NCP CAR PARK, BATH ROAD, WEST DRAYTON, GREATER LONDON

PRELIMINARY ECOLOGICAL APPRAISAL

A Report to: Heathrow NCP Property Limited

Report No: RT-MME-157814-01 Rev A

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

Report Version	Date	Completed by:	Checked by:	Approved by:
Final	06/06/2022	Maria Valeva BSc (Hons) (Ecological Support Officer)	Harry Stone MSc ACIEEM (Ecological Consultant)	Paul Roebuck MSc MCIEEM (South East Manager)
Rev A	13/07/2022	Maria Valeva BSc (Hons) (Ecological Support Officer)	Harry Stone MSc ACIEEM (Ecological Consultant)	Paul Roebuck MSc MCIEEM (South East Manager)

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

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client’s brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of 24 months from the date of survey. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

NON-TECHNICAL SUMMARY

Middlemarch Environmental Ltd was commissioned by Heathrow NCP Property Limited to carry out a Preliminary Ecological Appraisal at the site of a proposed development at the NCP Car Park on Bath Road in West Drayton. To fulfil this brief, an ecological desk study and a walkover survey (in accordance with Phase 1 Habitat Survey methodology) were undertaken.

The desk study exercise identified one European statutory site within 5 km of the survey area, no UK statutory sites within 2 km, and one non-statutory site within 1 km. The site is not located within 10 km of a statutory site designated for bats. The desk study also provided records of protected/notable species within 1 km, including: bats, hedgehog, birds, invertebrates, and plants.

The walkover survey was undertaken on 13th May 2022 by Harry Stone (Ecological Consultant) and Zeina Farhat (Ecological Project Officer). At the time of the survey, the site comprised a large disused airport car park with a parcel of woodland along its southern border. A disused site was situated to the north and a residential neighbourhood to the west. Trees lined the site's eastern boundary, followed by a large, steep road verge descending onto the M4.

In order to ensure compliance with wildlife legislation and relevant planning policy, the following recommendations are made (see Chapter 7 for full details). The development proposals have taken these recommendations into account or addiotnal documents are being produced to fulfil the recommendations:

R1 **Habitat Retention and Protection:** The development proposals should be designed (where feasible) to allow for the retention of existing notable habitats including the ephemeral/short perennial vegetation and woodland. If retention is not possible, appropriate replacement planting should be incorporated into the soft landscape scheme in accordance with the ecological mitigation hierachy. Only native and/or wildlife attracting species should be planted.

R2 **Biodiversity Enhancement:** In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, biodiversity enhancement measures should be incorporated into the landscaping scheme of any proposed development to work towards delivering net gains for biodiversity.

R3 **Lighting:** In accordance with best practice guidance relating to lighting and biodiversity (Miles et al, 2018; Gunnell et al, 2012), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species.

R4 **Terrestrial Mammals including Badger and Hedgehog:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.

R5 **Nesting Birds:** Vegetation clearance should be undertaken outside the nesting bird season (March-September). If this is not possible then any vegetation to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. A precautionary Bird Hazard Management Plan is recommended due to the proximity to Heathrow Airport.

R6 **Jersey cudweed:** As Jersey cudweed has been recorded on site, a licence from Natural England will be required before the site can be cleared, and a mitigation strategy will be needed to obtain the licence. The mitigation strategy could involve transferring seeds and/or plants of Jersey Cudweed to a biodiverse roof and/or appropriately landscaped part of the site. A precautionary survey for Jersey Cudweed must be undertaken before site clearance commences, should clearance take place 18 months after the last survey was undertaken. Evidence that the survey has been carried out shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of clearance.

R7 **Butterfly bush:** The works must not cause butterfly bush to spread in the wild. It must either be left in situ or removed with care during vegetation clearance and disposed of in an appropriate manner.

CONTENTS

1. INTRODUCTION

1.1 PROJECT BACKGROUND

In April 2022, Heathrow NCP Property Limited commissioned Middlemarch Environmental Ltd to undertake a Preliminary Ecological Appraisal of the site of a proposed development at the NCP Car Park on Bath Road in West Drayton. This assessment is required to inform a planning application associated with the commercial redevelopment of the site into an industrial estate with warehouse units and associated car parking areas.

To assess the existing ecological interest of the site an ecological desk study was carried out, and a walkover survey was undertaken on 13th May 2022. In addition, Middlemarch Environmental Ltd has also been commissioned to undertake a Biodiversity Net Gain Assessment, the findings of which can be found in Report RT-MME-157814-02.

1.2 SITE DESCRIPTION AND CONTEXT

The site under consideration comprises an irregularly shaped parcel of land situated on Bath Road in West Drayton, within the London Borough of Hillingdon. It measures approximately 1.6 ha in size and is centred at National Grid Reference TQ 07445 77070.

At the time of the survey, the site comprised a large disused airport car park with a parcel of woodland along its southern border. A disused site was situated to the north and a residential neighbourhood to the west. Trees lined the site's eastern boundary, followed by a large, steep road verge descending onto the M4.

The wider landscape comprises a mix of industrial and residential development interspersed with green spaces and reservoirs. Heathrow airport's northern runway is situated 250 m south of the site and extensive fields are situated to the east and west.

1.3 DOCUMENTATION PROVIDED

The conclusions and recommendations made in this report are based on information provided by the client regarding the scope of the project. Documentation made available by the client is listed in Table 1.1.

Document Name / Drawing Number	Author
Proposed Site Plan / 5110 CA 00 00 DR A 00060 Rev P1	Chetwoods (Birmingham) Limited

Table 1.1: Documentation Provided by Client

2. METHODOLOGIES

2.1 DESK STUDY

An ecological desk study was undertaken to determine the presence of any designated nature conservation sites and protected species in proximity to the site. This involved contacting appropriate statutory and non-statutory organisations which hold ecological data relating to the survey area. Middlemarch Environmental Ltd then assimilated and reviewed the desk study data provided by these organisations.

The consultees for the desk study were:

- Natural England - *MAGIC* website for statutory conservation sites;
- Greenspace Information for Greater London CIC (GiGL)

The desk study included a search for:

- European statutory nature conservation sites in the UK (now referred to as the 'National Site Network') within a 5 km radius of the site (extended to 10 km for any statutory site designated for bats);
- UK statutory sites within a 2 km radius; and,
- Non-statutory sites and protected/notable species records within a 1 km radius.

The data collected from the consultees is discussed in Chapter 4. Selected raw data are provided in Appendix 1. In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report.

The desk study also included a review of relevant local planning policy with regard to biodiversity and nature conservation (see Chapter 3).

2.2 PHASE 1 HABITAT SURVEY

The walkover survey was conducted following the Phase 1 Habitat Survey methodology of the Joint Nature Conservation Committee (JNCC, 2010) and the Institute of Environmental Assessment (IEA, 1995). Phase 1 Habitat Survey is a standard technique for classifying and mapping British habitats. The aim is to provide a record of habitats that are present on site. During the survey, the presence, or potential presence, of protected species was noted.

Whilst every effort is made to notify the client of any plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981, as amended) present on site, it should be noted that this is not a specific survey for these species.

Data recorded during the field survey are discussed in Chapter 5.

3. LEGISLATION AND POLICY

This chapter provides an overview of the framework of legislation and policy which underpins nature conservation and is a material consideration in the planning process in England. The reader should refer to the original legislation for the definitive interpretation.

3.1 GENERAL BIODIVERSITY LEGISLATION AND POLICY

The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (the Habitats Regulations 2019)

The Habitats Regulations 2017 (as amended) transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives) into English and Welsh law. Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1 January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

The Habitats Regulations 2019 have created a 'National Site Network' on land and at sea, including both the inshore and offshore marine areas in the UK. The National Site Network includes:

- Existing Special Areas of Conservation (SACs), which are designated due to their importance to the habitats and species listed in Annexes I and II of the Habitats Directive;
- Existing Special Protection Areas (SPAs), which are designated due to their importance for wild birds in accordance with the Wild Birds Directive; and,
- New SACs and SPAs designated under these Regulations.

SACs and SPAs in the UK no longer form part of the European Union's Natura 2000 ecological network. Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new National Site Network. However, guidance provided by Freeths (2020) recommends that SACs and SPAs can continue to be referred to as "European sites" / "European marine sites".

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SACs and SPAs.

The 2019 Regulations establish management objectives for the National Site Network. The network objectives are to:

- Maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status; and,
- Contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.

The appropriate authorities must also have regard to the:

- Importance of protected sites;
- Coherence of the National Site Network; and,
- Threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their favourable conservation status within the UK.

The Wildlife and Countryside Act (WCA) 1981 (as amended)
The WCA, as amended, consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Habitat Regulations 2017 and the Habitats Regulations 2019, offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

The Countryside and Rights of Way (CRoW) Act 2000
The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It places a duty on government departments and the National Assembly for Wales to have regard for biodiversity, and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006
Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all of their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CRoW Act 2000.

The Hedgerow Regulations 1997
The Hedgerow Regulations make provision for the identification of important hedgerows which may not be removed without permission from the Local Planning Authority.

UK Post-2010 Biodiversity Framework
The UK Biodiversity Action Plan (BAP), published in 1994, was the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The new UK Post-2010 Biodiversity Framework replaces the previous UK level BAP. The UK Post-2010 Biodiversity Framework covers the period 2011-2020 and forms the UK Government's response to the new strategic plan of the United Nations Convention on Biological Diversity (CBD), published in 2010 at the CBD meeting in Nagoya, Japan. This includes five internationally agreed strategic goals and supporting targets to be achieved by 2020. The five strategic goals agreed were:

- Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society;
- Reduce the direct pressures on biodiversity and promote sustainable use;
- To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity;
- Enhance the benefits to all from biodiversity and ecosystem services; and,
- Enhance implementation through participatory planning, knowledge management and capacity building.

The Framework recognises that most work which was previously carried out under the UK BAP is now focused on the four individual countries of the United Kingdom and Northern Ireland, and delivered through the countries' own strategies. Following the publication of the new Framework the UK BAP partnership no longer operates but many of the tools and resources originally developed under the UK BAP still remain of use and form the basis of much biodiversity work at country level. In England the focus is on delivering the outcomes set out in the Government's 'Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services' (DEFRA, 2011). This sets out how the quality of our environment on land and at sea will be improved over the next ten years and follows on from policies contained in the Natural Environment White Paper.

Species and Habitats of Material Consideration for Planning in England
Previous planning policy (and some supporting guidance which is still current, e.g. ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process but such habitats and species are now described as Species and

Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.

3.2 NATIONAL PLANNING POLICY FRAMEWORK AND PRACTICE GUIDANCE

In July 2021, the National Planning Policy Framework (NPPF) was updated, replacing the previous framework published in 2012 and revised in 2018 and 2019. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives.

Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing existing sites of biodiversity value;
- minimising impacts on and providing net gains for biodiversity; and,
- establishing coherent ecological networks.

If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. With respect to development on land within or outside of a Site of Special Scientific Interest (SSSI) which is likely to have an adverse effect (either alone or in-combination with other developments) would only be permitted where the benefits of the proposed development clearly outweigh the impacts on the SSSI itself, and the wider network of SSSIs. Development resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons for the development, and a suitable compensation strategy is provided.

Chapter 15 identifies that development whose primary objective is to conserve or enhance biodiversity should be supported and opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature.

Chapter 11, making effective use of the land, sets out how the planning system should promote use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Opportunities for achieving net environmental gains, including new habitat creation, are encouraged.

In March 2014 the Department for Communities and Local Government released guidance to support the National Planning Policy Framework (NPPF), known as the National Planning Practice Guidance (NPPG).This has been produced to provide guidance for planners and communities which will help deliver high quality development and sustainable growth in England.

The guidance includes a section entitled ‘Natural Environment: Biodiversity, geodiversity and ecosystems and green infrastructure’, which was updated in July 2019. This document sets out information with respect to the following:

- the statutory basis for seeking to conserve and enhance biodiversity;
- the local planning authority’s requirements for planning for biodiversity;
- what local ecological networks are and how to identify and map them;
- how plan-making bodies identify and safeguard Local Wildlife Sites, including Standard Criteria for Local Wildlife Sites;
- the sources of ecological evidence;
- the legal obligations on local planning authorities and developers regarding statutory designated sites and protected species;
- definition of green infrastructure;
- where biodiversity should be taken into account in preparing a planning application;
- how policy should be applied to avoid, mitigate or compensate for significant harm to biodiversity and how mitigation and compensation measures can be ensured;

- definitions of biodiversity net gain including information on how it can be achieved and assessed; and,
- the consideration of ancient woodlands and veteran trees in planning decisions and how potential impacts can be assessed.

The NPPG July 2019 issue also includes a section entitled 'Appropriate assessment: Guidance on the use of Habitats Regulations Assessment' which provides information in relation to Habitats Regulations Assessment processes, contents and approaches in light of case law. This guidance will be relevant to those projects and plans which have the potential to impact on European Sites and European Offshore Marine Sites identified under the Conservation of Habitats and Species Regulations 2017 (as amended).

3.3 LOCAL PLANNING POLICY – LONDON BOROUGH OF HILLINGDON

Local Plan: Part 1

The Hillingdon 'Local Plan: Part 1- Strategic Policies' (previously known as the Core Strategy) was adopted by the Council on the 8th November 2012. It sets out the key elements of the planning framework for the borough over the next 15 years. It comprises a spatial vision, strategic objectives, a spatial strategy, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. The policy of relevance to ecology is:

Policy EM7: Biodiversity and Geological Conservation

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

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

1. The conservation and enhancement of the natural state of:
   - Harefield Gravel Pits
   - Colne Valley Regional Park
   - Fray's Farm Meadows
   - Harefield Pit
2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 Importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.
3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.
4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.
5. The provision of biodiversity improvements from all development, where feasible.
6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

Local Plan: Part 2

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 16th January 2020. The new Local Plan Part 2 replaces the Local Plan Part 2 Saved UDP Policies (2012). Policies of relevance to ecology within this document comprise:

Policy DMHB 11: Design of New Development

A. All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:
   i) harmonising with the local context by taking into account the surrounding:
      - scale of development, considering the height, mass and bulk of adjacent structures;
      - building plot sizes and widths, plot coverage and established street patterns;

- building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
- architectural composition and quality of detailing;
- local topography, views both from and to the site; and,
- impact on neighbouring open spaces and their environment.

ii) ensuring the use of high-quality building materials and finishes;
iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
C. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.
D. Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

Policy DMHB 14: Trees and Landscaping

A. All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
B. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
C. Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.
D. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

Policy DMEI 7: Biodiversity Protection and Enhancement

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

The London Plan 2021

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. It is the policies in this document that form part of the development plan for Greater London, and which should be taken into account in taking relevant planning decisions, such as determining planning applications.

This London Plan runs from 2019 to 2041. It was formally published by the Mayor on 2nd March 2021. This is a new plan, replacing all previous versions.

The policies of relevance to ecology are:

Policy G1 Green Infrastructure

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

Policy G2 London's Green Belt

A. The Green Belt should be protected from inappropriate development:
    1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,
    2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
B. Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.

Policy G3 Metropolitan Open Land

A. Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:
    1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt
    2) boroughs should work with partners to enhance the quality and range of uses of MOL.
B. The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:
    1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
    2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
    3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
    4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Policy G4 Open Space

A. Development Plans should:
    1) undertake a needs assessment of all open space to inform policy.
    2) Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 (the reader should refer to the full text within the plan) as a benchmark for the different types required. Assessments should take into account the quality, quantity and accessibility of open space
    3) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies

4) promote the creation of new areas of publicly accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
5) ensure that open space, particularly green space, included as part of development remains publicly accessible.

B. Development proposals should:
1) not result in the loss of protected open space
2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.

Policy G5 Urban Greening

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

Policy G6 Biodiversity and Access to Nature

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

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
1) avoid damaging the significant ecological features of the site
2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3) deliver off-site compensation of better biodiversity value.

D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and Woodlands

A. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
B. In their Development Plans, boroughs should:
1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site
2) identify opportunities for tree planting in strategic locations.

C. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for

example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy SI 17 Protecting and enhancing London's waterways

A. Development Plans should support river restoration and biodiversity improvements.
B. Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats, water quality as well as heritage value, should be supported. Development proposals to impound and narrow waterways should be refused.
C. Development proposals should support and improve the protection of the distinct open character and heritage of waterways and their settings.
D. Development proposals into the waterways, including permanently moored vessels, should generally only be supported for water-related uses or to support enhancements of water-related uses.
E. Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.
F. On-shore power at water transport facilities should be considered at wharves and residential moorings to help reduce air pollution.

4. DESK STUDY RESULTS

4.1 INTRODUCTION

The data search was carried out in May 2022 by GiGL. All relevant ecological data provided by the consultees was reviewed and the results from these investigations are summarised in Sections 4.2 to 4.4. Selected data are provided in Appendix 1.

4.2 NATURE CONSERVATION SITES

Statutory and non-statutory nature conservation sites located in proximity to the survey area are summarised in Table 4.1.

Site Name	Designation	Proximity to Survey Area	Description
European Statutory Sites			
South West London Waterbodies	Ramsar, SPA	3.8 km south-west	The South West London Waterbodies site comprises a series of reservoirs and former gravel pits that support internationally important numbers of wintering gadwall *Anas strepera* and northern shoveler *Anas clypeata*. The Staines Moor SSSI forms part of this site.
Non-statutory Sites			
Field Close Open Space Roughs	SINC	520 m east	An area that has been set aside for wildlife, this site links Field Close Open Space with Bolton's Lane Open Space. Rough grassland dominated by false oat-grass *Arrhenatherum elatius* with scattered native scrub and trees. The grassland is rich in common wild flowers including red clover *Trifolium pratense*, scarlet pimpernel *Anagallis arvensis* and cut-leaved cranesbill *Geranium dissectum.*
Key: RAMSAR: Site listed on The Convention on Wetlands of International Importance (Ramsar Convention) SPA: Special Protection Area SINC: Site of Importance for Nature Conservation			

Table 4.1: Summary of Nature Conservation Sites

No Sites of Special Scientific Interest (SSSIs) are located within a 2km radius of the survey area; however, the survey area does fall within a SSSI impact Risk Zone for Staines Moor SSSI which is located 3.8 km south-west.

4.3 PROTECTED / NOTABLE SPECIES

Table 4.2 and the following text provide a summary of protected and notable species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Mammals - bats					
Common pipistrelle *Pipistrellus pipistrellus*	1	2019	610 m north	-	ECH 4, WCA 5, WCA 6, Local
Soprano pipistrelle *Pipistrellus pygmaeus*	2	2019	610 m north	✓	ECH 4, WCA 5, WCA 6, Local
Brown long-eared bat *Plecotus auritus*	1	2019	610 m north	✓	ECH 4, WCA 5, WCA 6, Local
Mammals – other					
Hedgehog *Erinaceus europaeus*	2	2019	370 m north-west	✓	WCA 6

Table 4.2: Summary of Protected/Notable Species Records Within 1 km of Survey Area (Cont.)

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Birds					
Skylark *Alauda arvensis*	8	2014	340 m south	✓	-
Kingfisher *Alcedo atthis*	172	2014	340 m south	-	WCA1i
Linnet *Linaria cannabina*	1	2014	340 m south	✓	-
Red kite *Milvus milvus*	25	2017	340 m south	-	WCA1i
Firecrest *Regulus ignicapilla*	10	2014	340 m south	-	WCA1i
Starling *Sturnus vulgaris*	252	2014	340 m south	✓	-
Green sandpiper *Tringa ochropus*	9	2014	340 m south	-	WCA1i
Redwing *Turdus iliacus*	109	2014	340 m south	-	WCA1i
Fieldfare *Turdus pilaris*	36	2014	340 m south	-	WCA1i
Hen harrier *Circus cyaneus*	1	2010	Potentially within 1 km*	✓	WCA1i
Invertebrates					
Stag beetle *Lucanus cervus*	1	2016	900 m north	✓	ECH 2, WCA 5 S9(5), Local

Key:
*: Grid reference provided was four figures only.

ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation.
ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection.

WCA 1i: Schedule 1 Part 1 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties at all times.
WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds).
WCA 5 S9(5): Schedule 5 Section 9(5) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to selling, offering for sale, processing or transporting for purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from, such animal.
WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods.

Species of Principal Importance: Species of Principal Importance for Nature Conservation in England.
Local: London Biodiversity Action Plan priority species

Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Table 4.2 (Cont.): Summary of Protected/Notable Species Records Within 1 km of Survey Area

Birds

The desk study provided numerous records of bird species listed as Species of Principle Importance within a 1 km radius of the survey area. These included grasshopper warbler *Locustella naevia*, house sparrow *Passer domesticus*, and lapwing *Vanellus vanellus*. Additional records of birds listed on the RSPB red list included swift *Apus apus*, house martin *Delichon urbicum*, and mistle thrush *Turdus viscivorus*.

Invertebrates

The desk study provided records of notable invertebrate species, including white-letter hairstreak *Satyrium w-album* butterfly and cinnabar moth *Tyria jacobauae*.

Plants
The desk study returned four records of large-leaved lime *Tilia platyphyllos* (Nationally Scare).

4.4 INVASIVE SPECIES

Table 4.3 provides a summary of invasive species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Legislation / Conservation Status
Cotoneaster *Cotoneaster* sp.	2	2004	10 m south	LISI 2, WCA 9
False-acacia *Robinia pseudoacacia*	5	2020	110 m west	LISI 4
Cherry laurel *Prunus laurocerasus*	1	2004	590 m west	LISI 3
Evergreen oak *Quercus ilex*	1	2020	640 m north	LISI 5
Turkey oak *Quercus cerris*	1	2004	650 m west	LISI 5
Butterfly-bush *Buddleia davdii*	1	2004	660 m north	LISI 3

Key:
WCA9: Schedule 9 of Wildlife and Countryside Act 1981 (as amended). Invasive, non-native, plants and animals.
LISI 2: London Invasive Species Initiative – Species of high impact or concern present at specific sites that require attention (control, management, eradication etc).
LISI 3: London Invasive Species Initiative – Species of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate.
LISI 4: London Invasive Species Initiative – Species which are widespread for which eradication is not feasible but where avoiding spread to other sites may be required.
LISI 5: London Invasive Species Initiative – Species for which insufficient data or evidence was available from those present to be able to prioritise.

Table 4.3: Summary of Invasive Species Records Within 1 km of Survey Area

5. PHASE 1 HABITAT SURVEY

5.1 INTRODUCTION

The results of the Phase 1 Habitat Survey are presented in the following sections. An annotated Phase 1 Habitat Survey Drawing (Drawing C157814-01-01) is provided in Chapter 8. This drawing illustrates the location and extent of all habitat types recorded on site. Any notable features or features too small to map are detailed using target notes. Photographs taken during the field survey are presented in Chapter 9.

The survey was carried out on 13th May 2022 by Harry Stone (Ecological Consultant) and Zeina Farhat (Ecological Project Officer). Table 5.1 details the weather conditions at the time of the survey.

Parameter	Condition
Temperature (ºC)	14-18
Cloud (%)	0-100
Wind (Beaufort)	F1-F3
Precipitation	Dry

Table 5.1: Weather Conditions During Field Survey

5.2 SURVEY CONSTRAINTS AND LIMITATIONS

No significant constraints or limitations were experienced on site during the survey.

5.3 HABITATS

- Building;
- Ephemeral/short perennial;
- Hardstanding;
- Semi-natural Broadleaved Woodland; and,
- Wall.

These habitats are described below. They are ordered alphabetically, not in order of ecological importance.

Building
A disused car park security office was situated in the northern section of the site (Plate 9.1), with *Wisteria* sp. growing on its south-facing aspect. The building was tightly boarded up and generally in good condition.

Ephemeral/short perennial
The disused car parking spaces, which provided a freely draining shallow stony soil, had been colonised by ephemeral/short perennial vegetation (Plate 9.2, Plate 9.9). There was no clear dominant species, and the plants were generally low growing (less than 0.25 m high). Species comprised common yarrow *Achillea millefolium*, barren brome *Anisanthus sterilis*, mugwort *Artemisia vulgaris*, soft brome *Bromus hordeacueus* , butterfly bush *Buddleia x davidii*, ivy-leaved toadflax *Cymbalaria moralis*, cock's-foot *Dactylis glomerata*, greater willowherb *Epilobium hirsutum*, square-stalked willow herb *Epilobium tetragonum*, cleavers *Galium aparine*, small geranium *Geranium pusillum*, Jersey cudweed *Gnaphalium luteoalbum* (Plate 9.5), Yorkshire fog *Holcus lanatus*, wall barley *Hordeum murinum*, hairy cat's ear *Hypochaeris radicata*, wild lettuce *Lactuca virosa*, oxeye daisy *Leucanthemum vulgare*, yellow toadflax *Linaria vulgaris*, black medick *Medicago lupulina*, ribwort plantain *Plantago lanceolata*, broadleaf plantain *Plantago major*, creeping buttercup *Ranunculus repens*, bramble *Rubus fruticosus* agg., oxford ragwort *Senecio squalidus*, field madder *Sherardia arvensis*, bittersweet *Solanum dulcamara*, prickly sow thistle *Sonchus asper*, common dandelion *Taraxacum officinale*, and coltsfoot *Tussilago farfara.*

Hardstanding
Tarmac hardstanding dominated the site (Plate 9.4, Plate 9.9). This was generally in good condition with no cracks or vegetation growth noted.

Woodland
A parcel of woodland, measuring approximately 0.1 ha in size, was situated along the site's southern boundary (Plate 9.8). Sycamore *Acer pseudoplatanus* and field maple *Acer campestre* dominated, reaching heights of 15-20 m and appearing to be semi-mature to early mature in age class. Hawthorn *Crataegus monogyna* and a single coniferous tree were also recorded. Abundant ivy *Hedera helix* growth was noted on many of the tree stems and branches. The shrub layer was dominated by *Cotoneaster franchetii*, *Cotoneaster lacteus*, and privet *Ligustrum* sp. The ground flora was dominated by ivy (Plate 9.3), with occasional Oregon grape *Mahonia aquifolium*, cow parsley *Anthriscus sylvestris*, and cleavers *Galium aparine*. Frequent maple and sycamore saplings were observed and, therefore, the woodland appeared to be regenerating. Some areas of the woodland were heavily littered, and a moderate amount of dead wood was noted in the form of dead standing trees and fallen timber. Aside from litter, the woodland appeared otherwise undisturbed.

Wall
The woodland habitat was delineated from the northern portion of the site by a brick wall. The wall was approximately 3 m tall and had metalwork attached to its north-facing aspect (Plate 9.8).

5.4 FAUNA

During the survey, no field signs of faunal species were recorded. The time of year at which the survey is undertaken will affect species or field signs directly recorded during the survey.

5.5 INVASIVE PLANT SPECIES

Butterfly bush was recorded within the ephemeral/short perennial vegetation on site.

6. DISCUSSIONS AND CONCLUSIONS

6.1 SUMMARY OF PROPOSALS

It is understood that the proposals include the commercial redevelopment of the site into an industrial estate with warehouse units and associated car parking. The existing access road at the site's eastern boundary will be closed and a new access road will be created through the woodland to the south. Soft landscaping is proposed along the site boundaries.

6.2 NATURE CONSERVATION SITES

The desk study exercise identified one European statutory site within 5 km of the survey area, no UK statutory sites within 2 km, and one non-statutory site within 1 km. The site is not located within 10 km of a statutory site designated for bats. The significance of these sites to the proposed development is discussed below.

European Statutory Sites
South West London Waterbodies (RAMSAR, SPA) is located 3.6 km south-west. Given the distance separating this site from the survey area and the built-up nature of the intervening habitats, no adverse impacts upon this site are anticipated as a result of the proposed development.

SSSI Impact Risk Zones
No Sites of Special Scientific Interest (SSSIs) are located within a 2km radius of the survey area; however, the survey area does fall within a SSSI impact Risk Zone of Staines Moor SSSI which is located 3.8 km south-west. It is understood that the proposed development does not fall into any of the associated 'Risk Categories' (see Appendix 1). Therefore, no adverse impacts upon this SSSI are anticipated.

Non-Statutory Sites
Field Close Open Space Roughs (SINC) is located 520 m east. Given the distance separating this site from the survey area and the built-up nature of the intervening habitats, no adverse impacts upon this site are anticipated as a result of the proposed development.

6.3 HABITATS

The ecological importance of the habitats present on site is determined by their presence on the list of Habitats of Principal Importance in England and on the Local BAP. It also takes into account the intrinsic value of the habitat. Those habitats which are considered to be of intrinsic importance and have the potential to be impacted by the site proposals are highlighted as material considerations.

A discussion of the implications of the site proposals with regard to the habitats present on site is provided in the text below. A separate discussion of the value of the habitats on site to protected or notable species is provided in Section 6.4.

Building, hardstanding and wall
These habitats have negligible biodiversity value and are not a material consideration in relation to the proposed works.

Ephemeral/short perennial
Ephemeral/short perennial vegetation is neither a Habitat of Principal of Importance for Nature Conservation in England, nor understood to be included in current local Biodiversity Action Plans. Prior to 2009 this habitat would have been classified as 'Wasteland' and thereby a Biodiversity Action Plan Priority Habitat (GiGL, 2009). Ephemeral/short perennial vegetation is considered to be locally valuable and therefore recommendations regarding habitat enhancement have been made within Section 7.2.

Woodland
'Lowland mixed deciduous woodland' is a Habitat of Principal Importance for Nature Conservation in England. The woodland on site is of intrinsic ecological value due to its maturity and potential to support a range of protected/notable species, as discussed in Section 6.4. This habitat type cannot be easily replicated if lost and therefore should be retained where possible. If loss of this habitat cannot be avoided, then appropriate mitigation and compensation measures will need to be implemented. Recommendations have been made within Section 7.2.

6.4 PROTECTED/NOTABLE SPECIES

The following paragraphs consider the likely impact of the site proposals on protected or notable species. This is based on those species highlighted in the desk study exercise (Chapter 4) and other species for which potentially suitable habitat occurs within or adjacent to the survey area.

Mammals

Bats

The desk study provided four records of three bat species within a 1 km radius of the survey area, the closest of which were located 610 m north. The trees within the woodland on site were inspected for their potential to support roosting bats and no obvious features, such as knotholes, pruning wounds, or woodpecker holes, were recorded during the survey. Where ivy grew densely on trees, it was inspected with a torch and binoculars. These areas were not found to be highly suitable for roosting bats. Therefore, it is considered unlikely that bats would roost within the site. Nevertheless, the woodland and to a smaller extent the ephemeral/short perennial vegetation offer suitable foraging habitat for bats with connectivity to the wider landscape. Any new lighting, either temporary or permanent, has the potential to indirectly impact any foraging or commuting bats. Therefore, bats are a material consideration in relation to the proposed development and a recommendation has been made within Section 7.3.

Badger

The desk study provided no records of badger within a 1 km radius of the survey area. The majority of the site is considered to be sub-optimal for badger as it is dominated by the built environment; however, the woodland to the south may offer some potential foraging habitat with links to the wider landscape. No evidence of badger, such as setts or latrines, was observed on site during the survey. Nevertheless, badgers are mobile animals and there is a possibility they may pass through the site. To prevent any harm to this species during the construction phase of the proposed development, a recommendation regarding foraging and commuting mammals has been made within Section 7.3.

Hedgehog

The desk study provided two records of hedgehog within a 1 km radius of the survey area, the closest of which was located 370 m north-west. The woodland and ephemeral/short perennial vegetation on site offer some potential refuge and foraging opportunities for hedgehog, with connectivity to the wider landscape. Therefore, there is a possibility that hedgehog utilise the site in some capacity. To prevent any harm to this species during the construction phase of the proposed development, a recommendation regarding foraging and commuting mammals has been made within Section 7.3.

Amphibians

The desk study provided no records of amphibians within a 1 km radius of the survey area. The majority of the site is considered to be sub-optimal for amphibians as it is dominated by the built environment and no suitable breeding habitat is present on site. The ephemeral/short perennial vegetation does not offer sufficient shelter from predation. The woodland to the south may offer some terrestrial opportunities; however, these are limited in extent and isolated from suitable habitat within the wider landscape by busy roads and brick walls.

Reference to Ordnance Survey mapped data and aerial imagery indicates that there are no ponds within a 500 m radius of the site, which could offer potential breeding habitat. Given the lack of records and suitable habitat on site and within the local vicinity, it is considered unlikely that amphibians would be present on site. Therefore, amphibians are not a material consideration in relation to the proposed development.

Reptiles

The desk study provided no records of reptiles within a 1 km radius of the survey area. The majority of the site is considered to be sub-optimal for reptiles as it is dominated by the built environment and ephemeral/short perennial vegetation that does not offer sufficient shelter from predation. The woodland to the south may offer some foraging and refuge opportunities; however, these are limited in extent and isolated from suitable habitat within the wider landscape by busy roads and brick walls. Therefore, it is considered unlikely that reptiles would be present on site, and they are not a material consideration in relation to the proposed development.

Birds
The desk study provided numerous records of 10 bird species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), the closest of which were located 340 m south. It is considered unlikely that Schedule 1 birds would be present on site; however, the woodland along the southern boundary offers suitable nesting habitat for a range of more common bird species.

The development of the site has the potential to cause direct harm/injury to nesting birds if timed to occur within the nesting bird season. A recommendation regarding the appropriate timing of site clearance activities has been made within Section 7.3. Given the extent of suitable habitat within the wider landscape, no long-term impacts on birds are anticipated. The habitats on site are unlikely to be used by birds that can cause problems with aircraft due to the proximity to Heathrow (for example starling, swift, geese). Nevertheless, as some losses may occur, a recommendation regarding general habitat enhancement has been provided within Section 7.2 and a precautionary recommendation for a Bird Hazard Management Plan that can be conditioned as part of any planning decision is provided at Section 7.3.

Invertebrates
The desk study provided records of notable invertebrate species, including white-letter hairstreak butterfly and cinnabar moth. The woodland was found to provide still air habitat to common invertebrates such as the hoverfly *Myathropa florea*. The range of nectareous plants present within the ephemeral/short perennial vegetation can be expected to support local invertebrate populations from early spring through to late summer, in turn providing a foraging resource for local bird and bat populations. Evidence of saproxylic invertebrate activity was recorded on fallen timber and standing dead wood within the woodland on site (Plate 9.6).

Invertebrates present within the site may be temporarily displaced during the construction phase of the proposed development. The loss of woodland and ephemeral/short perennial habitat risks impacting local invertebrate populations in the long-term. It is feasible that this long-term impact can be mitigated for through habitat retention, habitat enhancement, and compensatory habitat creation. A recommendation regarding general habitat enhancement, which would increase the value of the site for invertebrates, has been provided within Section 7.2.

Notable Plants
Jersey cudweed was recorded within the ephemeral/short perennial vegetation on site. This species is listed on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), making it unlawful to intentional pick, uproot, or destroy the wild plant or any seed or spore attached to the plant. Jersey cudweed is, therefore, a material consideration in relation to the proposed development and a recommendation has been made within Section 7.3.

The desk study provided four records of large-leaved lime (Nationally Scare) within a 1 km radius of the survey area. This tree species was however not recorded on site.

Other Species
The following protected species are not considered to be material considerations due to the lack of desk study records and absence of suitable habitats within the development site and its surroundings: dormouse *Muscardinus avellanarius*, harvest mouse *Micromys minutus*, pine marten *Martes martes*, polecat *Mustela putorius*, brown hare *Lepus europaeus*, and white-clawed crayfish *Austropotamobius pallipes*.

Summary

Species considered to be of relevance to the proposed development are summarised in Table 6.1.

Species / Species Group	Species of Principal Importance?	Summary of Potential Impacts
Bats	#	Habitat loss, disturbance through increases in lighting.
Badger	-	Direct harm/injury.
Hedgehog	✓	Habitat loss, direct harm/injury.
Birds	#	Habitat loss, direct harm/injury.
Jersey cudweed	-	Direct harm/injury/destruction.

Table 6.1: Summary of Potential Impacts on Notable Species

6.5 INVASIVE PLANT SPECIES

The desk study provided records of six invasive plant species within a 1 km radius of the survey area, the closest of which was located 10 m south. Butterfly bush was recorded within the ephemeral/short perennial vegetation on site. This species is listed on the London Invasive Species Initiative. Therefore, invasive plants are a material consideration in relation to the proposed development and a recommendation regarding appropriate clearance has been made within Section 7.4.

7. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

The ecological mitigation hierarchy should be applied when considering development which may have a significant effect on biodiversity. The ecological mitigation hierarchy, as set out in the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG) should follow these principles:

- **Avoidance** – development should be designed to avoid significant harm to valuable wildlife habitats and species.
- **Mitigation** – where significant harm cannot be wholly or partially avoided, it should be minimised by design or through the use of effective mitigation measures.
- **Compensation** – where, despite whatever mitigation would be effective, there would still be significant residual harm, as a last resort, compensation should be used to provide an equivalent value of biodiversity.

7.1 NATURE CONSERVATION SITES

There are no recommendations made regarding nature conservation sites.

7.2 HABITATS

The following recommendations are made regarding the habitats present on site:

R1 **Habitat Retention and Protection:** The development proposals should be designed (where feasible) to allow for the retention of existing notable habitats including the ephemeral/short perennial vegetation and woodland. Protection measures comprise:

- Trees: Any trees on or overhanging the site, which are retained as a part of any proposed works should be protected in accordance with British Standard 5837: 2012 "Trees in relation to design, demolition and construction - recommendations". Protection should be installed on site prior to the commencement of any works on site.

If retention is not possible, appropriate replacement planting should be incorporated into the soft landscape scheme in accordance with the ecological mitigation hierachy. Only native and/or wildlife attracting species should be planted.

The development proposals have taken this recommendaiton into account.

R2 **Biodiversity Enhancement:** In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, biodiversity enhancement measures should be incorporated into the landscaping scheme of any proposed development to work towards delivering net gains for biodiversity. This could involve, for example:

- Planting of habitats which will be of value to wildlife, such as:
  - ephemeral/short perrenial vegetation;
  - nectar-rich native plants to attract pollinators, for example: honeysuckle *Lonicera periclymenum*, fleabane *Pulicaria dysenterica*, wild carrot *Daucus carota*, knapweeds *Centaurea* spp.
- Inclusion of hedgehog passes under any fence lines to allow connectivity between the site and the wider area.
- Provision of nesting/roosting habitat, such as installation of nest boxes for species such as house sparrow *Passer domesticus*, and bat boxes for species such as pipistrelle *Pipistrellus* spp.
- Creation of deadwood habitat of benefit to species such as stag beetle *Lucanus cervus*. Felled timber arising from woodland clearance should be positioned in partial shade and partially buried.

The development proposals have taken this recommendaiton into account.

7.3 PROTECTED / NOTABLE SPECIES

To ensure compliance with wildlife legislation and relevant planning policy (Policy DMEI 7: Biodiversity Protection and Enhancement), the following recommendations are made:

R3 **Lighting:** In accordance with best practice guidance relating to lighting and biodiversity (Miles et al, 2018; Gunnell et al, 2012), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice include:

- Avoiding the installation of new lighting in proximity to key ecological features, such as site boundaries.
- Using modern LED fittings rather than metal halide or sodium fittings, as modern LEDs emit negligible UV radiation.
- The use of directional lighting to reduce light spill, e.g. by installing bespoke fittings or using hoods or shields. For example, downlighting can be used to illuminate features such as footpaths whilst reducing the horizontal and vertical spill of light.
- Where the use of bollard lighting is proposed, columns should be designed to reduce horizontal light spill.
- Implementing controls to ensure lighting is only active when needed, e.g. the use of timers or motion sensors.
- Use of floor surface materials with low reflective quality. This will ensure that bats using the site and surrounding area are not affected by reflected illumination.
- For internal lights, recessed light fittings cause significantly less glare than pendant type fittings. The use of low-glare glass may also be appropriate where internal lighting has the potential to influence sensitive ecological receptors.

The development proposals have taken this recommendaiton into account. The lighting strategy has been reviewed by Middlemarch.

R4 **Terrestrial Mammals including Badger and Hedgehog:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.

The development proposals will take this recommendaiton into account.

R5 **Nesting Birds:** Vegetation clearance should be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March-August). If this is not possible then any vegetation to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting any works which may affect them should be delayed until the young have fledged and the nest has been abandoned naturally, for example via the implementation of an appropriate buffer zone (species dependent) around the nest in which no disturbance is permitted until the nest is no longer in use. A Precautionary Bird Hazard Management Plan is recommended.

The development proposals will take this recommendation into account. A Bird Hazard Management Plan can be conditoned as part of any planning permission granted.

R6 **Jersey cudweed:** As Jersey cudweed has been recorded on site, a licence from Natural England will be required before the site can be cleared, and a mitigation strategy will be needed to obtain the licence. The mitigation strategy could involve transferring seeds and/or plants of Jersey Cudweed to a biodiverse roof and/or appropriately landscaped part of the site.

A precautionary survey for Jersey Cudweed must be undertaken before site clearance commences, should clearance take place 18 months after the last survey was undertaken. Evidence that the

survey has been carried out shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of clearance.

The development proposals will take this recommendation into account. A Mitigation Strategy Report has been produced and all recommendations will be followed. RT-MME-158136.

7.4 INVASIVE PLANT SPECIES

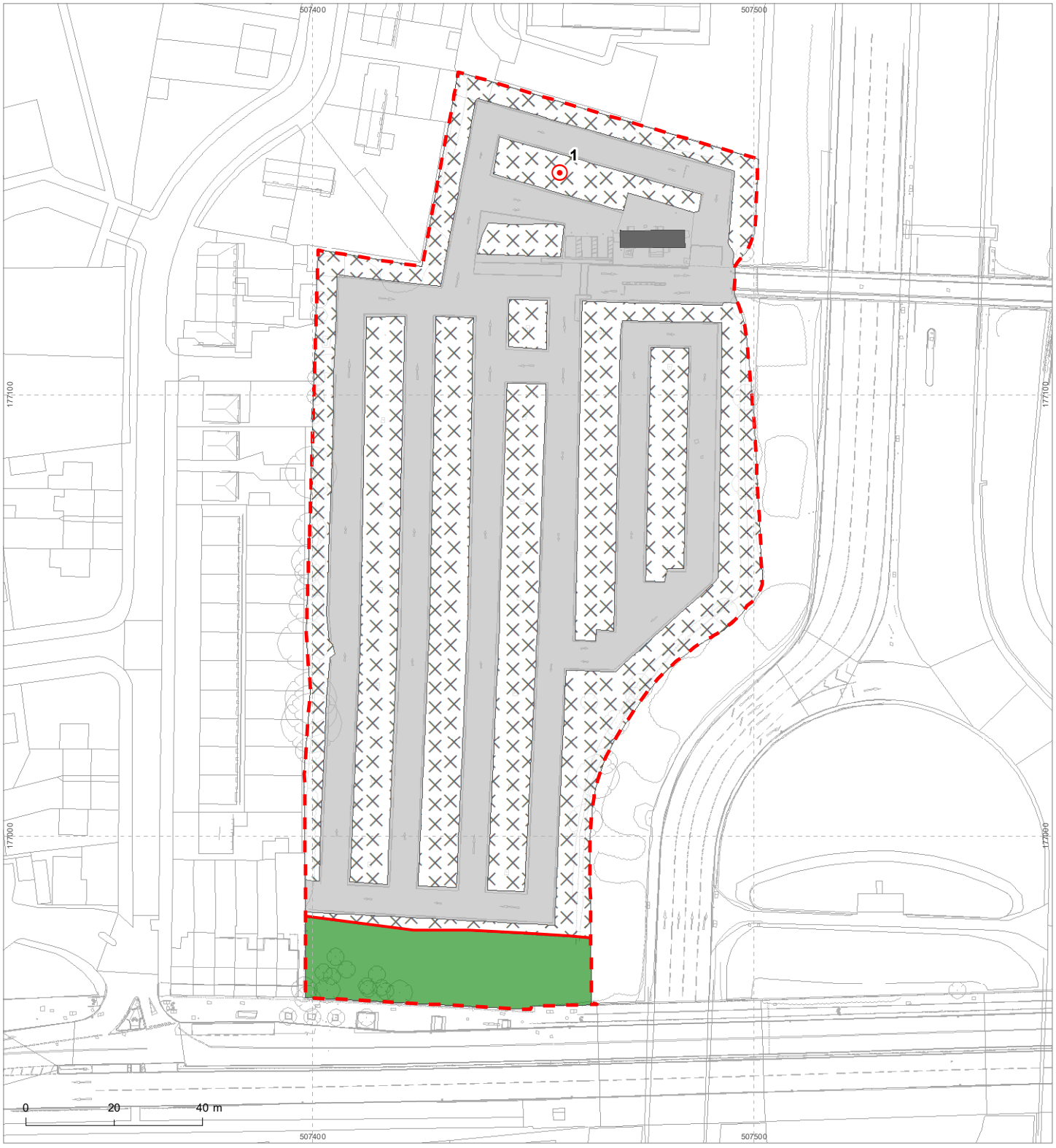
The following recommendation is made regarding invasive plant species:

R7 **Butterfly bush:** The works must not cause butterfly bush to spread in the wild. It must either be left in situ or removed with care during vegetation clearance and disposed of in an appropriate manner.

The development proposals will take this recommendation into account

8. DRAWINGS

Drawing C157814-01-01 – Phase 1 Habitat Map



Legend

- Site boundary
- Wall
- Building
- Ephemeral/short-perennial
- Hardstanding
- Semi-natural broad-leaved woodland
- Target note
  - 1 Jersey cudweed *Gnaphalium luteoalbum*

Project	NCP Car Park, Bath Road, West Drayton, Greater London
Drawing	Phase 1 Habitat Map
Client	Aprirose Real Estate Investment
Drawing Number	C157814-01-01
Revision	00
Scale @ A4	1:1,250
Date	May 2022
Approved By	HS
Drawn By	RP

MIDDLEMARCH

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C157814-01-01

9. PHOTOGRAPHS

Plate 9.1: Building

Plate 9.2: Ephemeral/short perennial vegetation

Plate 9.3: Woodland

Plate 9.4: Hardstanding

Plate 9.5: Jersey cudweed

Plate 9.6: Dead wood

Plate 9.8: Woodland

Plate 9.9: Ephemeral/short perennial vegetation and hardstanding

Plate 9.10: Jersey cudweed

Plate 9.11: Jersey cudweed

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APPENDICES

APPENDIX 1: Summary of Statutory Nature Conservation Sites

APPENDIX 2: Overview of Relevant Species Specific Legislation

APPENDIX 1

Summary of Statutory Nature Conservation Sites

UK Statutory Sites
Site Check Report Report generated on Tue May 10 2022
You selected the location: Centroid Grid Ref: TQ07457707
The following features have been found in your search area:
Ancient Woodland (England)
No Features found
Local Nature Reserves (England)
No Features found
National Nature Reserves (England)
No Features found
Sites of Special Scientific Interest (England)
No Features found
SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)
1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?
2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:
All Planning Applications
Infrastructure
Airports, helipads and other aviation proposals.
Wind & Solar Energy
Minerals, Oil & Gas
Rural Non Residential
Residential
Rural Residential
Air Pollution
Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t).
Combustion
General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.
Waste
Composting
Discharges
Any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.
Water Supply
Notes 1
Notes 2
GUIDANCE - How to use the Impact Risk Zones
/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf

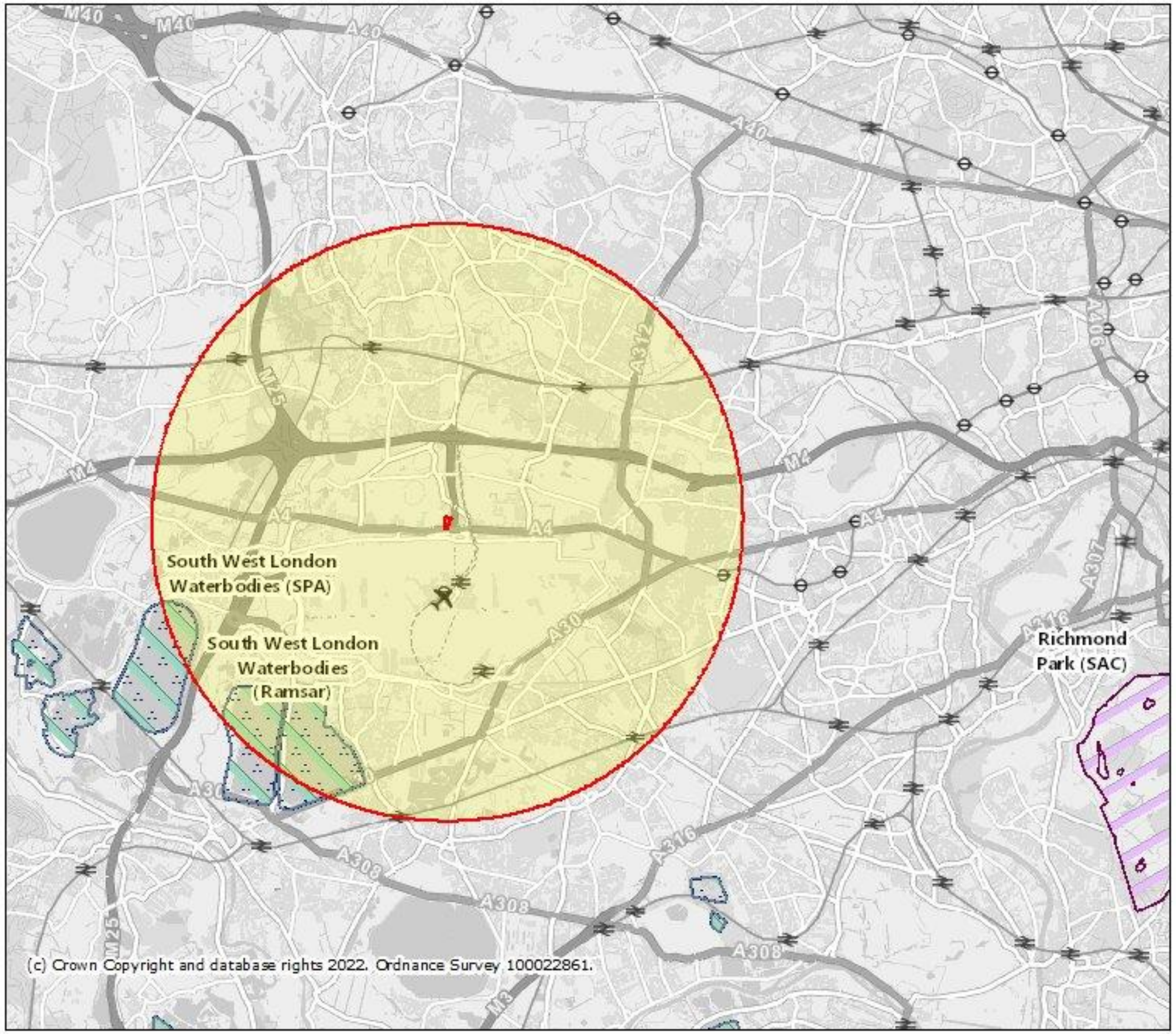
EU Statutory Sites
Site Check Report Report generated on Tue May 10 2022
You selected the location: Centroid Grid Ref: TQ07457707
The following features have been found in your search area:
Ramsar Sites (England)
Name
SOUTH WEST LONDON WATERBODIES
Reference
UK11065
Hectares
830.26
Special Protection Areas (England)
Name
SOUTH WEST LONDON WATERBODIES
Reference
UK9012171
Hectares
830.26
Proposed Ramsar Sites (England)
No Features found
Special Areas of Conservation (England)
No Features found
Possible Special Areas of Conservation (England)

No Features found

Potential Special Protection Areas (England)

No Features found

MAGIC 5 km European Statutory Sites - NCP Bath Road



Legend

- Ramsar Sites (England)
- Proposed Ramsar Sites (England)
- Special Areas of Conservation (England)
- Possible Special Areas of Conservation (England)
- Special Protection Areas (England)
- Potential Special Protection Areas (England)

Projection = OSGB36
xmin = 484900
ymin = 165300
xmax = 534800
ymax = 189000

0 2 4 km

Map produced by MAGIC on 10 May, 2022.

APPENDIX 2

Overview of Relevant Species Specific Legislation

Bats
Bats and the places they use for shelter or protection (i.e. roosts) receive legal protection under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1st January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, *or obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The reader should refer to the original legislation for the definitive interpretation.

The following bat species are Species of Principal Importance for Nature Conservation in England: barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, greater horseshoe bat *Rhinolophus ferrumequinum* and lesser horseshoe bat *Rhinolophus hipposideros*. Species of Principal Importance for Nature Conservation in England are material considerations in the planning process. The list of species is derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006.

Badger
Badgers and their setts are protected under the Protection of Badgers Act 1992. The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury, badgers are not protected for conservation reasons. The following are criminal offences:

- To intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it.

- To wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so.

A badger sett is defined in the legislation as:

- *'Any structure or place that displays signs indicating current use by a badger'*.

'Current use' is not synonymous with current occupation and a sett is defined as such (and thus protected) as long as signs of current usage are present. Therefore, a sett is protected until such a time as the field signs deteriorate to such an extent that they no longer indicate 'current usage'.

Badger sett interference can result from a multitude of operations including excavation and coring, even if there is no direct damage to the sett, such as through the disturbance of badgers whilst occupying the sett. Any intentional or reckless work that results in the interference of badger setts is illegal without a licence from Natural England[30]. In England a licence must be obtained from Natural England before any interference with a badger sett occurs.

The reader should refer to the original legislation for the definitive interpretation.

Hedgehog
Hedgehogs receive some protection under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended); this section of the Act lists animals which may not be killed or taken by certain methods, namely traps and nets, poisons, automatic weapons, electrical devices, smokes/gases and various others. Humane trapping for research purposes requires a licence.

Hedgehogs are a Species of Principal Importance for Nature Conservation in England and are thus capable of being material considerations in the planning process.

Birds
The Conservation of Habitats and Species Regulations 2017, (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019) places a duty on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds.

Nesting and nest building birds are protected under the Wildlife and Countryside Act WCA 1981 (as amended).

Subject to the provisions of the act, if any person intentionally:
- kills, injures or takes any wild bird;
- takes, damages or destroys the nest of any wild bird while that nest is in use or being built; or
- takes or destroys an egg of any wild bird, he shall be guilty of an offence.

Some species (listed in Schedule 1 of the WCA) are protected by special penalties. Subject to the provisions of the act, if any person intentionally or recklessly**:**
- disturbs any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or
- disturbs dependent young of such a bird, he shall be guilty of an offence.

Several bird species are Species of Principal Importance for Nature Conservation in England, making them capable of being material considerations in the planning process.