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Part of the ES Group

GSK SITE, STOCKLEY PARK, HILLINGDON

Ecological Assessment

July 2021
8516.EcoAs.vf3

ecology solutions for planners and developers

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1. INTRODUCTION

1.1. Background & Proposals

1.1.1. Ecology Solutions was commissioned in July 2019 by Prologis to undertake an ecological assessment of the site at the GSK Site, Stockley Park, Hillingdon, London (see Plan ECO1).

1.1.2. The proposals are for the redevelopment of the site to construct a new warehouse and van storage deck for use as a last mile distribution centre (Class B8 use), alongside associated car and cycle parking, landscaping and infrastructure. The principle of demolishing the buildings has been established by the earlier Prologis consent (ref. 39207/APP/2020/2188).

1.2. Site Characteristics

1.2.1. The site is approximately 6.3ha in size and located within the urban area of Yiewsley; West Drayton lies a short distance to the south whilst Uxbridge, Hillingdon and Hayes lie to the north and east. Stockley Road, a busy dual carriageway (A408), lies adjacent to the eastern boundary of the site. Immediately south of the site is the Grand Union Canal, while Stockley Park and associated golf course lie to the north. The mainline railway from London Paddington to Bristol is a short distance to the south of the Grand Union Canal beyond existing warehousing. Further south (approximately 1.4km) is the M4 motorway, beyond which is Heathrow Airport. Between Yiewsley and the M25 motorway, some 3km west, are the watercourses and waterbodies of the Colne valley.

1.2.2. The site is dominated by a large area of hardstanding (car park), in addition to three main office buildings and other ancillary buildings (Buildings B1 to B5) of varying size and structure. Several small areas of amenity grassland and amenity planting are present throughout the site, in addition to amenity hedgerows and trees. A man-made pond is also present in the north of the site. A small area of woodland lies in the east and south of the site, separating the site from the A408 dual carriageway (Stockley Road) and the Grand Union Canal.

1.3. Ecological Assessment

1.3.1. This document assesses the ecological interest of the site. The importance of the habitats within the site are evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1].

1.3.2. Where necessary, mitigation measures are recommended so as to safeguard any significant existing ecological interest within the site and, where appropriate, potential enhancement measures are put forward and reference made to both Priority Species and Priority Habitats (formerly National and Local Biodiversity Habitat Plans).

[1] CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.* Version 1.1 – Updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

2. SURVEY METHODOLOGY

2.1. The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey. These are discussed in more detail below.

2.2. Desk Study

2.2.1. In order to compile background information on the site and the surrounding area, Ecology Solutions contacted Greenspace Information for Greater London (GiGL).

2.2.2. Further information on designated sites from a wider search area was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)[2] database, which uses information held by Natural England and other organisations. This information is reproduced at Appendix 1 and where appropriate on Plan ECO1.

2.3. Habitat Survey

2.3.1. Habitat surveys were carried out by Ecology Solutions in September 2019 in order to ascertain the general ecological value of the land contained within the boundaries of the site, and to identify the main habitats and associated plant species.

2.3.2. An updated walkover survey of the woodland in the east of the site, adjacent to Stockley Road, and the woodland separating the site from the adjacent Grand Union Canal Walk towpath to the south of the site was undertaken in March 2020.

2.3.3. The site was surveyed based around extended Phase 1 survey methodology[3], as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.

2.3.4. Using the above method, the site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified.

2.3.5. All the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent in different seasons. Nonetheless, the surveys were largely undertaken within the optimal period for Phase 1 surveys and botanical surveys and given the habitats present it is considered an accurate and robust assessment has been made of the botanical interest.

[2] http://www.magic.gov.uk
[3] Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council, reprinted JNCC, Peterborough.

2.4. Faunal Survey

2.4.1. Obvious faunal activity, such as birds or mammals observed visually or by call during the course of the surveys, was recorded. Specific attention was paid to any potential use of the site by protected species, Priority Species (formerly Biodiversity Action Plan (BAP) species), or other notable species. In addition, specific attention was paid to the suitability of the site for Badgers, bats and small mammals.

Badgers

2.4.2. The surveys comprised two main elements: firstly, searching thoroughly for evidence of Badger setts. If any setts were encountered each sett entrance was noted and plotted, even if the entrance appeared disused. The following information was recorded:

i) The number and location of well used or very active entrances; these are clear of any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.

ii) The number and location of inactive entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance.

iii) The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be together with the remains of the spoil heap.

2.4.3. Secondly, evidence of Badger activity such as well-worn paths, run-throughs, snagged hair, footprints, latrines and foraging signs was recorded so as to build up a picture of the use of the site by Badgers.

Bats

2.4.4. The site was surveyed to assess its potential to support bats in September 2019, while the woodland in the east of the site and to the south of the site were subject to further survey in March 2020.

2.4.5. All trees within the site were assessed for their potential to support roosting bats. Features typically favoured by bats or evidence of past use by bats were searched for including:

- Obvious holes, e.g. rot holes and old Woodpecker holes;
- Dark staining on the tree, below the hole;
- Tiny scratch marks around a hole from bats' claws;
- Cavities, splits and or loose bark from broken or fallen branches, lightning strikes etc.; and
- Very dense covering of mature Ivy over trunk.

2.4.6. The buildings within the site were also assessed for their bat roosting potential in September 2019.

2.4.7. The probability of a building being used by bats as a summer roost site increases if it:

- is largely undisturbed;
- dates from pre-20th Century;
- has a large roof void with unobstructed flying spaces;
- has access points for bats (though not too draughty);
- has wooden cladding or hanging tiles; and/or
- is in a rural setting and close to woodland or water.

2.4.8. Conversely, the probability decreases if a building is of a modern or pre-fabricated design / construction, is in an urban setting, has small or cluttered roof voids, has few gaps at the eaves or is a heavily disturbed premises.

2.4.9. The main requirements for a winter / hibernation roost site is that it maintains a stable (cool) temperature and humidity. Sites commonly utilised by bats as winter roosts include cavities / holes in trees, underground sites and parts of buildings. Whilst different species may show a preference for one of these types of roost site, none are solely dependent on a single type.

3. ECOLOGICAL FEATURES

3.1. A habitat survey was undertaken across the site by Ecology Solutions in September 2019.

3.2. The following main habitat / vegetation types were identified within the site during the survey undertaken:

- Buildings;
- Hardstanding;
- Amenity Grassland;
- Amenity Planting and Amenity Hedgerow;
- Woodland; and
- Pond.

3.3. The locations of these habitats are shown on Plan ECO2.

3.4. Buildings

3.4.1. **Building B1** is a three-storey modern building in the centre of the site. Constructed from concrete, steel and glass, the building is in very good condition. A single storey concrete sub-station lies adjacent.

3.4.2. **Building B2** is a three-storey car park, with open sides in the southeast of the site. Constructed from steel and concrete, in a style similar to other buildings within the site. The building is in good condition.

3.4.3. Two small huts lie adjacent to Building B2; these huts appear to be used by gardeners and contain a variety of gardening tools and materials.

3.4.4. **Building B3** is a three-storey modern building in the southwest of the site (see Photograph 1). The building is similar in construction to Building B1 to which it is connected via a covered walkway, constructed from metal and glass. Overall, the building is in good condition. A single storey concrete sub-station lies adjacent, alongside a smoking shelter.

3.4.1. **Building B4** is a single-storey gatehouse at the entrance to the site, on the western boundary. The building is constructed from steel and glass and is in good condition.

3.4.2. **Building B5** is a three-storey modern building in the north of the site (see Photograph 2 and 3). The building is similar in construction to Building B1 and Building B3 and is in good condition.

3.4.3. All buildings were in active use by GSK at the time of the initial survey in September 2019, but at the time of writing this report stand vacant.

3.5. Hardstanding

3.5.1. Hardstanding is present across much of the site and forms the site access, footpaths and car park (see Photograph 4). Paved brick dominates the area areas of hardstanding, alongside areas of paving slabs and several strips of gravel adjacent to the buildings. Rock-filled gabions have reinforced the land to the east and south of the car park (Building B2).

3.6. Amenity Grassland

3.6.1. Small areas of amenity grassland are present throughout the site, associated with the site entrance in the west and adjacent to Building B5 in the north (see Photograph 3). The grass is well-maintained, mown short and consists of Perennial Rye Grass *Lolium perenne* and Red Fescue *Festuca rubra*, alongside frequent Creeping Buttercup *Ranunculus repens*, Daisy *Bellis perennis* and Cat's-ear *Hypochaeris radicata*. Dandelion *Taraxacum officinale*, Ragwort *Senecio jacobaea*, Greater Plantain *Plantago major*, Yorkshire Fog *Holcus lanatus* and Bristly Oxtongue *Helminthotheca echioides* were occasionally noted within the grassland.

3.7. Amenity Planting and Amenity Hedgerow

3.7.1. Semi-mature ornamental trees grow in lines dividing car parking spaces and separating the car parking from the buildings (see Photographs 4 and 5). Species include Lime *Tilia platyphyllos x cordata*, London Plane *Platanus* x *hispanica* and Silver Birch *Betula pendula*. Five pollarded White Willow *Salix alba* trees were noted on the northeastern bank of the pond in the north of the site.

3.7.2. Blocks of amenity planting, consisting principally of introduced species, are also present within the site, alongside several well-maintained hedgerows which further divide the areas of car parking and grow adjacent to the buildings. Species include Hornbeam *Carpinus betulus*, Ivy *Hedera helix*, Juniper *Juniperus communis*, Box-leaved Honeysuckle *Lonicera pileata*, Cotoneaster *Cotoneaster* sp., Berberis *Berberis* sp. and Portugal Laurel *Prunus lusitanica*. A small area of Rose *Rosa* sp. was noted by the site entrance in the west of the site whilst an area of Lavender *Lavandula* sp. was growing adjacent to Building B5 in the north of the site.

3.8. Woodland

3.8.1. An area of woodland is present in the east of the site, separating the main part of the site from the busy A408 (Stockley Road), in addition to along the southern boundary, which separates the site from the Grand Union Canal (see Photograph 6). This woodland is predominately broadleaved in its composition, consisting in the main of immature trees, which are dense and form a well-managed landscape buffer. Species include Ash *Fraxinus excelsior*, Beech *Fagus sylvatica*, Blackthorn *Prunus spinosa*, Cherry *Prunus avium*, Dogwood *Cornus sanguinea*, Elder *Sambucus nigra*, Field Maple *Acer campestre*, Hawthorn *Crataegus monogyna*, Hazel *Corylus avellana*, Hornbeam, Lime, Silver Birch, Sycamore *Acer pseudoplatanus*, Whitebeam *Sorbus aria* and Wild Privet *Ligustrum vulgare*. Dense Bramble *Rubus fruticosus* and Ivy form the groundcover; Cherry Laurel *Prunus laurocerasus*, Honeysuckle, Dog Rose *Rosa canina*, Lords-and-ladies *Arum maculatum* and Guelder Rose *Viburnum opulus* were also noted within the woodland.

3.9. Pond

3.9.1. A large, ornamental pond is present in the north of the site, adjacent to Building B5, and surrounded by short-mown amenity grassland (see

Photograph 3). The western bank, adjacent to Building B5, is vertical whilst the remaining banks slope steeply to the north, east and south. No aquatic vegetation was noted, but marginal vegetation includes Common Reed *Phragmites australis*, Lesser Bulrush *Typha angustifolia*, Purple-loosestrife *Lythrum salicaria* and Great Willowherb *Epilobium hirsutum*. Large fish were noted.

3.10. Off-site Habitats

3.10.1. The towpath of the Grand Union Canal is adjacent to the southern boundary of the site, beyond a band of trees and scrub of a similar composition to those recorded in the woodland in the east of the site (see above). The canal itself lacks significant vegetation at this location (see Photograph 6). A verge adjacent to the off-site woodland was noted to contain Bristly Ox-tongue, Creeping Buttercup, Cow Parsley *Anthriscus sylvestris*, Teasel *Dipsacus sylvestris*, Ribwort Plantain *Plantago lanceolata*, Hogweed *Heracleum sphondylium*, Selfheal *Prunella vulgaris* and Cowslip *Primula veris*.

3.11. Miscellaneous Items / Fly-tipping

3.11.1. Litter was noted along the canal side to the south of the site, which increased in volume and diversity in the southeast corner, adjacent to Stockley Road. During the March 2020 survey, evidence of members of the public dwelling in the woodland was noted in the southeast of the site, including campfires, tents, clothing and large bags of empty drinks cans.

3.12. Background Records

3.12.1. No records of notable plant species were returned from the site or its immediate vicinity.

4. WILDLIFE USE OF THE SITE

4.1. General observations were made during the surveys of any faunal use of the site, with specific attention paid to the potential presence of protected species.

4.2. Badgers

4.2.1. No evidence of the presence of Badgers *Meles meles* was recorded during Ecology Solutions' survey work in September 2019 or March 2020. Mammal pathways were identified within the woodland in the southeast corner of the site. However, given the proximity of the encampment it was not possible to trace these pathways to their source. Given the nature of the habitats present, the recent human disturbance and the surrounding land use, it is considered unlikely that Badgers would be present in this location.

4.2.2. GiGL did not return any records of Badger from the search area.

4.3. Bats

4.3.1. The buildings on site do not have potential to support roosting bats, owing to their construction materials and design. No trees with potential roost features were noted during survey work.

4.3.2. The majority of the habitats within the site are of negligible interest for foraging bats. The woodland to the south and east, which separates the site from the adjacent dual carriageway and canal, provides potential foraging opportunities. The Grand Union Canal to the immediate south of the site, part of the London's Canals Site of Metropolitan Importance for Nature Conservation (SMI) (see Plan ECO2), has potentially significant foraging interest for bat species and could be used as a corridor for commuting bats. In the wider area are a number of parks, including Little Britain SMI to the west, which provide good potential foraging resources in the form of lakes, rivers, scrub, areas of wasteland, woodland and grassland.

4.3.3. GiGL returned few bat records from the area around the site; A single Common Pipistrelle *Pipistrellus pipistrellus* was recorded in 2015 at a location approximately 1.8km east of the site in 2018. Eight Pipistrelle *Pipistrellus* sp. were also returned by GIGL; the closest record was recorded at a location approximately 1.7 km west of the site in 1995 whilst the most recent record from approximately 1.8 km west of the site in 2010.

4.4. Other Mammals

4.4.1. It is considered that small common mammal species could make use of vegetation within the site, but none of these are likely to be notable species. It is also possible that any small mammals in the vicinity of the encampment will have moved elsewhere, due to the human disturbance.

4.4.2. The GiGL data search returned a single record of Water Vole *Arvicola amphibius* present at a location approximately 1km east of the site in 2008.

4.4.3. Thirty-eight records of Hedgehog *Erinaceus europaeus* were also returned, though none related to the site or its immediate vicinity. The

closest and most recent record was returned for a location approximately 1.1km north of the site and was recorded in 2018.

4.5. Birds

4.5.1. The habitats within the site, particularly the trees, scrub and woodland, will offer nesting and foraging habitat to a variety of common species, but there is no evidence to suggest that any rare or notable species would be present.

4.5.2. Magpie *Pica pica*, Feral Pigeon *Columba livia*, Coal Tit *Periparus ater*, Blackbird *Turdus merula*, Robin *Erithacus rubecula* and Wren *Troglodytes troglodytes* were noted within the boundaries of the site during the surveys, while Common Moorhen *Gallinula chloropus* and Great Tit *Parus major* were noted off-site.

4.5.3. The data search returned records of bird species listed on Schedule 1 of the Wildlife & Countryside Act 1981 (as amended), with the most relevant records summarised below. The closest and most recent of these records is of a Kingfisher *Alcedo atthis*, a Local Species of Conservation Concern, which was recorded in 2011 approximately 0.6km east of the site.

4.5.4. Other species recorded include Skylark *Alauda arvensis*; the closest and most recent of 66 records refers to presence of the species at a location approximately 1.2 km southeast of the site in 2014; a single Wood Warbler *Phylloscopus sibilatrix* was recorded in 2018 approximately 1.3km southeast of the site boundary; the closest of 103 records of House Sparrow *Passer domesticus* refers to the presence of the species at a location approximately 0.8km southwest of the site in 2002, whilst the most recent record relates to a location approximately 1.6km east of the site in 2013; the closest and most recent of 49 Reed Bunting *Emberiza schoeniclus* were recorded at a location approximately 1.6km east of the site in 2013; a single Red-backed Shrike *Lanius collurio* was recorded at a location approximately 1.6km east of the site in 2012; the closest and most recent of six Black Redstart *Phoenicurus ochruros* were recorded at a location approximately 1.6km east of the site in 2013; the closest and most recent of 48 Fieldfare *Turdus pilaris* were recorded at a location approximately 1.6km east of the site in 2011.

4.5.5. The closest of four Cuckoo *Cuculus canorus* records refers to the presence of the species at a location approximately 0.6km east of the site in 2007, whilst the most recent record relates to a location approximately 1.7km east of the site in 2009; a single Lesser Redpoll *Acanthis cabaret* was recorded at a location approximately 1.7km east of the site in 2010; a single Brambling *Fringilla montifringilla* was recorded at a location approximately 1.7km east of the site in 2010; a single Wryneck *Jynx torquilla* was recorded at a location approximately 1.7km east of the site in 2008; the closest, and most recent, of 5 records for Mediterranean Gull *Larus melanocephalus* was recorded at a location approximately 1.7km east of the site in 2008; a single Whimbrel *Numenius phaeopus* was recorded at a location approximately 1.7km east of the site in 2008.

4.5.6. Fifty records of Redwing *Turdus iliacus* were returned by the data search, with the closest record referring to the presence of the species at a location approximately 1.3km east of the site in 1985, whilst the most recent record

relates to a location approximately 1.7km northeast of the site in 2014; the closest of twelve records of Red Kite *Milvus milvus* refers to the presence of the species at a location approximately 0.6km east of the site in 2009, whilst the most recent record relates to a location approximately 1.9km northwest of the site in 2017; the closest of 24 records of Lapwing *Vanellus vanellus* refers to the presence of the species at a location approximately 1.2km southeast of the site in 2000, whilst the most recent record relates to a location approximately 2km southwest of the site in 2014; the closest of 45 records of Spotted Flycatcher *Muscicapa striata* refers to the presence of the species at a location approximately 1.6km east of the site in 2011, whilst the most recent record relates to a location approximately 2km southwest of the site in 2014.

4.6. Reptiles

4.6.1. The site does not offer any opportunities for reptile species.

4.6.2. GiGL returned three records of Adder *Vipera berus*, a UK and London priority species and a Local Species of Conservation Concern, noted as present at a confidential location within a 2km radius of the centre of the site as recently as 2004. No other reptile species were recorded within the search area.

4.6.3. No further consideration to this group is required as part of this assessment.

4.7. Amphibians

4.7.1. The waterbody in the north of the site was surveyed in September 2019. Adjacent to a modern building, the pond is surrounded by short-mown amenity grassland and hardstanding, which is sub-optimal terrestrial habitat for these species. The pond is also classed as poor amphibian aquatic habitat, with no emergent vegetation suitable for newts to lay eggs. The presence of fish was confirmed within the pond, further reducing the likelihood of finding Great Crested Newts *Triturus cristatus* owing to likely predation. It is not necessary to undertake further surveys for Great Crested Newts as the species is not likely to be present.

4.7.2. A single record for Great Crested Newts was returned by GiGL; the single record was recorded in 2017 approximately 1.9km southwest of the site whist a single Palmate Newt *Lissotriton helveticus* was recorded in 2004 approximately 0.6km northeast of the site.

4.8. Invertebrates

4.8.1. Given the habitats present on site, it is likely a limited number of common of invertebrate species would be present.

4.8.2. A small number of notable invertebrate records were returned by the data search. The closest and most recent of these relates to a Stag Beetle *Lucanus cervus* record in 2018 approximately 1.5km northeast of the site.

4.8.3. Other species recorded within the vicinity of the site include Red-eyed Damselfly *Erythromma najas*, Ruddy Darter *Sympetrum sanguineum*, Brown Argus *Aricia agestis*, Small Heath *Coenonympha pamphilus*,

Marbled White *Melanargia galathea*, Knot Grass *Acronicta rumicis*, Dingy Footman *Eilema griseola*, Mother Shipton *Euclidia mi*, Buttoned Snout *Hypena rostralis*, White Ermine *Spilosoma lubricipeda*, Buff Ermine *Spilosoma lutea* and Cinnabar *Tyria jacobaeae*.

5. ECOLOGICAL EVALUATION

5.1. The Principles of Ecological Evaluation

5.1.1. The guidelines for ecological evaluation produced by CIEEM propose an approach that involves professional judgement, but makes use of available guidance and information, such as the distribution and status of the species or features within the locality of the project.

5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe[4]. These are broadly used across the United Kingdom to rank sites so priorities for nature conservation can be attained. For example, current sites of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.

5.1.3. In general terms, these criteria are size, diversity, naturalness, rarity and fragility, while additional secondary criteria of typicalness, potential value, intrinsic appeal, recorded history and the position within the ecological / geographical units are also incorporated into the ranking procedure.

5.1.4. Any assessment should not judge sites in isolation from others, since several habitats may combine to make it worthy of importance to nature conservation.

5.1.5. Further, relying on the national criteria would undoubtedly distort the local variation in assessment and therefore additional factors need to be taken into account, e.g. a woodland type with a comparatively poor species diversity, common in the south of England, may be of importance at its northern limits, say in the border country.

5.1.6. In addition, habitats of local importance are often highlighted within a local Biodiversity Action Plan (BAP). The Hillingdon and London BAPs have been considered as part of this assessment and are referenced where relevant.

5.1.7. Levels of importance can be determined within a defined geographical context from the immediate site or locality through to the international level.

5.1.8. The legislative and planning policy context are also important considerations and have been given due regard throughout this assessment.

5.2. Habitat Evaluation

Designated Sites

5.2.1. **Statutory Sites.** There are no statutory designations of nature conservation value within the site or adjacent to it. The nearest statutory designated site is Yeading Meadows Local Nature Reserve (LNR), situated some 3.1km to the northeast of the site, beyond existing

[4] Ratcliffe, D A (1977). *A Nature Conservation Review: The Selection of Biological Sites of National Importance to Nature Conservation in Britain*. Two Volumes. Cambridge University Press, Cambridge.

residential and commercial development. There are no Sites of Special Scientific Interest (SSSIs) within 5km of the site.

5.2.2. Owing to the distances concerned and the intervening land uses, the redevelopment of the site would have no effect on this statutory designated site, or on other such sites in the wider area.

5.2.3. **Non-statutory Sites.** The site is not subject to any non-statutory designations. It is immediately to the north of the Grand Union Canal, which forms part of London's Canals Site of Metropolitan Importance (SMI).

5.2.4. Best practice measures for the construction industry would avoid any significant adverse effects, such as direct encroachment or pollution events. It is therefore unlikely that there would be any adverse effects upon this site as a result of the proposed development; indeed, significant enhancements to the canal towpath and the interface with the site are proposed as part of the scheme.

5.2.5. Stockley Business Park Lakes and Meadows Site of Borough Importance Grade II (SBI2) lies approximately 40m east of the site at its closest point, separated from the site by the A408 dual carriageway (Stockley Road). Iron Bridge Road Railsides SBI2 lies beyond the canal to the south of the site, approximately 50m away. There is no likelihood of any adverse effects on either of these designated sites as a result of the proposed development.

5.2.6. Stockley Country Park SBI2is situated some 350m northwest of the site at its closest point, separated from the site by both Horton Road and a golf course. There is no likelihood of adverse effects on the designated site as a result of the proposed development.

Habitats

5.2.7. The site is dominated by large swathes of hardstanding alongside several large buildings. The other habitats present include intensively managed amenity grassland, amenity planting, amenity hedgerows and ornamental trees, which provide little ecological value. The pond in the north of the site is man-made and fish were noted within.

5.2.8. The areas along the eastern and southern boundaries of the site are more semi-natural in character; the woodland is of greater ecological interest in the context of the site and the wider area, particularly given the proximity to the canal corridor.

5.2.9. The Grand Union Canal, running parallel to the southern boundary of the site, designated as a Site of Metropolitan Importance as noted above, serves as an important habitat corridor for the local area.

5.2.10. The proposed development includes the demolition of the existing buildings, prior to the redevelopment. The proposed landscape strategy is based around a diverse selection of native species, of local provenance where possible, or species of known wildlife value. The focus of this work will include improvements the overall setting of the Grand Union Canal, enhancing the wildlife interest and promoting a more naturalistic setting.

5.2.11. The existing trees and scrub separating the Grand Union Canal towpath from the site will be retained, whilst the adjacent grassland areas will be sown with an ecological grassland seed mix (such as Emorsgate EG10 Tussock Grass Mixture) and wildflower seed mix (such as Emorsgate EL1F Wild flowers for Lawns), to increase biodiversity along the canal side. In addition, a reed bed is proposed adjacent to Stockley Road Bridge.

5.2.12. The majority of the woodland, which extends north from the canal along the eastern boundary of the site will be retained, whilst additional thicket mix planting comprising native species, will be interspersed along the boundary and across the north of the site to buffer the woodland from the site and increase biodiversity.

5.2.13. The proposed landscape strategy also includes amendments to an existing attenuation basin in the east of the site, currently dry and encroached upon by the surrounding woodland scrub. Proposals include the clearance of the basin and sowing of inundation grassland mix (Emorsgate EP1 Pond Edge Mixture) in addition to native marginal planting which will, in time, provide opportunities for bats, birds, reptiles, amphibians and invertebrates. The grassland adjacent to the attenuation basin will be sown with the same ecological grassland seed mix as that used adjacent to the towpath.

5.2.14. A small rain garden to be provided in the north of the site will capture surface water runoff from the adjacent car park and be planted with native species of known wildlife value, encouraging greater invertebrate interest, which in turn will provide further foraging opportunities for bats and birds.

5.2.15. Where tree removal is required within the site, the trunks will be kept, cut up and arranged within the woodland / area adjacent to the attenuation basin in the east of the site to create log piles and hibernacula (see Appendix 2); this will create basking opportunities, refuge and, as they rot, provide a foraging resource for reptiles and amphibians through encouraging invertebrates.

5.2.16. Additional hedgerows proposed at the entrance to the site and along the western and part of the northern and southern boundaries will be native and comprise of Hornbeam, increasing connectivity along the site boundaries. Amenity grassland in the north and west of the site will be sown with a mixture which also contains wildflower seeds (such as Emorsgate EL1 Flowering Lawn Mixture) to offer further biodiversity gains.

Invasive Species

5.2.17. There are no plant species listed on Schedule 9 Part II of the Wildlife & Countryside Act 1981 (as amended) present within the site boundaries.

5.2.18. Cotoneaster has been identified on site and is categorised as an invasive species in London by the London Invasive Species Initiative (LISI). The London Invasive Species Initiative is a sub-group of the London Biodiversity Partnership which encourages better co-ordination and partnership working to prevent, reduce and eliminate the impacts caused by invasive non-native species across the city.

5.2.19. Cotoneaster is classed as an LISI 3. These species, in London, are:

Species of high impact or concern which are widespread in London and require concerted coordinated and extensive action to control / eradicate.

5.2.20. It is noted that the control of species listed under the LISI is not a legal requirement, but nonetheless where works are proposed within or close to the vegetation all reasonable measures should be taken to prevent the spread of these plant species. Where vegetation is to be removed the material should be disposed of at an approved facility.

5.3. Faunal Evaluation

Badgers

5.3.1. **Legislation**. The Protection of Badgers Act 1992 consolidates the previous Badgers Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status, as the species is, in fact, common over most of Britain, with particularly high populations in the southwest.

5.3.2. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage or obstruction of Badger setts an offence. A sett is defined as, *"any structure or place which displays signs indicating current use by a Badger"*, by current Natural England guidance.

5.3.3. In addition, the intentional elimination of sufficient foraging area used to support a known social group of Badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a Badger.

5.3.4. Any work that disturbs Badgers is illegal without a licence granted by Natural England. The 1992 Act makes specific provision for the granting of licences for development purposes, including for the destruction of setts.

5.3.5. It should be noted that a licence cannot be issued until the site is in receipt of planning permission, and that generally licences are not granted between December and June inclusive to avoid disruption to the Badger breeding cycle.

5.3.6. **Site Usage**. No setts were recorded within or immediately adjacent to the site. A number of mammal paths were recorded within the woodland in the east of the site during the survey in March 2020, but the proximity of the trespassers' encampment prevented the surveyor locating the source of the pathways. It is not thought that the site offers foraging and dispersal opportunities for Badgers.

5.3.7. **Mitigation.** Notwithstanding that use of the site is unlikely, a check survey will be undertaken prior to the clearance of any vegetation.

Bats

5.3.8. **Legislation.** All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the

Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). These include provisions making it an offence:

- Deliberately to kill, injure or take (capture) bats;
- Deliberately to disturb bats in such a way as to significantly affect:-
  (i) be likely to impair their ability to survive, to breed or rear or nurture their young; or to hibernate or migrate; or
  (ii) to affect significantly the local distribution or abundance of the species to which they belong;
- Damage or destroy any breeding or resting place used by bats;
- Intentionally or recklessly to obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).

5.3.9. The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.

5.3.10. The offence of damaging (making it worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.

5.3.11. In accordance with the Habitats Regulations the licensing authority (Natural England) must apply the three derogation tests as part of the process of considering a licence application. These tests are that:

1. the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
2. there must be no satisfactory alternative; and
3. the favourable conservation status of the species concerned must be maintained.

5.3.12. Licences can usually only be granted if the development is in receipt of full planning permission.

5.3.13. **Site Usage.** The external survey found no evidence that bats are using the buildings for roosting. The structures are in good condition and lack potential roost features. No trees with potential roost features were noted. The small areas of amenity planting and woodland along the southern and eastern boundaries offer limited foraging and dispersal opportunities for bats. Further opportunities are present in the wider area, including the off-site Grand Union Canal.

5.3.14. **Mitigation and Enhancement.** No further survey work is required with regards to bats. The redevelopment of the site is not considered likely to have any effect on the favourable conservation status of local bat populations.

5.3.15. The features of principal interest to bats, namely the trees and scrub at the margins of the site, will largely be retained. As noted above, the interface with the Grand Union Canal is to be subject to enhancement. Establishment of new native planting, including thicket, hedgerow and wildflower grassland within the site, will promote greater invertebrate interest and therefore offer enhanced foraging resources to bat species.

5.3.16. The lighting scheme for the site will ensure that, subject to issues of public safety and security, the canal corridor is not lit to the detriment of bat species. This will be achieved through avoiding upward light spill. Light spill onto the canal should not exceed 3.7 lux.

5.3.17. As a further enhancement it is proposed to install a series of bat boxes on retained trees within the site and, subject to agreement, on the canal interface, which would offer new roosting opportunities for this group (see Appendix 3).

5.3.18. The man-made ornamental pond in the north of the site is proposed for removal; however, the improvements made to the existing attenuation basin in the east of the site will, in time, provide new, foraging opportunities for bats.

Hedgehogs

5.3.19. **Legislation.** Hedgehog is a Species of Principal Importance for the Conservation of Biodiversity under Section 41 (England) of the NERC Act 2006.

5.3.20. The NERC Act 2006 requires the Secretary of State to:

…take such steps as appear… to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any published under this section, or…promote the taking by other of such steps.

5.3.21. **Site Usage.** No evidence of Hedgehogs was recorded during the survey works undertaken. The woodland present along the eastern and southern boundary of the site offers suitable opportunities for foraging and dispersing Hedgehogs, in particular along the Grand Union Canal.

5.3.22. **Mitigation and Enhancements.** It is recommended that ground cover be cleared outside the winter hibernation period (October to April inclusively). The retention and enhancement of the majority of the woodland and scrub areas and boundary features will provide continued opportunities for commuting and foraging Hedgehogs. A series of 'Hedgehog Gateways' will be installed within the boundary fences to facilitate movement through the new development and ensure continued permeability (see Appendix 4).

Birds

5.3.23. **Legislation.** Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, whilst Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection whilst nesting.

5.3.24. **Site Usage.** Several bird species were recorded on site during the course of the surveys; no Schedule 1 species were recorded. The site will support an assemblage of common species, which would generally be focused on the margins, in particular the south and east.

5.3.25. The woodland in the south and east of the site provides some opportunities for both nesting and foraging birds. There is no evidence to suggest that any notable species would be reliant on the site.

5.3.26. **Mitigation and Enhancements.** Areas of existing formal planting to be removed and vegetation management along the canal interface would result in short term losses to bird nesting and foraging habitat, though significant alternative resources exist in the immediate area, most notably Stockley Country Park and the Grand Union Canal corridor.

5.3.27. The man-made, ornamental pond in the north of the site is proposed for removal; however, the improvements made to the existing attenuation basin in the east of the site will, in time, provide new, foraging opportunities for birds.

5.3.28. New landscape planting undertaken as part of the proposed development, which will include a number of fruit-bearing native species, will offer replacement foraging and nesting habitats for bird species such as Starling and Dunnock, which are listed as a priority species for the London BAP.

5.3.29. House Sparrow is also a priority species for the London Biodiversity Action Plan, and it is therefore proposed that House Sparrow terraces be installed on new buildings within the development. Bird boxes aimed at other species, such as Swifts, would offer new nesting opportunities and will be installed upon the new buildings and a variety of other boxes upon retained trees within the site and, subject to agreement, on the canal interface (see Appendix 5).

5.3.30. As a precaution to avoid a possible offence, during the site preparation phase it is recommended that any suitable bird nesting habitat be cleared outside of the nesting season (typically March to July inclusive) to avoid a potential offence under the legislation. Where this cannot be achieved a check survey for nesting birds should be undertaken by a trained ecologist, with any confirmed nests left in situ until the young have fledged.

6. PLANNING POLICY CONTEXT

6.1. The site is wholly situated in the London Borough of Hillingdon. The planning policy framework that relates to nature conservation in Hillingdon is issued at three main administrative levels: nationally through the National Planning Policy Framework (NPPF); at regional level through the London Plan; and at borough level through the Hillingdon Development Plan. Any proposed development will be judged in relation to the policies contained within these documents.

6.2. National Policy

National Planning Policy Framework (February 2019)

6.2.1. Guidance on national policy for biodiversity and geological conservation is provided by the NPPF, published in March 2012, revised on 24 July 2018 and updated on 19 February 2019. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now defunct Planning Policy Statement 9 (PPS9).

6.2.2. The key element of the NPPF is that there should be "*a presumption in favour of sustainable development*" (paragraphs 10 to 11). It is important to note that this presumption "*does not apply where the plan or project is likely to have a significant effect on a habitats 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*" (paragraph 177). 'Habitats site' has the same meaning as the term 'European site' as used in the Habitats Regulations 2017.

6.2.3. Hence the direction of Government policy is clear; that is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.

6.2.4. A number of policies in the NPPF are comparable to those in PPS9, including reference to minimisation of impacts to biodiversity and provision of net gains to biodiversity where possible (paragraph 170).

6.2.5. The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species.

6.2.6. Paragraphs 174 to 176 of the NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments; provision for refusal of planning applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European sites; and the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats – unless

there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.

6.2.7. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist and benefits can, in certain circumstances, be obtained.

6.3. Regional Policy

The London Plan (March 2021)

6.3.1. The new London Plan was published in March 2021. This document sets out a framework for how London will develop over the next 20-25 years.

6.3.2. The policy areas within the London Plan are formed by six Good Growth objectives to ensure that London's growth is Good Growth. These policies are: GG1 Building strong and inclusive communities; GG2 Making the best use of land; GG3 Creating a healthy city; GG4 Delivering the homes Londoners need; GG5 Growing a good economy; and GG6 Increasing efficiency and resilience.

6.3.3. Of these objectives, GG2 is concerned with protecting and enhancing London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces. It also seeks to promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.

6.3.4. Six new policies have been introduced specifically relating to green infrastructure and the natural environment.

6.3.5. *Policy G1 Green Infrastructure* states that green features in the built environment, such as street trees and green roofs, should be planned, designed and managed in an integrated way to achieve multiple benefits.

6.3.6. *Policy G2 London's Green Belt* states that the Green Belt should be protected from inappropriate development.

6.3.7. *Policy G5 Urban Greening* requires major developments to incorporate measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

6.3.8. *Policy G6 Biodiversity and Access to Nature* requires the protection of Sites of Importance for Nature Conservation (SINCs). Boroughs should also support the protection and conservation of priority species and habitats that sit outside of the SINC network and promote opportunities for enhancing them using Biodiversity Action Plans.

6.3.9. *Policy G7 Trees and Woodlands* is concerned with the protection of these features, including 'veteran' trees and ancient woodland not already in a protected site and identifying opportunities for tree planting in strategic locations. It encourages the retention of existing trees, wherever possible, and the planting of new trees as part of new developments.

6.3.10. *Policy SI17 Protecting and Enhancing London's Waterways* states developments should support biodiversity improvements, and that proposals along London's canal network should respect their local character, environment and biodiversity.

6.4. Local Policy

Hillingdon Local Plan: Part 1 – Strategic Policies

6.4.1. This Local Plan document was adopted in November 2012 and is central to Hillingdon's Development Plan up to 2026. It contains three policies of particular relevance to nature conservation issues.

6.4.2. *Policy EM2: Green Belt, Metropolitan Open Land and Green Chains* concerns the assessment criteria for development proposals relating to these categories of open space.

6.4.3. *Policy EM3: Blue Ribbon Network* enshrines the Council's commitment *to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats* through measures such as developer contributions.

6.4.4. *Policy EM7: Biodiversity and Geological Conservation* lists various measures to preserve and enhance biodiversity and geodiversity. These include actions under the London and Hillingdon Biodiversity Action Plans as well as the protection of designated sites, appropriate contributions from developers, the provision of green roofs, living walls and sustainable drainage systems, and *the provision of biodiversity improvements from all development, where feasible*.

Hillingdon Local Plan: Part 2 – Revised Proposed Development Management Policies, Site Allocations and Designations

6.4.5. The Local Plan: Part 2 comprises Development Management Policies, Site Allocations and Designations and Polices Map. Part 2 will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012). Together, the two Plans will form a comprehensive development strategy for the borough up to 2026. The Local Plan: Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. The new Local Plan: Part 2 replaces the Local Plan: Part 2 Saved UDP Policies (2012).

6.4.6. *Policy DMHB 11: Design of New Development* states that all developments will be required to incorporate landscaping and tree planting in order to protect and enhance amenity, biodiversity and green infrastructure.

6.4.7. *Policy DMHB 14: Trees and Landscaping* states that developments will be required to retain or enhance existing landscaping, trees, biodiversity or other natural features of value. Proposals will also be required to provide a landscape scheme which includes character appropriate landscaping, which supports and enhances biodiversity and amenity. Where trees are proposed for removal, proposals for replanting of new trees on-site should be provided, or else include contributions to offsite provisions.

6.4.8. *Policy DMEI 1: Living Walls and Roofs and on-site Vegetation* states that all major developments should incorporate living roofs and/or walls into the development; suitable justification should be provided where living walls and roofs cannot be provided.

6.4.9. *Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land* states that inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very exceptional circumstances.

6.4.10. *Policy DMEI 5: Development in Green Chains* states that development *"in Green Chains will only be supported if it conserves and enhances the visual amenity and nature conservation value of the landscape"* and makes reference to the potential to improve biodiversity in and around the area. Part B of the Policy states that *"any new development that meets the above criteria, particularly in areas deficient in Green Chains, will be required to provide new areas of habitat and amenity space, linking into existing Green Chains"*.

6.4.11. *Policy DMEI 6: Development in Green Edge Locations* states that any new development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should *"incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries"*.

6.4.12. *Policy DMEI 7: Biodiversity Protection and Enhancement* states that existing features of biodiversity value within the site should be retained by new developments and that where the features would be unavoidably lost, features of equivalent biodiversity value should be provided on-site.

6.4.13. The second part states that should the proposed development be on or in the vicinity of a site considered to have valuable ecological features, applicants *"must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value".* In addition, all developments alongside, or that benefit from, a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.

6.4.14. *Policy DMEI 8: Waterside Development* states that any development on sites that adjoin or include a watercourse should, where feasible, secure the implementation of environmental enhancements to open sections of river or watercourse and implement a scheme for restoring culverted sections of river or watercourses which must include an adequate buffer for flooding and maintenance purposes. Additionally, Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which fail to secure feasible enhancements or deculverting, will be resisted.

6.4.15. Furthermore, *"any development located in or adjacent to watercourses should enhance the waterside environment and biodiversity by*

demonstrating a high design quality which respects the historic significance of the canal and character of the waterway and provides access and improved amenity to the waterfront". In addition to this, *"all development alongside or that benefits from a frontage on the Grand Union Canal will be expected to contribute to improvements to biodiversity improvements to the Canal".*

6.4.16. In addition to the Strategic Industrial Locations identified in the London Plan, Hillingdon contains a series of locally significant sites that are designated for employment use. Grouped as part of 'Stockley Park' the site is designated as a LSEL (Locally Significant Employment Location) and Office Growth Location under the Local Plan Part 2: Site Allocations and Designations.

6.5. Discussion

6.5.1. The redevelopment proposals for the site would be judged against the policies summarised above. Overall, it is considered that the development site is of low ecological interest. Mitigation and enhancement measures have been recommended to offset any potential adverse impacts. Taking these recommendations on board it is considered that the relevant policy requirements will be met.

7. SUMMARY AND CONCLUSIONS

7.1. Ecology Solutions was commissioned in July 2019 by Prologis to undertake an ecological assessment of the site at the GSK site, Stockley Park, London.

7.2. The proposals are the redevelopment of the site to construct a new warehouse and van storage deck for use as a last mile distribution centre (Class B8 use), alongside associated car and cycle parking, landscaping and infrastructure.

7.3. The site is situated within the established Stockley Park estate and comprises predominately hardstanding, with several large modern buildings and small areas of amenity grassland, amenity planting and amenity hedgerows in addition to several young trees. An area of broadleaved woodland lies along the southern and eastern parts of the site, separating from the adjacent canal and dual carriageway. The principle of demolishing the buildings has been established by the earlier Prologis consent (ref. 39207/APP/2020/2188).

7.4. The site was subject to an extended phase 1 habitat survey in September 2019, and the woodland in east of the site and off-site to the south were subject to further survey in March 2020. A desk-based study was also undertaken.

7.5. **Statutory Sites.** There are no statutory designations of nature conservation value within the site or adjacent to it. The nearest statutory designated site is Yeading Meadows Local Nature Reserve (LNR), situated some 3.1km to the northeast beyond existing residential and commercial development. There are no Sites of Special Scientific Interest (SSSIs) within 5km of the site. Owing to the distances concerned and the intervening land uses, the redevelopment of the site would have no effect on this statutory designated site, or on other such sites in the wider area.

7.6. **Non-statutory Sites.** The site is not subject to any non-statutory designations. It is immediately to the north of the Grand Union Canal, which forms part of London's Canals Site of Metropolitan Importance. Best practice measures for the construction industry would avoid any significant adverse effects, such as direct encroachment or pollution events. It is therefore unlikely that there would be any adverse effects upon this site as a result of the proposed development; indeed, significant enhancements to the canal towpath and the interface with the site are proposed as part of the scheme.

7.7. Stockley Business Park Lakes and Meadows Site of Borough Importance Grade II (SBI2) lies approximately 40m east of the site at its closest point; Iron Bridge Road Railsides SBI2is beyond the canal, approximately 50m south of the site. There is no likelihood of any adverse effects on either of these designated sites as a result of the proposed development.

7.8. Stockley Country Park SBI2is situated some 350m northwest of the site at its closest point, separated by Horton Road and a golf course. There is no likelihood of adverse effects on the designated site as a result of the proposed development.

7.9. **Habitats.** The site is dominated by large swathes of hardstanding alongside several large buildings. The other habitats present include intensively managed amenity grassland, amenity planting, amenity hedgerows and ornamental trees, which provide little ecological value. The pond in the north of the site is man-made and fish were noted.

7.10. The areas along the eastern and southern boundaries of the site are more semi-natural in character; the woodland is of greater ecological interest in the context of the site and the wider area, particularly given the proximity to the canal corridor.

7.11. The Grand Union Canal, running parallel to the southern boundary of the site, designated as a Site of Metropolitan Importance as noted above, serves as an important habitat corridor for the local area.

7.12. The current proposed development includes the demolition of the current site, prior to the redevelopment. The landscape strategy for the proposed development is based around a diverse selection of native species, of local provenance where possible, or species of known wildlife value. The focus of this work will be to improve the overall setting of the Grand Union Canal, enhancing the wildlife interest and promoting a more naturalistic setting.

7.13. The existing trees and scrub separating the Grand Union Canal towpath from the site will be retained, whilst the adjacent grassland areas will be sown with an ecological grassland seed mix and wildflower seed mix, to increase biodiversity along the canal side. In addition, a reed bed is proposed adjacent to Stockley Road Bridge.

7.14. The clearance of an attenuation basin, which is to be retained, and sowing of inundation grassland mix in addition to native marginal planting which will provide opportunities for bats, birds reptiles, amphibians and invertebrates. The grassland adjacent to the attenuation basin will be sown with the same ecological grassland seed mix as that used adjacent to the towpath.

7.15. Where tree removal is required within the site, the trunks will be kept, cut up and arranged within the woodland / area adjacent to the attenuation basin in the east of the site to create log piles and hibernacula, creating basking opportunities, refuge and, as they rot, providing a foraging resource for reptiles and amphibians through encouraging invertebrates.

7.16. The majority of the woodland, which extends north from the canal along the eastern boundary of the site will be retained, whilst additional thicket mix planting comprising native species, will be interspersed along the boundary and across the north of the site to buffer the woodland from the site and increase biodiversity.

7.17. Proposed native hedgerows along the site boundaries should increase connectivity for wildlife, whilst the addition of native thicket mix planting interspersed along the boundary and across the north of the site will buffer the woodland from the site and increase biodiversity

7.18. **Invasive Species.** Cotoneaster has been identified on site and is categorised as an invasive species in London by the LISI. It is noted that the control of species listed under the LISI is not a legal requirement, but nonetheless where works are proposed within or close to the boundary vegetation all reasonable measures should be taken to prevent the spread of these plant species. Where vegetation is to be removed the material should be disposed of at an approved facility.

7.19. **Badgers.** No Badger setts were recorded within the site or immediately adjacent to the site. The site does not offer dispersal and foraging opportunities for this

species. Given the nature of the habitats present and of the surrounding land use it is considered unlikely that Badgers would be present in this location.

7.20. **Bats.** The buildings and trees within the site do not offer any suitable roosting opportunities for bats. The amenity vegetation, in addition to the hedgerows, trees and scrub offers some foraging and dispersal opportunities for locally present bat species however, greater opportunities are present in the wider area, including the London's Canals SMI adjacent to the south of the site.

7.21. New landscape planting based around native species and the addition of trees may encourage use of the site by bats through the provision of new foraging resources. The lighting scheme for the site will ensure that, subject to issues of public safety and security, the canal corridor is not lit to the detriment of bat species. This will be achieved through avoiding upward light spill. As a further enhancement it is proposed to install a series of bat boxes on retained trees within the site and, subject to agreement, on the canal interface.

7.22. **Hedgehogs.** No evidence of Hedgehogs was recorded during the survey work undertaken. The retention and enhancement of the woodland would provide continued opportunities for commuting and foraging Hedgehogs, while the establishment of new native landscaping should improve the site's suitability for this species. 'Hedgehog Gateways' will be installed within the boundary fences to facilitate movement through the new development and ensure continued permeability.

7.23. **Birds.** Several common bird species birds were recorded. The habitats within the site, particularly the hedgerows, trees and scrub, will offer nesting and foraging habitat to a variety of common species, but there is no evidence to suggest that any rare or notable species would be present, though significant alternative resources exist in the immediate area, most notably Stockley Country Park and the Grand Union Canal corridor. New planting based around native species would provide suitable nesting and foraging opportunities. As a further enhancement it is proposed to install a variety of bird nesting boxes on retained trees and new buildings within the site and, subject to agreement, on the canal interface, including for London Priority Species such as House Sparrow and Swift.

7.24. During the site preparation phase, it is recommended that any suitable bird nesting habitat be cleared outside of the nesting season (typically March to July inclusive) to avoid a potential offence under the legislation. Where this cannot be achieved, a check survey for nesting birds should be undertaken by an ecologist, with any confirmed nests left in situ until the young have fledged.

7.25. **Reptiles.** The site does not offer any opportunities for reptile species, and as such no further work for this group is required.

7.26. **Amphibians.** The site does not support any suitable aquatic or terrestrial habitat for this group of species. No further survey work is required. The enhancement of the currently dry attenuation basin in the east of the site with native planting, addition of log piles and hibernacula and the creation of a reed bed adjacent to the canal towpath could promote greater usage by amphibians.

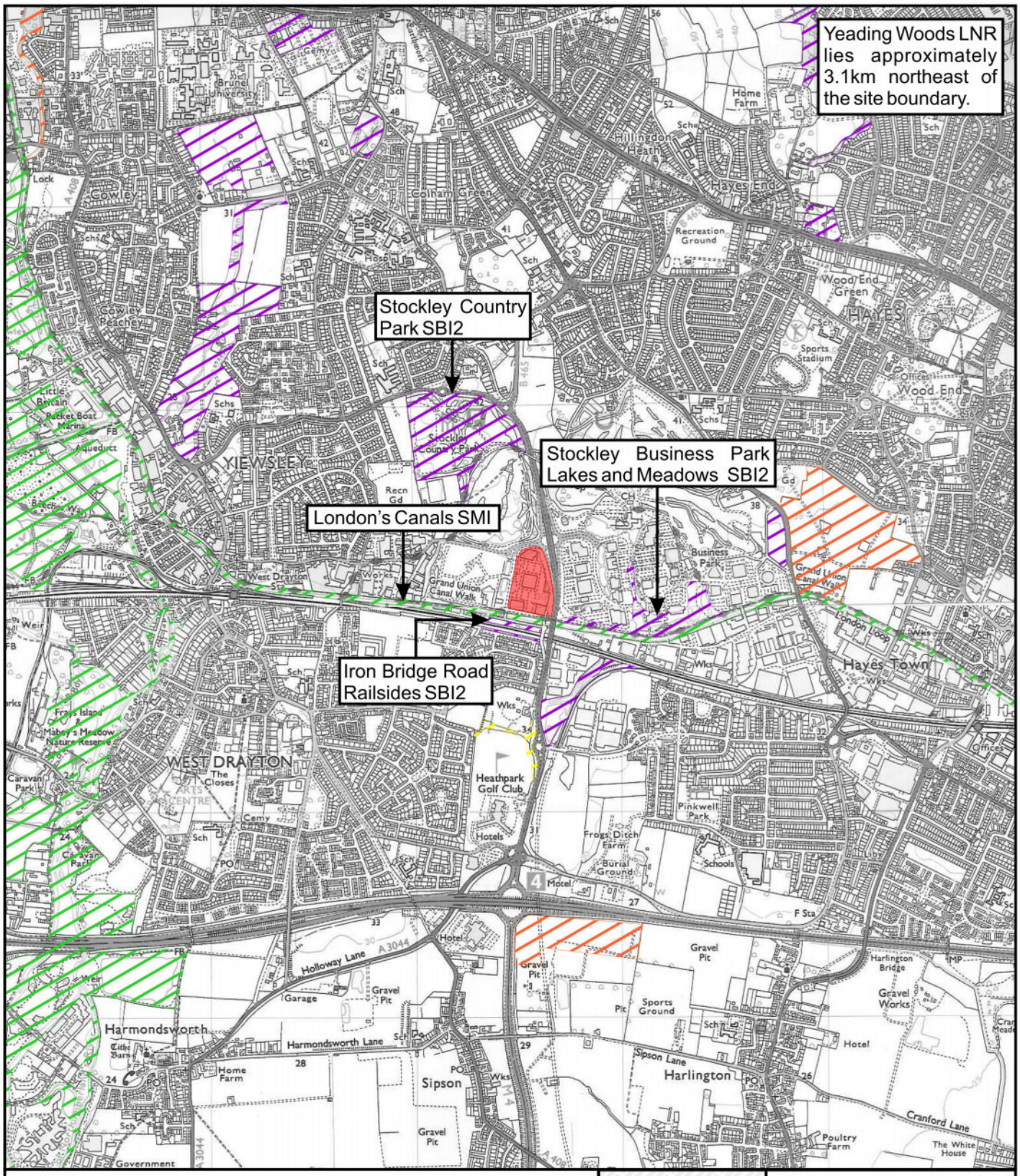
7.27. **Invertebrates.** Given the habitats present it is likely an assemblage of invertebrate species would be present within the site. Habitat enhancements as part of the proposed development would encourage greater invertebrate interest.

7.28. In conclusion, on the basis of the current evidence there is no overriding ecological reason why the site could not be redeveloped. The implementation of mitigation and enhancement measures accord with planning policy with regard to nature conservation at all administrative levels. There is therefore no ecological justification to refuse planning permission.

PLANS

PLAN ECO1

Site Location and Ecological Designations



KEY:

- SITE LOCATION
- SITE OF METROPOLITAN IMPORTANCE (SMI)
- SITE OF BOROUGH IMPORTANCE GRADE 1 (SBI1)
- SITE OF BOROUGH IMPORTANCE GRADE 2 (SBI2)
- SITE OF LOCAL IMPORTANCE (SLI)

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WEST LONDON EXPANSION

PLAN ECO1: SITE LOCATION AND ECOLOGICAL DESIGNATIONS

Rev: A

Oct 2019

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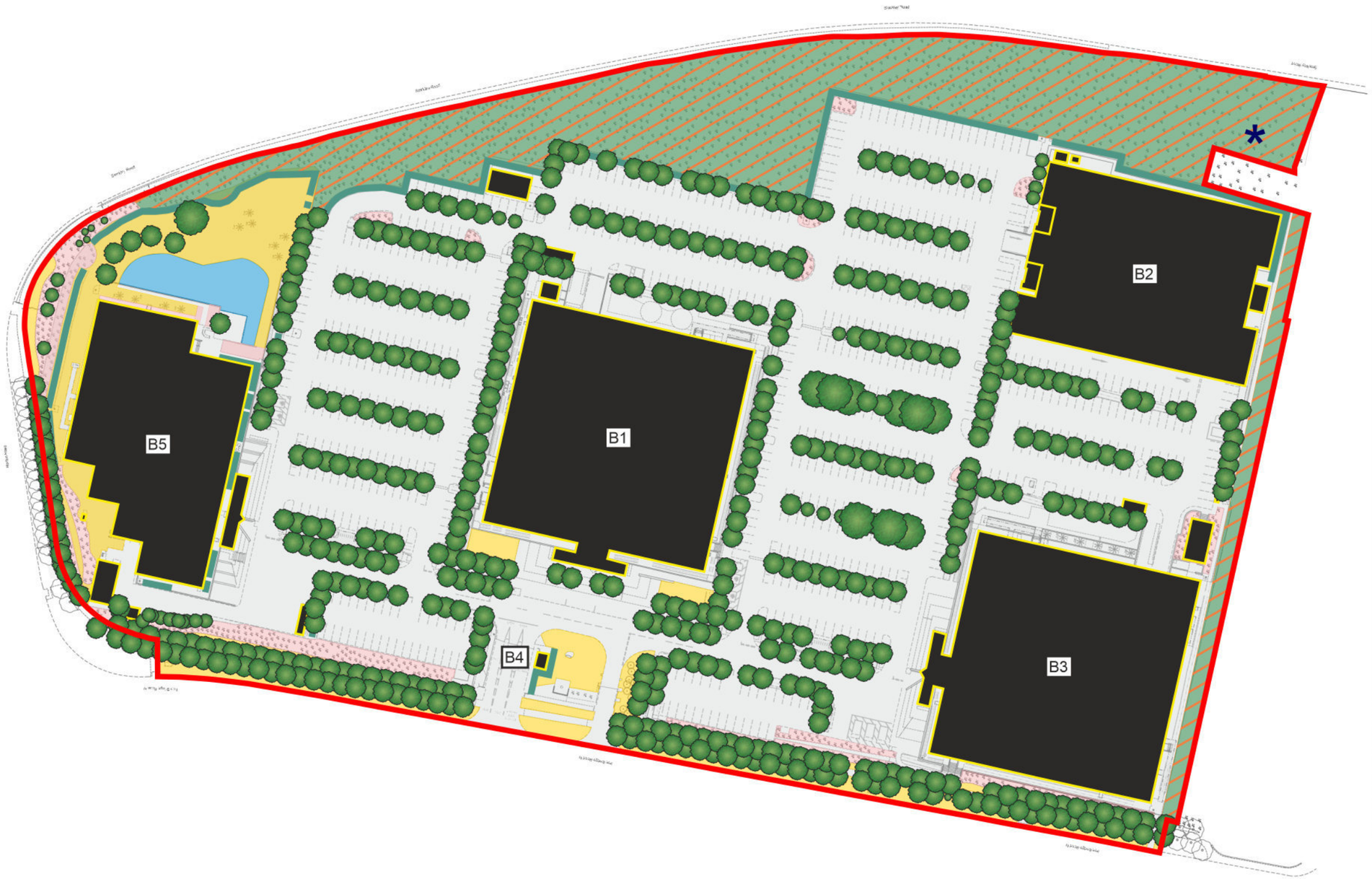
PLAN ECO2

Ecological Features



KEY:

- SITE BOUNDARY
- BUILDING
- HARDSTANDING
- WOODLAND
- AMENITY PLANTING
- SCATTERED SCRUB
- AMENITY GRASSLAND
- POND
- TREE
- FLY TIPPING / ENCAMPMENT
- AMENITY HEDGEROW

N

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8516: PROLOGIS PARK
WEST LONDON EXPANSION

PLAN ECO2:
ECOLOGICAL FEATURES

Rev: A

Jun 2020

PHOTOGRAPHS

PHOTOGRAPH 1: Building B3 in the centre of the site

PHOTOGRAPH 2: Building B5 in the north of the site

PHOTOGRAPH 3: Pond and amenity grassland adjacent to Building B5

PHOTOGRAPH 4: Hardstanding car park with amenity trees and hedgerows

PHOTOGRAPH 5: Amenity planting and amenity trees

PHOTOGRAPH 6: View of Grand Union Canal and the southern boundary

APPENDICES

APPENDIX 1

Information downloaded from Multi-Agency Geographic Information for the Countryside (MAGIC) website

MAGiC

8516: PROLOGIS PARK WEST LONDON EXPANSION (GSK SITE)

Legend

- Local Nature Reserves (England)
- National Nature Reserves (England)
- Ramsar Sites (England)
- Sites of Special Scientific Interest (England)
- Special Areas of Conservation (England)
- Possible Special Areas of Conservation (England)
- Special Protection Areas (England)
- Potential Special Protection Areas (England)

Projection = OSGB36
xmin = 497400
ymin = 175800
xmax = 516300
ymax = 184800

0 0.7 1.4 km

Map produced by MAGIC on 24 September, 2019.

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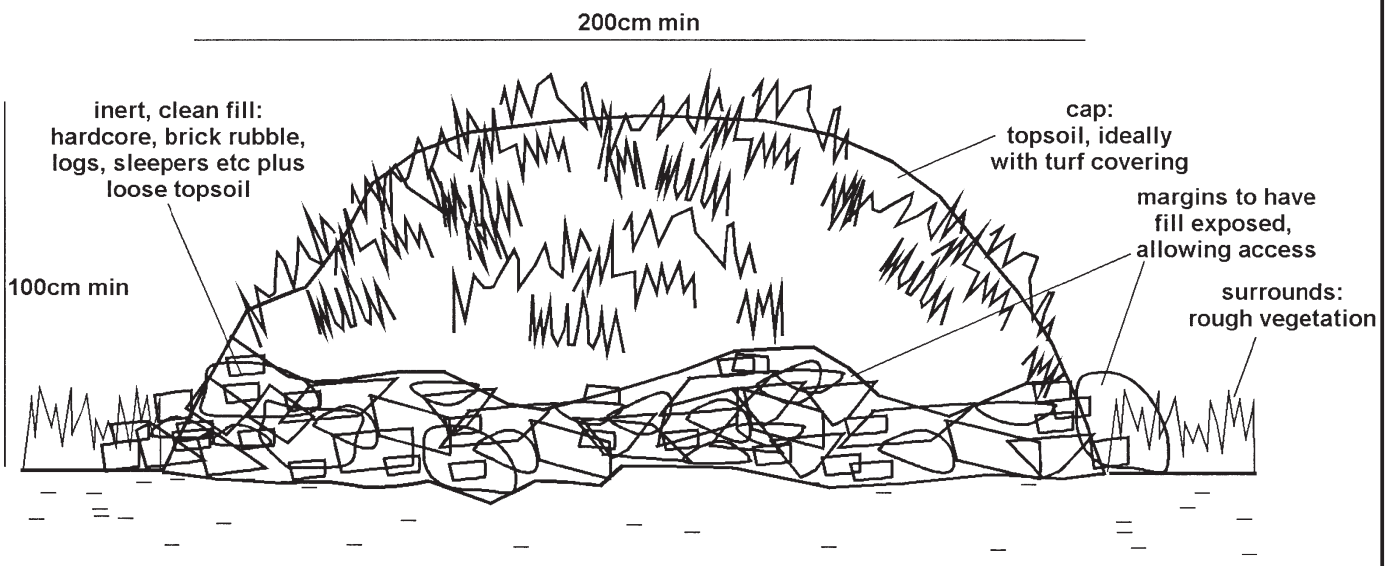
APPENDIX 2

Hibernacula Specification



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HIBERNACULA SPECIFICATION

APPENDIX 3

Bat Box Specifications

Bat Boxes

Schwegler bat boxes are made from ‘woodcrete’ and have the highest rates of occupation of all types of box.
The 75% wood sawdust, clay and concrete mixture is ideal, being durable whilst allowing natural respiration and temperature stability. These boxes are rot and predator proof and extremely long lasting.
Boxes can be hung from a branch near the tree trunk or fixed using ‘tree-friendly’ aluminum nails.

2F Bat Box

A standard bat box, attractive to the smaller British bat species. Simple design with a narrow entrance slit on the front.

Woodcrete construction, 16cm diameter, height 33cm.

2FN Bat Box

A large bat box featuring a wide access slit at the base as well as an access hole on the underside. Particularly successful in attracting Noctule and Bechstein’s bats.

Woodcrete construction, 16cm diameter, height 36cm.

1FD Bat Box

A larger than standard bat box, with two additional roughened l wooden panels inside to be used by the bats as perches.

Woodcrete construction, 16cm diameter, height 36cm.

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APPENDIX 4

Hedgehog Gateways

Hedgehog Gateways

A 13 x 13 cm section cut out at the base of the gravel board or directly into the fence panel creating links between residential gardens and the surrounding landscape.

This will facilitate the dispersal of Hedgehogs and other small animals and enhance the permeability of the new development for wildlife.

Signposting the features seeks to inform residents and aid the features retention and function.

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APPENDIX 5

Bird Box Specifications

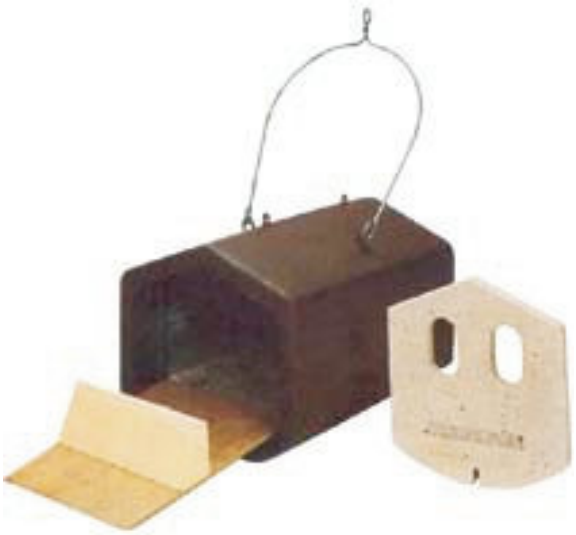
Bird Boxes

Schwegler bird boxes have the highest rates of occupation of all types of box. They are designed to mimic natural nest sites and provide a stable environment with the right thermal properties for chick rearing and winter roosting. Boxes are made from woodcrete. This 75% wood sawdust, clay and concrete mixture is breathable and very durable making these bird boxes extremely long lasting.

1B Bird Box

This is the most popular box for garden birds and appeals to a wide range of species. The box can be hung from a branch or nailed to the trunk of a tree with a 'tree-friendly' aluminium nail.

Available in four colours and three entrance hole sizes (26mm for small Tits, 32mm standard size, and oval for Redstarts).



1N Deep Nest Box

A deeper than standard nest box which is ideal for Robins, Spotted Flycatchers, Pied Wagtails, Tits and Sparrows. Its depth offers protection from cats, Magpies, Jays and Martens.

Two entrance holes, 30mm x 50mm.
Nesting area: 15cm x 21cm.

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Bird Boxes

2GR Nest Box

Owing to the special design of the large nesting area and front panel, this box is especially well protected against predators.

Available with a single oval entrance hole or as shown with three 27mm holes for small Tits. Nesting area: 14cm x 19cm.

Sparrow Terrace

House sparrows are gregarious and prefer to nest close to each other, so this woodcrete box provides room for three families under one roof. Made from long-lasting, breathable woodcrete. No maintenance required.

Colour: stone or brown.
Dimensions: 245mm x 430mm x 200 mm.
Weight: 15 kg.
Designed for fixing to walls (not suitable for fences or sheds due to the weight of the box).

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Bird Boxes

No. 17 Swift Box

This highly successful model is used extensively throughout Europe. Made from a special mixture of compressed plant fibres and concrete, it provides good insulation and extremely long life. The bracket allows the box to be fixed from above or behind, and the entrance hole can be easily removed for inspection and cleaning.

Dimensions: 152H x 340W x 150D mm.

No 18 Swift Box

This nest box is suitable for fixing high under the eaves or under the guttering of a building.

Woodcrete on board backing.
Interior dimensions 14 x 34 x 15 cm.
Exterior dimensions 19 x 50 x 22 cm

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