

20 August 2021

Dinny Shaw – Director of Planning
St Modwen

Sent by Email

Our Ref:404-03120-0048

Dear Dinny

**RE: ST ANDREWS PARK HILLINGDON ROAD UXBRIDGE PLANNING (REF 585/APP/2015/848) –
BADGER SURVEY TO DISCHARGE PLANNING CONDITION 81.**

SLR Consulting Ltd (SLR) was instructed by St Modwen Developments Ltd to undertake a site survey for badgers at part (Town Centre West (TCW)) of the St Andrews Park, Hillingdon site at Uxbridge. The site has planning consent for development and under planning consent 585/APP/2015/848, Condition 81 of this permission requires the following:

“Prior to commencement of each phase of the outline element of the development, or any of the elements of development for which full planning permission is hereby approved, a pre-commencement badger survey for the relevant phase/component of the full planning element shall be submitted to and approved in writing by the Local Planning Authority.”

This letter sets out the detail of the methodology used to check for badgers and the results of the survey which was focussed upon Phase Town Centre West (TCW) of the development and its immediate surrounds.

The aims of the survey work undertaken in July 2021 were to:

- to confirm the presence or absence of badger activity at the site;
- to record the location of badger setts and other field signs indicative of badger activity, should they be present;
- to establish a baseline record of badger activity that can be used to support a Natural England sett exclusion or disturbance licence, should one become necessary in the future; and
- should badger setts be located, this report shall be used to provide a baseline to identify potential conflicts between the proposed development plans and the Protection of Badgers Act (1992) in the Ecological Impact Assessment.

Approach

The badger activity survey was conducted on the 29th July 2021 by an experienced ecologist from SLR.

The surveys comprised a thorough walkover of all accessible land during daylight hours to visually inspect and assess them for their potential to support badgers. Particular attention was paid to the inspection of soil/materials storage mounds, around areas of vegetation cover and around the base of derelict buildings as these features are more likely (in such an urban setting) to support badger setts.

Evidence searched for was as follows:

- **Setts**

The entrances to badger setts are typically semi-circular in shape, with flattened bases, as opposed to the oval or circular tunnels associated with rabbits and foxes. They are typically larger than the holes of other common burrowing mammals, with tunnels usually being 22 to 25cm wide or greater, and approximately 190 to 200mm high.

The presence or absence of particular field signs and field sign combinations associated with each sett can help indicate the frequency with which badgers are currently using it. For example, the presence of freshly excavated spoil and discarded bedding materials on the spoil heap associated with the sett entrance may indicate a currently high level of activity, whereas the accumulation of leaf-litter within the tunnel mouth may indicate a lower frequency of activity. The season in which the badger survey is conducted will have an impact on the interpretation of such field signs, as badger activity fluctuates throughout the year. Badgers are capricious animals, moving between setts within their territory in response to environmental factors such as the availability of seasonal food resources, the accumulation of parasites, or territoriality.

In areas of confirmed badger activity all mammal burrows of sufficient aperture to permit access by badgers should be recorded, regardless of their origin. During licensed badger works any displaced badgers may seek shelter within these burrows and, under the auspices of the governing legislation, any such burrow would from then on be treated as a badger sett. Therefore, despite not exhibiting any definitive signs of badger activity and thus not technically being badger setts at the time of survey, it is prudent to record all potential places a badger may seek shelter so that they may be accounted for if a mitigation programme is required at a future date.

- **Characteristic Worn Pathways**

Badgers are animals with a squat stature and a low profile which, in combination with their long ventral hairs, causes them to effectively sweep the ground as they pass. Over time the passage of the badgers along frequently travelled routes wears away vegetation and results in the formation of characteristic tracks. However, it is usually only possible to definitively confirm that such tracks are of badger origin when they occur close to identified badger setts. This sweeping effect also results in the entrance tunnels to frequently used badger setts being cleared of leaf-litter and other natural debris.

- **Paw Prints**

Badger paw prints are characteristic and easily identified. During the survey any patches of damp ground, mud and the surface of spoil heaps were thoroughly searched for the presence of paw prints.

- **Hairs**

Badger hairs are frequently shed within setts or caught in fence wires at points where badgers have forced a way underneath. The identification of badger hairs provides conclusive proof of the presence of these animals at a location, but some caution must be employed during the interpretation of such field signs as hairs may persist for several years dependent upon local environmental conditions.

- **Latrines**

Badgers usually defecate into prepared pits, providing a distinctive field sign of their presence. A number of pits may be found together, forming a latrine. Dung pits and latrines are often used by badgers to mark territorial boundaries and examination of the faeces can provide information as to the badgers' current dietary components.

- **Foraging Signs**

As badgers forage for invertebrates they will frequently leave distinctive marks as they tear into the turf with their claws and snout. These are commonly referred to as "snuffle holes".

Results

The site was visited on 29th of July in dry and clear conditions by Mike Webb, a Technical Director of ecology from SLR with over 25 years' experience of ecological (vegetation and fauna) surveys. Full access to the survey area was feasible and areas outside the site were also checked where access was possible.

The Phase of development being examined currently comprises the Mons Building and surrounding lawns to the front and hard standing to the rear which is currently used for the developers compound and materials storage area.

To the north of this are some areas of safeguarded root protection areas around retained trees (with a grassy and tall herb understory).

The majority of the site is characterised by recently cleared land typically with compacted hardcore substrates with various levels of re-vegetation. To the west and east are solid board boundaries that are impenetrable for much of their extents limiting access to the site from the north and south where gates are located.

No evidence of any form of badger occupation or use, historic or current, was recorded within or near to the site. The habitats present provide limited opportunities for badgers to forage and to form setts in the hard compacted ground and materials that dominate. Combined with limited routes of access into the site, busy roads and built areas around it and a general low level of greenspace in the immediate vicinity the site is considered to be of very low potential for badgers.



The Mons Building and surrounding lawns



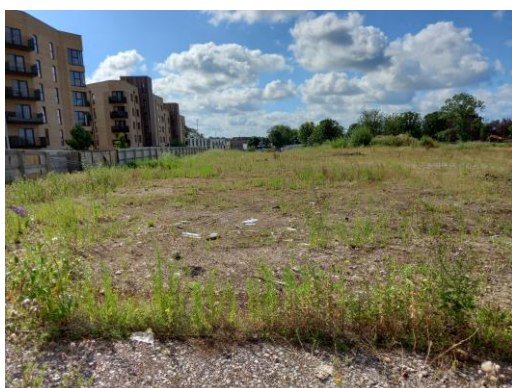
Rear of The Mons Building



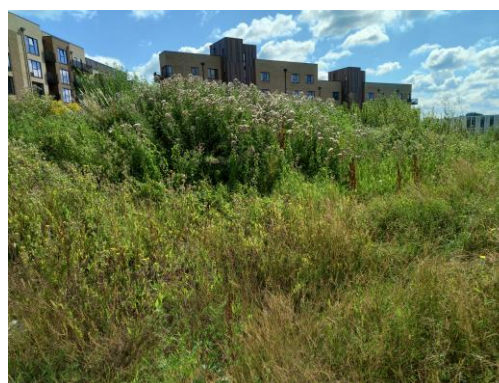
Fenced off tree protection areas



Areas of materials storage



Typical sparse vegetation covering most of site



Dense vegetation on mound of stripped substrates



Impenetrable boundary to east



Northern end of site

Summary

SLR was instructed to undertake a site survey for badgers at parts of the St Andrews Park, Hillingdon site at Uxbridge. The site has planning consent for development and under planning consent 585/APP/2015/848, Condition 81 of this permission requires a badger survey to be undertaken before each phase of development commences. This letter sets out the results of the survey undertaken to meet the requirements of Condition 81 for the Town Centre West (TCW) phase of the scheme.

The badger activity survey was conducted on the 29th July 2021 by an experienced ecologist from SLR. The surveys comprised a thorough walkover of all accessible land during daylight hours to visually inspect and assess them for their potential to support badgers. Particular attention was paid to the inspection of soil/materials storage mounds, around areas of vegetation cover and around the base of derelict buildings as these features are more likely (in such an urban setting) to support badger setts.

No evidence of any form of badger occupation or use, historic or current, was recorded within or near to the site.

Based upon these findings no additional mitigation is required for this species though it would be good practice to ensure that during the construction phase open excavations are left with a ramped side to allow any mammals that fall in an exit route should they fall in. If any mammal excavations are noted on site, the views of an ecologist should be sought before any activities around them occur.

Yours sincerely

Mike Webb – Technical Director
SLR Consulting Limited