TAYLOR WIMPEY UK

ECOLOGYSOLUTIONS

Part of the ES Group

217 HIGH STREET,
YIEWSLEY,
WEST DRAYTON

Ecological Assessment

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ecology solutions for
planners and developers

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1. INTRODUCTION

1.1. Background & Proposals

1.1.1. Ecology Solutions Limited was commissioned by Taylor Wimpey UK Ltd in February 2020 to undertake an Ecological Assessment of Land at 217 High Street, Yiewsley, West Drayton (see Plan ECO1), hereafter referred to as the application site.

1.1.2. The development proposals are described as follows:

"*Erection of 5 and 6 storey buildings to provide a 10,000sqft D1 Health Facility and 235 residential apartments with associated parking, communal podium garden, landscaping, pedestrian and cycle canal link and external works following the demolition of the existing buildings on site at 217 High Street, Yiewsley*"

1.2. Application Site Characteristics

1.2.1. The application site is located in Yiewsley, in the London Borough of Hillingdon. The application site is bounded to the east by the A408 High Street, to the south by a Shell fuel station and existing office buildings, to the west by the Grand Union Canal and to the north by the River Pinn with a retail park situated beyond.

1.2.2. The application site primarily comprises a large commercial unit (B&M store) with associated car parking and hardstanding. A car repair workshop and associated office building are also present in the western and north-western parts of the application site. Small areas of amenity planting are present, although these are limited both in area and diversity.

1.3. Ecological Assessment

1.3.1. This document assesses the ecological interest of the application site as a whole. The importance of the habitats present is evaluated with regard to current guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1].

1.3.2. The report also sets out the existing baseline conditions for the application site, setting these in the correct planning policy and legal framework and assessing any potential impacts which may occur from the proposed development. Appropriate mitigation where necessary is identified such that it will offset any negative impacts and where possible provide for the ecological enhancement of the application site, in accordance with relevant planning policy.

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

2. SURVEY METHODOLOGY

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

2.2. Desk Study

2.2.1. In order to compile background information on the application site and its immediate surroundings, Ecology Solutions contacted the Greenspace Information for Greater London (GiGL) and the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC).

2.2.2. Information has been returned from the records centres and is referenced within this report where appropriate, with designated sites being shown on Plan ECO1. Due to publication conditions this information is not directly appended to this document.

2.2.3. Further information on designated sites from a wider search area was also obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)[2] database. This information is reproduced at Appendix 1 and where appropriate on Plan ECO1.

2.3. Habitat Survey Methodology

2.3.1. A habitat survey was carried out in February 2020 to ascertain the general ecological value of the land contained within the boundaries of the application site and to identify the main habitats and associated plant species, with notes on fauna utilising the application site.

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

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

2.3.4. All of the species that occur in each habitat would not necessarily be detected during survey work carried out at any given time of the year, since different species are apparent at different seasons. However, given the paucity of semi-natural habitats present within

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

the application site, it is considered that an accurate and robust assessment has been made.

2.4. Faunal Survey

2.4.1. General faunal activity observed during the course of the survey work undertaken was recorded, whether visually or by call. Specific attention was paid to the potential presence of any protected, rare, notable or Priority Species. In addition, specific surveys were undertaken for bats and Badgers *Meles meles*.

2.4.2. **Bats**. Initial bat surveys were undertaken in February 2020 to assess the potential for roosting bats within any buildings and trees on site. The work was undertaken by an experienced bat worker and aimed to establish the likelihood of presence / absence of roosting bats within or immediately adjacent to the site.

2.4.3. Field surveys were undertaken with regard to best practice guidelines issued by Natural England (2004[4]), the Joint Nature Conservation Committee (2004[5]) and the Bat Conservation Trust (2016[6]).

2.4.4. All buildings present within the application site were assessed for their potential to support roosting bats. Detailed inspections of the buildings were undertaken to identify potential voids, gaps or other opportunities which could be utilised by roosting bats, with notes made of any evidence to indicate potential presence. Binoculars and torches were used to view inaccessible areas, as required.

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

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

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

2.4.7. The main requirements for a winter / hibernation roost site is that it maintains a stable (cool) temperature and humidity. Sites commonly utilised by bats as winter roosts include cavities / holes in trees, underground sites and parts of buildings. Whilst different species

[4] Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature, Peterborough.
[5] Mitchell-Jones, A.J. & McLeish, A.P. (Eds.) (2004). *Bat Workers' Manual*. 3rd edition. Joint Nature Conservation Committee, Peterborough.
[6] Collins, J. (Eds.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition)*. Bat Conservation Trust, London.

may show a preference for one of these types of roost site, none are solely dependent on a single type.

2.4.8. In addition, all trees present within and immediately adjacent to the application site were assessed for their potential to support roosting bats. For a tree to be classed as having some potential for roosting bats it must usually have one or more of the following characteristics:

- obvious holes, e.g. rot holes and old woodpecker holes;
- dark staining on the tree below a hole;
- tiny scratch marks around a hole from bats' claws;
- cavities, splits and/or loose bark from broken or fallen branches, lightning strikes etc.;
- very dense covering of mature Ivy *Hedera helix* over trunk.

2.4.9. Consideration was also afforded to habitats present within and adjacent to the site in terms of the potential opportunities that they provide for foraging and commuting bats in the local area.

2.4.10. **Badgers.** Survey work to search for evidence of Badgers was also undertaken in February 2020, which comprised two main elements. The first of these was a thorough search for evidence of Badger setts. For any setts encountered each sett entrance would be recorded and plotted, even if the entrance appeared disused. The following information was recorded if appropriate.

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

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

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

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

3. ECOLOGICAL FEATURES

3.1. The application site was subject to a habitat survey in February 2020. The vegetation present enabled the habitat types to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken.

3.2. The following main habitat / vegetation types were identified:

- Existing Buildings;
- Hardstanding;
- Ornamental Planting;
- Amenity Grassland; and
- Treelines (adjacent to the application site boundary).

3.3. The location of these habitats is shown on Plan ECO2. Each habitat present is described below with an account of their representative plant species.

3.4. Existing buildings

3.4.1. As illustrated on Plan ECO2, the application site supports a number of existing buildings, which when considered together comprise a significant proportion of the site. A detailed description of each building is provided below.

3.4.2. Building **B1** constitutes a large, warehouse unit which is currently in use as a supermarket store (B&M). The exterior of the building comprises brick and steel-clad walls, with a shallow pitched corrugated metal roof. A smaller fascia area serving as an entrance lobby protrudes from the eastern aspect of the building. All brick work and external cladding is considered to be in very good condition with no obvious cracks, gaps or crevices.

3.4.3. Most of the interior of building B1 constitutes a very large and single open space, with no internal voids or other crevices. A significant number of rooflights as well as internal lighting ensures that the entirety of B1 is well-lit. Where internal rooms exist (including the storage area), there are only separated from the main interior space (i.e. the shop-floor) by low-lying dividing walls which do not adjoin the main ceiling.

3.4.4. Building **B2** comprises a large car workshop located in the south-western part of the application site. The building has a metal frame with single skin metal clad walls and supports a very shallow pitched metal roof. No obvious signs of wear or any other external gaps, cracks of crevices were recorded on the outside of the building.

3.4.5. The interior of building B2 remains entirely open and well-lit. There are no internal voids or any other crevices and gaps of any sort.

3.4.6. Building **B3** comprises a two-storey brick building primarily utilised at the present time as an office (associated with the car workshop), with a number of extensions. The brick walls of the main building

(B3a) have a rendered finish and support a pitched asbestos sheet roof. A single-storey lean-to extension is attached to the southern aspect of the building (B3b), which also supports a pitched roof. A similar, albeit longer, extension is located along the western aspect of the main building (B3c). Again, this supports an asbestos sheet pitched roof with an addition membrane lined lean-to which extends over an area of car parking.

3.4.7. The vast majority of external rendering and brickwork associated with building B3 is in a good condition with very limited cracks, gaps or potential access points. Small gaps were recorded on the eastern aspect of B3b and B3c leading underneath the pitched roof. The main building (B3a) is largely in a good condition, aside from a small gap underneath the ridge tiles on the roof and two small gaps located under the eaves at the northern gable end. An inspection of the western aspect of the building (undertaken from the canal footpath to the west) did not identify any other potential gaps, cracks or crevices.

3.4.8. The interior of B3 supports two individual void spaces located within the main building (B3a) as well as above a false ceiling within B3c. Internally, the main void within B3a comprises asbestos sheets attached directly to a pitched wooden frame, with no lining or wooden cladding present. The survey recorded cobwebs along the entirety of the apex, with one potential aspect point visible from the eastern aspect. Internal conditions were recorded to be fairly draughty.

3.4.9. The interior void of B3c (located behind a partially missing false ceiling) was recorded to be completely sealed with no internal gaps or cavities. Furthermore, this void space was recorded to be lined with metal and asbestos sheets, aside from a single brick wall where it adjoins B3a.

3.4.10. The remainder of the interior of B3 consists largely of office and storage space located on the ground floor, with residential flats situated above (limited to B3a only). All interior windows are spaces were recorded to be well sealed with no obvious access points or gaps. Large windows provide light internal conditions throughout the building.

3.5. **Hardstanding**

3.5.1. The majority of the application site comprises existing hardstanding, in the form of the main access road, car park associated with building B1, service yards associated with the three buildings and the ‘garden centre’ element of building B1. It is evident that all areas are subject to regular use and are clear of vegetation.

3.6. **Ornamental planting**

3.6.1. Several areas of ornamental shrubs and amenity hedgerow planting are located within the application site, which are associated with the periphery of the car park to the east of building B1. These areas

primarily comprise amenity / non-native shrub species, with the ground layer supporting ruderal vegetation.

3.6.2. Species recorded include Privet *Ligustrum* sp., Oregon Grape, Laurustinus *Viburnum tinus*, Cotoneaster *Cotoneaster* sp., Silver Birch *Betula pendula*, Ornamental Dogwood *Cornus* sp., Buddleja *Buddleja davidii*, Elder *Sambucus* sp., Firethorn *Pyracantha coccinea*, Eleagnus *Eleagnus* sp, Wild Clematis *Clematis vitalba* and Honeysuckle *Lonicera* sp.. Species present in the ground layer include Ivy, Prickly Sow-thistle *Sonchus asper*, Creeping Thistle *Cirsium arvense* and Chickweed *Stellaria media*.

3.7. **Amenity grassland**

3.7.1. A small pocket of well managed amenity grassland is located in the northern part of the application site, surrounded by areas of hardstanding. The grassland sward supported a very short sward at the time of survey, and is dominated by Perennial Rye-grass *Lolium perenne*, with other species present including Dove's-foot Crane's-bill *Geranium molle*, Dandelion *Taraxacum officinale* agg., Cleavers *Gallium aparine*, Ground Ivy *Glechoma hederacea*, Common Nettle *Urtica* dioica, Creeping Buttercup *Ranunculus repens*, Willowherb *Epilobium sp.* and Spurge *Euphorbia sp*.

3.8. **Treelines (adjacent to the application site boundary)**

3.8.1. A line of trees and scrub is present along the northern boundary of the application site, located between the existing access road and the River Pinn. A number of trees are also located to the north and west of the car repair workshop and office buildings, along the western and north-western boundaries of the application site.

3.8.2. Tree and scrub species present include Ash *Fraxinus excelsior*, Silver Birch, Common Lime *Tilia x europaea*, Hazel *Corylus avellana*, Dogwood *Cornus sanguinea*, Field Maple *Acer campestre*, Sycamore *Acer pseudoplatanus* and Willow species *Salix* spp..

3.8.3. Species associated with the ground layer adjacent to the treelines include Creeping Thistle, Prickly Sow-thistle, Common Nettle, Chickweed, Canadian Fleabane *Conyza canadensis* and Common Ragwort *Senecio jacobaea*.

3.9. **Background Information**

3.9.1. The desk study undertaken by GiGL and BMERC returned no records of any protected or notable plant species from within the application site. The closest record of a notable plant species, was of Dittander Lepidium latifolium, recorded approximately 0.2km north-west of the site during 2003.

3.9.2. No protected or notable species were recorded within the application site during the Phase 1 survey and given the habitats present (dominated by hardstanding and existing built form), it is considered

highly unlikely that the application site would support any such species.

4. WILDLIFE USE OF THE APPLICATION SITE

4.1. During the surveys that have been undertaken within the application site, general observations have been made of any faunal use, with specific attention paid to the potential presence of protected or notable species. Specific surveys were also undertaken for bats and Badgers.

4.2. **Bats**

4.2.1. Buildings B1 and B2 are not considered to provide any potential opportunities for roosting bats, on account of their modern design with metal frame and corrugated sheet construction (lacking any voids, cavities or small gaps), the presence of rooflights and the light and draughty internal conditions.

4.2.2. Most of building B3 does not provide any opportunities for roosting bats, with the unlined and rather draughty loft void unlikely to provide an desirable roosting place. However, the presence of a number of small gaps and cavities between external materials and underneath ridge tiles superficially appear to provide some, limited opportunities for a small number of bats.

4.2.3. Given that building B3 is located in close proximity to the canal to the west of the application site, it is considered that this building would have low to moderate bat roosting potential.

4.2.4. No evidence to indicate the presence of roosting bats was recorded within any of the three buildings within the application site during the internal and external inspection survey.

4.2.5. During the Phase 1 survey a number of Ash trees with a dense covering of Ivy were recorded to be present adjacent to the northern boundary of the application site. Whilst these superficially appear to have low potential to support roosting bats, a number of tall non-directional lighting columns associated with both the A408 and the B&M car park to the south are highly likely to illuminate these trees, reducing the likelihood of bats utilising these features.

4.2.6. With the exception of the canal habitats which adjoin the western boundary of the site, opportunities for foraging and commuting bats within the application site are considered to be negligible, due to the absence of linear semi-natural features and the prevalence of artificial lighting.

4.2.7. **Background Information.** The desk study undertaken by GiGL and BMERC returned no records of any bat species from within the application site. The closest record of a bat species was a single occurrence of an unconfirmed Pipistrelle Pipistrellus sp. bat species, recorded over 0.4km south of the application site. However, it is noted that this was recorded during 1995, and as such, is considered a historical record.

4.2.7.1. Other bat species recorded within the locality (albeit further afield), include occurrences of Serotine *Eptesicus serotinus*, Daubenton's

Bat *Myotis daubentonii*, Leisler's Bat *Nyctalus leisleri*, Noctule *Nyctalus noctula*, Nathusius' Pipistrelle *Pipistrellus nathusii*, Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus* and Brown Long-eared Bat *Plecotus auritus* as well as further unidentified *Myotis* species.

4.3. Badgers

4.3.1. No Badger setts or any other evidence to indicate the presence of Badgers, such as latrines, footprints, hairs or foraging signs, was recorded within the application site during the survey.

4.3.2. Given the habitats present within the site and the absence of any evidence to indicate presence, it is considered that the application site does not support Badgers, and therefore no further consideration has been afforded to this group within this Ecological Assessment.

4.3.3. **Background Information**. The desk study undertaken by GiGL and BMERC returned no records of Badgers from either within the application site or wider search area.

4.4. Other Mammals

4.4.1. The habitats present within the application site are not considered to provide any potential opportunities for other protected or notable mammal species, primarily due to the prevalence of buildings and hardstanding, and the lack of any semi-natural habitats such as grassland, woodland, trees and scrub.

4.4.2. **Background Information.** The desk study undertaken by GiGL and BMERC returned a small number of records for additional protected or notable mammal species from the wider area, including several records for Water Vole *Arvicola amphibius* (the closest being a historical record located approximately 1.1km north-west from 1990) and Hedgehog *Erinaceus europaeus* (the closest record located approximately 0.3km south from 2018).

4.5. Reptiles and Amphibians

4.5.1. The habitats present within and immediately adjacent to the application site do not provide any potential opportunities for either reptiles or amphibian species. It is therefore considered that these species are absent from the application site, and no further consideration is afforded to this group within this Ecological Assessment.

4.5.2. **Background Information.** The desk study undertaken by GiGL and BMERC returned no records of any protected or notable species from within the application site. The closest record of an amphibian species was of Common Frog *Rana temporaria*, recorded approximately 0.9km north of the application site from 1999. The closest returned record of a Great Crested Newt *Triturus cristatus* was recorded approximately 1.6km south of the application site from 2017.

4.5.3. The closest record of a reptile species was of Grass Snake Natrix *helvetica*, recorded approximately 0.4km north-west of the application site from 2004. The only other reptile species recorded within the wider search area was Slow-Worm *Anguis fragilis*, recorded approximately 1km north of the application site from 2017.

4.6. Birds

4.6.1. The application site offers very limited opportunities for nesting and foraging birds in the form of mature ornamental shrub and hedgerow planting, and trees and scrub adjacent to the application site boundary. However, these are very limited in extent and are likely to be subject to significant levels of disturbance, such that far more attractive opportunities are likely to exist in the local area. There is nothing to indicate that the application site would be of any significance for this group.

4.6.2. Bird species recorded at the application site during the course of the Phase 1 survey were limited to Robin *Erithacus rubecula* and Dunnock *Prunella modularis*. Additionally, a single Red Kite *Milvus milvus* was seen flying high over the application site during the course of the survey.

4.6.3. **Background Information**. The desk study undertaken by GiGL and BMERC returned no records of any protected or notable bird species from within the application site. The closest returned record of a protected or notable bird species was for Common Tern *Sterna hirundo*, recorded approximately 0.3km north-west of the application site from 2004.

4.7. Invertebrates

4.7.1. The application site is expected to support a limited range of common invertebrate species, but given the habitats present, there is no evidence to suggest that any protected or notable species or assemblages are likely to be present.

4.7.2. **Background Information.** The desk study undertaken by GiGL and BMERC returned no records of any protected or notable invertebrate species from within the application site. The closest returned record of a protected or notable invertebrate species was for Stag Beetle *Lacanus cervus*, recorded approximately 0.3km north of the application site from 1999.

5. ECOLOGICAL EVALUATION

5.1. The Principles of Site Evaluation

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

5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe[7]. These are broadly used across the United Kingdom to rank sites, so priorities for nature conservation can be attained. For example, current Site of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.

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

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

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

5.1.6. In addition, habitats of local importance are often highlighted within a local Biodiversity Action Plan (BAP).

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

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

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

5.2. **Habitat Evaluation**

Designated sites

5.2.1. **Statutory sites.** There are no statutory designated sites of nature conservation interest located within or immediately adjacent to the application site. The nearest statutory site designated on account of its biodiversity interest is the Yeading Meadows Local Nature Reserve (LNR), located approximately 4.25km to the north-east of the application site at its closest point (See Plan ECO1).

5.2.2. The nearest Site of Special Scientific Interest (SSSI) to the application site is Kingcup Meadows and Oldhouse Wood SSSI, which is located approximately 4.4km to the north-west at its closest point.

5.2.3. Both of these statutory designated sites are significantly separated from the application site by extensive areas of existing development and infrastructure, including main roads and open land. It is therefore considered that the development proposals would not result in any potential adverse impact upon statutory designated sites.

5.2.4. **Non-statutory sites.** There are no non-statutory sites of nature conservation interest located within the application site. However the Grand Union Canal which adjoins the western boundary of the application site forms part of the London's Canals Site of Metropolitan Importance for Nature Conservation (SmINC) (see Plan ECO1).

5.2.5. London's Canals SINC is an extensive site encompassing a significant number of waterways in London, which is designated on account of the aquatic habitats and plants that it supports, in addition to the presence of notable assemblages of fish, breeding waterfowl and invertebrates.

5.2.6. Other non-statutory sites located within the locality of the application site include the River Pinn and Manor Farm Pastures SINC (located approximately 50m to the north-east at its closest point), Little Britain SINC (located approximately 100m to the west) and the Lower Colne SINC (located approximately 700m to the south) (see Plan ECO1).

5.2.7. In order to safeguard all nearby non-statutory sites from potential adverse effects which could arise as a result of the development proposals, standard engineering protocols and best practice guidelines will be implemented throughout the construction phase. Appropriate measures shall be employed to avoid and mitigate for risks, such as:

- The storage of materials such as fuels, oils and aggregates away from the western boundary of the site;
- Instigation of measures; the use of interceptor fencing as required to mitigate for potential for contaminated run-off to enter designated sites and off-site habitats including in

particular the Grand Union Canal to the west and River Pinn to the north;

- The use of spill kits and bunded compounds for high risk activities (such as refuelling);
- Delivery of measures to mitigate for potential dust impacts such as wheel washing, sensitive storage of aggregates away from sensitive features and spraying to limit airborne movements.

5.2.8. Furthermore, in order to prevent potential encroachment of machinery and personnel which could cause damage, temporary protective fencing shall be installed along the western boundary of the application site, which shall remain in place until the completion of construction works.

5.2.9. It is considered likely that the measures outlined above would be confirmed in a Construction Environment Management Plan (CEMP) prior to the commencement of any works on site.

5.2.10. As part of the development proposals, access will be provided for new residents leading from the new development to the canal path. Given that the reasons for the designation of the site are unlikely to be adversely affected by recreational pressure (unlike a site designated for a sensitive habitat prone to trampling, or for its breeding bird assemblage, for instance), it is considered that this would not be likely to result in any adverse effects to London's Canals SMINC.

5.2.11. As part of the design of the development (as illustrated on the Surface Water Drainage Plan produced by Stantec, drawing number 46187/4001/006), the drainage proposals incorporate measures to mitigate for contaminated run-off from entering off-site features, with measures such as green roofs and permeable paving proposed. It is also anticipated that the detailed design will also include measures such silt traps and fuel interceptors. The use of cellular attenuation tanks and flow control measures will also moderate the rate of discharge into offsite watercourses. This will essentially mirror the existing situation present at the site.

5.2.12. With the delivery of the measures as outlined above, it is considered that the development proposals would not be likely to lead to any adverse effects upon non-statutory designated sites.

Habitats within the application site

5.2.13. As illustrated on Plan ECO2 and described above, the vast majority of the application site currently comprises either existing buildings or hardstanding, which are of no ecological value. As such, losses to these habitats are of no significance in ecological terms.

5.2.14. Furthermore, the limited areas of ornamental planting and amenity grassland currently present within the application site boundary are considered to be of very little ecological interest. Losses to these

habitats are therefore also considered to be of negligible significance.

5.2.15. The only features of relatively greater interest – at the site level only – are the treelines that lie adjacent to the northern and western boundaries of the application site. These are to be retained in full under the development proposals.

5.2.16. As illustrated on the landscape illustrative plans produced by Assael Architecture (drawing numbers HSY-ASL-XX-01-DR-L-0200 to HSY-ASL-XX-01-DR-L-0204 inclusive), under the development proposals areas of new tree, scrub, hedgerow and grassland planting are proposed within the application site. Additional planting will also to be undertaken at a 'podium' level upon the western block.

5.2.17. Compared to the existing situation, this will result in a notable increase in both the extent and diversity of floral species within the site, with the planting mixture incorporating a range of native and wildlife beneficial species. New planting will also bolster and complement the existing habitats which form the northern and western boundaries of the application site, promoting enhanced connectivity for species passing through the local area.

5.2.18. Green roofs are also proposed for each of the buildings, which will provide additional habitat not currently present at the application site and in particular result in potential habitats for use by invertebrate species.

5.2.19. In summary, the development proposals will result in net gains in terms of the biodiversity of the habitats within the site, both in terms of the quantum of planting and also the botanical diversity of the site. This will provide new and improved opportunities for a number of faunal species / groups (see below).

5.3. Faunal Evaluation

Bats

5.3.1. **Legislation.** All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"), as amended. These include provisions making it an offence:

- Deliberately to kill, injure or take (capture) bats;
- Deliberately to disturb bats in such a way as to: -
    - be likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or to hibernate or migrate; or
    - affect significantly the local distribution or abundance of the species to which they belong;
- To damage or destroy any breeding or resting place used by bats; or

- To intentionally or recklessly to obstruct access to any place used by bats for shelter or protection.

5.3.2. While the legislation is deemed to apply even when bats are not in residence, Natural England guidance suggests that certain activities such as re-roofing can be completed outside sensitive periods when bats are not in residence provided these do not damage or destroy the roost.

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

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

5.3.5. European Protected Species licences are available from Natural England in certain circumstances, and permit activities that would otherwise be considered an offence.

5.3.6. Licences can usually only be granted if the development is in receipt of full planning permission and it is considered that:

(i) The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
(ii) There is no satisfactory alternative; and
(ii) 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.

5.3.7. **Application Site Evaluation.** Building B3 was identified to offer some limited opportunities for roosting bats in the form of small gaps and crevices. Given the nature of the opportunities that it offers, and its location adjacent to the off-site canal, in light of the guidance it has been assessed to be of low to moderate bat roosting potential.

5.3.8. No other buildings present within the application site are considered to provide potential for roosting bats.

5.3.9. A small number of Ash trees located adjacent to the northern boundary of the application site were identified to have low potential to support roosting bats, due to a covering of dense Ivy. However, the prevalence of non-directional lighting columns for the adjacent road and car park are likely to mean that these features are subject to direct illumination, which significantly reduces the likelihood of use by roosting bats.

5.3.10. As outlined above, the application site is considered to be intrinsically low importance to foraging and / or commuting bats, with

the only feature likely to be of any value comprising the canal habitat along the western boundary.

5.3.11. **Avoidance, Mitigation and Enhancements.** In order to ascertain the presence or absence of roosting bats within building B3, specific roost survey work will be undertaken in the form of evening emergence and dawn re-entry survey work. This survey shall be undertaken with regard to the guidelines, with a minimum of two surveys to be undertaken in late April and early May. Surveyors shall be positioned as to observe all identified access points, utilising bat detectors to record all bats and noting emergence or re-entry events. The survey effort shall be complemented by the use of a static detector deployed within the loft void of B3a, to provide a further check for evidence to indicate whether the building is utilised by roosting bats. All work shall be led by an experienced bat surveyor, with data to be subject to analysis using specialist software.

5.3.12. The findings of this survey will be provided to the local planning authority at the earliest opportunity, in the form of an Addendum Report, which will ensure that all information is available prior to the determination of the application.

5.3.13. In light of the findings of the detailed internal and external assessment and noting the urban location of the site in general, it is considered highly unlikely that a bat roost of high conservation significance would be identified within building B3. As such, at this stage, there is no reason to believe that suitable mitigation could not be provided in order to obtain a relevant mitigation licence from Natural England, in the event that bats are found to be utilising the building for roosting purposes. It is anticipated that such mitigation would most likely entail sensitive demolition of the building outside of the key period for roosting bats, in addition to the provision of new roosting opportunities in the form of bat boxes on suitable mature trees. However, the requirement for and scope of any mitigation would be confirmed following the completion of the survey work in late April / early May.

5.3.14. Notwithstanding the sub-optimal opportunities that they provide, the trees identified to have low bat roosting potential are to be retained under the development proposals. Should any arboricultural works be required in due course, it is recommended that this should be undertaken in line with a soft felling methodology in order to avoid any potential for adverse upon bat species, should they be present.

5.3.15. The provision of new tree, scrub, grassland and hedgerow habitats within the site will provide some limited opportunities for foraging and commuting bats in the local area, primarily by bolstering the invertebrate population present within the application site.

5.3.16. It is recommended that a sensitive approach should be adopted towards lighting along the western boundary of the application site, in order to ensure that lightspill onto the canal corridor is minimised and avoided if possible. Where lighting is required, measures should be incorporated to direct this only to where it is needed, using

features such as bollard lights and hoods, cowls and louvres as required. This will ensure that existing opportunities for this group along the canal will remain unaffected by the proposed development.

Birds

5.3.17. **Legislation.** Section 1 of the Wildlife and Countryside Act 1981 is concerned with the protection of wild birds, whilst Schedule 1 lists species which are protected by special penalties.

5.3.18. **Application Site Evaluation.** The application site offers very limited opportunities for nesting and foraging birds in form of mature ornamental shrub, hedgerow planting, trees and scrub, although it is recognised that far more attractive opportunities are available within the wider area. As such, there is nothing to indicate that the application site is likely to be particularly important for nesting birds.

5.3.19. **Avoidance, Mitigation and Enhancements.** As all species of birds receive general protection whilst nesting, it is recommended that the clearance of suitable nesting habitats should be undertaken outside of the main development of the main bird breeding season (typically considered to March to July inclusive). Should this not be possible, potential nesting habitat should be subject to a nesting bird survey undertaken by an experienced ecologist, immediately prior to its removal. Should any nesting birds be identified, then the nest should be fully safeguarded *in situ* and subject to an appropriate disturbance buffer (as advised by the ecologist), and only removed once it has been confirmed any fledglings have left the nest and it is no longer active.

5.3.20. As outlined above, the development proposals for the site will provide new tree and scrub planting, in addition to hedgerow and grasslands. This will provide modest enhancements for the site in terms of new opportunities for foraging and nesting birds in the local area.

Invertebrates

5.3.21. **Legislation.** A number of invertebrate species are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), and are therefore afforded protection.

5.3.22. **Application Site Evaluation and Avoidance, Mitigation and Enhancement.** The application site is expected to support a limited range of common invertebrate species, but given the habitats present, there is no evidence to suggest that any protected or notable species or assemblages are likely to be present.

5.3.23. The provision of semi-natural habitats within the site in the form of open space is likely to provide enhancements for invertebrates compared to the existing situation.

6. PLANNING POLICY CONTEXT

6.1.1. The planning policy that relates to nature conservation in the London Borough of Hillingdon is issued at three main administrative levels: nationally though the National Planning Policy Framework (NPPF); regionally through the London Plan; and at the local level through policies in the Hillingdon Local Plan.

6.2. National Policy

National Planning Policy Framework (2019)

6.2.1. The National Planning Policy Framework (NPPF) sets out the Government's requirements for the planning system and was adopted on 27th March 2012 and subsequently revised on the 24th July 2018 and 19 February 2019.

6.2.2. The key element of the NPPF is that there should be "*a presumption in favour of sustainable developmen*t" (paragraphs 10 to 11).

6.2.3. The revised NPPF is comparable to previous versions (which it replaces), including reference to minimising impacts on biodiversity and provision of net gains to biodiversity where possible (paragraph 170) and ensuring that Local Authorities place appropriate weight to statutory and non-statutory nature conservation designations, protected species and biodiversity.

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

6.2.5. Paragraph 175 of the NPPF comprises a number of principles which Local Authorities should apply, including:

- encouraging opportunities to incorporate biodiversity in and around developments;
- provision for refusal of planning applications if significant harm cannot be avoided, mitigated or, as a last resort, compensated for; and
- the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss.

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

6.3. **Regional Policy**

Adopted London Plan (March 2016)

6.3.1. Policies providing guidance on the relationship between development and nature conservation in London can be located in The London Plan adopted in March 2016 (consolidated with alterations since 2011). The plan is the overall strategic plan for London and sets out an integrated framework for the development of the capital for the next 20 – 25 years.

6.3.2. There are four policies relevant to ecology and nature conservation (policies 2.18, 5.15, 7.19 and 7.21), while a number of other policies outline features which proposals may include to deliver biodiversity enhancements (such as policy 5.14 [water quality]).

6.3.3. Policy 7.19 is the main policy concerned with biodiversity and refers to the protection of statutory and non-statutory designated sites, protected and priority species and habitats from adverse impacts. The policy also states that development proposals should, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

6.3.4. Policy 7.21 relates to the protection of trees and woodlands and states that development proposals should retain existing trees of value and, wherever appropriate, include planting of additional trees.

6.3.5. Policy 2.18 is concerned with green infrastructure, and states that development proposals should incorporate appropriate elements that can be integrated into the green infrastructure network and should encourage the linkage of green infrastructure.

6.3.6. Policy 5.15 includes a strategic objective that states that water supplies will be protected and conserved by ensuring that the water supplied will not give rise to likely significant adverse effects on the environment.

Draft New London Plan (December 2019)

6.3.7. The Mayor of London is in the process of adopting a new London Plan to which it can be afforded significant weight.

6.3.8. There are four key policies within the draft Intend to Publish London Plan which relate to biodiversity and ecology: Policy G1 – Green Infrastructure; Policy G5 – Urban Greening; Policy G6 - Biodiversity and Access to Nature, and G7 - Trees and Woodland. Due to the advanced stage in the examination process, the draft London Plan can be afforded significant weight.

6.4. **Local Policy**

Hillingdon London Borough Local Plan: Part 1

6.4.1. The Hillingdon Local Plan: Part 1 was adopted in November 2012 and outlines the borough objectives for the next 15 years. There is

one policy which relates specifically to ecology and nature conservation; Policy EM7: Biodiversity and Geological Conservation.

6.4.2. Policy EM7 refers to the management of SINC status throughout the borough, in addition to the implementation of green initiatives during development design stages and implementation (for example, the incorporation of green roofs).

Hillingdon London Borough Local Plan: Part 2

6.4.3. The Hillingdon Local Plan: Part 2 Development Management Policies and Sites Allocations and Designations was adopted on 16 January 2020. The Part 2 Local Plan includes the following policies, which are of relevance to ecology and nature conservation:

- Policy OL26, which includes the protection of, as well as management of, trees and woodland habitats present within the borough;
- Policy EC1 and EC3, which are concerned with the protection of statutory designated sites as well as Sites of Nature Conservation Importance;
- Policy EC4, which identifies to need to monitor Sites of Nature Conservation Importance in a close proximity to development, in addition to identify new areas to designate as Sites of Nature Conservation Importance;
- Policy EC5, which identifies to need to retain, enhance and create new habitats as part of the development process; and
- Policy EC6, which includes provisions to convert land (i.e. re-wild) for the purposes of wildlife benefit, should the possibility arise.

6.5. **Discussion**

6.5.1. Recommendations have been put forward in this report that would fully safeguard the existing ecological interest of the application site, and wherever possible, measures to enhance ecological and biodiversity value have been set out. Based on surveys undertaken and assessment, the presence and potential presence of protected species has been given due regard and measures to enhance to further understand the use of the site by protected species have been put forward.

6.5.2. In conclusion, implementation of the measures set out in this report would enable the emerging development proposals for the application site to fully accord with planning policy for ecology and nature conservation at all administrative levels.

7. SUMMARY AND CONCLUSIONS

7.1. Ecology Solutions Limited was commissioned by Taylor Wimpey UK Ltd in February 2020 to undertake an Ecological Assessment of Land at 217 High Street, Yiewsley.

7.2. Subject to implementation of standard engineering protocols and best practice throughout the construction period, it is considered that the proposed development is not likely to give rise to any significant adverse impacts on any statutory or non-statutory designated sites.

7.3. The majority of the habitats within the application site do not have any ecological value, comprising existing buildings and hardstanding. The development proposals will result in an increase in both the quantum of semi-natural habitats and also the botanical diversity within the site, resulting in a net gain in biodiversity compared to the existing situation.

7.4. The site offers few opportunities for protected and notable species at present. Whilst further work is underway to ascertain the presence or absence of roosting bats within a building identified to have low to moderate potential (with this information to be submitted during the consultation period), there is no reason at this stage to believe that suitable mitigation could not be granted in order to obtain a relevant mitigation licence from Natural England, in the event that roosting bats are found.

7.5. A number of appropriate mitigation measures have been identified in respect of key protected species / groups, with recommendations made to deliver enhancements compared to the existing situation.

7.6. In conclusion, on the evidence of the ecological surveys undertaken, the application site supports habitats of exceptionally little interest from an ecology and nature conservation perspective. The design of the proposed development and the implementation of mitigation measures as recommended in this report will either ensure that there are no adverse effects on any designated sites or protected species as a result of development at the application site.

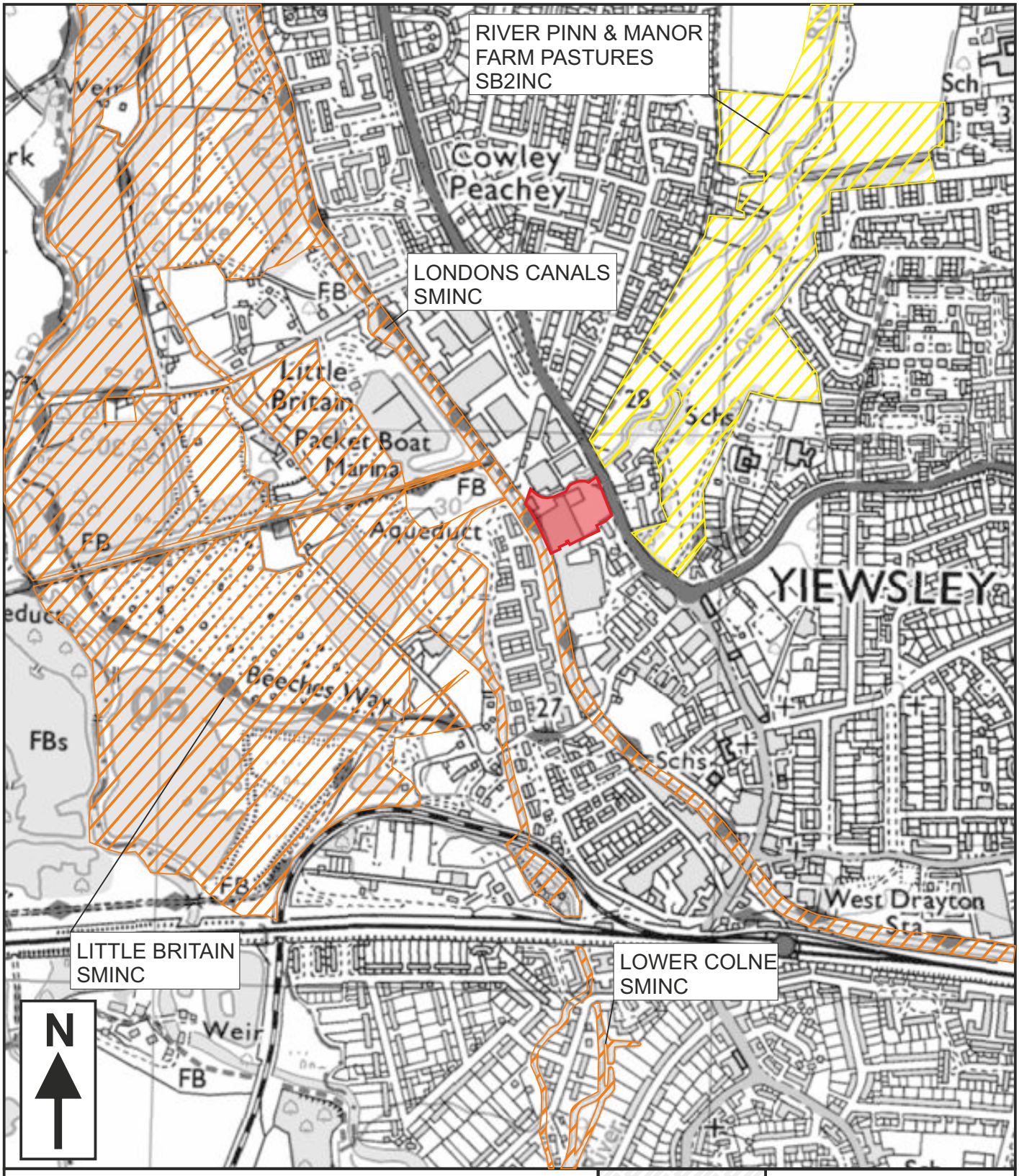
7.7. Moreover, it is considered that the proposals offer enhancements for biodiversity over the existing situation. The proposals therefore fully accord with current legislation and policy pertinent to ecology and nature conservation.

PLANS & APPENDICES

PLANS

PLAN ECO1

Application Site Location and Ecological Designations



KEY:

- APPLICATION SITE LOCATION
- SITE OF METROPOLITAN IMPORTANCE FOR NATURE CONSERVATION (SMINC)
- SITE OF BOROUGH GRADE 2 IMPORTANCE FOR NATURE CONSERVATION (SB2INC)

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PLAN ECO1: APPLICATION SITE LOCATION & ECOLOGICAL DESIGNATIONS

Rev: A

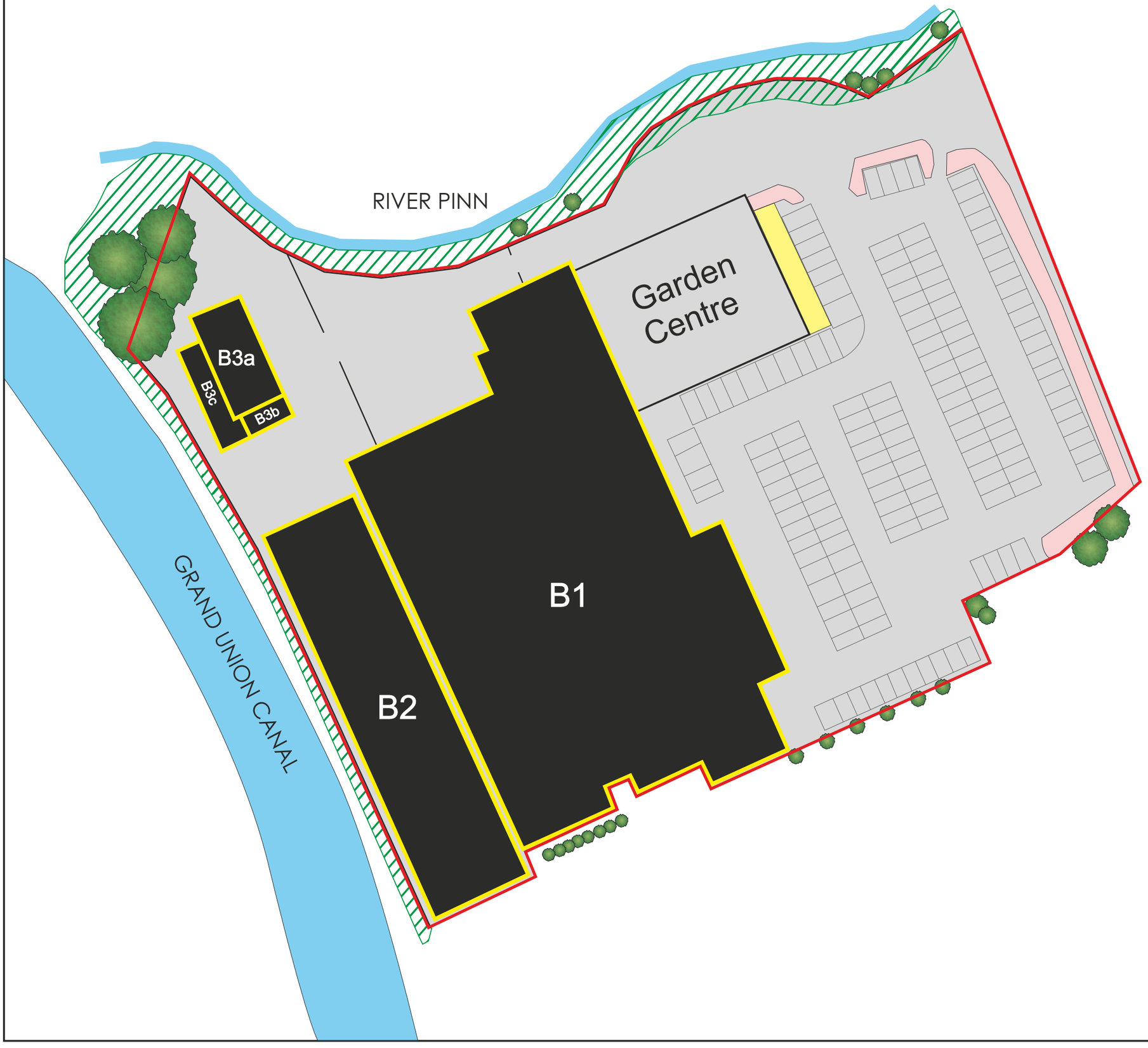
Feb 2020

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PLAN ECO2

Ecological Features

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KEY:

- APPLICATION SITE BOUNDARY
- BUILDING
- HARDSTANDING
- TREELINE (ALONG SITE BOUNDARY)
- ORNAMENTAL PLANTING
- AMENITY GRASSLAND
- OFFSITE WATERBODY
- TREE

N

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PLAN ECO2: ECOLOGICAL FEATURES

Rev: A

Feb 2020

APPENDICES

APPENDIX 1

Information obtained from MAGIC

MAGiC

8858 Yiewsley



Legend

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

Ancient Woodland (England)

- Ancient and Semi-Natural Woodland
- Ancient Replanted Woodland

Projection = OSGB36
xmin = 499300
ymin = 178000
xmax = 512600
ymax = 184500

0 0.75 1.5
km

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