat 2) to record activity. Sound recordings were later analysed using Kaleidoscope software. Identification of bat calls was undertaken using the parameters set out by Russ (2012).

3.3. Dates, times and weather conditions

The dates, times and weather conditions are given for each site visit, are given in Table 3, along with the buildings surveyed and the equipment used.

Table 3: Survey dates, times, weather conditions and equipment used

Date of each survey visit	Start and end times, sunset/sunrise times	Building reference	Equipment used	Weather*
24/09/2025	**Start:** 18:40 **End:** 20:25 **Sunset:** 18:55	Buildings B3, B4 and B5	**Bat detectors:** Songmeter Minibat 2 **Infrared video recorder:** Sony FDR AX53 with Nightfox infrared torches	**Start temp:** 16°C **End temp:** 14°C **Precipitation:** None **Wind:** 2 **Cloud cover:** 4
Comments: Three surveyors, five cameras, four bat detectors				

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

3.4. Surveyors

The Bat Emergence Surveys were undertaken by the following surveyors:

- Hammaad Zubair-Sheikh, Graduate Ecologist at MKA Ecology Ltd. Hammaad is within his first year as a consultant ecologist.
- Max Ellis, Consultant Ecologist at MKA Ecology Ltd. Max has over three years' experience as a consultant ecologist and holds a Natural England level 2 Bat Licence (CL18).

- Izzy Clarke, Graduate Ecologist at MKA Ecology Ltd. Izzy is within her first year as a consultant ecologist.

Analysis of video and audio data and the writing of the report was undertaken by Hammaad Zubair-Sheikh. The report has been reviewed by Felix Bird, Senior Ecologist at MKA Ecology Ltd. Felix has seven years' experience as an ecological consultant.

3.5. Constraints

The results taken from bat detector recordings are biased towards bats that use louder echolocation calls. Therefore quiet bats, such as brown long-eared bat, may be under-recorded due to the limited recording range of the equipment. This was not considered to present a significant constraint as surveyors were vigilant to ensure that visual cues indicating the presence of quiet species were recorded.

In some circumstances it is not possible to confirm that species of bat with absolute confidence using sound analysis techniques. In particular some calls of common pipistrelle and soprano pipistrelle overlap making species identification difficult. In these circumstances the bat can be identified as a *Pipistrellus* sp. only. Within this report where *Pipistrellus* sp. is used this refers only to common pipistrelle and soprano pipistrelle. This should not be interpreted as other species of the *Pipistrellus* genus, such as Nathusius' pipistrelle *Pipistrellus nathusii* which, although it occurs relatively frequently within the UK is not commonly recorded. Where Pipistrelle species other than common or soprano pipistrelle are suspected this will be directly referenced and discussed within the report. Similarly calls of *Myotis* species can demonstrate a large number of overlapping parameters making identification difficult. Where this is the case a bat has been identified as *Myotis* sp.

September is considered a sub-optimal month for conducting bat emergence surveys. However, the weather conditions during the survey were favourable for bat activity—dry with low wind speeds, and temperatures ranged between 16°C and 14°C. As such, the timing is not considered a significant constraint.

3.6. Assessment

The guidelines for categorisation of bats in England by distribution and rarity (adapted from Reason and Wray, 2025) are shown in the tables below.

Table 4: Categorising bats by rarity (South-eastern/East Anglia to The Wash)

Rarity within England	Species
Rarest Annex II species and very rare	• Alcathoe's bat *Myotis alcathoe* • Barbastelle *Barbastella barbastellus*
Rarer or restricted distribution	• Whiskered bat *Myotis mystacinus* • Brandt's bat *Myotis brandtii* • Leisler's bat *Nyctalus leisleri* • Nathusius' pipistrelle *Pipistrellus nathusii* • Serotine *Eptesicus serotinus*
Widespread in many geographies, but not abundant in all	• Noctule *Nyctalus noctula* • Daubenton's bat *Myotis daubentonii* • Natterer's bat *Myotis nattereri*
Widespread	• Common pipistrelle *Pipistrellus pipistrellus* • Soprano pipistrelle *Pipistrellus pygmaeus* • Brown long-eared bat *Plecotus auritus*

Table 5: Level of importance of roost type

Geographic frame of reference	Roost type
Site, District, Local or Parish	• Feeding perches • Non-breeding day roosts • Mating sites (excluding individual trees and swarming sites) • Small numbers of hibernating bats • Larger transitional roosts • Maternity sites (for widespread species, unless colony atypically large)
County	• Hibernation sites (excluding rarest Annex II species) • Maternity sites (for widespread but not abundant in all geographies species unless colony atypically large) • Autumn swarming sites (can reach regional importance depending on assemblage)
Regional	• Maternity sites (depending on rarity and value of assemblage) • Hibernation sites (for rarest Annex II species, depending on assemblage and size)

Geographic frame of reference	Roost type
National/UK	Sites meeting SSSI guidelines*
International	SAC sites

*Sites meeting SSSI (Sites of Special Scientific Interest) selection guidelines include Barbastelle maternity roosts and mixed species hibernacula assemblages

4. RESULTS

The results from the Bat Emergence Survey are summarised below. Raw survey data are provided in Appendix 4

4.1. Results summary

No bats were recorded emerging from Buildings B3, B4 or B5 during the emergence survey. Bat activity was overall very low and only comprised common pipistrelle.

4.2. Dusk emergence survey 1 – 24 September 2025

The survey was completed on 24 September 2025. Sunset was at 18:55. No bats were observed emerging from or re-entering the buildings at 1 and 2 Longwalk Road, Uxbridge during the survey effort.

The sound analysis detected six instances of common pipistrelle activity across the Site. The first bat was detected by song meter 13 at 19:39 and the last detection was at 20:24 by song meter 11. No bats were recorded on camera or observed by the surveyors during the survey effort.

5. EVALUATION

The following evaluation is based on the combined information from the Preliminary Ecological Appraisal and Preliminary Rost Assessment on 11 August 2025 (MKA Ecology Ltd, 2025) and the Bat Emergence Survey undertaken on 24 September 2025 .

5.1. Evaluation

The Preliminary Roost Assessment identified a number or potential bat roost features/ areas of features on buildings B3, B4 and B5. The potential roost features on B3 include cavities within the door frame on the western aspect, wooden beams along the ceiling within the building and wooden panels on the door of the northern aspect which allow access into the interior. The features on B4 include weep vents and gaps within the brickwork and the feature on B5 is a gap under the soffit on the northern aspect of the building. All three buildings were categorized as having low potential to support roosting bats.

In line with Best Practice Guidelines (Collins, 2023), the buildings were subject to one bat emergence survey. No roosting bats were observed during the survey effort, and only very low activity of common pipistrelle were recorded. Common pipistrelle typically roost in crevices and gaps found within built structures and are one of the most abundant species across Greater London (London Bat Group, 2023)

However, as no bats were recorded emerging or re-entering the buildings, the proposed development is not anticipated to have an impact on bat roosts and no further surveys or licencing will be required.

6. RECOMMENDATIONS

The proposed development involves the demolition of all existing buildings onsite and the construction of two warehouses, with associated parking areas and access roads.

With no evidence of roosting bats recorded at buildings B3, B4 and B5 and overall bat activity at the Site being very low, it is highly unlikely that roosting bats are present within these buildings. However, in the unlikely event that a bat is found roosting at the Site during construction work, all works must cease immediately and MKA Ecology Ltd should be contacted immediately for advice. This advice will likely be to leave the bat to disperse of its own accord or to wait for a licensed bat handler to move the bat if required. Building contractors are explicitly forbidden from handling bats.

Recommendation 1
In the highly unlikely event that a bat is found on site during building demolition, all works must cease immediately and advice must be sought from MKA Ecology Ltd.

During the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025), a few potential roost features were identified on buildings B1 and B2. These included gaps in the cladding which are of suitable size to support bat roosts or to provide access into the area behind the cladding. However, due to the building material, these features are of very low risk**.** It is recommended that the demolition of buildings B1 and B2 should be carried out under ecological supervision and potential roost features should be removed through soft stripping. It is recommended that the mitigation measures to be adopted throughout the construction phase of the development should be documented within a Construction and Environmental Management Plan (CEMP). The CEMP will outline the sensitive working measures to be followed to ensure that the very low risk of adverse impacts are avoided during the construction phase. If a roost is discovered during the supervised soft strip, works must stop and a licence sought from Natural England.

Recommendation 2
Produce a Construction Environmental Management Plan (CEMP) detailing measures by which the proposed works will minimise disturbance to any bat roosts identified within buildings B1 and B2 during the construction phase.

Following the issue of the National Planning Policy Framework (NPPF, see Appendix 1), all planning decisions should aim to maintain, and enhance, restore or add to biodiversity conservation interests.

Although bats were not found roosting at the Site, common pipistrelle were recorded in the immediate vicinity, and with improved roosting features there is potential for bats to roost at the Site. To provide

improved provisions for roosting bats on Site, it is recommended that a minimum of four bat box/bat bricks are integrated into the new buildings and/or mounted on the trees onsite. Examples of suitable bat box/bricks models are given in Appendix 5.

Recommendation 3

It is recommended that a minimum of four bat box/bricks be integrated into the new buildings and/or mounted on the trees onsite. Examples of suitable bat boxes and bat bricks are given in Appendix 5.

The large number of trees onsite provide suitable habitat for foraging and commuting activity for bats. It is recommended that trees be retained where possible and they should not be directly lit for the duration of the works. All lighting should follow the recommendations the Institute of Lighting Professionals best practice guidance for minimising artificial lighting (ILP,2023).

Recommendation 4

Retain trees where possible and design a sensitive lighting strategy which ensures that they are not directly lit.

Bats are a mobile species and common pipistrelle were recorded during the survey effort. If there is a significant delay before the commencement of works, it is feasible bats could start using the buildings for roosting. As such, and in line with best practice guidelines (CIEEM, 2019) the information within this report is considered valid for 12 months. If works have not commenced within this period, a pre-commencement daytime inspection and bat emergence survey (dependent on the results of the daytime inspection) will be required prior to the commencement of works on Buildings B3, B4 and B5 to confirm roosting bats are still absent.

Should evidence of roosting bats be found during these pre-commencement surveys, further surveys and a Natural England European Protected Species Licence may be required.

Recommendation 5

Complete a pre-commencement inspection if works have not commenced within 12 months.

Summary of recommendations

Table 6 below summarises the requirement for further work at the site in relation to bats and the stage of development at which the work should be undertaken.

Table 6: Summary of further work required at 1 and 2 Longwalk Road, Uxbridge

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Bats	Sensitive lighting scheme and incorporation of bat boxes/bricks into the final Site design.	Produce a CEMP for the proposed works on buildings B1 and B2.	Sensitive lighting scheme. Supervised soft strip of B1 and B2.	Integrated bat boxes/ bricks.

7. CONCLUSIONS

In September 2025 MKA Ecology Ltd undertook a Bat Emergence Survey on buildings B3, B4 and B5 at 1 and 2 Longwalk Road, Uxbridge. The proposed development involves the demolition of all buildings onsite and the construction of two warehouses. The Preliminary Ecological Appraisal and Preliminary Roost Assessment found a few potential roost features on buildings B3, B4 and B5 and they were categorised as a having low potential to support bat roosts. A single bat emergence survey was undertaken on the three buildings to confirm presence or likely absence of roosting bats.

Common pipistrelle were the only bat species detected during the survey and overall activity levels were very low. No bats were recorded emerging from or re-entering the buildings. Therefore, in relation to buildings B3, B4 and B5, roosting bats do not represent a constraint to development, with no further surveys or licensing required.

However, during the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2025), a few features of very-low bat roost potential were identified on buildings B1 and B2. It is recommended that the demolition of buildings B1 and B2 should be carried out under ecological supervision and that mitigation measures during the construction phase should be detailed in a CEMP.

Pursuant to the requirements of the NPPF, it is recommended that four bat boxes be integrated into the new building and/or mounted on the trees onsite post-development. Furthermore, a sensitive lighting scheme should be in place to ensure suitability for commuting bats both during and after the construction phase. With these measures in place, the Site can play a role in enhancing local bat populations.

8. REFERENCES

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9. APPENDICES

Appendix 1: Relevant legislation and planning policy

Please note that the following is not an exhaustive list and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant criminal offences
Bats (all species)	The Conservation of Habitats and Species Regulations 2017 (as amended) All bat species are listed on Schedule 2, which designates them as European Protected Species. European Protected Species are subject to the provisions of Part 3, Regulation 41 (Protection of certain wild animals).	• Deliberate capture, injury or killing of a bat; • Deliberate disturbance of a bat; • Damage or destruction of a bat roost; • To possess, control, transport, sell or exchange, or to offer for sale or exchange, any live or dead bat or part of a bat, or anything derived from a bat or any part of a bat. **Notes** In this interpretation, a bat roost is "*a breeding site or resting place of a bat*". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time. In this interpretation, disturbance of animals includes *in particular* any disturbance which is likely – (a) to impair their ability: • to survive, to breed or reproduce, or to rear or nurture their young, or • in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

		• (b) to affect significantly the local distribution or abundance of the species to which they belong.
	Wildlife and Countryside Act 1981 (as amended) All bat species are listed on Schedule 5 and are therefore subject to parts of the provisions of Section 9 (Sections 9(4)(b) and (c) and Section 9(5)).	• Intentional or reckless disturbance of a bat while it is occupying a roost; • Intentional or reckless obstruction of access to a roost; • To sell, expose for sale, possess or transport for the purpose of sale, any live or dead bat or any part of, or anything derived from a bat; or • Publishing or causing to be published any advertisement likely to be understood as conveying that an individual buys or sells, or has an intention to buy or sell bats. In this interpretation, a bat roost is "*any structure or place which any wild [bat]...uses for shelter or protection*". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time.

The Wildlife & Countryside Act 1981 (as amended)

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1981/69

Conservation of Habitats and Species Regulations 2017 (as amended)

Full legislation text available at: https://www.legislation.gov.uk/uksi/2017/1012/contents/made

Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2006/16/contents

Several bat species are listed as species of principal importance for the purpose of conserving biodiversity under Section 41 of the NERC Act 2006.

The NERC Act 2006 places a legal obligation on public bodies, including those considering planning applications, to maintain, and where possible enhance, the conservation status of any Section 41 species found on a site. Species included on Section 41 were also included on the UK Biodiversity Action Plan (BAP) and remain an integral part of the Post-2010 Biodiversity Framework.

These species are:

- Barbastelle *Barbastella barbastellus*;
- Bechstein's bat *Myotis bechsteinii*;
- Brown long-eared bat *Plecotus auritus*;
- Greater horseshoe bat *Rhinolophus ferrumequinum*;
- Lesser horseshoe bat *Rhinolophus hipposideros*;
- Noctule *Nyctalus noctula*; and
- Soprano pipistrelle *Pipistrellus pygmaeus*.

National Planning Policy Framework (NPPF)

Full text is available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

The revised NPPF was updated on 12 December 2024 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 187 to 201 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
- Recognise the wider benefits of ecosystem services; and

- Minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in National Parks, Sites of Specific Scientific Interest, the Broads or Areas of Outstanding Natural Beauty other than in exceptional circumstances.

Where possible, planning policies should also

"*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*".

Appendix 2: Figures and photographs

Figure 1: Site location plan and Preliminary Ecological Appraisal map

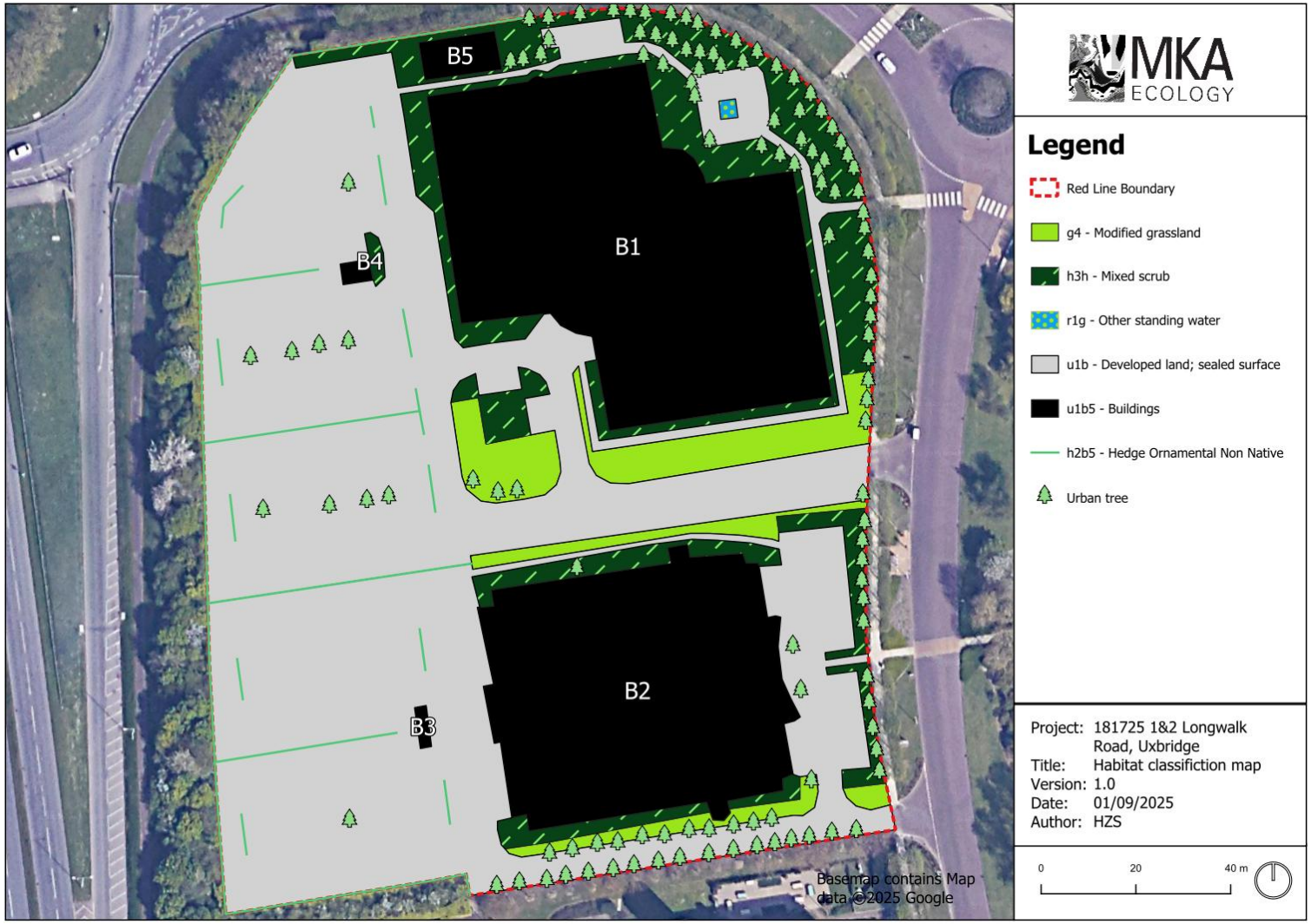
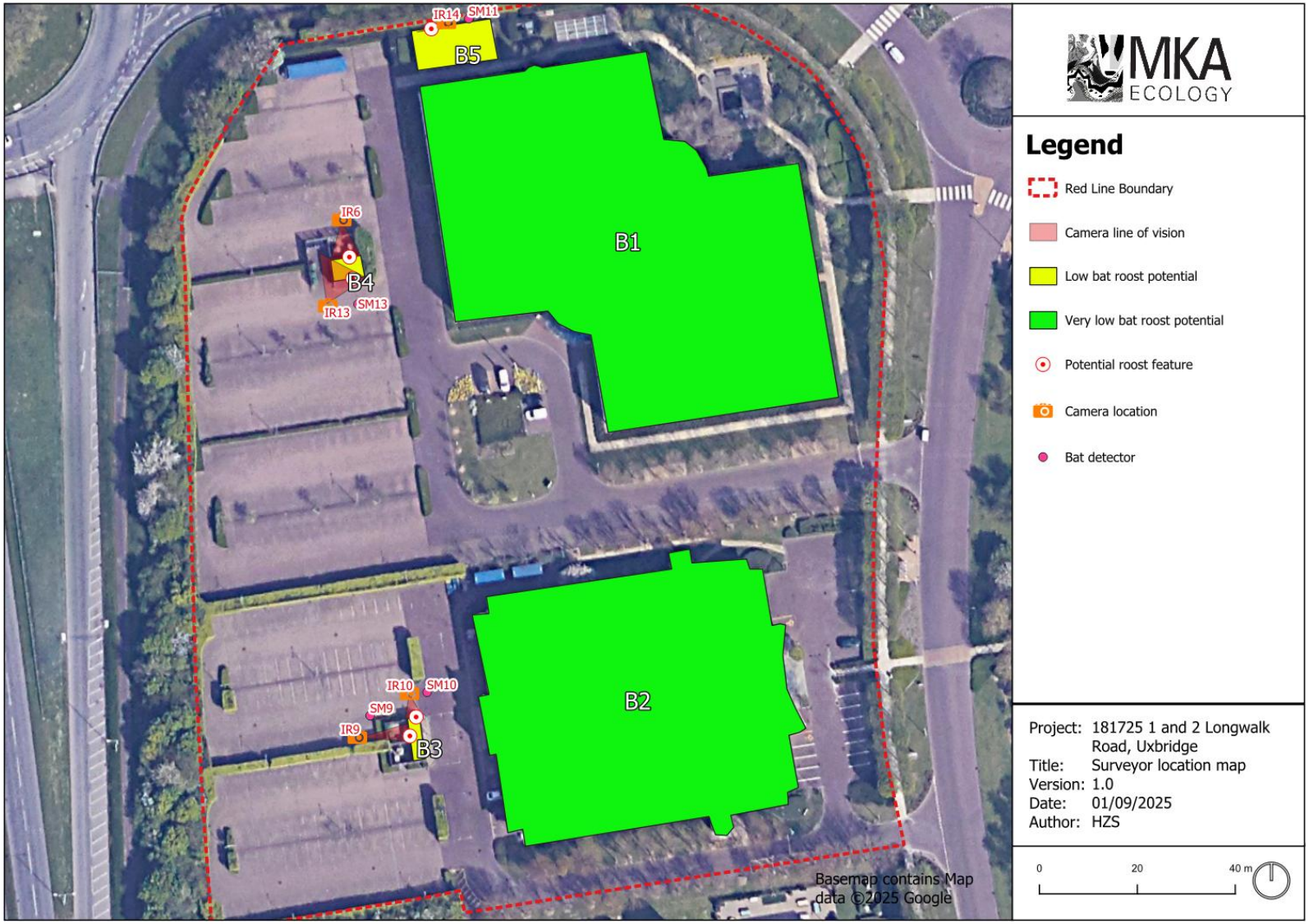


Figure 2: Surveyor Location Plan (Survey date: 24/09/2025)



Appendix 3: Screenshots from infrared cameras

The screenshots provided below are taken from the darkest points of each of the Bat Emergence Surveys conducted at 1 and 2 Longwalk Road, Uxbridge.

Survey: 24/09/2025



Camera IR9



Camera IR10



Camera IR13



Camera IR6



Camera IR14

Appendix 4: Raw survey data

Time	Location	Common Name	Passes	Comments
Survey: 24/09/2025				
19:39	SM13	Common pipistrelle	1	Heard not seen
19:40	SM9	Common pipistrelle	1	Heard not seen
19:41	SM11	Common pipistrelle	1	Heard not seen
19:42	SM11	Common pipistrelle	1	Heard not seen
20:12	SM13	Common pipistrelle	1	Heard not seen
20:24	SM11	Common pipistrelle	1	Heard not seen

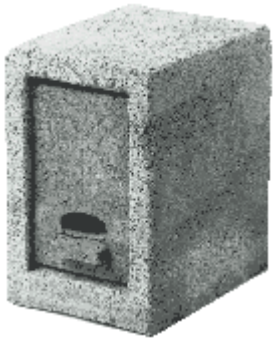
Appendix 5: Bat box recommendations

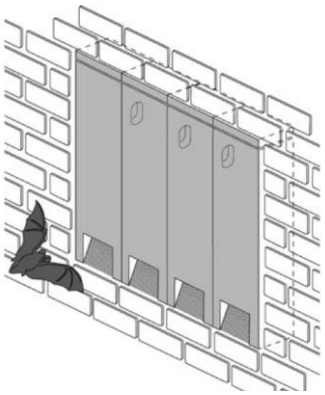
Bat box recommendations

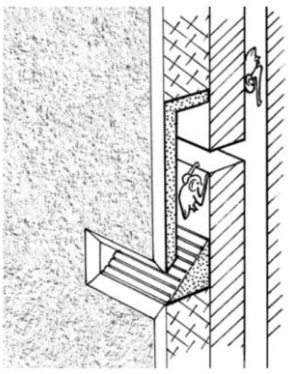
A wide range of bat boxes are available to suit a variety of species and design requirements. Bat boxes can be mounted externally on buildings, built directly into the wall structure or mounted on trees (dependent on box design).

Boxes are more likely to be inhabited if they are located where bats feed and it may help to place the box close to features such as tree lines or hedgerows, which bats are known to use for navigation and can provide immediate cover for bats leaving the roost. Boxes should be placed in areas sheltered from strong winds and are exposed to the sun for part of the day. Access to any bat roosting features should not be lit and should also be at a reasonable height to avoid predation (at least 2m if possible, preferably 4-5m).

Example	Description	Picture
Schwegler General Purpose Bat Box 2F	www.schwegler-nature.com Height: 33 cm Weight: approx. 3.8 kg External diameter: 16 cm Installation: Hanging A general purpose box, suitable for all species.	
Schwegler General Purpose Bat Box 2F with Double Front Panel	www.schwegler-nature.com Height 33 cm Weight: approx. 4.1 kg External diameter: 16 cm Installation: Hanging This box is suitable for crevice dwellers, such as Nathusius´ pipistrelle, Daubenton`s bat and common pipistrelle.	

Example	Description	Picture
Schwegler 1FF	www.schwegler-nature.com Dimensions: 14(d) x 27(w) x 43(h) cm Weight: 9.9 kg Installation: Hanging This box is suitable for crevice dwellers, such as Nathusius´ pipistrelle, Daubenton`s bat and common pipistrelle. This box minimises temperature fluctuations in spring and autumn and is self-cleaning.	
Schwegler 1FQ	www.schwegler-nature.com Dimensions: 60(h) x 35(w) x 9(d) cm Weight: 15.8kg Installation: Attached to most external brick, timber or concrete walls at least 3m high. Can also be placed inside roof space This box is ideal for all types of bats that inhabit buildings. The box is weather-resistant and is also temperature controlled and self-cleaning. The front panel of the box can also be painted during manufacture, to match an existing colour.	
Brick Box Type 27	www.schwegler-nature.com Dimensions: 26.5(h) x 18(w) x 24(d) cm Weight: 9.5kg Installation: Can be flush with outside wall and rendered or covered so only the entrance hole is visible. This box is ideal for all types of bats that inhabit buildings.	

Example	Description	Picture
2FR Schwegler Bat Tube	www.schwegler-nature.com Dimensions: 47(h) x 20(w) x 12.5(d) Weight: 9.8kg Installation: Can be installed on external walls – either flush or beneath a rendered surface in concrete and, during renovation work, under wooden panelling or in building cavities. Several tubes should be installed together (recommended three). This box is ideal for all types of bats that inhabit buildings. By installing boxes side by side a colony roosts can be created with any size requirement. This box has three different environmental partitions inside, attracting different species. The box is self-cleaning.	 
1WI Schwegler Summer and Winter Bat Box	www.schwegler-nature.com Dimensions: 55(h) x 35(w) x 9.5(d) cm Weight: 15kg Installation: Attached to most types of external brick, timber or concrete walls. It can be installed flush-mounted and rendered over or simply against the wall. It should be installed at a height of at least 3m. This box typically attracts building-inhabiting bat species like pipistrelles or serotine bat. This box is weather-resistant and designed for both winter hibernation and larger colonies in summer, including nursery roosts.	

Example	Description	Picture
1FE Schwegler Bat Access Panel	www.schwegler-nature.com Dimensions: 30(h) x 30(w) x 8(d) cm. Weight: approx. 5.1 kg. Installation: Installation of multiple units is recommended. The box can be integrated into insulation or masonry. It can also be attached to the underlying structure to cover existing cavities, allowing bats to still use them. Install at least 3m above the ground. This is a general purpose box, suitable for all species. There is a maintenance-free access panel for installing on or in the surface of exterior walls. The open rear enables bats to continue to use existing nesting sites in walls.	 



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10.6. Appendix 5: Characterising Ecological Impacts (CIEEM, 2018)

The guidance below taken from CIEEM (2018) was used to characterise ecological impacts.

5.9 When describing ecological impacts and effects, reference should be made to the following characteristics as required:

- *Positive or negative*
- *Extent*
- *Magnitude*
- *Duration*
- *Frequency and timing*
- *Reversibility.*

5.10 The assessment only needs to describe those characteristics relevant to understanding the ecological effect of the impacts and determining its significance. For example, timing of the removal of a hedgerow is unlikely to be of particular relevance to the assessment of the effect on hedgerows, although it may be relevant in assessing the effect on a species using the hedgerow, such as nesting birds.

Positive or negative

5.11 Positive and negative impacts and effects should be determined according to whether the change is in accordance with nature conservation objectives and policy:

- *Positive – a change that improves the quality of the environment e.g. by increasing species diversity, extending habitat or improving water quality. This may also include halting or slowing an existing decline in the quality of the environment.*
- *Negative – a change which reduces the quality of the environment e.g. destruction of habitat, removal of foraging habitat, habitat fragmentation, pollution.*

Extent

5.12 The extent is the spatial or geographical area over which the impact/effect may occur under a suitably representative range of conditions (e.g. noise transmission under water).

Magnitude

5.13 Magnitude refers to size, amount, intensity and volume. It should be quantified if possible and expressed in absolute or relative terms e.g. the amount of habitat lost, percentage change to habitat area, percentage decline in a species population.

Duration

5.14 Duration should be defined in relation to ecological characteristics (such as the lifecycle of a species) as well as human timeframes. For example, five years, which might seem short-term in the

human context or that of other long-lived species, would span at least five generations of some invertebrate species.

5.15 The duration of an activity may differ from the duration of the resulting effect caused by the activity. For example, if short-term construction activities cause disturbance to birds during their breeding period, there may be long-term implications from failure to reproduce that season. Impacts and effects may be described as short, medium or long-term and permanent or temporary. These will need to be defined in months/years.

Frequency and timing

5.16 The number of times an activity occurs will influence the resulting effect. For example, a single person walking a dog will have very limited impact on nearby waders using wetland habitat, but numerous walkers will subject the waders to frequent disturbance and could affect feeding success, leading to displacement of the birds and knock-on effects on their ability to survive.

5.17 The timing of an activity or change may result in an impact if it coincides with critical life-stages or seasons e.g. bird nesting season.

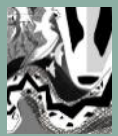
Reversibility

5.18 An irreversible effect is one from which recovery is not possible within a reasonable timescale or there is no reasonable chance of action being taken to reverse it. A reversible effect is one from which spontaneous recovery is possible or which may be counteracted by mitigation. In some cases, the same activity can cause both reversible and irreversible effects.

10.7. Appendix 6: EcIA checklist

EcIA Criteria			Yes No NA	Page reference number(s)
Pre-app.scope	1	Where pre-application advice has been received for the Local Planning Authority and/or an NGO and/or statutory body (e.g. NE DAS, NRW DAS), it has been fully accounted for in the EcIA.	Y	10
	2	The scope, structure and content of the EcIA is in accordance with published good practice	Y	7
Surveys, Sites, Species and Habitats	3	Adequate and up-to-date: a. Desk study has been undertaken b. Phase 1 habitat survey (or equivalent) has been undertaken c. Phase 2 ecology surveys have been undertaken (where necessary)	Y	11 and 12
	4	All statutory and non-statutory sites likely to be significantly affected are clearly and correctly identified	Y	11 and 17
	5	All protected or priority species and priority habitats likely to be significantly affected are clearly and correctly identified, and adequate surveys have been undertaken to inform the baseline	Y	17 and 22
	6	Any invasive non-native plant species present are clearly and correctly identified	Y	18, 26 and 33
	7	Where a separate PEA report states that Phase 2 ecology surveys are required, these have been undertaken in full and results submitted with the application (or lack of such surveys is justified)	Y	12
Impacts and Effects	8	The assessment is based on clearly defined development proposals along with relevant drawings/plans (and any plans used are the same version number as those submitted with the application) or	Y	20
	9	The residual ecological effects are considered to be not significant at any geographical scale irrespective of the detailed development proposals, and the assessment is based on a worst-case scenario	Y	22
	10	The report describes and assesses all likely significant ecological effects (including cumulative effects) clearly stating the geographical scale of significance (where relevant)	Y	22
Mitigation, Compensation and Enhancement	11	The mitigation hierarchy has been clearly followed	Y	
	12	The report: a. Clearly identifies the proposed mitigation and compensation measures, and explains how these will adequately address all likely significant adverse effects b. Includes, where necessary, proposals for post-construction monitoring c. Recommends how proposed measures may be secured through planning conditions/obligations and/or necessary licences	Y	22 and 36
	13	A summary table of proposed mitigation and compensation measures has been provided	Y	33
	14	The need for any mitigation licences required in relation to protected species is clearly identified	Y	22
	15	Proposals to deliver ecological enhancement/Biodiversity Net Gain have been provided	Y	36
Competence/Good Practice	16	Limitations of the ecological work have been correctly identified and the implications explained	Y	12
	17	All relevant key timing issues (e.g. site vegetation clearance or roof removal) that may constrain or adversely affect the proposed timing of the development have been identified	Y	22
	18	All ecological work and surveys accord with published good practice methods and guidelines OR deviation from such guidelines is made clear and fully justified, and the implications for subsequent conclusions and recommendations made explicit in the report	Y	10
	19	All ecologists and surveyors hold appropriate species licences (where relevant) and/or have all necessary competencies to carry out the work undertaken	Y	8

EcIA Criteria			Yes No NA	Page reference number(s)
Conclusions	20	The report clearly identifies where the Proposed Development complies with relevant legislation and policy, highlighting any possible non-compliance issues, and highlighting circumstances where a conclusion cannot be drawn as it requires an assessment of non-ecological issues (such as socio-economic ones)	Y	7, 10, 14, 18 and 18
	21	The report provides a clear summary of losses and gains for biodiversity, and a justified conclusion of an overall net gain for biodiversity	Y	4, 36 and 38
	22	Justifiable conclusions based on sound professional judgement have been drawn as to the significance of effects on any designated site, protected or priority habitat/species or other ecological feature, and a justified scale of significance has been stated	Y	22 and 33



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