Aval Consulting Group

CIVIL, ENVIRONMENT & STRUCTURAL ENGINEERS

# Preliminary Ecological Appraisal

34a Drayton Gardens, West Drayton, UB7 7LG

BMR Property Group

03 February 2026

| Project Information | |
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# 1 Introduction

## 1.1 Overview

BMR Property Group ('the client') is seeking consent for a proposed development at 34a Drayton Gardens, West Drayton, UB7 7LG Grid Reference TQ 06055 79758 (hereafter referred to as the 'potential development site'), which falls under the administrative authority of London Borough of Hillingdon.

Aval Consulting was commissioned in December 2025 to carry out a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) of the site. A PEA and PRA was undertaken in January 2026 consisting of an extended Phase 1 Habitat Survey and desk study, following the BCT Guidelines (Collins 2023), Chartered Institute of Ecology and Environmental Management (CIEEM) Preliminary Ecological Appraisal (2017) guidelines and using UK Habitat Classification Version 2.0 codes (UK Hab, 2023).

The scope of work to be undertaken is as follows:

- The construction of one two-storey residential property containing two units.

Due to the small scale of works and distance from statutory sites, it was considered that international and national statutory designated sites would not be impacted by the proposal.

Habitats recorded onsite include developed land sealed surface and sparsely vegetated urban land.

The habitats listed above, and features recorded within the site do not contain habitats suitable for European Protected Species and impacts aren't expected.

No further surveys are recommended for priority or protected species. Guidance has also been provided to avoid impacts upon habitats and species including precautionary methodologies, and a number of enhancements have been suggested.

## 1.2 Objectives

- To survey and determine the ecological value of the site according to the JNCC (Joint Nature Conservation Committee), (2010), Handbook for Phase 1 habitat survey;
- To identify how protected species are / may be using the site in order to assess its functionality to the local populations;
- To consider impacts to all habitats immediately adjacent to the site;
- To consider potential impacts to local statutory and non-statutory site either within 1km or for European level designations, a buffer deemed as appropriate by the relevant Planning Authority; and
- To assess the suitability of the proposed development site in terms of existing ecological factors.

## 1.3 Legislation

Protected species, as referred to within this report, are taken to be those protected under European Legislation (Conservation of Habitats and Species Regulations 2017, as amended, and UK legislation (Wildlife and Countryside Act 1981; Protection of Badgers Act 1992); and those of principle importance in England as listed in Section 41 of the NERC Act (2006).

The National Planning Policy Framework (NPPF) December 2024 places responsibility on Local Planning Authorities (LPAs) to aim to conserve and enhance biodiversity in and around developments. Of particular relevance are the following paragraphs:

Paragraph 174 of the NPPF states that:

*"Planning policies and decisions should contribute to and enhance the natural and local environment by:/… minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."*

Paragraph 179 of the NPPF states that:

*"To protect and enhance biodiversity and geodiversity, plans should:/… promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

Paragraph 180 of the NPPF states that:

*"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 reasons1 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.*

Paragraph 181 of the NPPF also states that potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are to be afforded the same

protection as designated Special Protection Areas, Special Areas of Conservation and Ramsar sites.

The NPPF is also complemented by the Circular 06/2005: Biodiversity and Geographical Conservation – Statutory Obligations and Their Impacts Within The Planning System (Office of the Deputy Prime Minister, 2005). Paragraph 99 states that "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."

Section 40 of the NERC Act requires every public body to "have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". Biodiversity, as covered by the Section 40 duty, is not confined to habitats and species of principal importance but refers to all species and habitats. However, the expectation is that public bodies would refer to the Section 41 list (of species and habitats) through compliance with the Section 40 duty. Appendix V details legislation which protects species and groups relevant to the site.

The Environment Act 2021 includes a target to halt the decline of nature by 2030, and mandates Biodiversity Net Gain for developments. BNG is an approach to development whereby biodiversity is left in a measurably better state post-development than it was before the development occurred. Schedule 14 of The Act makes provision for grants of planning permission in England subject to the attainment of a biodiversity gain of at least 10%. The Act also states that references to the biodiversity value of any habitat or habitat enhancement are calculated in accordance with the biodiversity metric, as published by the Secretary of State (Defra).

## 1.4 Local Policy

London Borough of Hillingdon outlines their Biodiversity policies within the 'A Vision for 2026' Local Plan: Part 1 – Strategic Policies Adopted November 2012:

**Policy EM7: Biodiversity and Geological Conservation**

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.

## 1.5 Protected Species Legislation

### Bats

All European species of bats are listed on Annex IV of the EC Habitats Directive as being in need of "strict protection". This is implemented in Britain under The Conservation of Habitats and Species Regulations 2017 (as amended). All British bats are included on Schedule 5 of the WCA 1981 (as amended) and the whole of Section 9 of The Act applies to European bat species.

In England, licences are issued by Natural England for any actions that may compromise the protection of a European protected species, including bats, under the Habitats Regulations 2010 (as amended). This includes all developments, regardless of whether they require planning permission.

In summary, the above legislation collectively prohibits the following:

- Deliberately or recklessly capturing, injuring, taking or killing of a bat;
- Deliberately or recklessly harassing a bat;
- Intentionally of recklessly disturbing a bat in its place of rest (roost), or which is used for protection or rearing young;
- Deliberately or recklessly damaging, destroying or obstructing access to any resting place or breeding area used by bats;
- Deliberately or recklessly disturbing a bat in any way which is likely to significantly affect the local population of the species, either through affecting their distribution or abundance, or affect any individual's ability to survive, reproduce or rear young; and
- Possession or advertisement/sale/exchange of a bat (dead or alive) or any part of a bat.

### Great Crested Newts

Great crested newts are protected under European and British law, having the same level of protection as bats. Licences are issued by Natural England for any action that may compromise the protection of these species, under The Conservation of Habitats and Species

Regulations 2010 (as amended). This includes all developments, regardless of whether or not they require planning permission.

### Badger

The species is protected under the Protection of Badgers Act 1992, which makes it an offence to:

- Knowingly kill, capture, injure or disturb any individual;
- Intentionally damage or destroy a badger sett, or any part thereof;
- Obstruct access to an area which is used for breeding, resting or shelter; and
- Disturb a badger while it is using any place used for breeding, resting or shelter.

### Water Vole

Water voles are protected under the Wild Mammals (Protection) Act 1996 and Schedule 5 of the WCA 1981 (as amended). This makes it an offence to:

- Intentionally kill, injure of take water voles;
- Possess or control the species;
- Damage or destroy any place used by water vole for shelter or protection;
- Disturb water vole while they occupy such places of shelter;
- Sell, possess or transport water vole for the purpose of sale; and
- Advertise the buying or selling of water vole.

### Otter

Otter are protected under European and British law. The species is listed under Annex and IV of the Habitats Directive, which is implemented in Britain under The Conservation of Habitats and Species Regulations 2010 (as amended). Otters are also protected under Schedules 5 and 6 of the WCA 1981 (as amended), The Wild Mammals (Protection) Act 1996 and are listed as a priority species in Appendix II of the Bern Convention.

### Reptiles

Common reptiles (grass snake, adder, common lizard and slow worm) receive partial protection under the WCA 1981 (as amended), which makes it an offence to:

- Intentionally or recklessly kill or injure these species; and
- Sell, offer or advertise for sale, possess or transport for the purposes of sale these animals, whether alive or dead, or any part thereof.

In addition, smooth snake and sand lizard are listed on both the WCA 1981 and the Conservation (Natural Habitats, & c.) Regulations 2017 (as amended), which makes it an offence to:

- Intentionally or recklessly kill or injure these species;

- Intentionally or recklessly damage or destroy any place used by these species for shelter, protection, resting or breeding; and
- Intentionally or recklessly obstruct access to any place used for shelter, protection, resting or breeding by these species

### Dormouse

Hazel Dormice receive protection under the Conservation of Habitats and Species Regulations 2017 (as amended) Wildlife and Countryside Act 1981 which makes it an offence to:

- Deliberately capture, injure or kill a dormouse;
- Deliberately disturb dormice;
- Damage or destroy a breeding site or resting place of a dormouse
- Obstruct access to any structure or place which a dormouse uses for shelter or protection; or
- Disturb a dormouse while occupying a structure or place which it uses for shelter or protection

# 2 Methodology

To achieve the objectives outlined in Section 1.2, a desktop study was completed followed by a site visit.

## 2.1 Desktop Study

The Multi Agency Geographic Information for the Countryside (MAGIC) website and Ancient Woodland Inventory website (online) was accessed on the 9th January 2026 and used to obtain information regarding the:

- Presence of statutory designated Sites of international importance within 10km (Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation or Ramsar Sites)
- Presence of statutory designated Site of national importance within 1km. (Local Nature Reserves, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, National Nature Reserves, or biosphere reserves
- Presence of Impact Risk Zones (IRZs) within 1km associated with Sites of Special Scientific Interest.
- Presence of Ancient Woodland and Priority Habitats within 1km.
- Presence of waterbodies within 500m of the Site boundary in respect of great crested newts (*Triturus cristatus*) and other amphibian species.
- Previously granted European Protected Species (EPS) mitigation licenses within 1km; and
- Great crested newt (GCN) class survey license returns (England only) and pond survey data within 500m.
- Online aerial imagery was analysed to provide an indication of the overall land use patterns and connectivity within the immediate and wider landscape.
- Presence of ancient or veteran trees within 50m of the site

No prior ecological surveys or reports concerning the site, or adjacent sites, have been reviewed in relation to this report.

## 2.2 Phase 1 Habitat Site Survey

A walkover of the Site was carried out by Natalie Boote ACIEEM and Evan Browne (MSc Ecology and Conservation). Natalie has over 10 years' experience in carrying out field surveys and holds a Level 2 bat licence and Level 1 GCN Licence.

The survey was undertaken at 11 on 23rd February 2026. The temperature was recorded as 10°C, and fine, dry weather conditions.

This PEA has been produced in accordance with CIEEM's Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017b) and Guidelines for Ecological Report Writing (CIEEM, 2017a). Vegetation was classified and mapped using the UK Habitat Classification (UKHab) system and habitat descriptions (UKHab Ltd., 2023) Version 2.1.

There were no buildings and trees on site to be assessed for roosting bat suitability in accordance with the Bat Conservation Trust (BCT) best practice guidance (Collins, 2023). Surveys usually include a search of the external elevations for evidence of bats such as droppings and urine staining and potential roosting features such as lifted tiles and fascia. The Equipment used during the PRA of buildings includes a recording form, a camera, binoculars, high powered torch and endoscope. The buildings roosting bat suitability is scored as either negligible, low, medium, high or confirmed in accordance with the BCT criteria, which determines the necessary mitigation requirements.

A photographic record of the site was taken during the site visit. A selection of images is provided in Section 3.2 of this report.

## 2.3 Limitations

The results of the survey and assessment work undertaken by Aval Consulting Group are representative at the time of surveying.

This document does not contain a comprehensive list of botanical species on site. Only plant species characteristics of each habitat and incidental observations of notable plant species were recorded. In addition, many plant species are only evident at certain times of year and so some plant species may have gone undetected.

Any third party and external data sources used may vary due to the quality and scale, the supporting information used to define locations/boundaries and sensitivity of the data itself. Aval Consulting Group cannot take responsibility for the accuracy of external data sources and as such discrepancies and inaccuracies may occur.

The survey was conducted outside of the optimal botanical survey period of April-September. This was deemed acceptable due to the urban, low-distinctiveness of the site.

# 3 Results

## 3.1 Desktop Study

The following section sets out the existing conditions in relation to ecology for the proposed re-development. Relevant ecological information is available from several sources including local, regional, and national ecological reports and websites. For the purpose of this assessment, some data has been obtained from Defra-provided geographical sources.

### 3.1.1 Site Location

The development site surveyed is approximately 0.03 hectares in area and is located in a residential urban area at 34a Drayton Gardens, West Drayton, UB7 7LG.

The site is currently used for an empty lot/carpark.

Immediate surrounding habitats include residential buildings with gardens and an area of individual trees on the western boundary of the site. Figure 1 and Figure 2 below shows the site location highlighted in red and the surrounding area.


Figure 1. Near view of site showing immediate surroundings (Source: QGIS 2026)

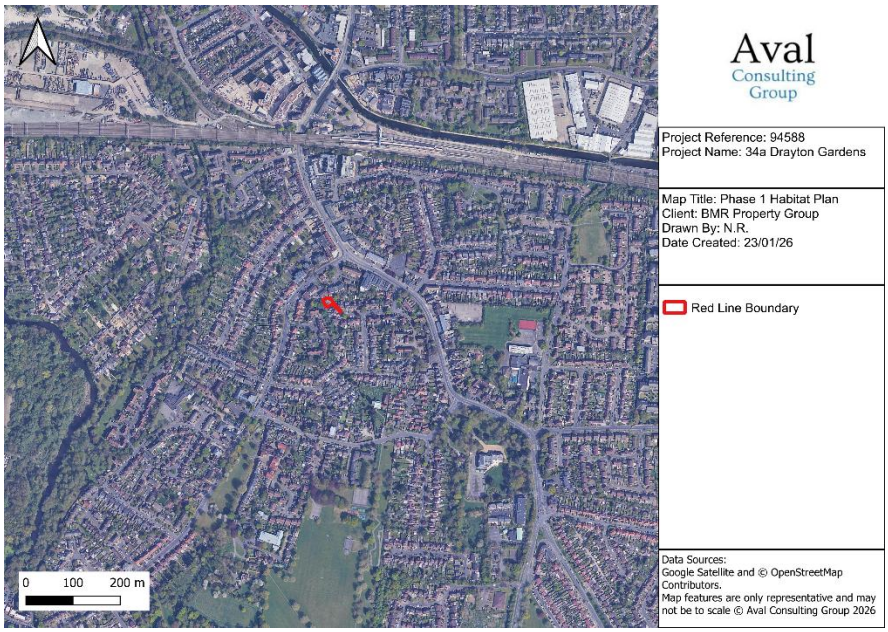


Figure 2. Far view of the site within a landscape context (Source: QGIS 2026)

### 3.1.2 Internationally Designated Sites

A search for internationally designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), and RAMSAR sites was conducted within a 10km radius of the site. This search identified one SPA (South West London Waterbodies) and one RAMSAR (South West London Waterbodies) within 10km of the application site.

**Table 1.** Summary of the designated sites within a 10km radius of the application site.

| Site Name | Central Grid reference | Designation | Reason for Designation | Distance and Direction from Site |
|---|---|---|---|---|
| South West London Waterbodies | TQ02467504 | Special Protection Area (SPA) and RAMSAR | Site comprises a series of embanked water supply reservoirs and former gravel pits which support a range of man-made and semi-natural still, open-water habitats. Designated for Shoveler and Gadwall. | 5.2km southwest of the site |

### 3.1.3 Nationally and Locally Designated Sites

A search for national and locally designated sites within a 1km radius of the site was conducted using MAGIC Maps. This search identified no statutory sites and no non-statutory sites within 1km of the application site (**Error! Reference source not found.**).

### 3.1.3. Priority Habitat Inventory (PHI) and Ancient Woodland

The 1km data search using MAGIC maps involved a search for any Priority Habitat Inventory (PHI) habitats and ancient woodland. No PHI habitats or areas of ancient woodland were recorded on, or adjacent to, the site. However, 16 patches of PHI deciduous woodland were located within 1km of the site.

**Table 2.** Summary of the Priority Habitat Inventory (PHI) habitats and areas of ancient woodland located within a 1km radius of the application site.

| Priority Habitat | Number of areas within 1km radius | Location of closest area |
|---|---|---|
| 'No main habitat but additional habitat exists' | 1 | 490m southwest of site |
| Deciduous Woodland | 16 | 228m west of site |
| Traditional Orchard | 1 | 819m southwest of site |

### 3.1.4. Protected and Notable Species

The MAGIC maps 1km data search involved a search for any granted European Protected Species (EPS) Licences. MAGIC revealed no EPS Licence within 1km of the site.

### 3.1.5. Pond Search

MAGIC revealed no granted EPS Licence Applications or GCN Class Survey License Returns within 1km of the site. No GCN Pond Surveys were found within the MAGIC search, nor were any ponds identified within 500m of the site.

## 3.2 Field Survey Results

### 3.2.1 Habitats

The Phase 1 Habitat map of the site is given in Appendix B. The site consisted of developed land sealed surface, sparsely vegetated urban land, and invasive species Japanese knotweed (*Reynoutria japonica*).

**Table 2.** Habitat types recorded on site and national/local importance for biodiversity conservation.

| Habitat | National/Local Importance |
|---|---|
| Developed Land Sealed Surface | No |
| Sparsely Vegetated Urban Land | No |

## Developed Land

The site consisted of half developed land. This land consisted of nonpermeable hardstanding present west and northeast on site.

## Sparsely Vegetated Urban Land

The northwest and southeast areas of the site consisted of sparsely vegetated urban land. This was classified due to the 10-50% of vegetation coverage on the urban land. Some species on site included Japanese knotweed (*Reynoutria* japonica), Garden angelica (*Angelica archangelica*), Sycamore (*Acer pseudoplanatus*), Opium poppy (*Papaver somniferum*), Ragwort (*Jacobaea vulgaris*), Common sowthistle (*Sonchus oleraceus*), Silvergreen bryum moss (*Bryum argenteum*) and Hairy bittercress (*Cardamine hirsute*).

## Non-native Invasive Species

The site was assessed for the presence of any non-native invasive plants, including but not limited to, those listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (see Appendix 2.2 for more details). There were invasive plants, Japanese knotweed

(*Reynoutria japonica*), recorded on the site in the northwest corner of the sparsely vegetated urban land (flagged in Appendix B mapping).

### 3.2.2 Protected Species

Habitats on site were assessed for their potential to support protected species. Parakeet was heard and a Red Kite was spotted flying over the site.

#### Bats:

Trees – There were no trees on site.

Buildings - There were no buildings on site.

#### Foraging and Commuting Bats:

The site had potential links to wildlife corridors, as the site adjacent to the contained multiple individual trees. The hardstanding on-site provided limited opportunities for foraging bats. This combined with the urban location of the site and constant lighting deems the site as having negligible potential for foraging and commuting bats.

Negligible Potential for impacting bats

Table 6. Summary of Preliminary Roost Assessment

| Building/Tree Reference | Bat Potential | Use by Birds | Bat Signs and Features |
|---|---|---|---|
| ---- | ---- | ---- | ---- |

#### Great Crested Newts:

The site has limited suitability for great crested newts as there are no ponds on site and lack of refugia such as log piles and exposed tree roots. There is no pond or granted European Protected Species Mitigation Licences for GCN on site or within 500m of the site.

Negligible Potential for impacting GCN

#### Badger:

No signs of badger setts, mammal tracks or foraging/territory marking were seen on site. The habitat on site is not suitable for badger sett creation and if badger were in the area, it would not be used by commuting badger due to walled enclosure.

Negligible Potential for impacting badger

#### Reptiles:

The habitat on site is not suitable for reptiles as the site lacks the vegetative and mosaic of habitats that reptiles utilise. Neither is there refugia such as log piles, scrub or tree roots onsite. The potential for impacting reptiles is negligible and reptiles will no longer be considered in this report.

Negligible Potential for impacting reptiles

### Otter and Water Vole:

The site does not contain the water or riparian habitats otter or water vole habituate and therefore Otter and Water Vole will no longer be considered in this report.

### Breeding birds:

There were no buildings or trees on site, thus limited suitable habitat for nesting birds present.

Negligible Potential for impacting breeding birds

### Dormouse:

The site has no connectivity or suitable habitat such as hedgerows, scrub or woodland on site to support dormice.

Negligible-Low Potential for impacting Dormouse

### NERC/BAP Species:

Species such as toad Bufo bufo, hedgehog Erinaceus europaeus; and stag beetle Lucanus cervus, – The site habitats do not provide suitable refugia for other amphibians, hedgehog or stag beetle. The site also lacks any foraging habitat for hedgehog.

Negligible-Low Potential for impacting NERC/BAP species

# 4 Interpretation and Evaluation

## 4.1. Proposed Development

The proposed development at the site consists of the construction of one two-storey residential property containing two units. Proposed site plans are contained within Appendix C of this report. Site clearance will be required to facilitate the development. This will involve the destruction of the onsite habitats and displacement of any protected and notable species utilising these habitats. The expected ecological impacts of the development are discussed in this section.

## 4.2. Evaluating Constraints to the Proposed Development

### 4.2.1. Designated Sites

There are no Local Nature Reserves (LNR) within a 1km vicinity of the site. A special protected area (SPA) and RAMSAR site, South West London Waterbodies, is present 5.2km southwest of the site. The zone of influence does not overlap with the proposed site, therefore, impacts to designated sites are expected to be negligible.

### 4.2.2. Priority and Protected Habitats

The habitats on site are considered locally frequent and of low value. A small, unmarked area of individual trees is adjacent to the western boundary of the site. However, the site provides poor connectivity to this area as there is a concrete wall separating the two sites. There are 16 areas of deciduous woodland recorded within 1km of the site. Proposed works on the site do not appear they will impact the deciduous woodlands. However, lighting associated with construction and the new dwelling may disrupt bats or other animals using the trees adjacent to the west of the site. Therefore, impacts to significant habitats onsite and offsite are expected to be negligible and short term. Appropriate mitigation of impacts to site habitats, as well as opportunities for enhancement are outlined in section 7.

### 4.2.3. Priority and Protected Species

Features and habitats present are not suitable for protected species such as Badger, Great Crested Newt, and Breeding Birds. The desk study found no protected species licence within 1km of the site. The lack of licences and suitability of the site's habitats for protected species makes impacts to protected species unlikely, as long as mitigation measures are adopted (see 5.1).

# 5 Conclusion and Recommendations

## 5.1 Mitigation requirements

The proposed development includes the construction of one two-storey residential property containing two units. If the proposed work was to proceed without the appropriate mitigation measures, it could cause disturbance, displacement and/or harm, injury or death of protected and notable species which may utilise the site for foraging, commuting, refuge, or breeding purposes. Table 3 outlines the mitigation measures required to safeguard protected and notable habitats and species associated with the site, with the aim of reducing the negative ecological impacts of the proposed development.

**Table 3.** Summary of mitigation measures required to safeguard protected and notable habitats and species associated with the site.

| Ecological Feature | Protected Status | Mitigation Measures | Timescale |
|---|---|---|---|
| Breeding Birds | All wild birds and their nests are protected by law, Under Section 1 of the Wildlife and Countryside Act (1981). Hence, development works must consider the potential impacts to breeding birds, their nests, eggs and young. | Trees directly adjacent to site are suitable for breeding birds. All site construction works should be undertaken outside of the breeding bird season (generally considered to be between 1st March and 31st August*) to reduce impacts to any breeding birds utilising these trees.<br><br>If the site clearance works cannot be completed outside of the breeding bird season, a pre-works nesting bird check must be carried out by a suitably qualified ecologist, to search suitable nesting habitats for any active nests, a minimum of 24 hours prior to commencement of any site works. If any active nests are identified, the area must be partitioned off, and the nests must be protected until the stage at which the young have fledge and the nests are no longer active. | Construction works to be undertaken between October and February (outside of the breeding bird season).<br>Pre-clearance checks to take place 24 hours prior to commencement of works. |
| Foraging and Commuting Bats | All bats and their habitats are protected under the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations (2017). | The site is considered to hold 'negligible' suitability for foraging and commuting bats, however the trees along the western site boundary provide commuting value for bats in the local vicinity.<br><br>The impact of the development on foraging and commuting bats should be reduced, where possible. | During design, development and post-development. |

| | | | |
|---|---|---|---|
| | | Disturbance to foraging and commuting bats can be reduced by implementing a sensitive lighting scheme both during construction works, and if any post-development artificial and/or security lighting is required.<br><br>A lighting scheme should be devised with advice from a suitably qualified ecologist, in order to ensure minimal light overspill and disturbance to foraging and commuting bats. A sensitive lighting scheme should include a 10m dark buffer zone along the northern and eastern boundaries of the site, and any site lighting should be directed away from suitable features, with light overspill of less than 1lux. | |
| Japanese Knotweed | Planning conditions under the Town & Country Planning Act often require Japanese knotweed management plans and treatment before development starts to prevent spread, as uncontrolled knotweed can lead to enforcement action. | Undertake immediate treatment of the Japanese knotweed stand in accordance with the Environment Agency's Code of Practice for managing Japanese knotweed on development sites (e.g. herbicide stem injection or foliar spray using glyphosate, applied by a qualified contractor from March to September when actively growing). Erect temporary security fencing around the extent of the contaminated area (minimum 7 m radial extent from visible growth, down to 3 m depth) prior to any ground disturbance. Develop a site-specific method statement detailing treatment regime, excavation (if required), rhizome disposal (to licensed landfill only) and root barrier installation if retained near boundaries. Monitor for regrowth for a minimum of two years post-treatment. | Prior- and during construction works |

* Birds are known to nest outside of these dates if conditions are suitable. The breeding bird season is changing as the climate warms.

## 5.2 Further Surveys and Mitigation

### 5.2.1 Further Surveys

No further ecological surveys are required before planning permission is considered.

## 5.3 Ecological Enhancements

As indicated in planning policy, ecological enhancements should be incorporated into the site. An example relevant to the site include:

**Table 4.** Summary of identified opportunities to enhance the ecological value and biodiversity of the site.

| Ecological Feature | Enhancement Recommendation | Timescale |
|---|---|---|
| Habitat | The National Planning Policy Framework (NPPF, 2023) states that all developments should achieve Biodiversity Net Gain (BNG). A 10% BNG is now a statutory requirement, under the Environment Act (2021), for all planning applications.<br><br>A Biodiversity Net Gain assessment is required to assess the value of the baseline habitats and compare it to the expected post-development biodiversity value. A completed biodiversity metric tool must be submitted for planning application validation. The following will be required before commencement of works can take place:<br>- Biodiversity Gain Plan, outlining how 10% BNG will be achieved. | Design phase and pre-commencement of site works.<br><br>Submitted with planning application. |
| Bat Bricks | Install at least two integrated bat bricks (e.g. Green&Blue Bat Block or similar) on north, north-east or north-west elevations, approximately 4–5 m above ground level, away from windows, doors and external lighting columns or fitting | Design stage; construction |

| | | |
|---|---|---|
| Swift Bricks | Install at least two integrated swift bricks high on suitable north or east-facing elevations, ideally just below the eaves at a minimum of 5 m above ground level, with a clear, unobstructed flight path | Design stage; construction |
| Native garden planting | Implement a soft-landscaping scheme using a mix of native and wildlife-friendly flowering shrubs, climbers and perennials to provide nectar, berries and structural diversity, avoiding invasive species and minimising hard landscaping. | At landscaping stage, immediately following construction, with ongoing management. |
| Hedgehog access | Ensure gaps of approximately 130 mm by 130 mm are present at the base of boundary fences or walls to create a hedgehog-friendly garden network; where new solid boundaries are proposed, design these gaps into each side of the garden. | During installation of new boundary treatments or modification of existing boundaries, prior to occupation. |

# Appendices

# Appendix A : References

BCT) Bat Conservation Trust (2023). Bats and Artificial Lighting at Night Guidance note 8.

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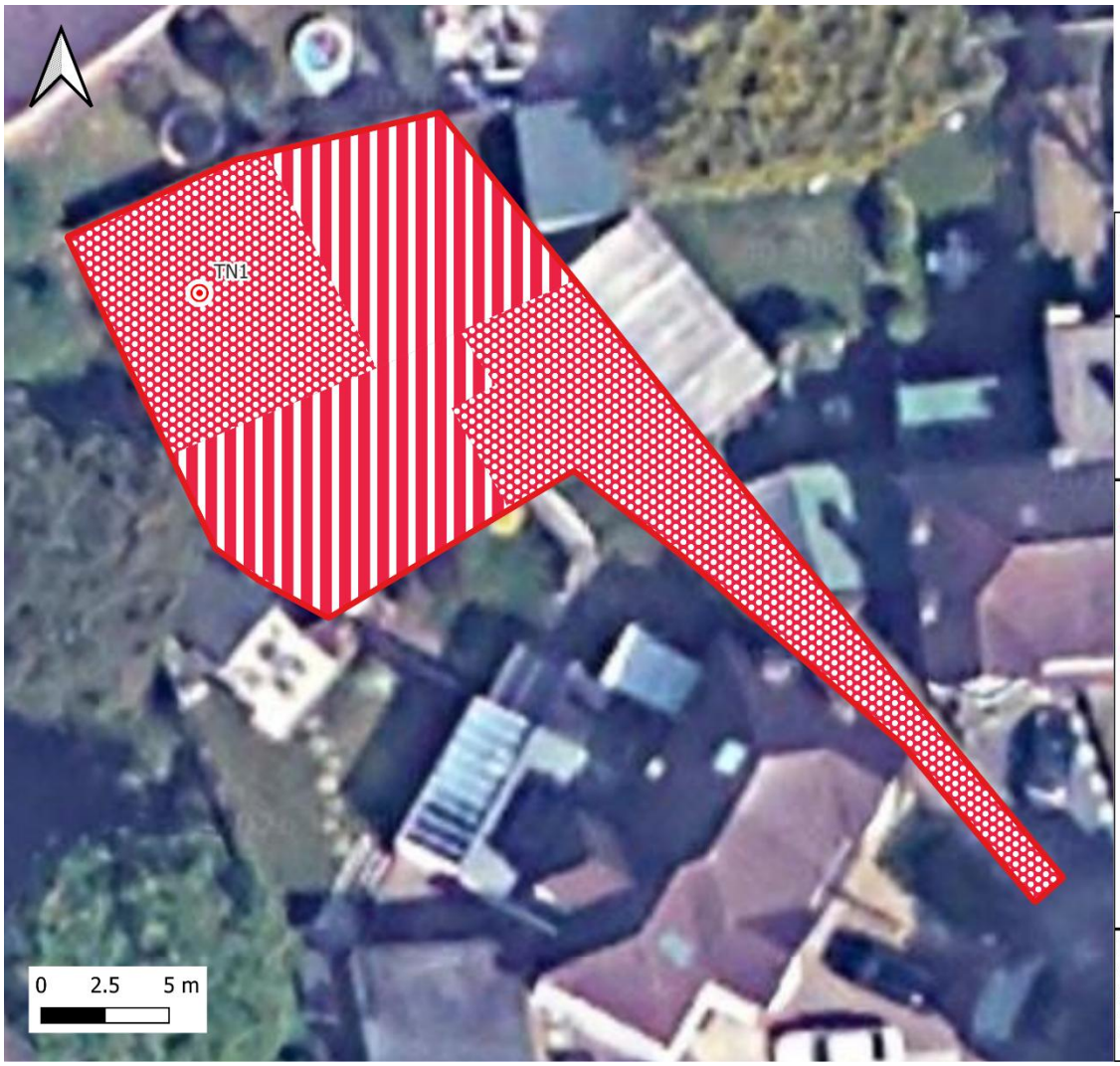
# Appendix B : Baseline Habitat Plan




Aval Consulting Group

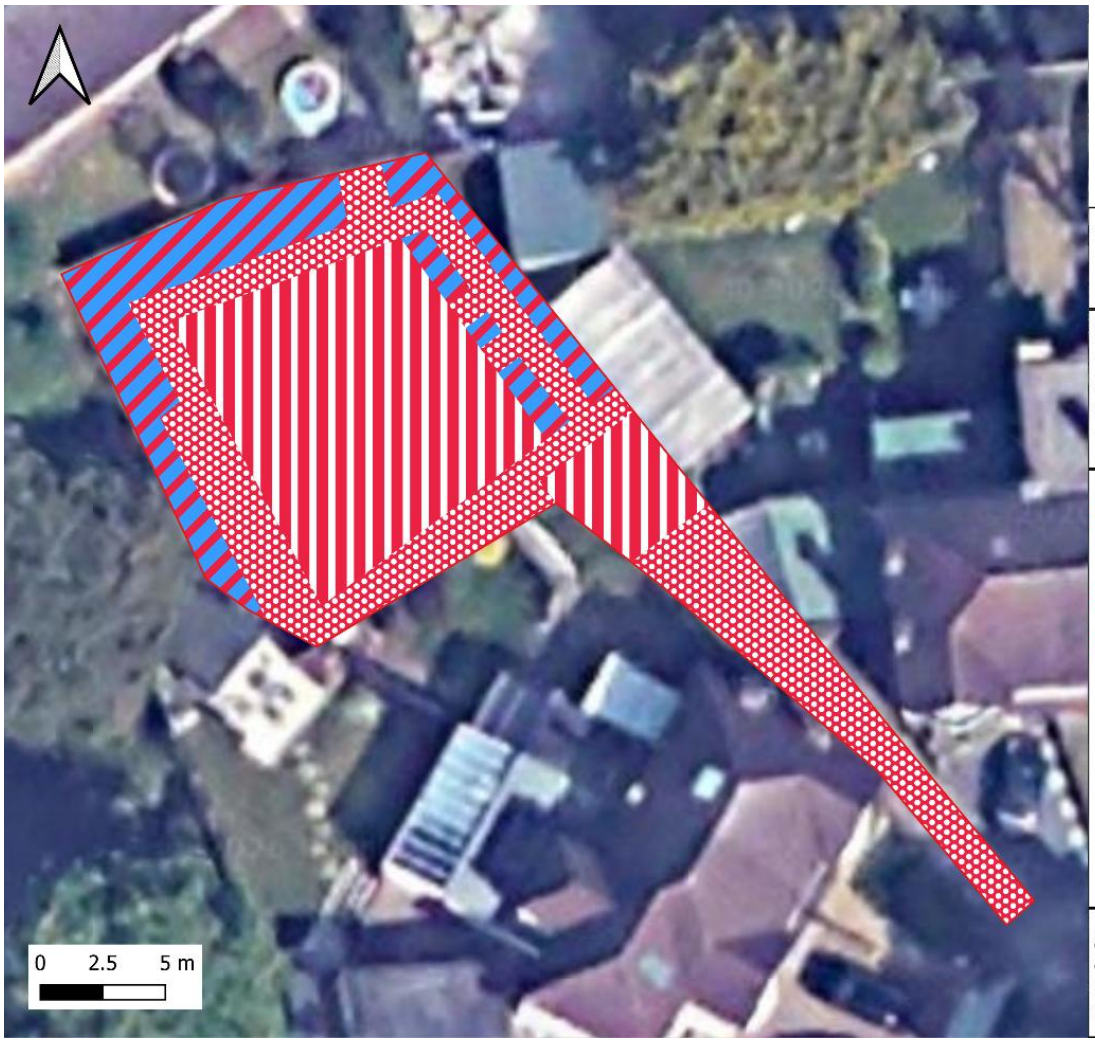
Project Reference: 94588
Project Name: 34a Drayton Gardens

Map Title: Phase 1 Habitat Plan
Client: BMR Property Group
Drawn By: N.R.
Date Created: 23/01/26

- Red Line Boundary
- Target Note (Stand of Japanese Knotweed)
- u1b - developed land; sealed surface
- u1c - artificial unvegetated unsealed surface

Data Sources:
Google Satellite and © OpenStreetMap Contributors.
Map features are only representative and may not be to scale © Aval Consulting Group 2026

# Appendix C : Proposed Habitat Plan




Aval Consulting Group

Project Reference: 94588
Project Name: 34a Drayton Gardens

Map Title: Post-development Habitat Plan
Client: BMR Property Group
Drawn By: N.R.
Date Created: 23/01/26

- Red Line Boundary
- u1b - developed land; sealed surface
- u1c - artificial unvegetated unsealed surface
- 828 - vegetated garden

Data Sources:
Google Satellite and © OpenStreetMap Contributors.
Map features are only representative and may not be to scale © Aval Consulting Group 2026

# Appendix D : Plant Species Lists and Target Notes

The following plant species list was produced as part of the Phase 1 Habitat Survey. This list is not exhaustive and does not relate to a full botanical survey. Any additional botanical survey work required can be found within the recommendations section of this report. Abundance was estimated using the DAFOR scale: D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare, LF = Locally Frequent

Table 1. Plant species list produced as part of the Phase 1 Habitat Survey, with estimated abundance using DAFOR scale.

| Common Name | Scientific Name | Abundance (DAFOR) |
|---|---|---|
| **Sparsely vegetated urban land** | | |
| Japanese Knotweed | *Reynoutria japonica* | O |
| Garden angelica | *Angelica archangelica* | R |
| Sycamore | *Acer pseudoplatanus* | R |
| Opium poppy | *Papaver somniferum* | R |
| **Sparsely vegetated urban land** | | |
| Ragwort | *Jacobaea vulgaris* | O |
| Common Sowthistle | *Sonchus oleraceus* | R |
| Hairy bittercress | *Cardamine hirsute* | R |
| Guernsey Fleabane | *Erigeron sumatrensis* | O |
| Opium poppy | *Papaver somniferum* | R |
| Silvergreen bryum moss | *Bryum argenteum* | O |

Table 2. Target Notes highlighted within the Phase 1 Habitat Plan.

| Target Note Number | Description |
|---|---|
| 1 | Invasive Species, Japanese Knotweed (*Reynoutria japonica*) |

# Appendix E : Relevant Protected Species Legislation

## EC Habitats Directive

In 1992 the then European Community, adopted Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, known as the Habitats Directive. The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring member states to introduce protection for these habitats and species of European importance. The mechanism for protection is through the designation of Special Areas of Conservation (SACs), both for habitats and for certain species listed within Annex II. There are several species listed within Annex II of the Habitats Directive that are present within the UK; these include four lower plant species, nine higher plant species, six species of molluscs, six species of arthropods, eight species of fish, two species of amphibian, and nine species of mammal.

## The Bern Convention

The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) came into force in 1982. The principal aims of the Convention are to ensure the conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix 3. To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species.

## Bonn Convention

The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention or CMS) was adopted in Bonn, Germany in 1979 and came into force in 1985. Contracting Parties work together to conserve migratory species and their habitats by providing strict protection for endangered migratory species (listed in Appendix 1 of the Convention), concluding multilateral agreements for the conservation and management of migratory species which require or would benefit from international cooperation (listed in Appendix 2 of the Convention), and by undertaking cooperative research activities.

## Convention on Biological Diversity

The Convention on Biological Diversity (Biodiversity Convention or CBD) was adopted at the Earth Summit in Rio de Janeiro and entered into force in December 1993. It was the first treaty to provide a legal framework for biodiversity conservation. Contracting Parties are required to create and enforce national strategies and action plans to conserve, protect and enhance biological diversity.

## Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. However, it does not extend to Northern Ireland, the Channel Islands, or the Isle of Man. This legislation is how the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the

European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Natural Habitats and Wild Fauna and Flora (92/43/FFC) are implemented in Great Britain.

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

In the UK the Council Directive 92/43/EEC has been transposed into national laws by means of the Conservation (Natural Habitats, & c.) Regulations 1994 (as amended), and the Regulations (Northern Ireland) 1995 (as amended). The Regulations came into force on 30 October 1994 and have been amended several times. Subsequently the Conservation of Habitats and Species Regulations 2010 was created which consolidates all the various amendments made to the 1994 Regulations in respect of England and Wales and is commonly known as the 'the Habitats Regulations'. In Scotland the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the 1994 Regulations. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transpose the Habitats Directive in relation to Northern Ireland. The Regulations contain five Parts and four Schedules and provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.