Preliminary Ecological Appraisal

for

The Arena, Stockley Park

December 2024

Status: For planning

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The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association.

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Quality Standards

This report is certified BS 42020:2013 'Biodiversity – code of practice for planning and development' compliant and has been prepared in accordance with The Chartered Institute of Ecology and Environmental Management's (CIEEM) Technical Guidance Series '*Ecological Report Writing*' and Code of Professional Conduct.

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Non-technical summary

The Landscape Partnership was commissioned by SmithJenkins on behalf of BBC Pensions Trust Ltd to undertake a Preliminary Ecological Appraisal comprising a desk study, UK Habitat Classification, Habitat Suitability Index (HSI) survey and an assessment of the potential of site features to support bats, together with an assessment of impacts at The Arena, Stockley Park.

The objectives of the appraisal were to identify the habitats and species present or potentially present and evaluate their importance, assess the impact of the development proposal and describe any measures necessary to avoid impacts, reduce impacts or compensate for impacts so that there is no net harm to ecological features.

The survey involved classifying and recording habitat types and features of ecological interest and identified the potential for protected species to be present by assessing habitat suitability for those species. The survey was undertaken by appropriately qualified and experienced personnel.

The site comprised a building that was previously used as offices on the first floor and a pub on the ground floor, a car park and two small areas of amenity grassland and introduced shrubs. The majority of the boundaries were not physically demarcated on the ground. The southern boundary lay adjacent to two large lakes. Collectively the habitats within the proposed development site are assessed as being of value at the **Site Only** level.

Based on the habitat types present, it is considered that the site has potential to support the following protected species or groups of species: breeding birds.

The proposed development is to extend the existing Travelodge into the vacant buildings. A new roof is also proposed.

In the absence of mitigation, the proposed development could give rise to the following impacts: potential destruction of birds' nests and potential to degrade large waterbodies adjacent to the southern site boundary, which would give rise to a **Minor Adverse** impact upon habitats and breeding birds. Mitigation has been proposed, including removal of vegetation outside the nesting bird season or following a nest check, adopt pollution prevention measures during construction period and sensitive lighting scheme to prevent potential disturbance to foraging bats on the large waterbodies. This mitigation would reduce the impacts of the development proposals upon the habitats and species present, to give rise to an overall **Neutral** impact.

No further surveys are considered necessary at this stage.

A number of **ecological enhancements** have been proposed, which would improve the quality of the site for native flora and fauna, including bat boxes, swift boxes and native planting. Delivery of these enhancements would lead to an overall **Neutral-Minor Beneficial** impact

Calculations of Biodiversity Net Gain are required for most developments under the Environment Act 2021 and the report and associated documents are separate to this report.

1 Introduction

1.1 Commission

1.1.1 The Landscape Partnership was commissioned by SmithJenkins on behalf of BBC Pensions Trust Ltd to carry out a Preliminary Ecological Appraisal (PEA), comprising a desk study, UK Habitat Classification, Habitat Suitability Index (HSI) survey and an assessment of the potential of site features to support bats, together with an assessment of impacts.

1.2 Legislation and policy background

1.2.1 There is a range of protection given to sites and species. Sites may be designated for local, national, or global importance for nature conservation. Species may be protected by varying levels of national regulation.

1.2.2 The Local Planning Authority has a policy to protect features of nature conservation value within its Local Plan. Other regulators have policies relating to the consents issued by them.

1.2.3 Further information is given in Appendix 1.

1.2.4 Assessment was undertaken against current legislation and planning policy, and in accordance with standard guidance. Further information is given in Section 2 and Appendix 2.

1.2.5 A Biodiversity Net Gain assessment is required under The Environment Act 2021 for most planning applications. A minimum of 10% net gain is required as part of this legislation.

1.3 Site location and context

1.3.1 The site was located within Stockley Business Park, which was located to the south-west of Hayes, in Greater London. Access is off an internal road within the business park to the west of the site. This internal road is connected to Bennetsfield Road to the south. The site comprised a building that previously was used as offices on the first floor and a pub on the ground floor, a car park and two small areas of amenity grassland and introduced shrubs. The majority of the boundaries were not physically demarcated on the ground.

1.3.2 The site is adjacent to two large lakes to the south, with Stockley Park Golf Club to the north. The wider landscape consists of the remainder of Stockley Business Park and residential areas of Hayes. Stockley County Park and Lake Farm Country Park were located 400m west and 800m east of the site, respectively. The Grand Union Canal is approximately 525m south of the site.

1.3.3 The Ordnance Survey Grid Reference for the approximate centre of the proposed development site is TQ 0800 8040. The location of the site is shown in Appendix 3. A plan showing the site is provided at Figure 01.

1.4 Description of the project

1.4.1 It is proposed to extend the existing Travelodge into the existing building within the site boundary. The development proposals are shown in Appendix 4.

1.5 Objectives of this appraisal

1.5.1 The purpose of this appraisal is to inform a planning application for the proposed development, as described above. Detailed objectives are to:

- identify the habitats and species present or potentially present and evaluate their importance;
- identify any ecological constraints to development;
- assess the impact of the development proposal;
- identify any opportunities available for integrating ecological features within the development;
- describe any measures necessary to avoid impacts, reduce impacts or compensate for impacts so that there is no net harm to ecological features;
- propose ecological enhancements;

- identify any additional surveys that may be required to inform an Ecological Impact Assessment (EcIA).

1.6 Previous ecological studies

1.6.1 There are no known previous ecological studies of the site.

1.7 Duration of appraisal validity

1.7.1 The assessment, conclusions and recommendations in this appraisal are based on the studies undertaken, as set out in this report, and the stated limitations. This appraisal is based on the project as described and any changes to the project would need the appraisal to be reviewed. Unless otherwise stated, the assessment, conclusions and recommendations given assume that the site habitats will continue to be used for their current purpose without significant changes until development takes place. However, changes in use or management may occur between the time of the survey and proposals being implemented. Ecological features may change naturally at any time; for example, species may be lost from existing sites or colonise new areas. Our knowledge of the ecology of the site enables us to provide an estimate of the duration of the validity of the surveys carried out and hence the applicability of this appraisal, so that any future need for review and update of this appraisal, or the surveys described within it, and the date by which such updates would become necessary, can be identified.

1.7.2 The table below sets out a guide to duration of validity of each element of each information source. If the proposed development is delayed beyond the stated timescale, updated surveys or further investigations may be required. Provided a planning application is made and validated prior to the end of the period stated below there would not normally be a requirement for a further update survey except as indicated in Section 4.6.

Information source	Date undertaken	Guideline duration of validity from date undertaken	Notes
Desk study	28th March 2024	2 years	Further data may become available.
UK Habitat Classification survey	8th April 2024	2 years	The habitats on site may change especially if management changes.
Great Crested Newt Habitat Suitability Index survey	8th April 2024	2 years	Pond condition and suitability for great crested newts may change especially if management of nearby habitats changes.
Preliminary bat roost inspection: Buildings	8th April 2024	2 years	Storm damage, maintenance, neglect or other factors can change bat roost potential of buildings.

2 Methodology

2.1 Desk study methodology

2.1.1 Greenspace Information for Greater London was asked to provide records of protected, rare and/or priority species and details of statutory and non-statutory designated sites, within a 2km radius of the centre of the site at TQ 0800 8040. The data were received on 28th March 2024.

2.1.2 The Magic website[1] was used to identify European sites within a 10km radius and national sites within a 2km radius. Sites of Special Scientific Interest designated for bats were also identified within a 10km radius. The Magic website was also used to identify any Natural England mitigation licences or licence returns that were present within a 2km radius from the site boundary. The Magic website was accessed on 20th March 2024.

2.1.3 Aerial photographs and OS maps were used to gain initial information about the site and the surrounding area. This gives an indication of the types of habitat and species likely to be present and the setting of the site within the landscape.

2.1.4 Water bodies within 100m of the site were identified from the relevant 1:25,000 Ordnance Survey map sheet, to establish the need for protected species scoping surveys, such as great crested newt Habitat Suitability Index surveys. Consideration was also given to the green infrastructure of the local area.

2.1.5 The potential for protected, rare and/or priority species to be present on site has been considered in this assessment, taking into account the nature of the site and the habitat requirements of the species in question. Absence of records does not constitute absence of a species. Habitats on the site may be suitable for supporting other protected species that have not previously been recorded within the search area. Conversely, presence of a protected species in the search area does not imply its presence on-site. Records of alien species, non-localised records (e.g. tetrad records) and records dated before 1995 have not been described in detail but are taken into account when considering likely species presence or absence.

2.1.6 The data supplied by the Records Centre were considered in the assessment of potential impacts below.

Limitations to desk study methodology

2.1.7 In accordance with BS42020 and advice from most Local Biological Record Centres, species lists are not appended to this report but are available to the Local Planning Authority on request.

2.1.8 Availability of records will vary in different locations, as many depend on the presence of local experts and survey effort within the local area. An absence of a record does not necessarily indicate the absence of that species.

2.1.9 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, the methodology does not provide results which we can reproduce in this report.

2.2 UK Habitat Classification survey methodology

2.2.1 The standardised UK Habitat classification and mapping methodology[2] was followed. All habitats present and areas or features of ecological interest within such habitats were recorded and mapped. The survey methodology facilitates a rapid assessment of habitats and it is not necessary to identify every plant species on site. Where given, scientific names of plant species follow Stace ed. 4[3].

[1] MAGIC: https://magic.defra.gov.uk/MagicMap.aspx.
[2] UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*
[3] Stace, C (2019) *New Flora of the British Isles*. C&M Floristics. 4th Edition.

2.2.2 The survey was also used to identify potential for protected, rare and/or priority species, for example bats, mammals, amphibians and reptiles, to occur on, or in the vicinity of, the proposed development site. Although the survey methodology is not intended for species survey, any protected, rare and/or priority species which were seen during the survey were noted.

2.2.3 The survey was undertaken on 8th April 2024 and the weather conditions were overcast (80% cloud cover), with a light air (Beaufort 1) and a temperature of 15°C.

Limitations to UK Habitat Classification survey

2.2.4 The UK Habitat Classification survey was undertaken outside the main flowering season for many species, including woodland ground flora, as well as being outside the seasons in which some invasive species would be visible, for example those that are annual, or which die back in winter. This was not considered a significant limitation given the habitat types found within the site.

2.3 Bat Preliminary Ecological Appraisal methodology

2.3.1 The Preliminary Ecological Assessment for Bats, as described in the Bat Survey Guidelines[4] was undertaken.

2.3.2 In addition to the desk-top study described above, aerial photographs and other available images were reviewed. The client was asked if any previous bat surveys had been carried out, who carried them out, what the recommendations were and why a new survey is needed. Copies of reports were requested if available. Other relevant literature was searched for, where relevant.

2.3.3 A Daytime Bat Walkover was carried out concurrently with the Habitat Survey as described above. Structures (buildings and other built structures e.g. bridges, and underground features) and trees were inspected to assess if they could be suitable for bats to roost in, and habitats were inspected to assess if they could be suitable for bats to commute, forage, or swarm in. Roosting and foraging habitats, and flight paths were recorded separately where they existed.

2.3.4 The categories of potential suitability are listed and definitions are provided in Appendix 5, extracted from Table 4.1 of the Bat Survey Guidelines[6]. These categories were applied to the features seen.

2.3.5 The assessment of site features suitable for hibernation potential considered

- The suitability of features to support roosting bats or to allow access for roosting bats
- the temperature and humidity conditions likely to be present within the structure during the winter period and the suitability in this respect for it to be used by hibernating bats
- the surrounding habitat, in terms of its potential for use by bats outside of the hibernation period for commuting and/or foraging purposes (i.e. is it reasonable that bats are familiar with the area and therefore may be aware of suitable roosting locations within the site?)
- the presence of known roosts within the structure, or adjacent structures, or surrounding area during the active season

2.3.6 If there were no or very limited potential roost features in a structure, and/or the temperature and humidity conditions were unsuitable, the structure would be assessed as low potential. A 'classic' hibernation site such as an underground feature, cellar or tunnel would be assessed as high potential with further surveys required. A 'non-classic' site with some features and temperature / humidity being reasonably suitable would be assessed as moderate potential, with consideration as to further survey work.

2.3.7 If the surrounding foraging / commuting habitat was poor quality or had poor connectivity, consideration would be given to reducing the potential level of a structure. Conversely, if the surrounding foraging / commuting habitat was good quality and had poor connectivity, consideration would be given to increasing the potential level. The presence of a known roost would lead to consideration of increasing the potential level, but the absence of a known roost would not lead to a reduction of potential level.

2.3.8 The potential suitability of trees was recorded as

[4] Collins J (ed) (2023) *Bat Surveys for Professional Ecologists Good Practice Guidelines*. Bat Conservation Trust

- NONE – no potential roost features in the tree or highly unlikely to be any
- FAR – further assessment required to establish if potential roost features are present in the tree
- PRF – A tree with at least one potential roost feature present

2.4 Great crested newt Habitat Suitability Index (HSI) survey methodology

Rationale

2.4.1 Great crested newts are protected by national legislation and are 'European Protected Species'.

2.4.2 Great crested newts are widespread but scattered at low density in mainland Britain. They breed in ponds and outside the breeding season they use land habitats such as farmland, woods, grasslands, quarries, industrial and brownfield sites. They do not usually occur in flowing water. They hibernate on land, in shelter away from frosts and flooding, in places such as in log piles, under rubble or in hollow tree stumps. If a pond close to a site supports great crested newts, then there is potential for this species to occur on the site itself.

2.4.3 The Habitat Suitability Index (HSI) survey is used to estimate the likelihood of great crested newts being present in a pond and identifies which ponds in a survey area are likely to require great crested newt surveys. A summary of the methodology is given below.

2.4.4 HSI is a geometric mean of ten suitability indices, all of which are factors thought to affect Great Crested Newts. In general, ponds with high HSI scores are more likely to support Great Crested Newts than those with low scores. There is a positive correlation between HSI scores and the numbers of Great Crested Newts observed in ponds. So, in general, high HSI scores are likely to be associated with greater numbers of Great Crested Newts. The system is not sufficiently precise to allow the conclusion that any particular pond with a high score will support newts, or that any pond with a low score will not do so. It can, however, be useful in prioritising ponds for further survey effort.

Selection of ponds

2.4.5 Natural England's *Method statement template for great crested newt mitigation licence*[5] is used to determine the risk of great crested newts from being harmed by development. The area of the site is measured from OS maps and inputted into the great crested newts rapid risk assessment as part of the NE method statement. This informs the distance of the pond from the development site, whether that be 100m, 250m or 500m, required to identify that an offence to great crested newts is *highly unlikely,* see table below. A large-scale OS map is then inspected to identify any ponds within the buffer distance.

Distance from site (m)	**Maximum area lost or damaged (hectares)**		
	Green: *Offence highly unlikely*	**Amber:** *Offence likely*	**Red:** *Offence highly likely*
0 - 100	Up to 0.01	0.01-0.5	>0.5
101 - 250	Up to 0.5	0.5-10	>10
250+	Up to 5	5-10	N/A

2.4.6 Guidance on risk assessment categories

- **'Green', offence highly unlikely**: indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, precautions may need to be taken to avoid an offence.
- **'Amber', offence likely**: indicates that the development activities are of such a type, scale and location that it is likely. Design plans for the development may need to be

[5] https://www.gov.uk/government/publications/great-crested-newts-apply-for-a-mitigation-licence

altered (location, layout, methods, durations or timings) to minimise the effect on great crested newts and if the scheme still results in a likely offence a licence may be required to carry out the works.

- **'Red', offence highly likely:** indicates that the development activities are of such a type, scale and location that it is highly likely. Design plans for the development should be altered (location, layout, methods, durations or timings) to minimise the effect on great crested newts and if the scheme still results in a likely offence a licence may be required to carry out the works.

2.4.7 The rapid risk assessment is a simplistic assessment and provides a general overview of a situation. The following factors should be considered when using the rapid risk assessment; population size, terrestrial habitat quality, presence of dispersal barriers, timing and duration of works, detailed layout of development in relation to places newts may use for shelter and dispersal routes. The following factors could increase the risk of committing an offence: large population size, high pond density, good terrestrial habitat, low pre-existing habitat fragmentation, large development footprint, and long construction period. The following factors could decrease the risk: small population size, low pond density, poor terrestrial habitat, substantial pre-existing dispersal barriers, small development footprint and short construction period.

2.4.8 The area of the site is approximately 0.34ha, therefore any development within 100m of a breeding pond for great crested newt would cause an *Amber: Offence likely* impact. Any ponds over 100m from the site boundary would cause a *Green: Offence highly unlikely* impact and were therefore scoped out of the assessment.

Methodology

2.4.9 The standard Habitat Suitably Index (HSI) methodology[6] was followed. No water bodies were identified on the Ordnance Survey 1:25,000 map within the site and a further two within an approximate 100m radius of the site. Two water bodies were HSI survey.

2.4.10 The following measurements were made or estimated on site:

- pond area, to nearest $50m^2$;
- estimate of the number of years in every ten when the pond would dry up in summer;
- water quality, estimated by observation of invertebrates present;
- percentage of pond edge (up to 1m from the shore) which is shaded, e.g. by trees;
- presence/absence of, and impact from, waterfowl;
- presence/absence and density of fish populations;
- quality of surrounding terrestrial habitat;
- percentage of the pond covered by aquatic macrophytes (plant species).

2.4.11 Two map-based estimates were made following the field survey

- The area of the UK within which the pond is situated
- The number of ponds within a 1km radius (including any ponds seen on the site visit but which are absent from 1:25,000 Ordnance Survey mapping and excluding any mapped ponds found to be absent during the site visit (see above)).

2.4.12 Pond suitability for great crested newts was defined using a categorical scale, as follows.

<0.5	**poor**: very unlikely to contain great crested newts.
0.5 – 0.59	**below average**: unlikely to contain great crested newts.
0.6 – 0.69	**average**: might contain great crested newts.
0.7 – 0.79	**good**: might contain great crested newts.
> 0.8	**excellent**: most likely to contain great crested newts.

2.4.13 The survey was undertaken during the UK Habitat Classification site visit on 8th April 2024.

[6] ARG UK (2010) *ARG UK Advice note no. 5. Great crested newt habitat suitability index,* Amphibian and Reptile Groups of the United Kingdom.

Limitations to HSI survey

2.4.14 Whilst the HSI assessment is particularly useful in terms of quantifying and subsequently comparing pond conditions within the local area, the assessment is not without limitations, which should be taken into consideration. The HSI score is designed to provide a general overview which quantifies favourable conditions that are commonly associated with the species. The assessment alone should not therefore be used to determine, at least with any confidence, whether or not further surveys should be undertaken.

2.4.15 In practice, there are many different variables which dictate the likelihood of presence or absence. For example, the methodology takes into account neither known records of the species in the vicinity nor habitat connectivity. The surveyor's own personal experience should therefore always be used in combination with the HSI scores to determine which ponds should be included within the next stage of survey.

2.5 Preliminary bat roost assessment methodology: Buildings

Rationale

2.5.1 Bats are European Protected Species. Many roosts are within building or other structures, and the protection given to roosts means that their presence or absence in buildings and other structures on the proposed development site needs to be understood.

2.5.2 A Preliminary Roost Assessment (PRA) is a detailed inspection of the exterior and interior of a structure to look for features that bats could use for entry/exit and roosting and to search for signs of bats.

2.5.3 Structures were chosen for survey based on the Preliminary Ecological Appraisal (PEA) for bats, detailed in Section 2.3.

Methodology

2.5.4 The standard Preliminary Roost Assessment (PRA) methodology for structures[7] was followed. This aims of this survey is to determine the actual or potential presence of bats and the need for further survey and/or mitigation. In many situations, it is not possible to inspect all locations where bats may be present and therefore an absence of bat evidence does not equate to evidence absence.

2.5.5 Building 1 and Building 3 were inspected internally and externally. Building 2 was inspected externally. A search was made for direct evidence of bat presence. A systematic search pattern was used in order to avoid missing parts of the building or built structure, although some may not have been visible from accessible parts of the building. During the survey, a search was made for live or dead bats, droppings, urine splashes, fur-oil staining and clean, cobweb-free gaps around potential entrance points and crevice roost sites. The sound of bats was listened for. Feeding remains such as moth wings were also searched for, particularly internally. Potential access points and roosting sites were recorded even if there was no direct evidence of use by bats. The inspection was thorough and a consistent search effort was applied to all accessible parts of the buildings. Sometimes bats leave no visible signs of their presence in or outside a building, and rain can remove external signs.

2.5.6 The external search included the following, where these features were present:

- the ground, particularly beneath potential access points;
- any window-sills;
- window panes;
- walls and any loose mortar between bricks;
- behind peeling paint or lifted render;
- hanging tiles;
- weatherboarding;
- eaves;
- barge boards and soffit boxes;
- fascias;

[7] Collins, J. (ed.) (2023) *Bat surveys for professional ecologists: good practice guidelines*, Fourth Edition, Bat Conservation Trust.

- lifted lead flashing (particularly around chimneys); gaps under felt, including flat roofs;
- under tiles/slates;
- gaps in brickwork or stonework;
- in bat boxes;
- space between downpipe and wall;
- quoins; and
- all other relevant external features.

2.5.7 A high-power torch (Cluson Clulite) was used to survey the internal and external parts of the building, so that no evidence of bats was missed because of poor illumination.

2.5.8 The internal search included the following, where these features were present:

- the floor and surfaces of furniture and other objects;
- behind wooden panelling;
- in lintels above doors and windows;
- behind window shutters, curtains and boarded up windows;
- behind pictures, posters, furniture, peeling paintwork or wallpaper;
- behind lifted plaster;
- inside cupboards;
- in chimneys accessible from fireplaces; and
- all other relevant internal features.

2.5.9 The survey of building(s) included an assessment of their potential to support bat roosts using the following categories.

Category	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 site that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by large numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost site that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classical cool/stable hibernation site.
Unknown	Unable to survey fully, for example because part of the building is inaccessible.

2.5.10 The assessment was undertaken during the UK Habitat Classification site visit on 8th April 2024.

Limitations to preliminary bat roost assessment: buildings

2.5.11 There were no significant limitations to the survey.

2.5.12 It was not considered necessary to carry out an internal check of Building 2 (existing Travelodge wing), given the lack of external bat access points into the building and lack of external potential roost features. The works to this building are internal modifications and the fabric of the building will not be altered.

2.6 Surveyor competencies

Survey(s) undertaken	Surveyor(s)	Experience (years)	Licences Held
UK Habitat Classification survey Great Crested Newt Habitat Suitability Index (HSI) Survey Bats: Preliminary Roost Assessment: Buildings	Emily Costello MCIEEM	10+	Great crested newt Class Licence CL08 (Level 1) Bat Survey Class Licence CL18 (Level 2) FISC Level 3
	Jacob Heath	1+	-

2.7 Assessment methodology

2.7.1 The assessment was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's Professional Guidance Series[8].

2.7.2 More details of the assessment methodology are provided in Appendix 2, but, in summary, the impact assessment process involves:

- identifying and characterising impacts;
- incorporating measures to avoid and mitigate (reduce) these impacts;
- assessing the significance of any residual effects after mitigation;
- identifying appropriate compensation measures to offset significant residual effects; and
- identifying opportunities for ecological enhancement.

2.7.3 The hierarchical process of avoiding, mitigating and compensating for ecological impacts is explained further below.

2.7.4 In Ecological Impact Assessment (EcIA) it is only essential to assess and report significant *residual* effects (i.e. those that remain after mitigation measures have been taken into account). However, it is considered good practice for the EcIA to make clear both the potential significant effects without mitigation and the residual significant effects following mitigation, particularly where the mitigation proposed is experimental, unproven or controversial. Alternatively, it should demonstrate the importance of securing the measures proposed through planning conditions or obligations.

2.7.5 Assessment of the potential impacts of the proposed development takes into account both on-site impacts and those that may occur to adjacent and more distant ecological features. Impacts can be positive or negative. Negative impacts can include:

- direct loss of wildlife habitats;
- fragmentation and isolation of habitats through loss of connectivity;
- disturbance to species from noise, light or other visual stimuli;
- changes to key habitat features; and
- changes to the local hydrology, water quality, nutrient status and/or air quality.

2.7.6 Negative and positive impacts on ecological features are characterised based on predicted changes as a result of the proposed activities. In order to characterise the impacts on each feature, the following parameters are considered:

- the magnitude of the impact;
- the spatial extent over which the impact would occur;

[8] CIEEM (2016) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal*, Second Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

- the temporal duration of the impact and whether it relates to the construction or operational phase of the development;
- the timing and frequency of the impact; and
- whether the impact is reversible and over what time frame.

2.7.7 Both short-term (i.e. impacts occurring during the site clearance and construction phases) and long-term impacts are considered.

Conservation status

2.7.8 The extent to which the proposed development may have an effect upon ecological features should be determined in the light of its expected influence on the integrity of the site or ecosystem. The integrity of protected sites is considered specifically in the light of the site's conservation objectives. Beyond the boundaries of designated sites with specific nature conservation designations and clear conservation objectives, the concept of 'conservation status' is used. Conservation status should be evaluated for a study area at a defined level of ecological value. The extent of the area used in the assessment relates to the geographical level at which the feature is considered important.

2.7.9 For habitats, conservation status is determined by the sum of the influences acting on the habitats and their typical species that may affect their long-term distribution, structure and functions, as well as the long-term survival of its typical species within a given geographical area. For species, conservation status is determined by the sum of influences acting on the species concerned and inter-relationships that may affect the long-term distribution and abundance of its populations within a given geographical area.

Confidence in predictions

2.7.10 It is important to consider the likelihood that a change or activity will occur as predicted and also the degree of confidence in the assessment of the impact on ecological structure and function.

- **Certain** probability estimated at above 95%
- **Probable** probability estimated above 50% but below 95%
- **Possible** probability estimated above 5% but below 50%
- **Unlikely** probability estimated as less than 5%

Cumulative impacts

2.7.11 Consideration is also given to the potential for the development proposal to give rise to significant negative impact in combination with other proposed developments in the local area.

Overall assessment

2.7.12 An overall assessment of value and impact is provided. This is based upon the highest level or value of any of the features or species present, or likely to be present on the site. Similarly, the overall assessment of impact is the impact of greatest significance.

2.8 Mitigation hierarchy

2.8.1 The following principles underpin EcIA and have been followed, where applicable, in this assessment.

- **Avoidance** Seek options that avoid harm to ecological features (for example, by locating the proposed development on an alternative site or safeguarding on-site features within the site layout design).
- **Mitigation** Adverse effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation.
- **Compensation** Where there are significant residual adverse ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.
- **Enhancement** Seek to provide net benefits for biodiversity over and above requirements for avoidance, mitigation or compensation.

3 Results

3.1 Desk study results

European sites

3.1.1 The following European site (Special Protection Area, Special Area of Conservation, and Ramsar sites which are treated as if they were European sites) was identified within the search area and is detailed within the table below.

Site	Distance from development site (approx.)	Direction	Key habitat/features of interest
South West London Waterbodies Ramsar SPA	6.9km	SW	This site comprises a number of reservoirs and former gravel pits in the Thames Valley adjacent to Heathrow Airport between Windsor and Hampton Court which support internationally important numbers of Gadwall *Anas strepera* and Shoveler *Anas clypeata*.

Sites of national importance

3.1.2 There were no sites of national importance in the search area.

3.1.3 None of the SSSIs within 10km from the site boundary were designated for bats.

Sites of local importance

3.1.4 There were no statutory sites of local importance, such as Local Nature Reserves, in the search area.

3.1.5 There are twelve Sites of Importance for Nature Conservation (SINC) within the 2km search area.

3.1.6 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, site details are not presented here, although the data were considered in the assessment of potential impacts below. A summary sheet detailing the findings of the data search can be found in Appendix 6.

Protected, rare and/or priority species

3.1.7 A number of species records were returned for the search area. Records for protected, rare and/or priority species from within the search area are summarised below. In accordance with BS42020 and advice from most Local Biological Record Centres, species lists are not appended but are available to the Local Planning Authority on request.

3.1.8 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, species information is not presented here, although the data were considered in the assessment of potential impacts below. A summary sheet detailing the findings of the data search can be found in Appendix 6.

3.1.9 The data below has been sourced from Magic Maps or other web sources.

Invertebrates

3.1.10 Stag beetles have been recorded within Stockley Park[9].

[9] https://stockleypark.co.uk/the-park/ [Date accessed 20th March 2024]

Amphibians including great crested newts

3.1.11 A search on MAGIC maps for great crested newts (GCN) *Triturus cristatus* survey licence returns and mitigation licenses[10] revealed that none were found within a 2km radius of the site boundary.

3.1.12 A healthy breeding population of smooth newts *Lissotriton vulgaris* have been recorded within Stockley Park, particularly in the pond at the Square[9Error! Bookmark not defined.].

Breeding birds

3.1.13 At least 23 breeding-bird species have been recorded within Stockley Park. Species included reed warblers *Acrocephalus scirpaceus*, mute swans *Cygnus olor*, mallards *Anas platyrhynchos*, red crested pochards *Netta rufina*, coots *Fulica atra* and moorhens *Gallinula chloropus*[9].

Dormouse

3.1.14 A search on MAGIC maps for dormice mitigation licenses and licence returns[10] revealed that none were found within 2km of the site boundary.

Terrestrial mammals

3.1.15 Hedgehogs *Erinaceus europaeus* have been recorded within Stockley Park[9].

Bats

3.1.16 A search on MAGIC maps for bat mitigation licenses and licence returns[10] revealed that none were found within 2km of the site boundary.

3.1.17 Foraging common pipistrelles *Pipistrellus pipistrellus* have been recorded within Stockley Park[9].

3.2 UK Habitat Classification survey results

3.2.1 The UK Habitat types that were identified during the survey are shown on Figure 01 and each habitat is described below.

Management, setting and green infrastructure

3.2.2 The site comprised a building that previously was used as offices on the first floor and a pub on the ground floor, a car park and two small areas of amenity grassland and introduced shrubs. The grassland, hedgerows and shrubs appeared to be regularly maintained for amenity value. These habitats were not well-connected to habitats within the local area and were surrounded by vast expanses of hardstanding or buildings.

3.2.3 The site is adjacent to two large lakes to the south, with Stockley Park Golf Club to the north. The wider landscape consists of the remainder of Stockley Business Park and residential areas of Hayes. Stockley County Park and Lake Farm Country Park were located 400m west and 800m east of the site, respectively. The Grand Union Canal is approximately 525m south of the site.

Scattered trees u1 32

3.2.4 A row of planted lime *Tilia* sp. trees was located along part of the northern site boundary adjacent to the existing car park.

Modified grassland g4 108

3.2.5 A strip of regularly mown grassland was located to the west of the existing car park and beyond the footpath to the west of the site. The sward height was uniform and was approximately 5cm in height. Areas of bare ground appeared to have been recently reseeded, with new shoots apparent in the sward.

3.2.6 Grass species were dominated by annual meadow grass *Poa annua*, with occasional perennial rye-grass *Lolium perenne*. Broadleaved herb species included occasional occurrences of daisy *Bellis perennis*, spotted medick *Medicago arabica*, ribwort plantain *Plantago lanceolata*, yarrow *Achillea millefolium*, cut-leaved crane's-bill *Geranium dissectum*, dove's-foot crane's-bill *Geranium molle* and dandelion *Taraxacum officinale* agg.

[10] MAGIC: https://magic.defra.gov.uk/MagicMap.aspx. [Date Accessed 20th March 2024]

Introduced shrubs u1 847

3.2.7 Areas of introduced shrubs were located towards the north of the existing car park in close proximity to the bike shed (Building 3). These shrub beds contained a single species of shrub that appeared to be regularly maintained.

Hardstanding u1b

3.2.8 The existing car park, footpaths and courtyard area consisted of hardstanding. The car park consisted of asphalt, while the courtyard and footpaths were covered with blockwork and pavers. Raised planted were located within the circular courtyard.

Buildings u1b5 815

3.2.9 Three buildings were located within the site, the former office and pub building (Building 1), part of the existing Travelodge (Building 2) and a bike shed (Building 3). Full building descriptions can be found in Section 3.5 below.

Bare ground u1c 510 532

3.2.10 An area of former modified grassland had been converted to bare ground with remnants of grass and herb species. This strip of bare ground was located to the rear of car parking spaces and had likely converted to bare ground due to trampling.

3.2.11 Species were very sparse but included annual meadow grass, bristly ox-tongue *Helminthotheca echioides*, bittercress *Cardamine* sp. and groundsel *Senecio vulgaris*.

Yew hedgerows h2b

3.2.12 Several small lengths of yew *Taxus baccata* hedgerow were located in close proximity to the bike shed. These hedgerows appeared to be regularly managed to a height of 1.5m and a width of 1m.

3.3 Bat Preliminary Ecological Appraisal results

Buildings and other structures

3.3.1 The potential use of buildings and other structures were assessed as shown in the table below.

Structure name and / or number	Potential (Appendix 5)	Description	Further survey needed?
Building 1 – Former office and pub	Negligible	Building with no roosting opportunities for bats	No
Building 2 – Existing Travelodge wing	Negligible	Modern building (constructed in 2019/2020) no roosting opportunities for bats.	No
Building 3 – Bike shed	Negligible	Modern structure with no roosting opportunities for bats	No

Trees

3.3.2 The potential bat use of trees was assessed as shown in the table below.

Tree species and / or number	Potential (Appendix 5)	Description	Further survey needed?
Planted lime trees	None	Trees have been planted and did not currently provide any roosting opportunities for bats	No

Potential flight paths and foraging habitats

3.3.3 The habitats within the site did not provide suitable foraging/commuting opportunities for bats. The offsite waterbodies did, however, offer some foraging opportunities for common and widespread bats. No further survey is considered necessary. See further discussion on offsite lakes in Section 4.

3.4 Great crested newt Habitat Suitability Index (HSI) survey results

3.4.1 The results of the HSI assessment for each of the waterbodies surveyed are tabulated below. The location of the waterbodies can be found in Figure 01.

Pond No.	HSI variables										HSI Total
	SI1 - Location	SI2 - Pond area	SI3 - Pond drying	SI4 - Water quality	SI5 - Shade	SI6 - Fowl	SI7 - Fish	SI8 - Ponds	SI9 - Terrestrial habitat	SI10 - Macrophytes	
1	1	-	0.9	0.33	1	0.01	0.01	1	0.33	0.3	**0.28**
2	1	-	0.9	0.33	1	0.01	0.01	1	0.33	0.35	**0.28**

3.4.2 Pond 1 area approximately 9,500m^2 and Pond 2 area approximately 3,000m^2. These pond areas exceeded 2,000m^2 and therefore following guidance the value has been omitted from the calculation. By omitting a value from the calculation, the calculation assumes that the value is 1 and therefore the resulting HSI scores are likely to be an overestimate.

3.4.3 A summary of the HSI scores, with the distances from the development site and comments is tabulated below.

Pond No.	HSI Score	HSI category	Distance from development (approx.)	Direction	Comments
1	0.28	Poor	Adjacent	S	Large waterbody that was surrounded by hardstanding and buildings and was heavily stocked with fish
2	0.28	Poor	Adjacent	S	Large waterbody that was surrounded by hardstanding and buildings and was heavily stocked with fish

3.4.4 Both ponds were categorised as providing 'Poor' habitat suitability for breeding great crested newts. These ponds are therefore considered unsuitable for great crested newts.

3.5 Preliminary bat roost assessment results: Buildings

Plans of the buildings surveyed

3.5.1 The buildings which were surveyed are shown on Figure 01. Photographs of these buildings are shown in Figure 02.

Building 1 – Former offices and pub

3.5.2 This building was formerly used as a pub on the ground floor and office spaces on the upper floor. A glass structure was located at the western end of the building and was internally linked to the rest of the building via the ground floor.

External

3.5.3 This building was externally covered with wooden cladding on its northern elevation and brickwork on its southern and south-eastern elevations. The construction materials were in good condition and tightly fitted and therefore did not provide potential roosting features or potential bat access into the building. The building supports appeared to be constructed from concrete.

3.5.4 The doors consisted of wooden frames with glass panes. These doors were tightly fitted to the frames and the frames to the brickwork.

3.5.5 Windows consisted of glass panes and wooden frames, with bay windows at the southern elevation also consisting of this construction materials. The windows were tightly fitted to the frames and the frames to the brickwork. The seal was missing above one of the windows on the upper floor at the northern elevation. This provided potential bat access into the building; however, did not provide a potential roosting opportunity. On the ground floor at the northern elevation above the windows there were ventilation slats. A mesh covering was present behind these slats which prevented access to wildlife.

3.5.6 The roof consisted of a flat roof. The roofing material could not be seen from ground level. At the southern and south-eastern elevation a lean-to roof was present which created a slight overhang. This overhang was covered in wooden cladding and likely created a small void. This void was not accessible to surveyors and was not likely accessible to bats as the cladding was tightly fitted.

3.5.7 At the circular area of the building the upper walkway was covered by a monopitched roof that consisted of glass panes. This roof was well-sealed and did not provide any roosting opportunities for bats.

Internal – ground floor

3.5.8 The ground floor was previously used as a pub and consisted of a large open space once inside. The ceiling was previously a false ceiling and at the time of the survey the majority of the ceiling tiles had been removed, with the metal supports remaining in situ. The ceiling itself was lined with corrugated metal and the void, that was currently exposed, housed metal units, wiring and pipes.

3.5.9 Some modern wooden beams were located within the roof and were supporting the roof; however, these beams did not offer roosting potential for bats and there were no gaps at the joins.

3.5.10 Internally the bay windows on the southern elevation were tightly fitted and all the doors were tightly fitted.

3.5.11 No bats or evidence of bats were found on the ground floor of this building.

Internal – upper floor

3.5.12 The upper floor consisted of vacant office spaces and was divided into multiple smaller rooms.

3.5.13 The ceiling was a false ceiling and the majority of the ceiling tiles were still in situ. In areas where ceiling tiles had been removed, the roof structure could be seen. This roof was lined with corrugated metal and the void housed metal units, wiring and pipes.

3.5.14 Internally the windows were tightly fitted and all the doors were tightly fitted.

3.5.15 Several mouse and rat droppings were found throughout the upper floor of this building.

Glass structure

3.5.16 The glass structure was at least two storeys in height but only contained a ground floor. This structure was constructed from glass panes with uPVC and metal supports. This structure appeared to be tightly fitted and was not internally lined.

3.5.17 Doors were located on the ground floor and were tightly fitted. These were constructed from similar construction materials as the rest of the structure. The ground floor was externally surrounded by security mesh to prevent unwanted intruders.

3.5.18 No bats or evidence of bats were found during the survey. This building as a whole was assessed as providing Negligible bat roost potential. There were some, but very few potential bat access points into the building. However, the building itself lacked any potential roosting features.

Building 2 – Existing Travelodge wing

3.5.19 This section of the Travelodge was constructed in 2019/2020 according to aerial photographs. This building was generally in good condition and no potential roosting features or potential bat access was noted in the construction materials.

3.5.20 This section of the building consisted of three storeys and had a flat roof. The walls were constructed from brickwork with the third storey covered in wooden cladding. The brickwork and the cladding were in good condition and tightly fitted.

3.5.21 The windows consisted of wooden frames with glass panes. The windows were tightly fitted to the frames and the frames were tightly fitted to the brickwork/cladding.

3.5.22 Two bat boxes were noted on the south-western elevation of the building at the third storey height. These bat boxes were external features and did not provide internal access to any parts of the building.

3.5.23 No bats or evidence of bats were found during the survey. The building, with the exception of the bat boxes, was considered to provide Negligible bat roost potential.

Building 3 – Bike shed

3.5.24 This was a small modern structure that was used to store bikes. The walls were covered in wooden cladding. The cladding contained large gaps between each board. The walls were not internally lined. The eastern elevation consisted of metal mesh access gates.

3.5.25 The building was supported by metal supports that did not provide roosting opportunities for bats.

3.5.26 The flat roof consisted of corrugated metal and was not internally lined.

3.5.27 No bats or evidence of bats were found during the survey. This building did not provide roosting opportunities for bats.

4 Evaluation of conservation status and impact assessment

4.1 Assessment rationale

4.1.1 The assessment is based on the ecological data presented within this report. Future changes in the wildlife present on site are beyond the scope of this report, unless specifically stated.

4.2 Evaluation of conservation status and assessment of designated sites

4.2.1 The ecological value of the site is considered below and evaluated using the methodology set out in Appendix 2 and in accordance with species legislation and planning policy, as outlined in Appendix 1.

European Sites and component Sites of Special Scientific Interest

4.2.2 There was one European sites within the search area, which was South West London Waterbodies Ramsar SPA approximately 6.9km from the site boundary. This site is assessed as being of **Very High** importance for wildlife.

4.2.3 The proposals are for an extension to the existing Travelodge. Therefore there will be no net dwellings as part of the proposals and limited recreation impacts as a result of the Travelodge extension. South West London Waterbodies Ramsar SPA is considered to be too far for guests of the Travelodge to visit without a car. It is assumed that guests would have a purpose to travel to the area would likely not include visiting South West London Waterbodies Ramsar SPA. This is assumed as the Ramsar SPA is not considered to be a point of interest for the area and it is not very local to this area. Furthermore, a lot of the sites that form the Ramsar and SPA control public access to the sites.

4.2.4 Parts of the South West London Waterbodies Ramsar SPA are also designated as Sites of Special Scientific Interest (SSSI). A requirement for consultation with Natural England was not highlighted, as detailed below.

4.2.5 Taking this into consideration, it is anticipated that no negative impacts to these sites are likely to result from the proposed development. The impact of the proposed development upon European sites is therefore assessed as **Neutral.**

Sites of national importance

4.2.6 There are no sites of national importance in the search area.

4.2.7 Sites of Special Scientific Interest (SSSI) Impact Risk Zones are used to assess the need for the LPA to consult Natural England on planning applications at varying distances from SSSIs. In accordance with the SSSI Impact Risk Zones User Guidance[11] consultation with Natural England would be required for the proposed development site for:

- **Infrastructure:** Airports, helipads and other aviation proposals.
- **Air Pollution:** Livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².
- **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.
- **Discharges:** Any discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream.

4.2.8 The proposed development does not fall within these categories and therefore does not require the LPA to consult Natural England.

4.2.9 The impact of the proposed development upon sites of national importance is considered to be **Neutral**, due to the distance of the proposed development from the designated sites, the reasons for the sites' designation and the character of the development within its local context.

[11] Magic Maps www.magic.defra.gov.uk/MagicMap.aspx

Sites of local importance

4.2.10 There are twelve Sites of Importance for Nature Conservation (SINCs) located within the 2km search area. These sites are assessed as being of **Medium** importance for wildlife at the **County** scale.

4.2.11 The closest SINC to the proposed development site is Stockley Business Park Lakes & Meadows SINC and is approximately 100m south of the site. This SINC is separated from the proposed site by the two large waterbodies. It is considered that the if the pollution prevent measures and lighting measures recommended within other sections of the site should minimise any potential impacts upon this SINC. The other SINCs are considered far enough away from the site that they should not be negatively impacted.

4.2.12 The impact of the proposed development upon sites of local importance is considered to be **Neutral**, due to the distance of the proposed development from the locally important sites, the reasons for the sites' designation and the character of the development within its local context.

4.3 Evaluation of conservation status and assessment of habitats and green infrastructure

Habitats

4.3.1 The habitats within the site were of negligible to low ecological value given their limited suitability for wildlife, such as the short mown grass, regular management of the hedgerows and shrubs, and the isolation of these habitats within the wider area. The trees, hedgerows and shrubs do offer some but little nesting opportunities for breeding birds, given their management and isolation. The value of the habitats within the site are considered to be **Negligible** at the **Site Only** scale. The impact of the proposed development for onsite habitats is therefore considered to be **Neutral**.

4.3.2 The large waterbodies adjacent to the southern boundary of the site are considered to be of at least moderate ecological value. The proposed development is to re-purpose the existing building that was previously used as office spaces to extend the Travelodge. These proposals are not likely to have a direct negative impact to the two waterbodies. Pollution prevention measures should be adhered to, to minimise any potential pollution during construction.

Green infrastructure

4.3.3 The site does not provide habitat linkage to the wider area, with the habitats within the site being isolated from habitats within the wider area. The newly planted trees do contribute to the green infrastructure on the site although provide a low contribution.

4.4 Evaluation of conservation status and assessment of species

Veteran trees

4.4.1 There are no veteran trees present on the site and the value of the proposed development site for these is therefore **Negligible.** The impact of the proposed development upon veteran trees is **Neutral.**

Plants

4.4.2 The character of the habitats recorded at the site and the plant records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority plants. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Invertebrates

4.4.3 The character of the habitats recorded at the site and the invertebrate records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority invertebrates. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Amphibians including great crested newts

4.4.4 The records returned from the data search indicated that great crested newts had not been previously recorded within the local area. Greenspace Information for Greater London provides a map of great crested newts in London[12], no GCN have been recorded within the ward of Hayes Town, which Stockley Park lies within.

4.4.5 Records of amphibians from Stockley Park suggest that the site has been reasonably well surveyed for amphibians and the lack of great crested newt records could well suggest an absence of this species. The habitats within the site include short grass, hardstanding and buildings. These habitats do not provide suitable terrestrial habitats for great crested newts. The introduced shrubs and yew hedgerows potentially offer suitable sheltering opportunities; however, these habitats are isolated from other habitats within the local area. Furthermore, the ten lakes within Stockley Park are stocked with koi carp[13], indicating that the waterbodies in close proximity to the proposed site are not suitable for GCN. Natural England's District Level Licencing scheme for great crested newts excludes water bodies over 2,500m^2 from licences, because great crested newts are not normally found in water bodies of this size.

4.4.6 There appears to be no reasonable likelihood that great crested newts are present, based on habitat types within the site, poor suitability of the two large waterbodies adjacent to the site, local recording at Stockley Park and its known distribution in the Borough. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Reptiles

4.4.7 The habitats within the site were not suitable for reptiles, given that the grass was regularly maintained at a short sward and the majority of the site was covered in buildings and hardstanding. The introduced shrubs and yew hedgerows potentially offer suitable sheltering opportunities; however, these habitats are isolated from other habitats within the local area.

4.4.8 The character of the habitats recorded at the site and the reptile records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority reptiles. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Birds

Breeding birds

4.4.9 The site is likely to be used by common breeding birds species, predominantly for foraging, as the habitats within the site provided very limited opportunities for breeding. The buildings did not appear to provide suitable opportunities for breeding birds and no evidence of nesting was noted during the site visit. The site is considered to be of **Negligible** vale at the **Site Only** scale for breeding birds. The impact of the proposed development is therefore considered to be **Neutral**.

4.4.10 To avoid an offence being committed, it is recommended that woody vegetation is removed outside of the bird nesting season or following a nest check.

Wintering birds

4.4.11 There are no habitats present on site which might support significant populations of wintering birds, although the site does offer some limited foraging potential for small numbers of common species. The site itself is considered to be of **Negligible** value for this group.

4.4.12 The large waterbodies adjacent to the southern boundary of the site do offer some value to wintering birds, with species records returning some wintering birds using the large waterbodies within the local area. The proposed development is to re-purpose the existing building that was previously used as office spaces to extend the Travelodge. These proposals are not likely to have a direct negative impact upon any wintering birds that may use the two waterbodies. Mitigation

[12] https://www.gigl.org.uk/atlas/amphibians-reptiles-atlas/ [Date accessed on 17th August 2023]

[13] https://stockleypark.co.uk/the-park/ [Date accessed 20th March 2024]

measures have been suggested with regards to lighting to ensure that light pollution is not increased as a result of the development. Pollution prevention measures should also be adhered to, to minimise any pollution during construction.

Dormice

4.4.13 There were no dormouse records returned for the site, and the habitats present offer an inadequate resource for this species.

4.4.14 The site is therefore considered to be of **Negligible** value for this species and the impact of the proposed development is **Neutral**.

Aquatic mammals including water voles and otters

4.4.15 The site itself does not provide suitable terrestrial habitats for water voles and otters. However the two large waterbodies adjacent to the southern boundary of the site do offer some foraging opportunities to aquatic mammals, such as otters. The banks were predominantly reinforced with concrete or other man-made materials and therefore were not suitable for water vole burrows. The habitats surrounding the large lakes did not offer suitable resting/sheltering opportunities for otters. No evidence of water voles or otters were recorded during the site visit.

4.4.16 The proposed development is to re-purpose the existing building that was previously used as office spaces to extend the Travelodge. These proposals are not likely to have a direct negative impact any aquatic mammals that may use the two waterbodies. Mitigation measures have been suggested with regards to lighting to ensure that light pollution is not increased as a result of the development. Pollution prevention measures should also be adhered to, to minimise any pollution during construction.

4.4.17 The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Terrestrial mammals including badgers

4.4.18 There were no opportunities within the site that provided cover for sett creation. No evidence of badgers was recorded during the site visit. The site does provide limited opportunities for foraging by terrestrial mammals, such as urban foxes.

4.4.19 The site is therefore considered to be of **Negligible** value for this species and the impact of the proposed development is **Neutral**. Mitigation measures have been recommended in Section 5, below, to safeguard any terrestrial mammals, such as urban foxes, that may use the site for occasional foraging purposes.

Bats

Roosting potential

4.4.20 None of the trees or buildings provided roosting opportunities for bats, given that recent construction/planting or lack of potential roosting features. The value of site for roosting bats is therefore considered to be **Negligible** and the impact of the proposed development is considered to be **Neutral**.

4.4.21 There were two bat boxes located on the south-western elevation of Building 2. The proposals for this section of the building are restricted to internal modifications. These boxes may be being used by bats. It is important to note that bats and their roosts are protected by law, and the bat boxes should not be removed, and should not be checked internally or altered by any persons that does not hold the correct bat licence to do so. If these boxes can remain in situ without disturbance during the construction period then the impact of the proposals will likely be **Neutral**. If these boxes need to be removed/moved or disturbed then further surveys will need to be carried out to ascertain whether these boxes are being used by bats for roosting.

Foraging/commuting potential

4.4.22 Based on the evidence gained during the UK Habitat Classification survey, the site provided very limited foraging and commuting opportunities for bats given the habitat types present within the site and the isolation of these habitats from suitable foraging/commuting opportunities within the

local area. The site itself is considered to be of **Negligible** value at the **Site Only** scale for foraging/commuting bats.

4.4.23 The two large waterbodies adjacent to the southern boundary of the site do offer some value to foraging bats, in particular Daubenton's bats. The proposed development is to re-purpose the existing building that was previously used as office spaces to extend the Travelodge. These proposals are not likely to have a direct negative impact any foraging bats that may use the two waterbodies. Mitigation measures have been suggested with regards to lighting to ensure that light pollution is not increased as a result of the development. Pollution prevention measures should also be adhered to, to minimise any pollution during construction.

4.5 Cumulative impacts

4.5.1 There are no known cumulative impacts.

4.6 Proposals for further survey or investigation

Surveys

4.6.1 No further survey or investigation is required unless the bat boxes on the Travelodge are proposed to be impacted.

Biodiversity Net Gain calculations

4.6.2 Biodiversity Net Gain is required under The Environment Act 2021 from 12th February 2024 for major developments and from 2nd April 2024 for minor developments. This requires there to be a net gain of at least 10% which should be calculated using the Statutory Metric.

5 Mitigation hierarchy measures

5.1 Avoidance measures

5.1.1 The following impact avoidance measures have been identified and will be delivered.

Habitats and species potentially present in the two waterbodies adjacent to the southern boundary

- Contractors will follow pollution prevention measures during the construction phase as a precaution to prevent any pollution to the two waterbodies south of the site.
- A Construction Environment Management Plan is required to demonstrate that construction works will not impact the two waterbodies south of the site directly or through dust, chemical spills and other construction impacts.

Breeding birds

- Vegetation removal required for the construction phase should take place outside the bird breeding season of March to August inclusive, to prevent disturbance to birds, or if removed in that period, only after a survey has shown that no active nests are present.

Bats

- It is important to note that bats and their roosts are protected by law, and the bat boxes will not be removed, and will not be checked internally or altered by any persons that does not hold the correct bat licence to do so.

5.2 Proposed mitigation for known impacts

5.2.1 No mitigation is needed for the following ecological features, because no significant impacts have been identified: European sites and nationally important designated sites; rare plants; invertebrates; great crested newts and other amphibians; reptiles and badgers.

5.2.2 The following mitigation is required to reduce the impacts of the scheme to within acceptable limits.

Habitats

- Ensure that no works come closer than Root Protection Zones of trees and shrubs (as a minimum) in retained habitats.

Terrestrial mammals

- Trenches should be filled in prior to the end of the working day, or a ramp left from the base of the trench to the surface, so that animals falling in can get out of the excavation.
- Pipework should be closed off at the end of each working day to avoid badgers and other animals becoming trapped.

Nocturnal wildlife including bats

- The waterbodies adjacent to the southern boundary will not be directly illuminated, via external lighting. If lighting is required, e.g. for security, it should be reduced to a minimum, and designed in accordance with guidelines from the Bat Conservation Trust.[14]

[14] See https://www.bats.org.uk/news/2023/08/bats-and-artificial-lighting-at-night-ilp-guidance-note-update-released

5.3 Compensation for ecological impacts

5.3.1 The following compensation is required to reduce the impacts of the scheme to within acceptable limits.

Habitats

- To mitigate for any loss of hedgerow and trees, newly planted native hedgerows and native trees will be incorporated into the proposals. Species should include berry-bearing native trees and shrubs to enhance food availability for wildlife.

5.4 Species licensing

5.4.1 No species licences are necessary.

6 Enhancement measures

6.1 Ecological enhancement

6.1.1 Ecological enhancement aims to improve the quality of the site and the immediate vicinity for native flora and fauna. Such enhancements can also provide aesthetic appeal and can add value to the proposed development.

6.1.2 Enhancement opportunities specific to the development proposals for this site are provided below. It is not anticipated that all of these options would be utilised. The options are listed in order of priority, with habitat enhancements having most benefit to wildlife. Small-scale enhancements targeted at individual species, whilst valuable, are generally of less overall benefit than habitat enhancement measures.

6.2 Habitat enhancement

6.2.1 Wherever possible, planting would use native species, which support biodiversity significantly better than non-native plants. This is due to the numbers of flowers, fruits, seeds and berries that are produced by our native species and their different flowering and fruiting times throughout the year.

6.2.2 Habitat enhancements include the following.

- Incorporation of native shrub planting or non-native species that provide benefit to wildlife within landscape design.
- Structural native trees will be planted to provide a foraging resource for a variety of species.

6.2.3 These enhancements would benefit common invertebrates, breeding birds, potentially badger foraging and bat foraging.

6.3 Small-scale species enhancement measures

6.3.1 Small-scale enhancements to benefit individual species/species groups would include the following.

- Two bat boxes (e.g. Vivara, Ibstock, Habibat or similar), suitable for a range of bat species, will be externally installed onto southern elevation of Building 1 following the construction period. These boxes will be positioned at least 5m above ground level. Boxes will avoid being positioned above doors and windows.
- Two swift boxes will be externally installed onto the northern elevation of Building 1 following construction period. These boxes will be positioned at least 5m above ground level. Boxes will avoid being positioned above doors and windows.

7 Recommendations

7.1 Recommended conditions

7.1.1 It is recommended that the following conditions, based on model conditions in Appendix D of BS42020:2013, are applied to the planning permission.

7.1.2 No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

8 Conclusions

8.1.1 The purpose of this report was to inform a planning application for the proposed development.

8.1.2 The overall value of the site to wildlife is considered to be **Lower** at the **Site Only** scale.

8.1.3 A summary of assessments of value and the impact of the proposed development without mitigation, and the residual significant effects following mitigation, is provided in the table below.

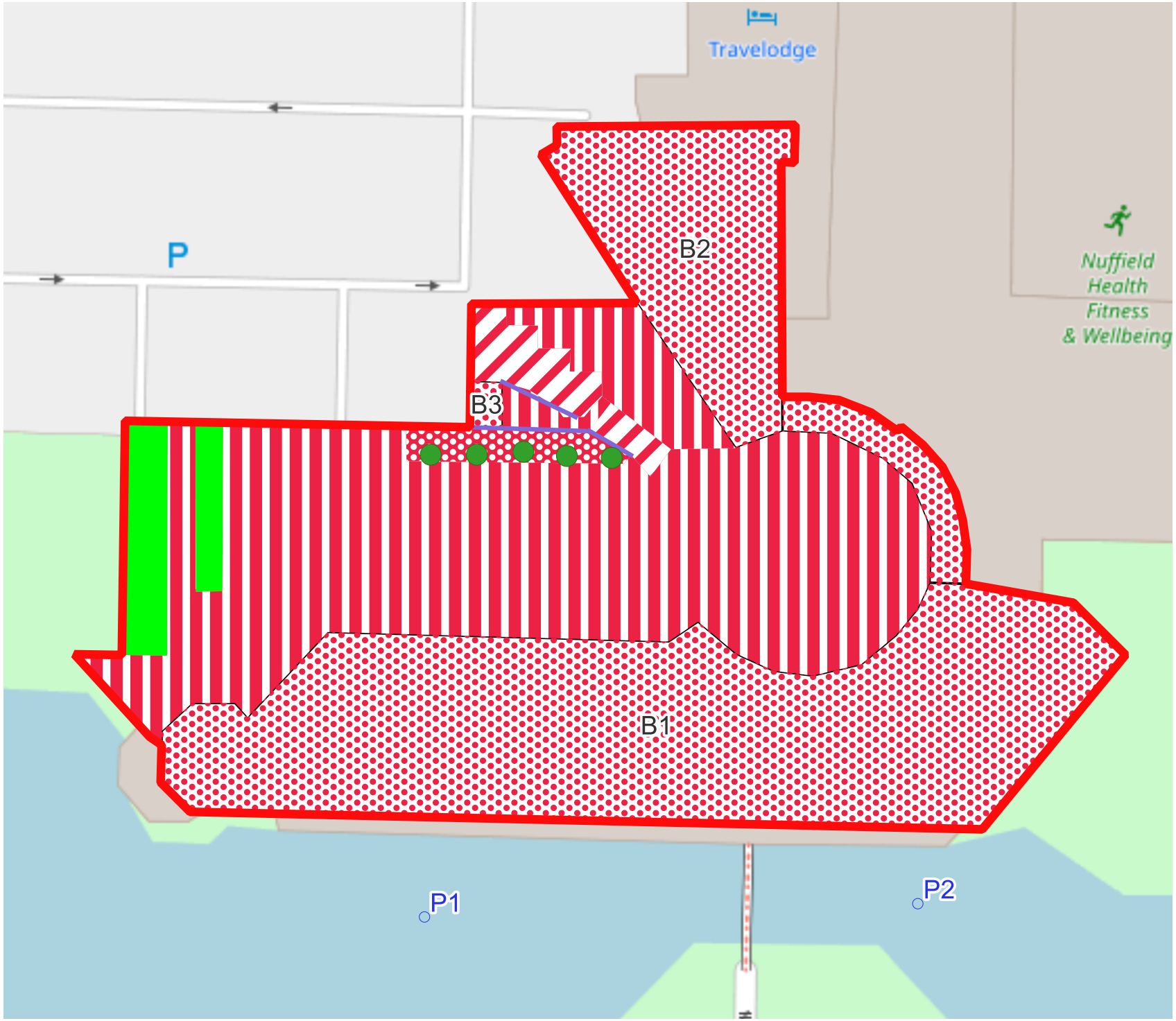
Feature	Level of value	Scale	Unmitigated impact	Confidence level	Mitigated impact
European Sites	Very High	European	Neutral	Probable	-
Sites of national importance	High	National	Neutral	Certain	-
Sites of local importance	Medium	County	Neutral	Probable	-
Habitats	Negligible	Site Only	Neutral	Probable	-
Veteran trees	Negligible	-	-	-	-
Plants	Negligible	-	-	-	-
Invertebrates	Negligible	-	-	-	-
Amphibians including great crested newts	Negligible	-	-	-	-
Reptiles	Negligible	-	-	-	-
Breeding birds	Negligible	Site Only	Neutral	Probable	-
Wintering birds	Negligible	-	-	-	-
Dormice	Negligible	-	-	-	-
Aquatic mammals including water voles and otters	Negligible	-	-	-	-
Terrestrial mammals including badgers	Negligible	-	-	-	-
Bats: Roosting	Negligible	-	-	-	-
Bats: Foraging/commuting	Negligible	Site Only	Neutral	Probable	-

8.1.4 No further surveys are considered necessary at this stage.

8.1.5 The overall impact of the proposals is considered to be **Minor Adverse** in the absence of mitigation. The mitigated impact is considered to be **Neutral**.

8.1.6 The adoption of all or most of the enhancement measures detailed in Section 6 above would give rise to a **Neutral-Minor Beneficial** impact.

Figures



Key

- Site Boundary
- Scattered trees u1 32
- Modified grassland g4 108
- Introduced shrubs u1 847
- Hardstanding u1b
- Buildings ulb5 815
- Bare ground u1c 510 532
- Yew hedgerow h2a6

B24023 The Arena, Stockley Park

UK Habitat Classification Survey

Figure 01

Scale: 1:750

May 2024

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Building 1
North-western elevation

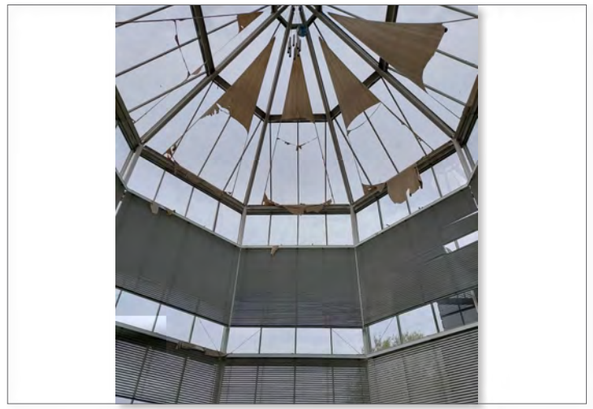
Building 1
North-western elevation of glass structure

Building 1
Southern elevation, showing part of Pond 1.

Building 1
Southern elevation showing underpass beneath Building 1

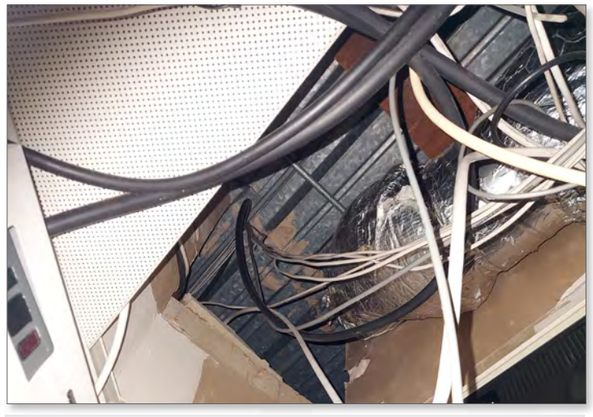
Building 1
Southern and south-eastern elevation

Building 1
Internal view of ground floor



Building 1
Internal view of glass structure

Building 1
External view of upper floor balcony



Building 1
Internal view of roof above false ceiling. Showing metal supports and metal roof lining

Building 2
South-western elevation

Building 3
Eastern elevation

B24023 The Arena, Stockley Park

Photographs of Building

Figure 02

April 2024

thelandscapepartnership

Appendix 1

Legislative and policy context

There is a number of pieces of legislation, regulations and policies specific to ecology which underpin this assessment. These may be applicable at a National or Local level. References to legislation are given as a summary for information and should not be construed as legal advice.

Birds Directive

The European Community Council Directive on the Conservation of Wild Birds (79/409/EEC), normally known as the Birds Directive, sets out general rules for the conservation of all naturally occurring wild birds, their nests, eggs and habitats. It was superseded by the 'new' Birds Directive (2009/147/EC) which generally updated the previous directive.

Since the end of the Brexit transition period on 31st December 2020 the Birds Directive no longer is part of the UK legal system.

Habitats Directive

The European Community Council Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC), normally known as the Habitats Directive, aims to protect the European Union's biodiversity. It requires member states to provide strict protection for specified flora and fauna (i.e. European Protected Species) and the registration and regulation of Special Areas of Conservation.

Since the end of the Brexit transition period on 31st December 2020 the Habitats Directive no longer is part of the UK legal system.

Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017 generally follow the Birds Directive and Habitats Directive but unlike the Directives there is no role for the European Union; the UK Government has taken that role following the end of the Brexit transition period on 31st December 2020. For clarity, the following paragraphs consider the case in England only, with Natural England given as the appropriate nature conservation body. In Wales, the Countryside Council for Wales is the appropriate nature conservation body.

Special Protection Areas and Special Areas of Conservation are defined in the regulations as forming a national network of 'European sites'. The Regulations regulate the management of land within European sites, requiring land managers to have the consent of Natural England before carrying out management. Byelaws may also be made to prevent damaging activities and if necessary land can be compulsorily purchased to achieve satisfactory management.

The Regulations define competent authorities as public bodies or statutory undertakers. Competent authorities are required to make an appropriate assessment of any plan or project they intend to permit or carry out, if the plan or project is likely to have a significant effect upon a European site. The permission may only be given if the plan or project is ascertained to have no adverse effect upon the integrity of the European site. If the competent authority wishes to permit a plan or project despite a negative assessment, imperative reasons of over-riding public interest must be demonstrated, and there should be no alternative to the scheme. The permissions process in that case would involve the Secretary of State. In practice, there will be very few cases where a plan or project is permitted despite a negative assessment. This means that a planning application has to be assessed by the Local Planning Authority, based on information provided by the applicant, and the assessment must either decide that it is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

Government policy is for Ramsar sites (wetlands of global importance) to be treated as if they were European sites within the planning process.

Appropriate Assessment

Appropriate Assessment is required in certain instances under the Conservation of Habitats and Species Regulations 2017. Regulation 63 says that:

> *63.— (1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-*
>
> *(a) is likely to have a significant effect on a European site or a European offshore marine site*

(either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

(2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

(3) The competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.

(4) It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.

(5) In the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(6) In considering whether a plan or project will adversely affect the integrity of the site, the authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.

Regulation 70 provides that Regulations 63 and 64 apply in relation to the grant of planning permission. Regulation 70(3) specifically addresses outline applications, saying that:

"*Where [Regulations 63 and 64] apply, outline planning permission must not be granted unless the competent authority is satisfied (whether by reason of the conditions and limitations to which the outline planning permission is to be made subject, or otherwise) that no development likely adversely to affect the integrity of a European site or a European offshore marine site could be carried out under the permission, whether before or after obtaining approval of any reserved matters*."

The tests under the Habitats Regulations are very strict. To exclude a likely significant effect under Regulation 63(1)(a) or to exclude an adverse effect on integrity under Regulation 63(5) a competent authority must be certain beyond a reasonable scientific doubt as to the absence of such effects.

Although not provided for under the Habitats Regulations, Government policy under paragraph 176(b) of the NPPF is for Ramsar sites (wetlands of global importance) to be treated as if they were European sites within the planning process.

The competent authority is typically the local planning authority, or an Inspector / Secretary of State for appeals. The appropriate assessment contains the information the council requires for the purposes of its assessment under the Habitat Regulations.

The Habitats Regulations also are applicable to local authority land use plans and policies. If a policy or plan is likely to have a significant effect upon a European site, the permission may only be given if the policy or plan is ascertained to have no adverse effect upon the integrity of the European site. This approach gives rise to a hierarchy of plans each with related appropriate assessments. For example, the appropriate assessment of a Regional Spatial Strategy will affect policies within a Core Strategy, which will then need its own appropriate assessment, and so on.

European Protected Species

European Protected Species of animals are given protection from deliberate capture, injury, killing, disturbance or egg taking/capture. Their breeding sites or resting places are also protected from damage or destruction, which does not have to be deliberate. A number of species are listed as European Protected Species, with those most likely to be considered in planning applications being bats, dormouse, great crested newt and otter. Natural England may give a licence for actions that are otherwise illegal, subject to them being satisfied

on the three tests of no alternative, over-riding public interest, and maintenance of the species in favourable condition.

European Protected Species of plant are also listed and given protection. These species are generally very rare and unlikely to be present in proposed development sites.

Wildlife and Countryside Act 1981

The Wildlife and Countryside Act 1981 has been amended many times, including by the Countryside and Rights of Way Act 2000. It contains provisions for the notification and regulation of Sites of Special Scientific Interest, and for protected species.

The Regulations regulate the management of land within Sites of Special Scientific Interest, requiring land managers to have the consent of Natural England before carrying out management.

All public bodies are defined as 'S28G' bodies, which have a duty to further the nature conservation of Sites of Special Scientific Interest in the undertaking of their functions. In practice, this prevents planning applications being permitted if they would harm Sites of Special Scientific Interest, as it would be a breach of that duty.

The Act makes it an offence intentionally to kill, injure, or take any wild bird, take, damage or destroy the nest of any wild bird, while that nest is in use or being built, or take or destroy an egg of any wild bird. Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young.

The Act makes it an offence intentionally to kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. Some species have lesser protection under this Act, for example white-clawed crayfish, common frog and toads are only protected from sale, and reptile species, other than smooth snake and sand lizard, are protected from intentional killing or injury, but they are not protected from disturbance and their habitat is not protected. It is also an offence intentionally to pick, uproot or destroy any wild plant listed in Schedule 8.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) dated December 2023 provides Government Policy in relation to nature conservation and planning as well as other matters.

Chapter 15 paragraph 180(d) of the NPPF says that the planning system should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

Paragraphs 181 and 182 relate to policy for designated sites of biodiversity or landscape importance. Local Plan policies should distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value and maintain and enhance networks of habitats and green infrastructure. Further policy is within paragraph 185, where Local Planning Authorities should to protect and enhance biodiversity within their Local Plans by:

- Identifying, mapping and safeguarding 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
- Promoting 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.

When determining planning applications Local Planning Authorities should apply the following principles (paragraph 186):

- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused,
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other

developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Paragraph 187 adds protection to candidate sites of European or International importance (Special Protection Areas, Special Areas of Conservation and Ramsar sites) and also to those sites identified or required as compensatory measures for adverse effects on habitats sites, potential SPA, possible SAC listed or proposed Ramsar sites.

Paragraph 188 clarifies that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a 'habitats' site, i.e. a European site, (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Government circular 'Biodiversity and Geological Conservation – Statutory Obligations and their Impact Within the Planning System' referenced ODPM 06/2005 has not been replaced and remains valid. It sets out the legislation regarding designated and undesignated sites and protected species and describes how the planning system should take account of that legislation. It does however pre-date the NERC Act 2006 (see below), which includes a level of protection for a further list of habitats and species regardless of whether they are on designated sites or elsewhere.

Natural Environment and Rural Communities (NERC) Act 2006

This Act includes a list of habitats and species of principal importance in England. Local Authorities are required to consider the needs of these habitats and species when making decisions, such as on planning application.

Local Planning Authority's planning policy

The Local Planning Authority will have policies relating to biodiversity conservation.

Species Legislation

The following table provides an overview of legislation with regard to species.

Protected Species	Legislation			
	Wildlife & Countryside Act, 1981	**The Conservation of Habitats and Species Regulations, 2017**	**Natural Environment & Rural Communities (NERC) Act, 2006**	**Protection of Badgers Act, 1992**
Plants (certain 'rare' species)	✓	✓[15]	✓	
Invertebrates (certain 'rare' species)	✓	✓[16]	✓	
White-clawed crayfish	✓		✓	
Great crested newt, natterjack toad, pool frog	✓	✓	✓	
Other amphibians	✓[17]		✓	
Sand lizard, smooth snake	✓	✓[18]	✓	
Other reptiles	✓[19]		✓	
Breeding birds	✓	✓	✓	
Wintering birds (certain 'rare' species)	✓	✓	✓	
Bats	✓	✓	✓	
Dormouse	✓	✓	✓	
Water vole	✓		✓	
Otter	✓	✓	✓	
Badger				✓

[15] Nine species present in the UK, with very specialised habitat requirements, are European Protected Species.

[16] Fisher's estuarine moth, large blue butterfly and lesser whirlpool ram's-horn snail are European Protected Species.

[17] The four other native amphibian species (smooth and palmate newts, common frog and common toad) are only protected against trade under this act.

[18] Smooth snake and sand lizard are European Protected Species.

[19] The four other native reptile species (common lizard, slow worm, grass snake and adder) are protected against intentional killing, injury and trade under this act.

Appendix 2

Assessment Methodology: Valuing Ecological Features and Impact Assessment

The three-stage assessment method for determining ecological value is based upon assessment matrices published in the Handbook of Biodiversity Methods[20]. It has been updated to comply with recent changes to planning policy and legislation. The three-stage process allows the value of ecological sites, habitats and populations, and the magnitude of the impact, to be cross-tabulated to identify impact significance.

Valuing ecological sites, habitats and populations: scale and level of value

Scale	Level of value	Sites, habitats and populations
Greater than national	**Very High**	Statutory sites designated under international conventions or related national legislation, in particular: • Wetlands of International Importance (Ramsar sites), • Special Areas of Conservation, • Special Protection Areas.
National	**High**	Statutory sites designated under national legislation, for example: • Sites of Special Scientific Interest (England, Wales, Scotland), • National Nature Reserves (UK). Significant viable areas of habitats, or populations or assemblages of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[21] of such size and quality as might qualify for SSSI designation. Populations or assemblages of red-listed, rare or legally protected species, as might qualify for SSSI designation, for example: • species of conservation concern, • Red Data Book (RDB) species, • birds of conservation concern (Red List species), • nationally rare and nationally scarce species, • legally protected species.
County	**Medium**	Statutory sites of lower conservation value designated under national legislation, for example Local Nature Reserves (UK). Non-statutory sites designated under local legislation, for example: • County Wildlife Sites, • Local Wildlife Sites, • Roadside Nature Reserves (protected road verges). Viable areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[22] of such size and quality as might qualify for designation at the county level. Other non-designated sites which meet the criteria for designation at this level.

[20] Hill, D., Fasham, M., Tucker, G., Shewry, M., Shaw, P. (eds.) (2005) *Handbook of Biodiversity Methods: Survey, Evaluation and Monitoring*, Cambridge University Press.

[21] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

[22] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

District/ Borough[23]	**Lower**	Sites meeting criteria for metropolitan designations. Undesignated sites or features not meeting criteria for county designation, but that are considered to enrich appreciably the habitat resource within the local district or borough, for example: • ancient woodland, • diverse, ecological valuable and cohesive hedgerow networks, • significant clusters or groups of ponds, • veteran or ancient trees. Viable areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[24] not qualifying for designation at the county level.
Parish	**Lower**	Areas of habitat considered to enrich appreciably the ecological resource within the context of the local parish. Small areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[25].
Site only	**Negligible**	Ecological feature or resource not meeting any of the above criteria.

Note: there is much overlap in designations and lists of important species, and many sites, habitats and species appear on several. Where a site, habitat or species has multiple designations or levels of protection, normally the highest level would be the level at which impacts are assessed.

[23] Including metropolitan boroughs.

[24] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

[25] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx. Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

Definitions of impact magnitude

Magnitude (negative or positive)	Definition/trigger
Severe	Loss or severe degradation affecting over 75% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 90% of a site feature, habitat or population, for example through disturbance or trampling.
Major	Loss or severe degradation affecting over 25% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 50% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of over 50% in a site feature, habitat or population.
Moderate	Loss or severe degradation affecting over 5% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 10% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of 10-50% in a site feature, habitat or population
Minor	Loss or severe degradation affecting up to 5% of a site feature, habitat or population. Adverse change to, or reduced condition of, 1-10% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of up to 10% in a site feature, habitat or population.
Insignificant	No loss of or severe degradation to a site feature, habitat or population. Adverse change to, or reduced condition of, less than 1% of a site feature, habitat or population. No benefit to a site feature, habitat or population.

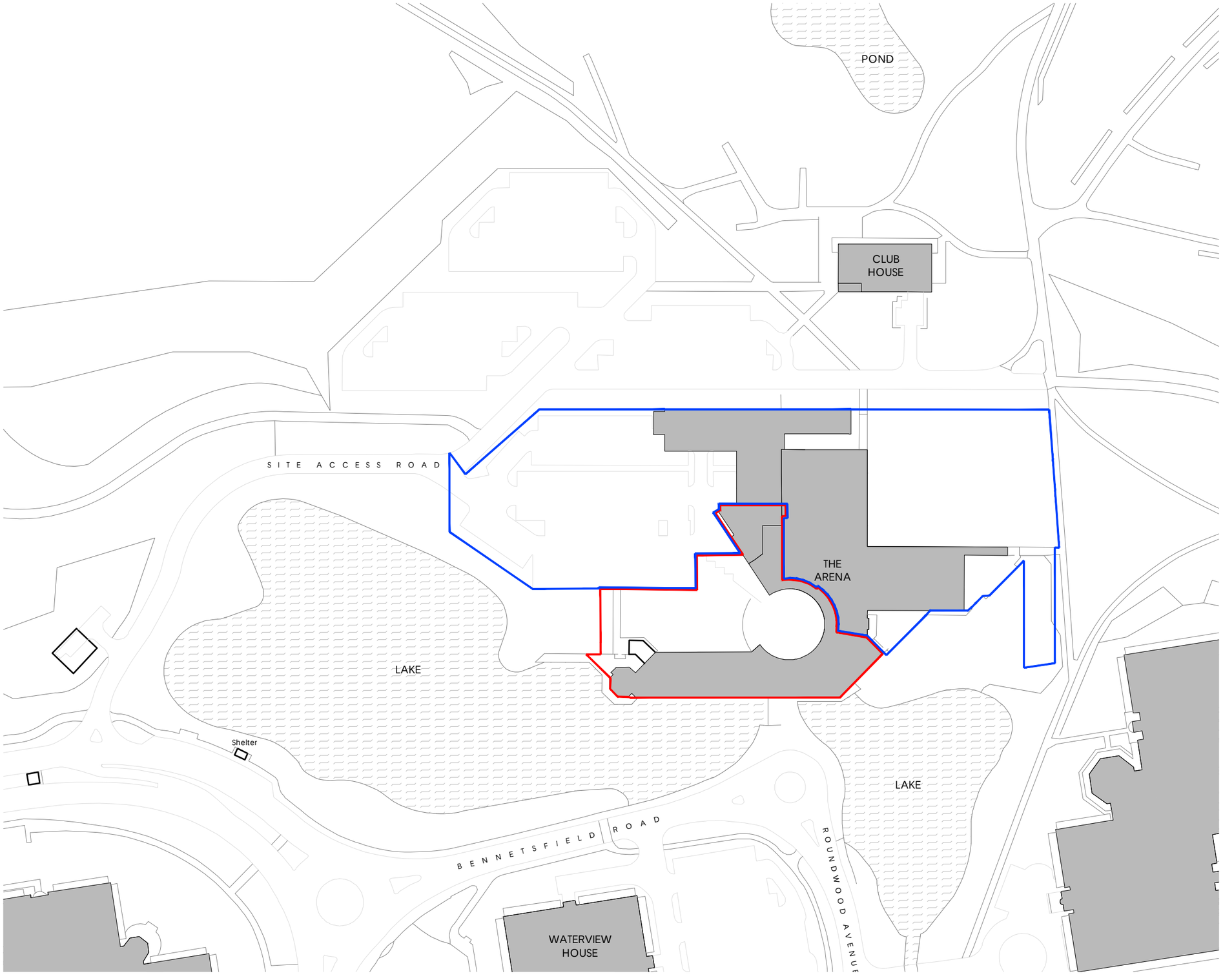
Impact significance

	Magnitude of impact							
Value of site, habitat or population	*Severe Negative*	*Major Negative*	*Moderate Negative*	*Minor Negative*	*Insignificant*	*Minor Positive*	*Medium Positive*	*Major Positive*
Very High	Severe Adverse	Severe Adverse	Major Adverse	Major Adverse	Neutral*	Major Beneficial	Major Beneficial	Major Beneficial
National (High)	Severe Adverse	Major Adverse	Major Adverse	Moderate Adverse	Neutral*	Moderate Beneficial	Major Beneficial	Major Beneficial
County/Metropolitan (Medium)	Major Adverse	Major Adverse	Moderate Adverse	Moderate Adverse	Neutral	Minor Beneficial	Moderate Beneficial	Major Beneficial
District/Borough (Lower)	Major Adverse	Moderate Adverse	Moderate Adverse	Minor Adverse	Neutral	Minor Beneficial	Moderate Beneficial	Moderate Beneficial
Parish (Lower)	Moderate Adverse	Moderate Adverse	Minor Adverse	Minor Adverse	Neutral	Minor Beneficial	Minor Beneficial	Moderate Beneficial
Minimal/negligible	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Beneficial	Minor Beneficial	Moderate Beneficial

Where the impact significance falls below Minor Adverse, the term 'Neutral' is used.

*In some circumstances, some 'insignificant' impacts might fail legislative or policy tests and the impact would be greater than Neutral.

Appendix 3



A
200

LOCATION PLAN
1:1250@A3

C	09.05.24	APPLICATION BOUNDARY UPDATED EC
B	15.04.24	APPLICATION BOUNDARY UPDATED SMP
A	02.04.24	APPLICATION BOUNDARY UPDATED EC

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Client: BBC PENSION TRUST LTD

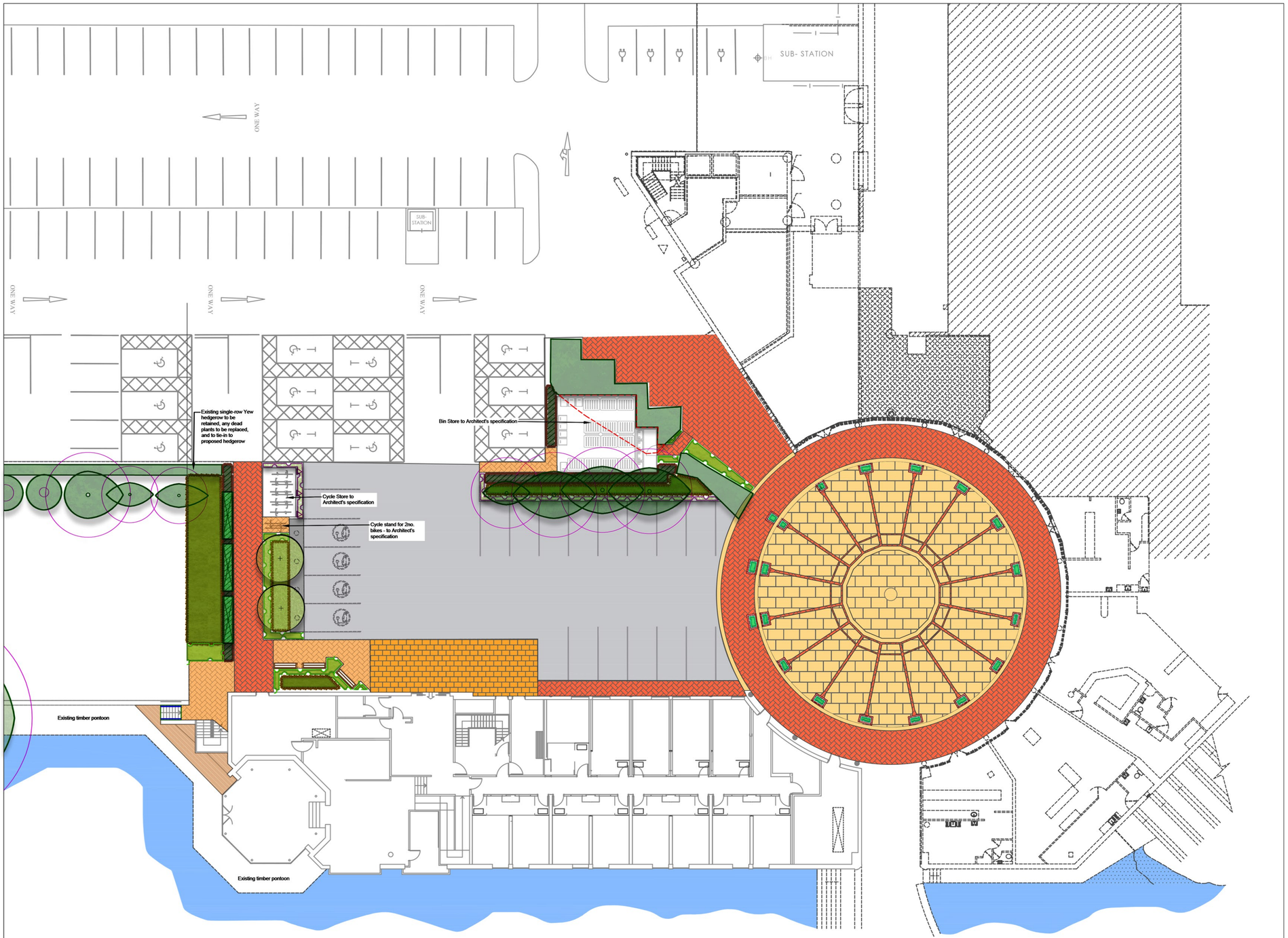
Project: TRAVELODGE
STOCKLEY PARK
UXBRIDGE

Drawing: LOCATION PLAN

Purpose: PLANNING
Scale: 1:1250@A3
Dwg. No: J9614 - 200

Date: FEB 2024
Drawn: EC
Revision: C

Appendix 4



0 5 m 10 m 15 m 20 m 25 m

SCALE: 1:250

Note: for Site boundary refer to Architect's drawing

Key

- Existing trees and vegetation to be retained with Root Protection Areas indicated
- Existing vegetation to be removed
- Proposed tree
- Proposed pleached tree
- Proposed low/groundcover shrub planting
- Proposed nectar rich ornamental shrub planting
- Existing ornamental planting within brick planters to be retained
- Proposed mixed native shrub planting
- Proposed climbing / trailing shrubs
- Proposed native hedgerow
- Existing raised planter - brick
- Proposed asphalt
- Existing asphalt to be retained
- Existing block paving to be retained
- Proposed block paving - colour to match existing adjacent block paving
- Existing paving to be retained
- Proposed feature paving
- Proposed seat
- Proposed hand rails to steps
- Proposed timber pontoon - to match existing adjacent timber pontoon

Letter	Revision	By	Date
A	Amendments following updated layout	RG	26.11.2024

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Project
The Arena, Stockley Park

Drawing
Landscape Proposals

Status
Planning

Job No.	B24023
Dwg. No.	101A
Scale	1:250@A2
Drawn	RG
Checked	OT
Date	24.05.2024

Do not scale off drawing. All dimensions & Levels are to be checked on site. Any discrepancies must be reported to the landscape architect immediately.

North

Appendix 5

Guidelines for assessing potential suitability of proposed development sites for bats
Source: Collins J (ed) (2023) Bat Surveys for Professional Ecologists Good Practice Guidelines. Bat Conservation Trust

Potential Suitability	Roosting habitats in structures	Potential flight paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices / suitable shelter at all ground / underground levels)	No habitat features on site likely to be used by any commuting or foraging bats at any time of year (i.e. no habitats that provide continuous lines of shade / protection for flight lines or generate / shelter insect populations available to foraging bats.
Negligible[26]	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.	No obvious habitat features on site likely to be used as flight paths or by foraging bats; however a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[27], and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool / stable hibernation site but could be used by individual bats[28]).	Habitat that could be used by small numbers of bats as flight paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[45] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[45] and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool / stable hibernation site.	Continuous, high quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland.

[26] Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage due to one attribute, but it is unlikely that they actually would due to another attribute.
[27] For example, in terms of temperature, humidity, height above ground level, light levels, or levels of disturbance
[28] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten et al 2016 and Jansen at al 2022). Common pipistrelle swarming has been observed in the UK (Bell 2022 and Tomlinson 2020) and winter hibernation of numbers of this species has been detected at Seaton Delavel Hall in Northumberland (National Trust 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape.

Appendix 6

eCountability
Managing your biodiversity risks and opportunities

In Partnership with

GiGL Greenspace Information for Greater London CIC
the capital's environmental records centre

THIS SUMMARY PAGE MAY BE PUBLISHED
THE FULL REPORT AND MAPS MAY NOT BE PUBLISHED IN THE PUBLIC DOMAIN

Ecological Data Search 24933dr - Summary Page

A 2000m ecological data search was carried out for site Stockley Park, Hayes on behalf of The Landscape Partnership Ltd on 28 Mar 2024.

The following datasets were consulted for this report:

- Statutory sites ✓
- Non-statutory sites ✓
- Non-statutory sites (Proposed) ✓
- Protected species ✓
- London invasive species ✓
- Notable Thames Structures ✓
- Habitats ✓
- Open space ✓

Results

Statutory sites	None present within search area
Non-statutory sites	
SINCs	12 SINCs
Proposed SINCs	None present within search area
Areas of Deficiency	Not present within search area
Geological sites	1 site
Species	
Protected and notable species	2184 species records
London invasive species	215 species records
Notable Thames Structures	Not present within search area
Habitats	
BAP habitat suitability	Present within search area
Open space	Present within search area

The report is compiled using data held by GiGL at the time of the request. Note that GiGL does not currently hold comprehensive species data for all areas. Even where data is held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there.

Permission
This data search report is valid until 28/03/2025 for the site named above.

Prepared by
28 Mar 2024