

151 Station Road
West Drayton
Greater London
UB7 7NG

Preliminary Ecological Appraisal (incl. Preliminary Roost Assessment)

Report ref.: R3157_PEA_a

Report Quality Control Information	
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April 2026



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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by Mr Joseph Kent, on behalf of his client Kearns Development Ltd., to undertake a Preliminary Ecological Appraisal (PEA), including an updated Preliminary Roost Assessment (PRA) for bats, at 151 Station Road, in West Drayton, Greater London. The PEA was commissioned to accompany a full planning application to be submitted to London Borough of Hillingdon Council seeking consent for the demolition of the existing bungalow and outbuildings, and the construction of four new flats and three houses.
- 1.1.2** The application site is approximately 0.18ha consisting of six buildings, including a residential bungalow (B1), and five single-storey outbuildings (B2, B3, B4, B5 & B6). The site features managed modified grassland, two areas of ruderal vegetation, scattered trees and urban habitats, including hard standing and paved areas surrounding the bungalow.
- 1.1.3** The desk study (including a GiGL1 kilometre data search) revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and has no protected/notable species records.
- 1.1.4** Meghan Porter-Smith ACIEEM and Lauren Hayward (Qualifying member of CIEEM) carried out a site visit on the 17th February 2026. The field survey identified the following UKHab habitats: Developed land, sealed surfaces (u1b), Buildings (u1b5), Other developed land (u1b6), Modified grassland (g4), Ruderal or ephemeral (81) and individual trees.
- 1.1.5** The PRA found no evidence of roosting bats in the bungalow (B1) or any of the outbuildings (B2 – B6) onsite. Considering the lack of potential roosting features and lack of bat droppings, the detached bungalow and all outbuildings have been classified as negligible potential suitability for roosting bats.
- 1.1.6** Section 10 provides recommendations which include
- Sensitive lighting measures for bats and other nocturnal species;
 - Precautionary measures for nesting birds, mammals, amphibians and reptiles; and
 - Ecological enhancements.
- 1.1.7** This report contains information regarding a mobile species (i.e. bats) so it will likely be valid for 12 months only (CIEEM 2019b).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by Mr Joseph Kent, on behalf of his client Kearns Development Ltd., to undertake a Preliminary Ecological Appraisal (PEA), including an updated Preliminary Roost Assessment (PRA) for bats, at 151 Station Road, in West Drayton, Greater London.

2.1.2 The PEA was commissioned to accompany a full planning application to be submitted to London Borough of Hillingdon Council seeking consent to demolish the existing bungalow and outbuildings and construct four new flats and three houses (refer to Proposed Site Layout in **Appendix 2**).

2.2 Site Location and Context

2.2.1 The application site covers 0.18ha and is situated on the eastern side of Station Road and approximately 500m to the south of West Drayton town centre, within Greater London (Central Grid Reference: TQ 06374 79649).

2.2.2 The site is bordered by residential dwellings to the west and south, and West Drayton Academy to the east. The recreation grounds of the academy border the northern boundary of the site and are surrounded by a mature tree line. There are several areas of deciduous woodland in the surrounding area; the closest parcel is within the grounds of Drayton Hall Park, approximately 110m to the south of the site. The Closes comprises a large area of open grassland with mature tree lines and is 220m to the south-west of the site. Grand Union Canal is approximately 450m to the north, and a network of rivers and ponds within scattered parcels of deciduous woodland, including River Colne and Mayfields Lake, are situated approximately 640m to the west of the site.

2.3 Report Objectives

2.3.1 The aim of this PEA is to understand the nature of the site and assess its ecological value. The key objectives are to:

- identify any likely ecological constraints associated with the planning proposals;
- establish appropriate mitigation measures in accordance with the mitigation hierarchy (i.e. avoid > mitigate > compensate);
- determine any additional surveys that may be required following on from this preliminary stage; and
- recognise opportunities to deliver ecological enhancements in line with national

and local planning policy.

- 2.3.2** The aim of the PRA is to ascertain if there is evidence of the presence of bats and/or potential for roosting bats to be present, and therefore whether further survey and/or mitigation would be required for the proposed development activities.

3 LEGISLATIVE BACKGROUND

3.1 Relevant Legislation

3.1.1 The following legislation is considered relevant for the purpose of this Preliminary Ecological Appraisal (PEA):

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations ('Habitat') Regulations 2017
- Countryside and Rights of Way (CRoW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

3.1.2 These acts hold relevance to both protected and invasive species and the degree of protection varies depending on faunal/floral group or species. For example, some species of European importance receive full protection in England and Wales under the Habitat Regulations (e.g. bats), whereas others may only be afforded protection through national legislation such as the W&CA 1981 (as amended) (e.g. common lizard). For a detailed overview of species-specific legislation, please refer to **Appendix 1**.

3.2 European Protected Species Mitigation Licensing

3.2.1 The Government's statutory nature conservation advisory organisation, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences that permit activities that would otherwise lead to an infringement of the Habitat Regulations. An EPS mitigation licence can be issued if the following three tests derived from Regulation 55 have been satisfied:

- (2)(e) – the derogation is for the purposes of '*preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.*'
- (9)(a) – there is '*no satisfactory alternative*' to the derogation; and
- (9)(b) – '*the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*'

3.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3)(e) of the Habitat Regulations consider and determine whether these three tests are likely to be

satisfied by planning proposals affected EPS before granted planning permission. If an EPS mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

4 PLANNING POLICY

4.1 National Planning Policy

- 4.1.1 The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England.
- 4.1.2 The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation in England, stating that *'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.'*
- 4.1.3 The revised National Planning Policy Framework (NPPF), published in December 2024, sets out the Government's planning policies for England and how they should be applied. Section 15 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. Paragraph 193 sets out the principles LPAs should apply when determining planning applications, as follows:

'When determining planning applications, local planning authorities should apply the following principles:

- a) *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around*

developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

4.1.4 In England, BNG became mandatory for major development from the 12th February 2024 and for minor development (small sites) from the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In practice, planning permission in England is now subject to a condition to secure a minimum 10% net gain for biodiversity, unless the development is a type that is exempt from mandatory BNG requirements.

4.2 Local Planning Policy

4.2.1 The London Borough of Hillingdon Council (Local Plan: Part One – Strategic Policies (adopted November 2012) includes the following policy (EM7) relevant to biodiversity as follows:

'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:Part2 – 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.'

5 SURVEY METHODOLOGY

5.1 Desk Study

- 5.1.1** A desktop study was conducted by Lauren Hayward (a Qualifying member of CIEEM) after the site visit. The study utilised data from the local environmental records centre and open access online resources to acquire information on the nature of the site and its surroundings and highlight any potential ecological features.
- 5.1.2** Greenspace Information for Greater London CIC (GiGL) was commissioned to undertake a search of pre-existing records of protected and/or notable species and non-statutorily designated wildlife sites held by them within a 1km radius around a central point inside the site.
- 5.1.3** The DEFRA Data Services Platform was used to obtain geospatial datasets for designated sites (i.e. RAMSAR, SPA, SAC, SSSI) and important habitats (i.e. Priority Habitat Inventory, Ancient Woodland Inventory) to be analysed in QGIS. The Multi-Agency Geographical Information Centre (MAGIC) website was examined for granted European Protected Species (EPS) licence applications. These geospatial datasets and Google Earth satellite imagery were used to determine the extent and connectivity of habitats, how the site is linked to the surrounding landscape and whether the development could have wider scale impacts on biodiversity.
- 5.1.4** Historical OS maps and Google Earth satellite imagery were consulted to provide insight into historic and current land use; such information helps contextualise the continuity of habitats and determine the importance of existing ecological features on site.
- 5.1.5** The type of soil on site was inferred using geological information taken from the British Geological Survey and on-site interpretation.

5.2 Field Survey

Habitat Survey

- 5.2.1** A site walkover was undertaken on the 17th February 2026 by ecologist Meghan Porter-Smith ACIEEM and assistant ecologist Lauren Hayward (Qualifying member of CIEEM). The site was surveyed using the UK Habitat Classification (UKHab) system (UKHab Ltd 2023) in accordance with the Guidelines for Preliminary Ecological Appraisal (2nd Edition) (CIEEM 2017). Particular attention was given to evidence of protected and priority species (NERC Act 2006 Section 41 species of principal importance) and the site's potential to support such species.

- 5.2.2** There were no significant survey constraints because full access was available to the site. The survey was subject to seasonal constraints because not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only.

Building Inspection

- 5.2.3** A detailed updated inspection of the exterior and interior of the buildings on-site was undertaken on the 17th February 2026 by ecologist Meghan Porter-Smith registered under Natural England Bat Survey Class Licence CL17 (Registration no.: 2025-86253-CL17-BAT) and assistant ecologist Lauren Hayward, in accordance with good practice guidelines (Collins 2023). The equipment used during the inspection comprised binoculars, a high-power (1 million candlepower) LED torch, a headtorch, ladder and PPE (facemask, gloves etc.). The inspection involved a systematic search of the exterior and interior of the structure during daylight hours to compile information on potential and actual bat access points; potential and actual bat roost sites; and any evidence of bat presence.
- 5.2.4** There were no significant survey limitations because PRAs can be carried out at any time of year under any weather conditions and the building was fully accessible.
- 5.2.5** It should be noted that it is not always possible to inspect all potential roost sites during a survey, particularly for bat species which typically roost in hidden crevices. Therefore, an absence of bat evidence found during a survey does not necessarily equate to evidence of bat absence in a building.

5.3 Report Validity

- 5.3.1** This report contains information regarding a mobile species (i.e. bats) so it will likely be valid for 12 months only (CIEEM 2019b).

6 DESK STUDY FINDINGS

6.1 Designated Sites

6.1.1 The desk study returned no internationally designated statutory sites within a 5km radius of the application site; no nationally designated statutory sites within a 2km radius; and six locally designated non-statutory sites, i.e. Sites of Importance for Nature Conservation (SINCs), were highlighted within a 1km search radius (see Table 1 below).

Table 1. Non-statutorily designated sites within the vicinity of the site (Source: GiGL).

Site name	Designation	Description	Distance from nearest site boundary (m)
London Canals	Site of Importance for Nature Conservation (SINC)	~187.5 ha of canals provides habitat for a range of fish, invertebrates, birds and aquatic plants, including uncommon and rare species such as narrow-leaved water plantain and sand martins who nest within the walls of Limehouse Cut.	~425m N
Beeches	Site of Importance for Nature Conservation (SINC)	~7.58 ha site contained a Grade II listed building and ancient woodland of beech trees with British White cows grazing in the onsite meadows.	~590 NW
St Georges Meadows at Southlands Arts Centre	Site of Importance for Nature Conservation (SINC)	~2.04 ha area on the grounds of Southlands Art Centre. The site includes areas of flower-rich grassland and a small pond, supporting a wide range of flora and fauna species, including meadow crane's-bill which is now scarce in the London area.	~685 SW
Lower Colne	Site of Importance for Nature Conservation (SINC)	~94.61 ha of river systems in London, including sections of the river Colne, Wraysbury and Frays, which originate as chalk streams, connect gravel pits, orchards, areas of wet woodland and wet meadows which support a range of wetland flora and fauna.	~787 SW
Archie and Emden Close	Site of Importance for Nature Conservation (SINC)	~2.39 ha area of railway lineside that use to be grazed, however recent lack of grazing has created a dense shrub habitat including hawthorn, bramble, elder and ivy, with scattered planted trees.	~940 NE
Stockley Road Rough	Site of Importance for Nature Conservation (SINC)	~5.16 ha area of scrub, tall herbs and grasses which is surrounded by industrial development therefore provides a accessible wildlife site within an urban area.	~955 SE

6.2 Important Habitats

6.2.1 There are no irreplaceable habitats (e.g. Ancient Semi-natural Woodland) or priority habitats (Section 41 NERC Act 2006 habitats of principle importance) on site or mapped within 50m of the site.

6.3 Protected Species and Notable Species

6.3.1 The search of the GiGL database revealed a range of protected and notable species records starting from 1960. Only recent records, defined as fewer than ten years old, are included in this report (see Tables 2a & 2b below).

Table 2a. Recent protected and/or notable species records within the vicinity of the site (Source: GiGL).

Common name	Scientific name	No. of records	Most recent record	Nearest record (m)	Precision (m)	Status
Amphibians & Reptiles						
Great crested newt	<i>Triturus cristatus</i>	7	2021	~659SW	100	HabReg_2, WCA_5s94b/c NERC_s41
Birds						
Barnacle Goose	<i>Branta leucopsis</i>	2	2018	~683NW	100	EU_Bird_1
Cuckoo	<i>Cuculus canorus</i>	1	2022	~641N	100	NERC_S41 BOCC_red
Greenfinch	<i>Chloris chloris</i>	1	2022	~799SW	100	BOCC_red
Herring Gull	<i>Larus argentatus</i>	3	2022	~641N	100	BOCC_red
Little Egret	<i>Egretta garzetta</i>	6	2019	~799SW	100	EU_Bird_1
Mistle thrush	<i>Turdus viscivorus</i>	9	2022	~641N	100	BOCC_red
Nightingale	<i>Luscinia megarhynchos</i>	1	2021	~514S	100	BOCC_red
Osprey	<i>Pandion haliaetus</i>	2	2020	~514S	100	WCA_1p1 EU_Bird_1
Red kite	<i>Milvus milvus</i>	35	2022	~514S	100	WCA_1p1 EU_Bird_1
Redwing	<i>Turdus iliacus</i>	11	2020	~683NW	100	WCA_1p1
Starling	<i>Sturnus vulgaris</i>	12	2022	~641N	100	BOCC_red
Swift	<i>Apus apus</i>	11	2020	~613SE	100	BOCC_red
Invertebrates						
Brown-banded carder bee	<i>Bombus humilis</i>	1	2021	~235W	100	NERC_S41
Small heath	<i>Coenonympha pamphilus pamphilus</i>	1	2020	~724SS W	100	NERC_S41
Stag beetle	<i>Lucanus cervus</i>	82	2024	~140NW	100	NERC_S41
Terrestrial Mammals (bats)						
Brown long-eared	<i>Plecotus auritus</i>	2	2019	~213S	100	HabReg_2 WCA_5s94b/c NERC_s41
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	5	2019	~500S	100	HabReg_2 WCA_5s94b/c
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	4	2019	~500S	100	HabReg_2 WCA_5s94b/c NERC_s41
Terrestrial Mammals						
European hedgehog	<i>Erinaceus europaeus</i>	13	2023	~225W	100	NERC_s41

Table 2b. Species status key.

Abbreviation	Legislation
BOCC_red	Birds of Conservation Concern Red list – Globally threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown substantial recovery.
HabReg_2	Schedule 2 of Conservation of Habitats and Species Regulations 2010 (European Protected Species animal) – It is an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2.

NERC_s41	Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
EU_Bird_1	Annex I of the Birds Directive
WCA_1p1	Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended) – birds protected from disturbance at their nests, or their dependent young.
WCA_5s94b/c	Schedule 5 Section 9 Parts 4b/c of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection / Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.

- 6.3.2** There are no European Protected Species (EPS) mitigation licences that have been granted inside a 2km radius of the application site in the last 10 years.
- 6.3.3** The London Borough of Hillingdon do not take part in the NatureSpace District Level Licensing scheme for great crested newts (*Triturus cristatus*). No potential breeding ponds were identified on OS mapping within a 500m radius of the site
- 6.3.4** There have been no rare reptile mitigation or hazel dormice (*Muscardinus avellanarius*) licences granted within 5km radius of the site, and limited suitable habitats for these protected species in close vicinity to the site.

6.4 Historic and Current Land Use

- 6.4.1** Google Satellite imagery dating from 1999 shows the application site to always have been used as a residential site with outbuildings and surrounded by vegetated garden, changing little up to present day.

6.5 Geology, Soils and Topography

- 6.5.1** The geology of the application site is freely draining slightly acid loamy soils; habitats associated with such soils include neutral and acid pastures and deciduous woodlands, including acid communities such as bracken and gorse in the uplands.

7 HABITAT SURVEY

7.1 Overview

7.1.1 The application site is approximately 0.188ha consisting of the main bungalow, and five single-storey outbuildings. The site is in an urban area and features urban habitats, such as hard standing and paved areas, modified grassland and small areas of ruderal habitat. The wider surroundings of the site included similar residential house and their associated gardens directly to the south and west of the site, and West Drayton Academy and its associated grounds directly to the north and east.

7.1.2 The following UK Habitat Classification (UKHab) habitat was observed during the site walkover: g4 Modified grassland, u1 828 Vegetated garden, u1 829 Unvegetated garden, u1b5 Buildings, u1b6 Other developed land and w1g 33 Line of trees.

7.1.3 Secondary codes observed included: 32 Scattered trees, 81 Ruderal or ephemeral, 106 Mown, 516 Active management, 521 Unmanaged and 818 Residential building.

7.1.4 The UKHab habitats are described alongside photographs (see **Photographs 1-13**) and a survey plan (see **Figure 1**), as follows:

7.2 g4 Modified grassland

32 Scattered trees / 106 mown/ 510 Bare ground

7.2.1 The garden to the south and east of the bungalow on site consisted of mown and actively managed modified grassland lawn (**Photograph 1**). Species present included common garden lawn species such as creeping bent (*Agrostis stolonifera*), perennial rye grass (*Lolium perenne*), Yorkshire fog (*Holcus lanatus*), cleavers (*Urtica dioica*), common yarrow (*Achillea millefolium*), common sorrel (*Rumex acetosa*), common daisy (*Bellis perennis*), dandelion (*Taraxacum officinale*), doves-foot crane's-bill (*Geranium molle*), dead nettle (*Lamium purpureum*), Germander speedwell (*Veronica chamaedrys*), snowdrops (*Galanthus nivalis*) and non-native bluebell (*Hyacinthoides* sp.). There were areas of bare ground and mounds of soil where ruderal species were present, such as spear thistle (*Cirsium vulgare*), common nettle (*Urtica dioica*), lord and ladies (*Arum*

maculatum), poppy (*Papaver* spp.), chickweed (*Stellaria* sp.), wood avens (*Geum urbanum*), parsley (*Petroselinum* sp.), foxglove (*Digitalis purpurea*) and petty spurge (*Euphorbia peplus*).



Photograph 1. Mown, modified grassland to the south of the site with tree line boundaries (g4).



Photograph 2. Area of bare ground within grassland to the southern end of the garden (g4 510).

7.3 w1g 33 Line of trees

7.3.1 Along the southern boundary was an area of mostly bramble scrub (*Rubus fruticosus*), with cherry laurel (*Prunus laurocerasus*), sycamore (*Acer pseudoplatanus*), ash (*Fraxinus excelsior*) and leylandii (*Cupressus x leylandii*). (Photograph 3). A sycamore (*Acer pseudoplatanus*) tree and a line of leylandii (*Cupressus x leylandii*) was present along the south-western boundary of the site.



Photograph 3. Line of trees along the southern boundary of the site (w1g 33).

7.4 u1 828 Vegetated garden

32 Scattered trees/ 81 Ruderal or ephemeral

7.4.1 Within the garden there were areas of sparsely vegetated land and ruderal vegetation. The parcel of ephemeral vegetation on the north-eastern side of the bungalow (B1) and besides, supported willowherb (*Epilobium* sp.), stone crop (*Sedum* sp.), herb robert (*G. robertianum*), parsley (*Petroselinum* sp.) and spurge

(*Euphorbia* sp.) (**Photograph 4**).

7.4.2 Another area of ruderal vegetation was present on the western side of the site, which had a similar botanical species composition to the modified grassland however, additional species were noted including cheeseweed mallow (*Malva parviflora*), common ragwort (*Jacobaea vulgaris*), caper spurge (*Euphorbia lathyris*), bramble (*Rubus fruticosus*), cherry laurel (*Prunus laurocerasus*) and a small lilac bush (*Syringa vulgaris*) (**Photographs 5 & 6**).



Photograph 4. Ruderal vegetation to the north-east of the site (u1 828).



Photograph 5. Ruderal vegetation to the west of B3 (u1 828).



Photograph 6. Mound of soil with ruderal vegetation to the west of site (u1 828).

7.5 Unvegetated garden (u1 829)

7.5.1 The access driveway from Station Road to the north-west of the site was of hard standing construction (**Photograph 7**). There was an area of paving to the western and northern side of the bungalow, with a concrete driveway present in front of the garage buildings (**Photograph 8**).



Photograph 7. Access driveway to the west of the site (u1 829).



Photograph 8. Paved area on the western side of the bungalow (u1 829).

7.6 u1b5 Buildings and u1b6 Other developed land

818 Residential building

- 7.6.1 There are six buildings on-site (Refer to **Figure 1 – UKHab Survey Plan**) including the detached residential bungalow (**B1: Photograph 9**). The nature of the buildings and suitability for bats has been detailed in the preliminary bat roost assessment - Refer to **Section 8**.



Photograph 9. Detached bungalow viewed from the south (B1).

- 7.6.2 The remaining five buildings on-site (Refer to **Figure 1 – UKHab Survey Plan**) are single-storey outbuildings comprising garages and storage sheds (**B2-B6; Photographs 10 – 14**).



Photograph 10. Double garage viewed from the south-west (B2).



Photograph 11. Storage outbuilding viewed from the south (B3).



Photograph 12. Outbuilding viewed from the south (B4).



Photograph 13. Timber shed viewed from the south (B5).



Photograph 14. Outbuilding within garden; viewed from the north (B6).

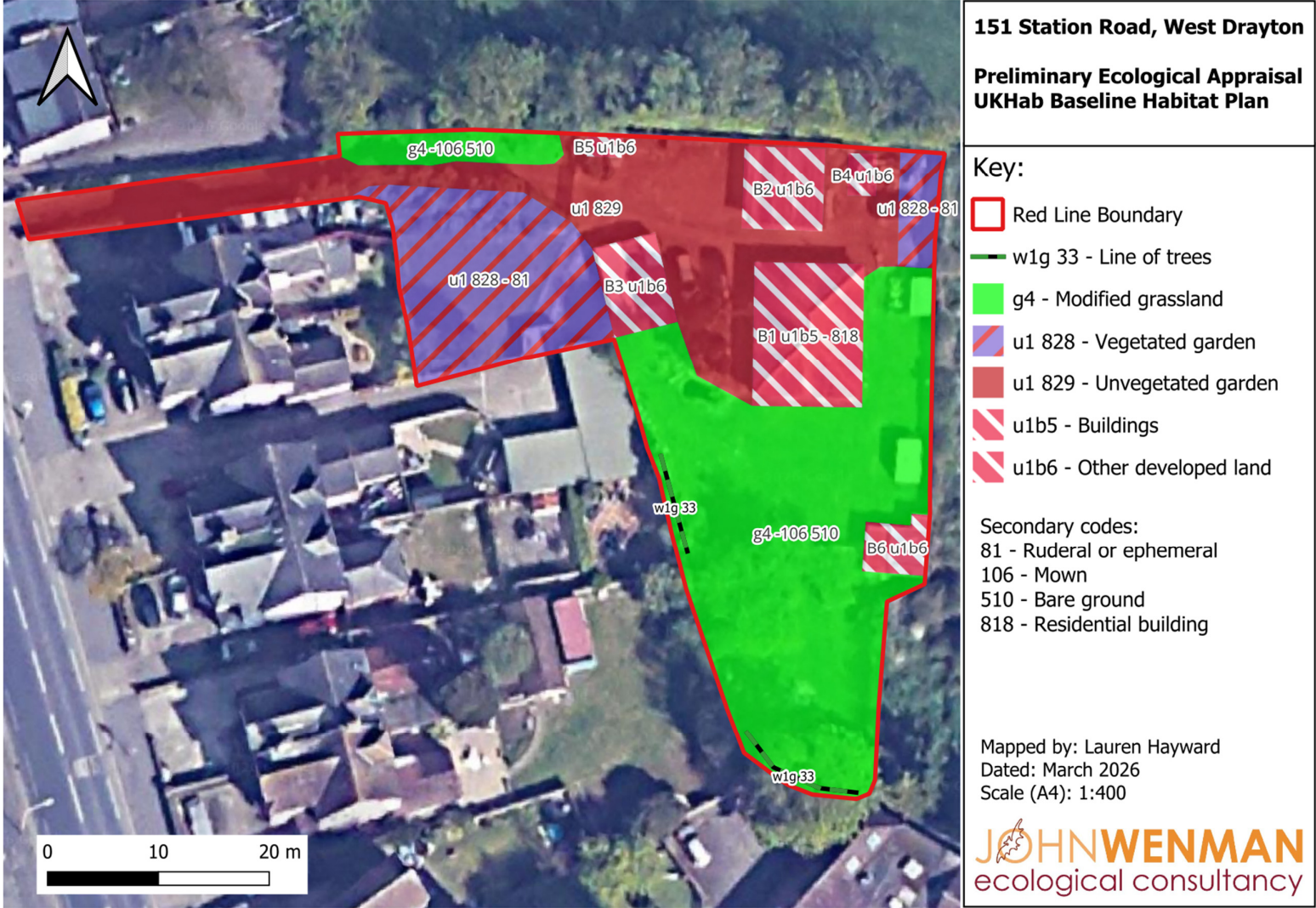


Figure 1. UKHab Survey Plan.

8 BUILDING INSPECTION

8.1 Overview

8.1.1 The findings from the external and internal inspections carried out for the buildings on site are described with photographs and annotated in a plan (see **Figure 2**), as follows:

8.2 B1 Residential bungalow

External survey

8.2.1 The detached residential bungalow (**B1**) was of brickwork construction with a hipped roof covered with intact interlocking roof tiles (**Photograph 15**). The ridge mortar was intact across the bungalow (**Photograph 16**). The hip mortar was mostly intact across the roof of the bungalow, with one small section of crumbling hip mortar on the western elevation of the bungalow (**Photograph 17; Target note 1**). However, upon close inspection using a high-powered LED torch, the crumbling mortar was superficial, creating no suitable gaps under the hip tiles.



Photograph 15. Intact interlocking roof tiles (B1 - western elevation).



Photograph 16. Ridge mortar intact (B1 - northern elevation).



Photograph 17. Superficial gap below crumbling hip mortar (B1 - western elevation).

8.2.2 The lead flashing around the chimney on the western side of the bungalow was slightly lifted, however, upon close inspection with a high-power LED torch, the gap was proven to be superficial and it was classified as being too exposed to be used by crevice-

dwelling bats, such as the pipistrelles (*Pipistrellus* spp.) (**Photograph 18; Target note 2**). All timber soffits around the bungalow were tight to the brickwork with intact sealant, including the timber panelling on the underside of the porch on the southern elevation of the bungalow (**Photographs 19 & 20**).



Photograph 18. Lifted lead flashing around chimney (B1 - western elevation).



Photograph 19. Intact/tight timber soffits across the bungalow (B1 - eastern elevation).



Photograph 20. Intact timber panelling of open porch (B1 – southern elevation).

Internal survey

- 8.2.3** There was one roof void that covered the full footprint of the bungalow and was accessible via a loft hatch on the ground-floor. The loft space was of ‘cut and pitch’ construction, had a floor to ridge height of approximately 2m, and the ridge was heavily cobwebbed throughout (**Photograph 21**). There was a small open water tank located on the western side of the loft void (**Photograph 22**).



Photograph 21. Cut and pitch construction and heavily cobwebbed ridge (B1 - Roof void).



Photograph 22. Small water tank (B1 - Roof void)

8.2.4 The roof was lined with heavily cobwebbed timber sarking boards that were intact and tight to the timber rafters (**Photograph 23**). There was a small skylight on the eastern elevation of the roof that was partially blocked by external interlocking tiles, and fiberglass was visible filling the space between the tiles and sarking boards (**Photograph 24; Target note 3**). The floor was boarded around the hatch entrance, with thick fibreglass between most of the timber joists, and areas of shredded fibreglass, which went up to the eaves (**Photograph 25**). There was no sign of bat activity or evidence of bats observed within the roof void during the internal inspection.



Photograph 23. Tight/intact timber sarking boards that are heavily cobwebbed (B1 - Roof void).



Photograph 24. Blocked skylight with small section of daylight (B1 - Roof void).



Photograph 25. Thick fibreglass between the timber joists (B1 - Roof void).

8.3 Outbuildings (B2 – B6)

External survey

8.3.1 The double garage (B2) situated to the north of the bungalow was of brick and blockwork construction, had two garage doors on the western elevation and had an open side on the eastern end of the building, with a corrugated metal flat roof (**Photograph 10**). The outbuilding to the west of the bungalow (B3) was of timber construction with a corrugated metal pitched roof (**Photograph 11**). The remaining outbuildings (B4, B5 and B6) were of simple wooden chipboard and timber panel construction, with no potential roosting features for crevice-dwelling bats (**Photographs 12-14**).

8.3.2 All the outbuildings were of simple construction and in a dilapidated state, with no potential roosting features for bats.

Internal survey

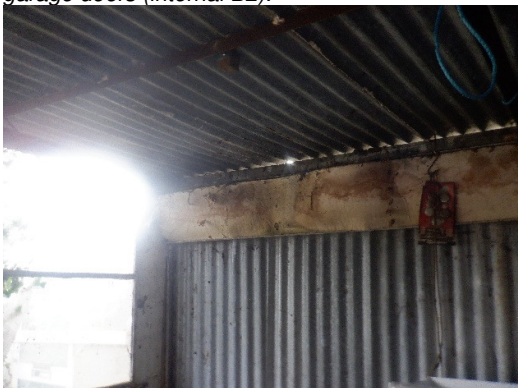
8.3.3 There were no internal roof voids within any of the outbuildings, which were all open to the roof and unlined (**Photographs 25 – 28**). There was no sign of bat activity or evidence of bats identified during the internal inspection of any of the outbuildings onsite.



Photograph 25. Unlined roof and daylight over garage doors (internal B2).



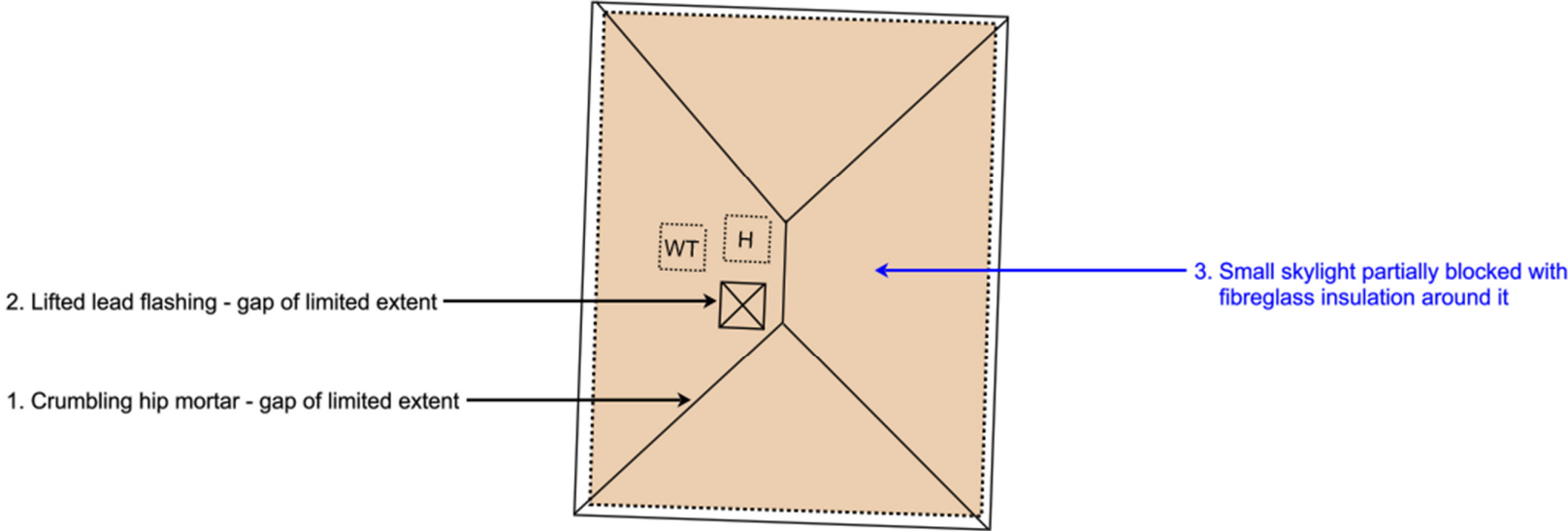
Photograph 26. Open wall at the eastern end (internal B2).



Photograph 27. Unlined roof and internal corrugated metal of B3.



Photograph 28. Unlined roof and internal woodchip boards of B6.



n. External target note
 n. Internal target note
 Roof void
 H Loft hatch
 WT Water tank
 X Chimney

Drawn by:	Date	Scale:	151 Station Road West Drayton	
LH	March 2026	Not to scale	B1- Preliminary Bat Roost Assessment Findings	

Figure 2. B1 - Preliminary Roost Assessment Findings Plan

9 DISCUSSION

9.1 Designated Sites

Evaluation of Baseline

- 9.1.1** The desk study revealed that the application site is not designated for its wildlife interest and therefore is not currently recognised as being of international, national or county level conservation significance.
- 9.1.2** The desk study data included no internationally designated sites for nature conservation within 5km of the site and no nationally designated sites for nature conservation within 2km of the site. The desk study revealed six locally designated sites within a 1km radius of the application site; the closest being London Canals SINC located approximately 425m to the north of the site.

Impact Assessment

- 9.1.3** The site does not fall into the IRZ of any statutory or non-statutory designated sites and proposed development does not fall into any of the IRZ categories (i.e. infrastructure, minerals, oil and gas, air pollution, combustion, waste, compost or discharge) recognised by Natural England to have an adverse impact, and therefore the proposals do not require consultation with Natural England. Furthermore, considering the nature, scale and distance of the proposed development, no adverse effects are anticipated on the locally designated non-statutory sites. The building of four new flats and three houses will not directly or indirectly cause degradation of the habitats and biodiversity features for which the sites are designated.

9.2 On-site Habitats

Evaluation of Baseline

- 9.2.1** There are no onsite habitats that are classified as Habitats of Principle Importance (NERC Act 2006 Section 41 Habitats of Principle Importance) or of high ecological distinctiveness.
- 9.2.2** The site includes numerous buildings including a residential bungalow (**B1**), and storage outbuildings (**B2 – B6**), with a driveway, areas of paving and concrete surrounding the bungalow, modified grassland and areas of ruderal vegetation – all urban habitats of low distinctiveness.

- 9.2.3** The line of trees along the southern and south-western side of the site are managed and of low distinctiveness, and therefore is not considered to be of ecological importance beyond the site level.

Impact Assessment

- 9.2.4** The trees present along the boundary of the site will be retained and protected during the demolition and construction works as informed by an arboriculturist report.
- 9.2.5** The proposed development will need to demonstrate that it has complied with mandatory Biodiversity Net Gain (BNG) requirements, either by achieving a 10% gain within the site or wider ownership boundary or by purchasing offsite habitat units – refer to recommendations in **Section 10.2**.

9.3 Bats

Evaluation of Baseline

- 9.3.1** The bungalow's (**B1**) roof void was heavily cobwebbed throughout, so is unlikely to have supported the internal flight typically exhibited by void-dwelling bat species, such as the locally recorded brown long-eared bat (*Plecotus auritus*). Moreover, in the absence of any bat droppings observed within the void or any of the buildings, it is considered highly unlikely that any void-dwelling bat species are presently roosting on site.
- 9.3.2** Externally, the bungalow (B1) and all outbuildings (B2 – B6) had limited potential roost sites, which were considered to provide conditions suitable for opportunistic use by small crevice-dwelling bat species, such as the locally recorded common pipistrelle (*P. pipistrellus*) and soprano pipistrelle (*P. pygmaeus*). These potential roost sites were confined to crumbling hip mortar and lifted lead flashing below the chimney on the **B1**, which were closely inspected with a high-powered torch, and ruled out as being superficial and of no bat roost potential.
- 9.3.3** Overall, all buildings onsite lacked potential roosting features, therefore the bungalow and all outbuildings are considered to be of negligible potential suitability for bats (see **Appendix 3** for potential suitability categories).
- 9.3.4** The modified grassland, vegetated garden and unvegetated garden habitats that will be impacted by the proposals, in isolation, do not resemble good quality foraging habitat.
- 9.3.5** However, the treeline along the southern and the western boundary of the site, offers some suitable commuting habitats linking to areas of open space in close vicinity to the

site, including allotments, cemeteries and recreational grounds, forming part of a wider local network of habitat that is considered likely to be of ecological importance at a local level.

Impact Assessment

- 9.3.6** The risk of an adverse impact to bats locally is very low and the trees onsite lack any potential bat roosting features and will be retained, therefore no potential bat roosting features or commuting habitats will be lost during the construction of the new dwellings.
- 9.3.7** The proposals will lead to changes in artificial lighting in the application site, that could result in an adverse impact on bat activity. Artificial lighting has been shown to alter the activity of nocturnal species and certain bat species have been found to be especially averse to lighting and actively avoid lit areas (ILP 2023). To prevent adverse impacts from lighting, any lighting should be designed with the aim of reducing light spillage onto the retained tree line, thereby maintaining dark corridors along the margins of the site – refer to recommendations in **Section 10.3**.

9.4 Amphibians (Great Crested Newt)

Evaluation of Baseline

- 9.4.1** The desk study included 7 recent records of great crested newt (GCN) (*Triturus cristatus*) within a 1km radius of the application site, with the closest being approximately 660m to the south-west. The desk study found no granted GCN licences within a 2km radius of the application site. The London Borough of Hillingdon do not take part in the NatureSpace District Level Licensing scheme for GCN and there are no potential breeding ponds present within 500 metres of the site.

Impact Assessment

- 9.4.2** The likelihood of GCN and other notable amphibians being on site is low; however, simple reasonable avoidance measures should be taken to mitigate the small risk of the harm to amphibians that could be in the neighbouring habitats and occasionally within the garden – refer to **Section 10.4**.

9.5 Reptiles

Evaluation of Baseline

- 9.5.1** The desk study data included no recent records of reptiles within a 1km radius of the

site. The urban habitats onsite are of low suitability for reptiles and are highly unlikely to support a reptile population. There is a low risk that the site could support reptiles opportunistically if present in the neighbouring habitats i.e. grounds of West Drayton Academy to the east.

Impact Assessment

- 9.5.2** The proposed development to the modified grassland and associated clearance of outbuildings and piles of debris onsite suitable for reptiles has low potential to harm and/or kill reptiles so precautionary measures should be taken during the construction—refer to **Section 10.4**

9.6 Other mammals

Evaluation of Baseline

- 9.6.1** The desk study data included no records of hazel dormice (*Muscardinus avellanarius*) and a search of MAGIC for granted EPS licence applications returned none within a 2 kilometre radius of the application site. Furthermore, there is no suitable dormouse (*M. avellanarius*) habitat in the proposed development area, therefore this species is unlikely to be present and affected by the project.
- 9.6.2** There were no signs of badger (*Meles meles*) presence on site and no suitable habitat in the vicinity, and therefore this species is unlikely to be found on site. There are no nearby records of otter (*Lutra lutra*) or water vole (*Arvicola amphibus*) and the site offers no opportunities for these species.
- 9.6.3** The garden habitats onsite and nearby open grassland provide opportunities for the European hedgehog (*Erinaceus europaeus*) to forage and take shelter, but the site is unlikely to be of more than site level value for opportunistic individuals.

Impact Assessment

- 9.6.4** The proposals are unlikely to have an impact on protected or notable mammals; however, to mitigate the low risk, precautionary measures should be taken when removing areas of grassland and shrub to avoid injury or harm to any small mammals that may be present onsite - refer to **Section 10.4**.
- 9.6.5** The proposed development's boundary features should be designed to maintain ecological permeability for any hedgehogs present in the local area – refer to **Section 10.6**.

9.7 Birds

Evaluation of Baseline

- 9.7.1 The desk study data included recent records of bird species protected under Schedule 1 of the Wildlife and Countryside Act (W&CA) 1981 (as amended), such as redwing (*Turdus iliacus*) and osprey (*Pandion haliaetus*), and notable species, such as greenfinch (*Chloris chloris*) and starling (*Sturnus vulgaris*). The trees present on site provides some foraging and nesting resources for local garden bird species; however, the habitats are unlikely to support significant or important local bird populations.

Impact Assessment

- 9.7.2 The proposals may result in the removal of scattered trees and/or shrubs. As such, timing precautions for the removal of the any other vegetation if necessary, must be adhered to, to avoid damaging active bird nests - refer to **Section 10.5**.

9.8 Invertebrates

Evaluation of Baseline

- 9.8.1 The desk study data included records of invertebrate priority species (NERC Act 2006 Section 41 species of principle importance) – within a 1km radius of the application site such as small heath butterfly (*Coenonympha pamphilus*) and stag beetle (*Lucanus cervus*). The site's relatively species poor and urban habitats, are on the whole, unlikely to be of value for a diverse and abundant invertebrate fauna.

Impact Assessment

- 9.8.2 The loss of species poor grassland and garden habitats are relatively poor habitats for invertebrates and is unlikely to have a significant impact on invertebrates. There is scope to create enhancements for invertebrate species, such as the stag beetle, within the landscape proposals – refer to **Section 10.6**.

10 RECOMMENDATIONS

10.1 Overview

10.1.1 This chapter provides the details regarding proposed avoidance, mitigation, compensation and enhancement measures, including measures to enable legislative compliance.

10.2 Onsite Habitats

10.2.1 The planning application will be subject to securing a minimum 10% net gain for biodiversity and is reported separately (refer to the separate report; R3157_BNG_a).

10.3 Bats

10.3.1 During development, artificial lighting should be avoided or kept to a minimum and if security lighting is required, this should be controlled by passive infra-red motion sensors with no light spillage onto the woodland or main house.

10.3.2 In the long term, external lighting should be avoided, but if external lighting is required, lighting with low or no UV content, e.g. warm white LED lamps (2700K), should be used in place of mercury and metal halides and luminaires or other directional light accessories should be used to ensure that light spillage onto the adjacent trees is avoided (ILP, 2023).

10.4 Amphibians, Reptiles and Small Mammals (Reasonable Avoidance Measures)

10.4.1 The following reasonable avoidance measures should be adopted to minimise the low risk of harming individual GCNs, reptiles and small mammals:

Pre-commencement of construction activities

- The vegetated garden and modified grassland within the site will be maintained as existing i.e. frequently mown lawn prior to commencement of the works to limit the likelihood of reptiles, amphibians and small mammals from being on site; and
- Any removal of debris onsite, that occurs within the site boundary will be carefully removed by hand.

During construction activities

- Any stored building materials or waste, such as bricks or debris etc., that might offer shelter for amphibians, reptiles or hedgehogs will be kept raised off the

ground on pallets or on existing hard standing, and efforts should be made to process and removed from site as soon as possible; and

- Excavation works will be avoided after dusk, and any open excavations or trenches will be backfilled (after a check for amphibian/reptile presence) or left with escape ramps to prevent amphibians, reptiles and hedgehogs from becoming trapped.

10.5 Nesting Birds

10.5.1 Any required tree or shrub removal should be completed outside of the peak bird nesting season (March to August) or alternatively, following an inspection by an ecologist confirming that there is no current nesting activity. If nesting birds are discovered prior to or during any work, work should stop immediately and should only continue once bird nesting has finished, i.e. young have fledged and left the nest.

10.6 Biodiversity Enhancement Measures

10.6.1 The planning proposals provide opportunities for the enhancement of the site's biodiversity value. The inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF):

- Create a stag beetle (*Lucanus cervus*) loggery within the southern boundary tree line by partially burying logs from native trees in the ground (approx. 50cm depth);
- Wildlife-friendly and native landscaping within the amenity areas in the development;
- Ensuring ecological permeability for hedgehogs, i.e. 13cm x 13cm holes in garden fencing and 'hedgehog highway' signs; and
- Installation of integral bat and bird boxes in the new residential dwellings.

11 REFERENCES

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APPENDIX 1 – LEGISLATIVE BACKGROUND

Amphibians

The seven native species of amphibian receive protection under the W&AC 1981 (as amended). The four widespread and common amphibians (common frog, toad, smooth newt and palmate newt) receive only limited protection – making their sale illegal.

The great crested newt (*Triturus cristatus*) receives full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2017. The combined legislation makes it illegal to:

- intentionally or recklessly kill, injure or take a great crested newt;
- possess or control any live or dead specimen or anything derived from a great crested newt;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- intentionally or recklessly disturb great crested newts; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Great crested newts (*T. cristatus*) and common toads (*Bufo bufo*) are species of principal importance for the conservation of biodiversity in England ('UKBAP Priority Species') under Section 41 of the NERC Act 2006.

Badgers

Badgers are protected by the Protection of Badgers Act 1992. The Act makes activities such as development that would harm or disturb badgers or damage, obstruct or destroy their setts illegal. If badgers are to be affected by the proposed development, activities can be undertaken only under a licence issued by Natural England.

Bats

All bat species in Britain are fully protected by the W&CA 1981 (as amended) and by the Habitat Regulations 2017. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;

- deliberately, intentionally or recklessly disturb bats; in particular, any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to significantly affect the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

Birds

All wild birds are protected under the W&CA 1981 (as amended). The Act makes it an offence to kill, injure or take a wild bird or to damage or destroy the nest of a wild bird whilst in use or being built. Species listed on Schedule 1 of the Act, such as barn owls and kingfishers, are afforded additional protection against disturbance while nesting.

Hazel dormice

Hazel dormice receive full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2017. These make it illegal to:

- intentionally or recklessly kill, injure or take a dormouse;
- possess or control any live or dead specimen or anything derived from a dormouse;
- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a dormouse; and
- intentionally or recklessly disturb dormice; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Invasive non-native plants

The W&CA 1981 (as amended) provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under Section 14(2) of the Act to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9, Part II. The species listed in the Act include Japanese knotweed (*Reynoutria japonica*), giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*).

Otters

Otters are fully protected by the W&CA 1981 (as amended) and by the Habitat

Regulations 2019. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by an otter;
- deliberately, intentionally or recklessly disturb otters; in particular, any disturbance which is likely to impair the ability of otters to survive, breed or reproduce or nurture their young; or to significantly affect the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

Reptiles

The four widespread reptiles most likely to be encountered (adder, grass snake, slow worm and common lizard) are protected under the W&CA 1981 (as amended). The Act makes it an offence to intentionally kill, injure, possess or sell any of the species.

The aforementioned species are all listed as being of principal importance for the conservation of biodiversity in England (*'UKBAP Priority Species'*) under Section 41 of the NERC Act 2006.

Water voles

Since April 2008, water voles have received full protection under Section 9 in Schedule 5 of the W&CA 1981 (as amended). This makes it an offence to intentionally kill, injure or take water voles or to possess or control live or dead water voles or derivatives. It is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

The water vole is listed as being of principal importance for the conservation of biodiversity in England (*'UKBAP Priority Species'*) under Section 41 of the NERC Act 2006.

Wild mammals

Under the Wild Mammals (Protection) Act 1996 it is an offence to intentionally inflict unnecessary suffering, as specified by the Act, on any wild mammal.

APPENDIX 2 – PROPOSED SITE PLAN



151 Station Road, West Drayton - Preliminary Ecological Appraisal (R3157_PEA_a)

APPENDIX 3 - POTENTIAL SUITABILITY CATEGORIES FOR ROOSTING BATS

The categories detailed in **Table 3** below are derived from the '*Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*' (Collins 2023) and provide guidance for assessing the potential suitability of buildings (and other structures) for roosting bats. These categories are applied using professional judgement and irrespective of whether the presence of a bat roost has been confirmed during a survey, as additional bat roosts could be present which have not yet been discovered.

Table 3. Categories for potential suitability of buildings (and other structures) for roosting bats.

Potential Suitability	Category Justification
None	A building (or structure) that has no features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of cracks, crevices or voids that could provide suitable shelter).
Negligible	A building (or structure) that has no obvious features likely to be used by roosting bats, but in this case a small element of uncertainty remains as bats will occasionally use small and apparently unsuitable features. This category may also be used where a bat could potentially roost due to one attribute, but it is considered unlikely due to another attribute (e.g. a feature that is subject to constant illumination from artificial lighting).
Low	A building (or structure) that has one or more potential roost sites suitable for opportunistic use by individual bats at any time of the year. However, these potential roost sites for bats do not provide sufficient space, shelter, protection, conditions and/or surrounding suitable habitat to be used regularly or by large numbers (i.e. unlikely to be suitable for a maternity colony and not a classic hibernation site).
Moderate	A building (or structure) that has one or more potential roost sites suitable for regular use by individual bats, or small non-breeding groups, due to sufficient space, shelter, protection, conditions and surrounding habitat. However, these potential roost sites for bats are unlikely to support a roost of high conservation status with regards to the type of roost only (i.e. maternity colonies and classic hibernation sites).
High	A building (or structure) that has one or more potential roost sites suitable for use by large numbers of bats more regularly and for longer periods of time due to sufficient space, shelter, protection, conditions and surrounding habitat. These potential roost sites for bats are capable of supporting high conservation status roosts (i.e. maternity colonies and classic hibernation sites).