



Link Park Road, West Drayton

Preliminary Ecological Appraisal

KHC Management Services Limited

June 2026



Document Control

Report Title:	Link Park Road, West Drayton – Preliminary Ecological Appraisal		
Client:	KHC Management Services Limited		
Project number and name:	1224 Link Park Road, West Drayton		
Document Ref:	1224-PEA-V1		
Created by:	Michael Underwood BSc MCIEEM (Principal Ecologist)	Date:	02/06/2026
Reviewed by	Q1 Samantha Payne MSci (Consultant Ecologist)	Date:	04/06/2026
Authorised by:	Alan Cowlshaw (Associate Director)	Date:	24/06/2026
Confidentiality Level:	Controlled: Uncontrolled if printed		

Version Control

Version:	V2
Date of Version:	04/07/2026
Reason for revision:	-

Work carried out by Envance on behalf of the client in accordance with the agreed terms of contract and/or written agreement form the agreed Services. The Services were performed by Envance with the skill and care ordinarily exercised by a reasonable Consultant at the time the Services were performed. Further, and in particular, the Services were performed by Envance taking into account the limits of the scope of works required by the client, the time scale involved and the resources, including financial and manpower resources, agreed between Envance and the client.

Other than that expressly contained in the paragraph above, Envance provides no other representation or warranty whether express or implied, in relation to the services.

This report is produced exclusively for the purposes of the client. Envance is not aware of any interest of or reliance by any party other than the client in or on the services. Unless expressly provided in writing, Envance does not authorise, consent or condone any party other than the client relying upon the services provided. Any reliance on the services or any part of the services by any party other than the client is made wholly at that party's own and sole risk and Envance disclaims any liability to such parties.

This report is based on Site conditions, regulatory or other legal provisions, technology or economic conditions at the time of the Service provision. These conditions can change with time and reliance on the findings of the Services under changing conditions should be reviewed.

Envance accepts no responsibility for the accuracy of third-party data used in this report.



Contents

1.	Introduction.....	3
2.	Methodology	4
2.1	Desk Study	4
2.2	Field Survey	4
2.3	Legislation and Policy	4
2.4	Limitations.....	6
3.	Baseline Conditions.....	7
3.1	Site Context	7
3.2	Designated Sites	7
3.3	Priority Habitats.....	9
3.4	Site Habitats	9
3.5	Protected Species.....	11
	Amphibians	11
	Badgers	11
	Bats	11
	Birds	12
	Plants	12
	Terrestrial Invertebrates.....	12
	Terrestrial Mammals.....	13
	Reptiles	13
	Invasive Non-Native Species.....	14
4.	Further Surveys, Mitigation and Enhancements	15
5.	References	18
6.	Figures	19
	Appendix A. Legislation and Policy.....	23
	Appendix B. Photographs	26

Tables

Table 1. Statutory designated sites.....	7
Table 2. Non-statutory sites.....	8
Table 3. Site habitats.....	9
Table 4. Potential impacts, mitigation and further recommendations.....	15
Table 5. Recommendations for enhancement.....	17



Figures

Figure 1. Site location.....	20
Figure 2. Non-statutory designated sites.....	21
Figure 3. Site habitats	22



Summary

This report is a Preliminary Ecological Appraisal (PEA) of land located to the east of Link Park Road, West Drayton, UB7 7HA, National Grid Reference (NGR): TQ 05186 79286. The Proposed Development comprises a waste management facility, including the treatment and recycling of metals, End of Life Vehicles (ELVs), including new surfacing and drainage, a site office and a weighbridge.

The Site was evaluated for habitats and species protected under UK nature conservation legislation, including the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017, the Natural Environment and Rural Communities Act 2006 and the Protection of Badgers Act 1992. The findings, along with potential impacts of the Development, are documented in accordance with industry standards.

A desk study was undertaken to gather ecological data, including records of protected and notable species, Priority Habitats and designated ecological sites. The sources consulted included Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC), Greenspace Information for Greater London (GIGL) and the MAGIC website.

A Site survey was undertaken in May 2026. The survey followed UK Habitat Classification methodology and made note of field signs and/or suitable habitat for protected or notable species. The Site is approximately 0.38 hectares in area and is dominated by developed land, comprising sealed hardstanding and artificial unvegetated, unsealed surface, with sparse ruderal vegetation and occasional offshoots from adjacent woodland / tree species.

Constraints Identified

1. Non-statutory Designated Sites

The Site lies within the Lower Colne SINC and is located close to the wider Lower Colne river corridor. Indirect adverse effects could occur if contaminated run-off or accidental spillages enter nearby drains or watercourses. Pollution prevention measures should be included within a CEMP / operational management plan.

2. Priority Habitat and Waterbodies

No Priority Habitat or ancient woodland is recorded within the Site. River Priority Habitat is present approximately 23 m from the Site, and nearby drains, the Lower Colne river corridor, the River Colne / Frays River, Thorney Pool, Mayfields Lake and the Grand Union Canal are present in the surrounding area. Indirect effects could occur through polluted run-off or accidental spillages. Appropriate surfacing, drainage, containment and pollution prevention measures should be implemented.

3. Bats

The Site does not contain any buildings or trees therefore, provides no habitat suitability in supporting roosting bats. However, adjacent habitats, including the river corridor, woodland edge and nearby wetland habitats, may support foraging and commuting bats.

4. Birds

The Site provides limited nesting habitat due to its disturbed nature and the regular management of vegetation. However, adjacent trees, scrub, watercourses and wetland habitats may support nesting, foraging and commuting birds. Vegetation clearance should therefore be undertaken outside the nesting bird season, 1 March to 31 August inclusive. Where this is not possible, a nesting bird check should be undertaken no more than 48 hours prior to clearance.

5. Reptiles and Hedgehog

The Site provides limited habitat suitability for reptiles and hedgehog due to the dominance of hardstanding and gravel. However, individuals could shelter beneath debris, stored materials or



vegetated margins. Reasonable Avoidance Measures should be followed during clearance works.

6. Riparian Mammals

Recent records of water vole and otter were returned from within 2 km of the Site. No aquatic habitat is present within the Site itself; however, the Site is close to the Lower Colne River corridor and nearby drains. The Site is also located within 50 m of a waterbody within adjacent off-site woodland. No signs of otter or water vole were recorded during the MoRPh survey. However, given the proximity of suitable off-site aquatic habitat, an pre-construction otter survey is recommended. Otter and water vole also remain potential constraints through indirect pollution pathways during works.

7. Invasive Non-native Species

No Schedule 9 invasive plant species were recorded within the Site during the survey. However, invasive non-native species are present within the wider area. Biosecurity measures should be implemented to prevent the introduction or spread of invasive species through vehicle movements, imported materials, soil movement or drainage connections.

Enhancements

A Habitat Management and Monitoring Plan will be required to demonstrate how the Development will deliver a minimum 10% net gain for biodiversity.

The following enhancements are recommended:

- Native boundary planting, including native scrub and shrubs, to improve habitat value within the hardstanding-dominated Site.
- Installation of bat boxes on suitable boundary trees, where feasible.
- Installation of bird boxes on suitable boundary trees, where feasible.
- Inclusion of berry- and seed-bearing native planting to improve foraging opportunities for birds.
- Creation of log piles, brash piles, rubble / stone habitat piles or dense native planting in low-disturbance areas for hedgehog, reptiles and invertebrates.



1. Introduction

- 1.1.1 Envance UK was commissioned by KHC Management Services Limited in May 2026 to undertake a Preliminary Ecological Appraisal (PEA) of a parcel of land located to the east of Link Park Road, West Drayton, UB7 7HA (National Grid Reference (NGR): TQ 05186 79286 hereafter referred to as the 'Site'), The appraisal was commissioned to inform proposals for a waste management facility comprising the treatment and recycling of metals and End of Life Vehicles (ELVs), requiring new surfacing and drainage, a site office, and a weighbridge (hereafter referred to as the Development). The Development boundary is shown in **Figure 1**.
- 1.1.2 This report documents survey findings and evaluates the likely Important Ecological Features (IEF) of the Site in line with standard guidelines (CIEEM, 2017). Methodologies employed are described and an evaluation of the Site is given, with recommendations for any further survey work and/or mitigation measures included, where appropriate.



2. Methodology

2.1 Desk Study

- 2.1.1 A desk study was undertaken to inform the requirements for survey and obtain additional ecological information outside the scope of field survey. The following sources were consulted to obtain relevant ecological information from within 2 km of the study area (5 km for designated sites of international importance): Buckinghamshire and Milton Keynes Environmental Record Centre (BMERC), Greenspace Information for Greater London (GiGL) and the Multi Agency Geographic Information Centre (MAGIC) website (www.magic.gov.uk). Records were received in May 2026. Only recent records (i.e., from 2006 to 2026) are considered in this report.
- 2.1.2 The following information was sought and considered:
- Records of notable protected and priority species;
 - Records of priority habitats;
 - Details of any statutory sites of ecological interest;
 - Details of any non-statutory sites of ecological interest; and
 - Presence of any ponds or other waterbodies within 250 m.
- 2.1.3 Only ecological features considered to have the potential to be affected by the Proposed Development (ecological constraints) are presented within this report.

2.2 Field Survey

- 2.2.1 A habitat survey was undertaken by Envance ecologists Samantha Payne MSci on 7th May 2026. The survey followed UK Habitat Classification (UKHab) survey methodology (UKHAB Ltd, 2023), where the habitats and vegetation types present were recorded, together with an indication of their relative abundance using the DAFOR scale (D = dominant, A = abundant, F = frequent, O = occasional, R = rare). This survey method aims to characterise habitats and communities present and is not intended to provide a complete list of all species occurring across the Site.
- 2.2.2 As the Site is immediately adjacent to Bigley Ditch, a River Condition Assessment (MoRPh) survey was also undertaken on 5th June 2026 to confirm river habitats and condition. The findings of this survey are reported in the BNG report that accompanies this application.
- 2.2.3 Site habitats were also assessed for their suitability to support protected or notable species. Any signs of the presence of such species were recorded, including observations of tracks, feeding remains, nests and burrows. Notable, rare or scarce plant species were highlighted if present. Invasive plant or animal species listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were recorded as seen.

2.3 Legislation and Policy

- 2.3.1 The principal conservation legislation relevant to this report includes the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 (as amended), the Natural Environment and Rural Communities (NERC) Act 2006, the Protection of Badgers Act 1992, the Hedgerow Regulations 1997 and the Environment Act 2021. The National Planning Policy Framework is the government policy document that informs Local Planning Authority policy (Buckinghamshire Council, 2025;). See **Appendix A** for further details surrounding legislation and policy.





2.4 Limitations

- 2.4.1 This report serves to indicate the value of the Sites in nature conservation terms based upon the survey data gathered. As with any survey of this kind, the information collected defines the habitat types present within the Sites and their condition and is not intended to be a record of every species present.
- 2.4.2 Ecological surveys are limited by factors that affect the presence of plants and animals, such as the time of year, weather, migration patterns and behaviour. Any absence of desk study records cannot be relied upon to infer absence of a species/habitat as the absence of records may be a result of under-recording within the given search area. The UK Habitats Classification survey does not constitute a full botanical survey, or a Phase 2 pre-construction survey that would include accurate GIS mapping for invasive or protected plant species.
- 2.4.3 Most of the ecological data remains valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for 18 months, assuming no considerable changes to the site conditions. This report assumes that construction will commence within 1-2 years of the date of the assessment in accordance with the British Standard 42020:2013 unless otherwise stated.



3. Baseline Conditions

3.1 Site Context

- 3.1.1 The Site is located at Romiley Golf Club, Greater Manchester. The surrounding landscape comprises the wider golf course, grazed agricultural fields, woodland belts, mature boundary trees, ditches, ponds and nearby residential settlement associated with Romiley, Compstall and Marple. The Site is set within a semi-rural urban-fringe context, with recreational land, pasture and wooded corridors forming the dominant ecological features in the local area.

3.2 Designated Sites

Statutory Designated Sites

- 3.2.1 There are two statutory designated sites of international importance for nature conservation located within 5 km for the Site. These are shown in Table 1 below.

Table 1. Statutory designated sites.

Name	Reason for Designation	Approximate Distance from Site	Ecological Connectivity with Site
Southwest London Waterbodies Special Protection Area (SPA)	Designated for its European ornithological interest, the South-west London Waterbodies SPA comprises a series of embanked water supply reservoirs and former gravel pits supporting a range of man-made and semi-natural open-water habitats. The site qualifies under Article 4.2 of the Birds Directive as it regularly supports internationally important wintering populations of gadwall (<i>Anas strepera</i>) and shoveler (<i>Anas clypeata</i>). It also supports nationally important numbers of cormorant (<i>Phalacrocorax carbo</i>), great crested grebe (<i>Podiceps cristatus</i>), tufted duck (<i>Aythya fuligula</i>), pochard (<i>Aythya ferina</i>) and coot (<i>Fulica atra</i>).	4.2 km south-west	No direct impacts or indirect adverse effects on the designated sites are expected due to the distance from the Development, the absence of viable impact pathways, and the local topography. The South West London Waterbodies SPA and Ramsar lie at a higher elevation than the River Colne, which runs along the eastern aspect of the designated sites. This topographical separation further reduces the potential for hydrological connectivity or pollution pathways between the Development and the designated sites.
Southwest London Waterbodies Ramsar	Designated for its internationally important wintering bird populations, the South-west London Waterbodies Ramsar site comprises a series of reservoirs and former gravel pits supporting a range of man-made and semi-natural open-water habitats. The site qualifies under Ramsar Criterion 6 as it supports species/populations occurring at levels of international importance, including black-necked grebe (<i>Podiceps nigricollis nigricollis</i>) and smew (<i>Mergellus albellus</i>).	4.2 km south-west	

Non-Statutory Designated Sites

- 3.2.2 There are 7 non-statutory Sites of Importance for Nature Conservation (SINC) located within 2 km of the Site, with details shown in Table 2 and Figure 2. SINC are recognised by the Greater London Authority and London Borough councils as important wildlife sites. These sites are graded into three tiers:
- Sites of Metropolitan Importance
 - Sites of Borough Importance (Borough I and Borough II)



- Sites of Local Importance

3.2.3 There are seven non-statutory designated sites within 2 km of the Site, with details shown in **Table 2** and **Figure 2**.

Table 2. Non-statutory sites.

Name	Summary Interest	Distance from Site	Ecological Connectivity with Site
Lower Colne (M059)	Metropolitan site comprising one of London's finest river systems, including the Colne, Wraysbury and Frays rivers, with diverse aquatic and marginal flora, wet woodland, birds, fish, invertebrates and water vole.	Within Site	The Site lies within this SINC; however, the habitats present within the existing Site comprise hardstanding and artificial unvegetated surfaces, which are of negligible ecological value and are not considered to be representative of the habitats for which the SINC is designated. As such, the Proposed Development is not anticipated to result in the direct loss, degradation or fragmentation of qualifying SINC habitat. The Proposed Development is therefore unlikely to adversely affect the integrity or function of the SINC. Notwithstanding this, standard pollution prevention measures should be implemented during construction and operation to avoid indirect effects on adjacent or connected habitats, including through contaminated run-off or accidental spillages.
St Georges Meadows at Southlands Art Centre (HiBI40)	Borough Grade II site near West Drayton supporting flower-rich grassland, wet hollows, hedgerows, scattered trees and a small pond with aquatic vegetation.	0.6 km east	There is limited ecological connectivity due to intervening roads and urban development. Direct effects are unlikely; however, pollution prevention measures should be implemented to avoid indirect effects via connected drainage or watercourses.
Lower Colne (HiBI22)	Borough Grade I site associated with the Lower Colne area; citation is currently awaiting production	0.7km south	The Site has some ecological connectivity with this SINC via the wider Lower Colne river corridor. Direct effects are unlikely; however, indirect effects from contaminated run-off associated with the Development cannot be fully excluded.
Beeches (HiBI20)	Borough Grade I site; citation is currently awaiting production.	0.8 km north-east	There is limited ecological connectivity due to intervening industrial and urban land. Direct and indirect effects are considered unlikely, subject to appropriate pollution prevention measures.
London's Canals (M006)	Metropolitan site comprising London's canal network, supporting aquatic flora, marginal vegetation, fish, invertebrates, breeding waterfowl and commuting / foraging bats within built-up areas.	1.1km north-east	There is some ecological connectivity via the wider watercourse and canal network. Direct effects are unlikely; however, indirect effects could occur if contaminated run-off enters connected drainage or watercourses.



Name	Summary Interest	Distance from Site	Ecological Connectivity with Site
Little Britian (M043)	Metropolitan site within the Colne Valley supporting a varied mosaic of lakes, rivers, scrub, woodland, wasteland and grassland, with notable wetland plants, birds, water vole and bats.	1.4 km north	There is some ecological connectivity via the Colne Valley river corridor. Direct effects are unlikely due to distance; however, indirect pollution pathways should be controlled.
River Pinn and Manor Farm Pastures (HiBII07)	Borough Grade II site comprising a stretch of the River Pinn with open grassland, scrub, hedgerows, scattered trees, tall herbs and secondary woodland.	1.4 km north-east	There is limited ecological connectivity due to intervening urban and industrial land. Direct effects are unlikely, and indirect effects are considered unlikely subject to drainage and pollution controls.

3.3 Priority Habitats

- 3.3.1 No Priority Habitat or Ancient or Semi-Natural Woodland habitat is recorded within the Site, however Priority Habitats in the wider area include rivers, reedbeds and traditional orchard, with river habitat of the Lower Colne River corridor recorded approximately 10 m from the Site. The Site is also located 10 m west of Bingley Ditch and the Lower Colne River corridor, with the River Colne / Frays River, Thorney Pool, Mayfields Lake and the Grand Union Canal present in the wider area.
- 3.3.2 The watercourse is not considered to represent a priority habitat within the Site. However, it is located within the Local Nature Recovery Strategy Nature Network and has therefore been assigned high strategic significance within the BNG assessment. No direct impacts to the watercourse are anticipated as a result of the Proposed Development. Direct loss of Priority Habitat as a result of the Proposed Development is unlikely, however there are anticipated indirect impacts to the Lower Colne River through potential pollution events such as contaminated run-off or accidental spillages associated with ELV treatment and metal recycling in the absence of mitigation. Priority Habitat is therefore considered a potential constraint to the Development.

3.4 Site Habitats

- 3.4.1 Site habitats are described in **Table 3** and mapped in **Figure 3**. Photographs are shown in **Appendix B**.
- 3.4.2 The Site is dominated by developed land, comprising areas of sealed hardstanding and artificial unvegetated, unsealed surface. Vegetation is limited to sparse ruderal species and occasional offshoots from adjacent woodland/tree species around gravel and semi-permeable areas.
- 3.4.3 The habitats present are common and widespread, are not Priority Habitats and are considered of Less than Local importance for nature conservation. Site habitats are not considered to be a significant constraint to the Development, although pollution prevention measures should be implemented to avoid indirect effects on adjacent habitats.

Table 3. Site habitats.

Habitat	Description
u1b- Developed land; sealed	Two areas of developed land; sealed surface u1b (area = 0.283 Ha) are present within the Site (Photograph 1). This habitat comprises sealed hardstanding associated with the existing industrial setting.



Habitat	Description
surface	Condition assessment N/A. This habitat is common and widespread, is not Priority Habitat, and is considered to be of Less than Local importance for nature conservation.
r1g - Other Standing Water 50 - Ditch	Bigley Ditch is within 10 m of the Proposed Development. The watercourse is heavily managed and modified, with a relatively straight channel, steep banks and areas of exposed or eroded bare ground. The surrounding land comprises predominantly hardstanding, with scattered scrub, ruderal vegetation and occasional trees present along sections of the bank. The ditch was assessed as part of the River MoRPh survey and was found to be in fairly poor condition due to channel modification, including an over deepened channel.
u1c-Artificial unvegetated, unsealed surface	Four areas of artificial unvegetated, unsealed surface u1c (Area = 0.097) are present within the Site (Photograph 2). This habitat comprises gravel / semi-permeable surfacing with sparse ruderal vegetation and occasional offshoots from adjacent woodland / tree species. Species recorded include herb-robert (<i>Geranium robertianum</i>), bramble (<i>Rubus fruticosus</i> agg.), willowherb (<i>Epilobium</i> sp.), cleavers (<i>Galium aparine</i>), common ragwort (<i>Jacobaea vulgaris</i>), dandelion (<i>Taraxacum</i> agg.), spear thistle (<i>Cirsium vulgare</i>), forget-me-not (<i>Myosotis</i> sp.), crack willow (<i>Salix fragilis</i>) offshoots / saplings, and buddleia (<i>Buddleja davidii</i>). Condition assessment N/A. This habitat is common and widespread, is not Priority Habitat, and is considered to be of Less than Local importance for nature conservation.



3.5 Protected Species

Amphibians

- 3.5.1 BMERC and GiGL returned seven recent records of great crested newt *Triturus cristatus* from within 2 km of the Site. The closest record was located approximately 0.5 km east of the Site. No recent records of other amphibian species were returned.
- 3.5.2 Two standing waterbodies were identified within 250 m of the Site: Thorney Pool and a small sluice-associated pond connected to the River Colne. Thorney Pool is separated from the Site by Thorney Mill Road and an absence of suitable terrestrial habitat, reducing its functional connectivity to the Site. The sluice pond is hydrologically influenced by the River Colne and is likely subject to fluctuating water levels, making it unsuitable for GCN.
- 3.5.3 The Site does not support ponds or other suitable breeding habitat and is dominated by hardstanding and gravel, with limited terrestrial habitat for amphibians. Great crested newt and other amphibians are therefore considered likely **not a significant constraint** to the Development, although Good Practice Guidelines and Reasonable Avoidance Measures should be adopted during clearance of stored materials, debris or vegetated margins.

Badgers

- 3.5.4 BMERC and GiGL returned no recent records of badger *Meles meles* from within 2 km of the Site.
- 3.5.5 The Site is dominated by hardstanding and artificial, unvegetated surfaces, providing negligible suitability for badger *Meles meles* sett creation, foraging or commuting. No evidence of badger activity was recorded within the Site during the survey.
- 3.5.6 However, woodland located adjacent to the Development provides habitat with potential to support badger sett creation, foraging and commuting. Although this habitat lies outside the Development footprint and is separated from the Site by existing hardstanding, it remains within a distance where badger activity could occur.
- 3.5.7 Badgers are therefore **not considered a significant constraint** for the proposed Development. As a precautionary measure, a pre-works badger check of the Site boundary and adjacent woodland is recommended to confirm the continued absence of setts prior to commencement of works.

Bats

- 3.5.8 BMERC and GiGL returned approximately 107 recent records of bats from within 2 km of the Site. Species recorded include common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Nathusius' pipistrelle *Pipistrellus nathusii*, Daubenton's bat *Myotis daubentonii*, noctule *Nyctalus noctula*, Leisler's bat *Nyctalus leisleri*, Natterer's bat *Myotis nattereri* and brown long-eared bat *Plecotus auritus*.

Roosting

- 3.5.9 There are no buildings on Site, and there were no trees within the Site.
- 3.5.10 No buildings or trees are located within the Site and therefore provides no suitability in supporting roosting bats.
- 3.5.11 Roosting bats are, therefore, **considered to be a potential constraint** for the development should new lighting on site impact the use of these features by bats thus reducing the quantity of adjacent roosting habitat.



Foraging and Commuting

- 3.5.12 The Site itself provides limited foraging and commuting habitat due to the dominance of hardstanding. However, adjacent habitats, including the river corridor, woodland edge and nearby wetland habitats, are likely to support foraging and commuting bats.
- 3.5.13 Foraging and commuting bats are, therefore, **considered to be a potential constraint** for the development where lighting could spill onto adjacent habitats.

Birds

- 3.5.14 BMERC and GiGL returned records of 53 notable bird species from within 2km of the Site. This includes 25 species specially protected under Schedule 1 of the Wildlife and Countryside Act 1981 (WCA), and eight species listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC).
- 3.5.15 The Site itself comprises predominantly hardstanding and artificial, unvegetated surfaces, offering negligible suitability for nesting birds. Although some bird species can nest on disturbed urban or sparsely vegetated habitats, the Site is considered unsuitable due to the level of disturbance, lack of established vegetation and limited availability of suitable nesting opportunities. As such, nesting birds are not considered a constraint to the Development.
- 3.5.16 Overhanging or encroaching vegetation from trees and scrub located immediately adjacent to the Site may require trimming or removal to facilitate access for machinery, equipment placement, or general site tidying. These off-Site features have potential to support common and widespread nesting bird species.
- 3.5.17 If any such vegetation requires removal or cutting back, works should be undertaken outside the main nesting bird season (typically March - August inclusive). If vegetation removal is required during the nesting season, a Nesting Bird Check should be carried out by a suitably qualified ecologist no more than 48 hours prior to works to confirm the absence of active nests.

Plants

- 3.5.18 BMERC and GiGL returned recent records of 10 notable plant species from within 2 km of the Site. Species recorded include frogbit *Hydrocharis morsus-ranae*, service-tree *Sorbus domestica*, large-leaved lime *Tilia platyphyllos*, dittander *Lepidium latifolium*, lizard orchid *Himantoglossum hircinum*, bluebell *Hyacinthoides non-scripta*, field pepperwort *Lepidium campestre*, chicory *Cichorium intybus*, Scots pine *Pinus sylvestris*, small-flowered buttercup *Ranunculus parviflorus*.
- 3.5.19 The Site is dominated by sealed hardstanding and artificial unvegetated, unsealed surface, with only sparse ruderal vegetation present. No notable plant species were recorded within the Site during the survey, and the habitats present are unlikely to support significant populations of notable plants
- 3.5.20 Notable plants are **not considered to be a significant constraint** for the Development. However, precautionary measures should be implemented to avoid indirect effects on nearby off-site habitats, particularly through contaminated run-off or accidental spillages.

Terrestrial Invertebrates

- 3.5.21 BMERC and GiGL returned recent records comprising 32 notable terrestrial invertebrate species from within 2 km of the Site. Species recorded include stag beetle *Lucanus cervus*, small heath butterfly *Coenonympha pamphilus*, small copper butterfly *Lycaena phlaeas*, Jersey tiger moth *Euplagia quadripunctaria*, cinnabar moth *Tyria jacobaeae*, brown-banded carder bee *Bombus humilis*, silver-washed fritillary *Argynnis paphia* and a range of other notable beetle and bee species.



- 3.5.22 The habitats present within the Site are common and widespread and comprise hardstanding, gravel and sparse ruderal vegetation. These habitats lack the botanical diversity, deadwood resource and structural complexity required to support significant populations of notable terrestrial invertebrates.
- 3.5.23 Terrestrial invertebrates are **not considered to be a significant constraint** for the Development. However, the Site's ruderal margins and any stored materials should be cleared following Reasonable Avoidance Measures.

Terrestrial Mammals

- 3.5.24 BMERC and GiGL returned recent records of Section 41 species hedgehog *Erinaceus europaeus*. The closest record was located approximately 120 m from the Site.
- 3.5.25 The Site is dominated by hardstanding and artificial, unvegetated surfaces, offering negligible suitability for hedgehog for foraging, commuting or nesting. As such, the Site is considered to be of negligible to less than local importance for hedgehog, and **no significant effects on the species are anticipated** as a result of the proposed Development.
- 3.5.26 Some limited potential exists within adjacent vegetated areas outside the Site boundary; however, these features lie outside the Development footprint and are not expected to be affected by the works. If any vegetation management is required along the Site boundary, this should be undertaken sensitively to avoid harm to any wildlife that may be present.

Reptiles

- 3.5.1 BMERC and GiGL returned recent records of two species of reptiles from within 2 km of the Site. Records included Section 41 species including grass snake *Natrix helvetica* and slow-worm *Anguis fragilis*.
- 3.5.2 The Site provides limited suitability for reptiles, owing to the dominance of hardstanding and sparse vegetation. Small pockets of gravel, ruderal vegetation and stored materials could offer very limited refugia for common reptile species, although overall the Site is considered to be of negligible to less than local importance for reptiles.
- 3.5.3 No significant effects on reptiles are anticipated as a result of the proposed Development. However, in line with CIEEM Good Practice Principles and standard Reasonable Avoidance Measures (RAMs) for low-risk reptile sites, any vegetation clearance or removal of stored materials should be undertaken in a sensitive, phased manner to avoid harm to any individual reptiles that may be present.

Riparian Mammals

- 3.5.4 BMERC and GiGL returned one recent record of water vole *Arvicola amphibius* and one recent record of otter *Lutra lutra* from within 2 km of the Site.
- 3.5.5 The Site lies immediately adjacent to Bigley Ditch, which connects to the Lower Colne River within approximately 50 m of the Site. No signs of otter or water vole were recorded from Bigley Ditch on the day of the MoRPh survey. The ditch is heavily managed and modified, with steep banks, limited marginal vegetation and surrounding hardstanding, and the habitats are therefore considered suboptimal for these species.
- 3.5.6 Although no aquatic habitat is present within the Site itself, otter and water vole remain a potential consideration through indirect impacts to adjacent off-site aquatic habitats, including pollution or disturbance during works.
- 3.5.7 Otters are therefore considered to be **a potential constraint** through potential disturbance during construction. The proposed works are considered unlikely to have any direct adverse effects on water vole however, there is potential for indirect adverse effects through pollution surface runoff.



Invasive Non-Native Species

- 3.5.8 BMERC and GiGL returned recent records of invasive non-native species from within 2 km of the Site. Species recorded include Japanese knotweed *Reynoutria japonica*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, floating pennywort *Hydrocotyle ranunculoides*, Nuttall's waterweed *Elodea nuttallii* and signal crayfish *Pacifastacus leniusculus*.
- 3.5.9 Buddleia *Buddleja davidii* was identified on Site during the walkover survey.
- 3.5.10 Japanese Knotweed was identified within the adjacent offsite woodland during the survey. However, given the presence of invasive species within the wider area – particularly in relation to the adjacent watercourse - invasive species are considered to be a **minor potential constraint** on the Development.



4. Further Surveys, Mitigation and Enhancements

4.1.1 **Table 4** below sets out the identified ecological constraints, further survey requirements and ecological mitigation and enhancement based on the surveys undertaken to date. Note that the scope of surveys and mitigation/design considerations may alter as more data is gathered.

Table 4. Potential impacts, mitigation and further recommendations

Ecological Feature	Potential Impact	Mitigation	Further Recommendations	Timings
Non-statutory Designated Sites	Indirect adverse effects could occur if contaminated run-off, oils, fuels, vehicle fluids or pollutants associated with ELV treatment and metal recycling enter nearby drains or watercourses.	Pollution prevention measures should be implemented and set out within a CEMP / Operational Management Plan. New surfacing and drainage should be designed to contain and manage potentially contaminated run-off.	Pollution prevention measures should be included in a CEMP/ Operational Management Plan	During construction and operation
Priority Habitat	No Priority Habitat is present within the Site. River Priority Habitat is present nearby and could be indirectly affected through polluted run-off or accidental spillages.	Pollution prevention measures should be implemented and set out within a CEMP / Operational Management Plan. New surfacing and drainage should be designed to contain and manage potentially contaminated run-off.	Pollution prevention measures should be included in a CEMP/ Operational Management Plan	Prior to and during construction and operation
Bats	The Development has potential to negatively affect roosting, foraging and commuting bats through increased lighting of adjacent habitats, particularly the river corridor, woodland edge and nearby wetland habitats.	A bat-sensitive lighting scheme should be implemented, avoiding unnecessary light spill onto boundary vegetation, adjacent trees and the nearby river corridor (BCT and ILP, 2023).	N/A	During design and operation
Birds	Harm to active nests of common and widespread birds could occur if vegetation clearance affects suitable nesting habitat. Birds using adjacent wetland and river habitats could also be affected by disturbance, lighting or pollution.	Vegetation clearance recommended to take place outside of the nesting bird season (1st March to 31st August inclusive). Any vegetation clearance required during the nesting bird season period should be subject to a nesting bird inspection no more than 48 hours prior to clearance.	N/A unless vegetation clearance undertaken within nesting bird season, in which case a nesting bird check survey by a competent ecologist will be required.	Vegetation clearance outside March - August inclusive, or following nesting bird check
Terrestrial	Potential harm to hedgehogs	The CEMP should outline	CEMP	During



Ecological Feature	Potential Impact	Mitigation	Further Recommendations	Timings
mammal	that may be passing through the Site during construction activities.	practical measures for hedgehogs and include simple, practical measures such as pre-works checks, slow and directional vegetation clearance, and moving any hedgehogs found to a safe receptor area under an ecologist's supervision.		Construction
Reptile	Potential harm to reptiles if individuals are present within gravel areas, sparse vegetation, debris or stored materials during clearance works.	The CEMP should outline practical measures for reptiles and include pre-works checks, slow and directional vegetation clearance away from working areas, and moving any reptiles found to a safe area under an ecologist's supervision.	CEMP	During site clearance
Riparian Mammal	Otter and water vole could be indirectly impacted if pollutants from the Development enter nearby drains or the Lower Colne River corridor.	Standard pollution prevention, drainage control, spill response and appropriate storage of oils, fuels, metals and vehicle fluids should be implemented.	A pre-construction otter survey is required prior to Proposed Developments CEMP/ Operational Management Plan	Prior to construction and during construction and operation
Invasive Non-Native Species	Invasive non-native species could be introduced or spread through vehicle movements, imported materials, soil movement or drainage connections.	Biosecurity measures should be implemented, including checks of imported materials, cleaning of machinery where required and procedures to prevent spread of invasive species.	CEMP/ Operational Management Plan	During construction and operation



- 4.1.2 The opportunity should be taken as part of the Proposed Development to improve the quality of habitats on Site where practicable. **Table 5** details ecological enhancement opportunities for the Proposed Development, which should be incorporated into the scheme where feasible.

Table 5. Recommendations for enhancement.

Ecological Feature	Enhancement Recommendations
Site Habitats	Landscape proposals should include native boundary planting where feasible, including native scrub and shrubs to increase habitat value within the otherwise hardstanding-dominated Site.
Birds	Bird boxes should be installed on suitable boundary line trees, where feasible. Native planting should include berry- and seed-bearing species to improve foraging opportunities for common and widespread birds.
Reptiles	Creation of small habitat piles using logs, brash, rubble or clean stone in low-disturbance boundary areas, where feasible, to provide sheltering and basking opportunities for common reptiles. Native scrub and rough grassland planting around Site margins would also improve habitat structure and connectivity.
Terrestrial Invertebrates	Native flowering plants and scrub should be included within landscaping to provide nectar, pollen and shelter resources for common invertebrates. Deadwood or log piles could be provided in low-disturbance areas.



5. References

BCT and ILP (2023) Bats and artificial lighting in the UK. ILP, Rugby, Warwickshire.

Buckinghamshire Council (2025) Local Plan – Draft Plan Consultation Part B – Development Management Policies.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester

Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

DEFRA (2023) *Statutory Biodiversity Metric*. Available at <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

London Borough of Hillingdon (2020) Local Plan Part 2: Development Management Policies.

Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D., Brown, A.F., Douse, A., Lindley, P., McCulloch, N., Noble, D.G. & Win, I (2021) Birds of Conservation Concern 5: the population status of birds in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. *British Birds* 114, 723-747.

UKHab (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>).



6. Figures



Figure 1. Site location

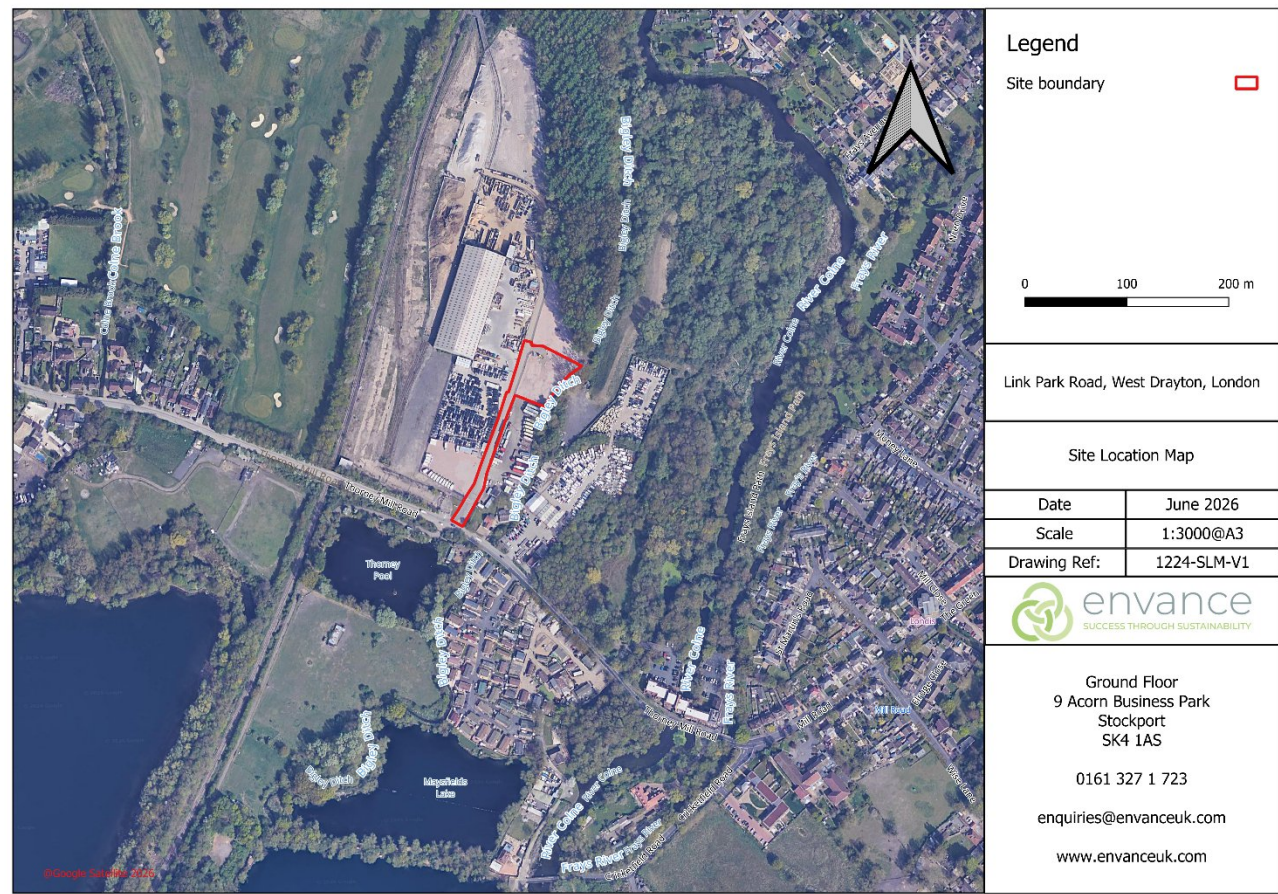




Figure 2. Non-statutory designated sites.

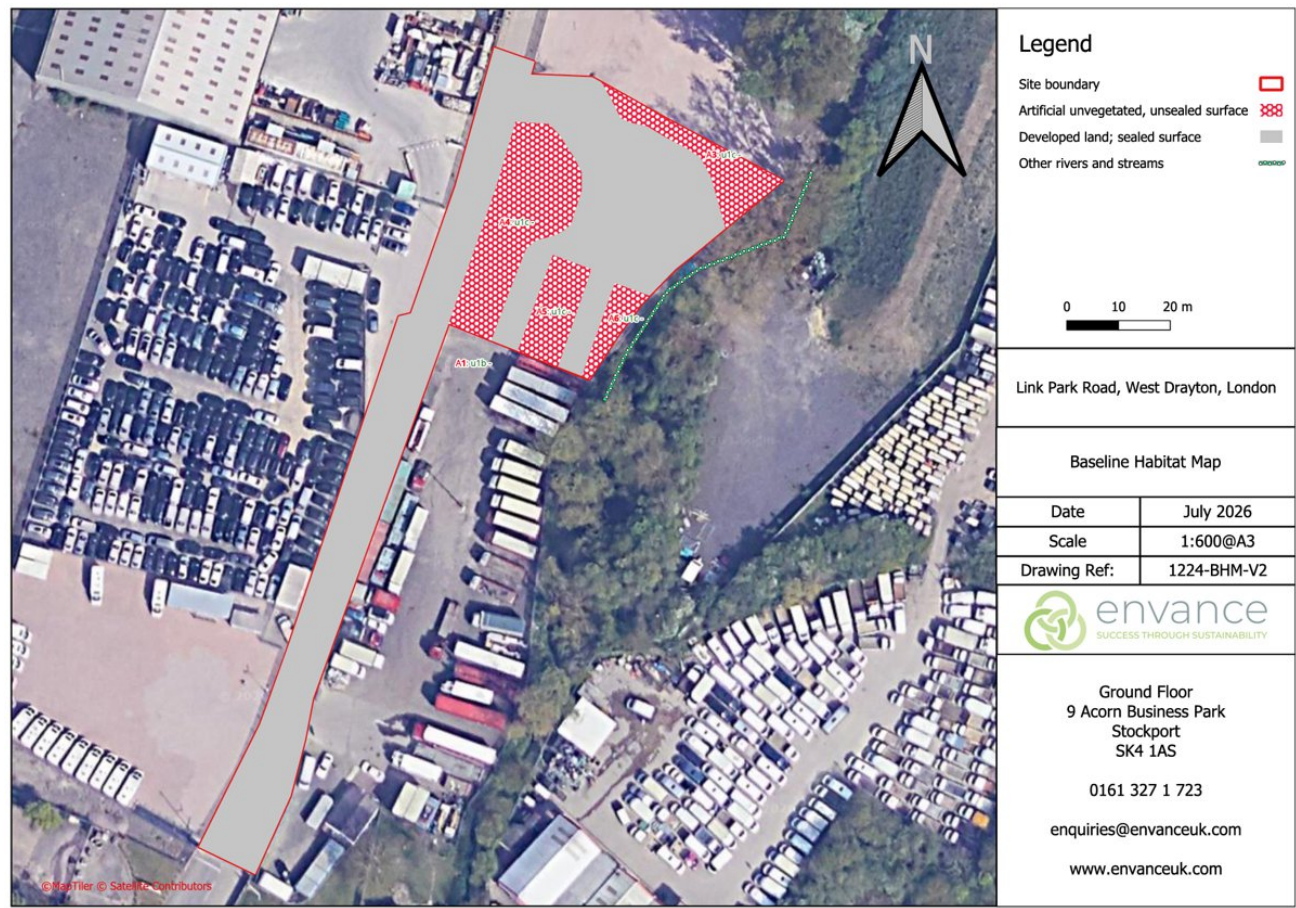
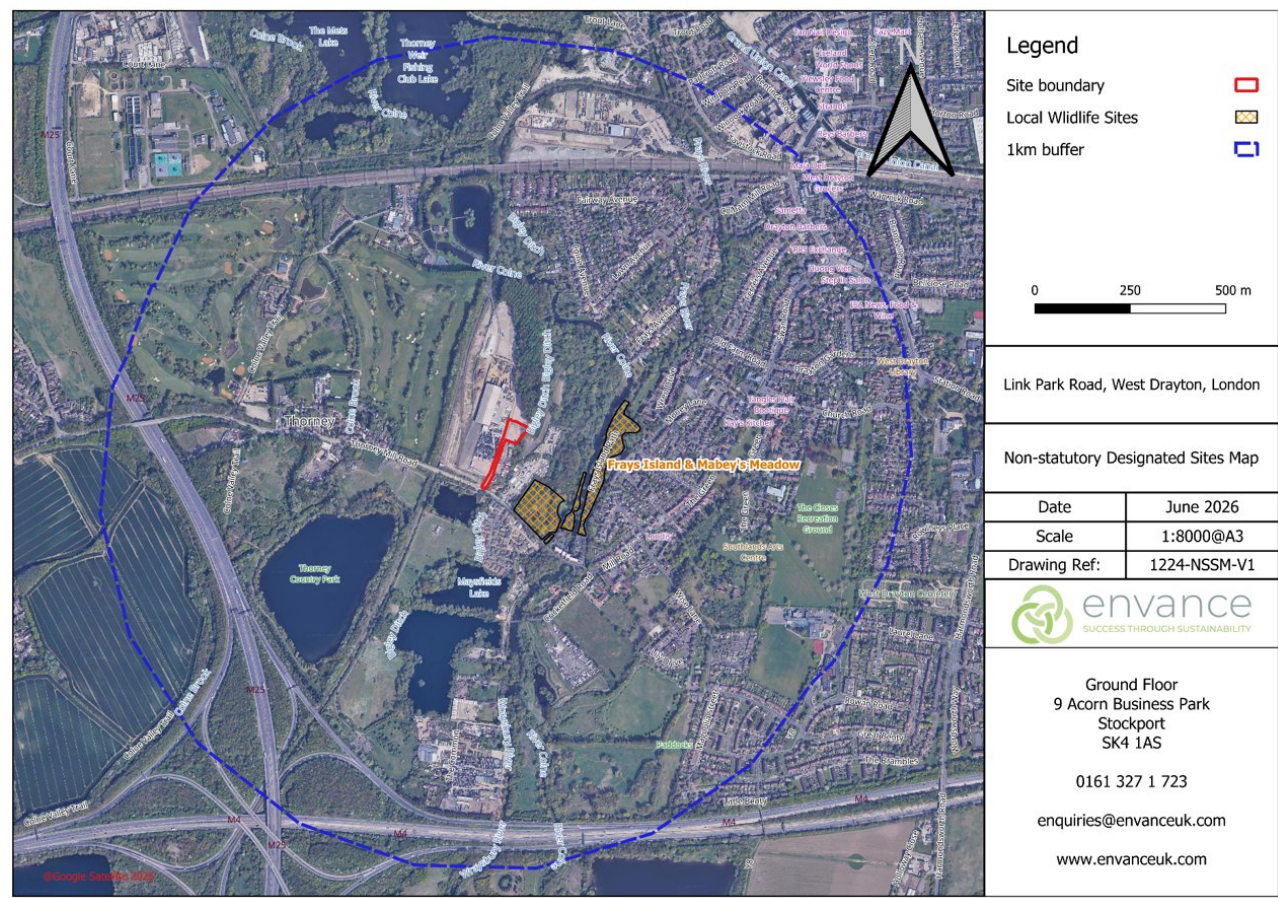




Figure 3. Site habitats





Appendix A. Legislation and Policy

Legislation

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) allows for the designation of National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSIs), to protect areas containing habitats and species of national or international importance.

The Act also provides for the protection of certain species. These include nesting birds, with additional special protection for birds listed within Schedule 1, as well as a range of other protected animals listed in Schedule 5 (including reptiles, water vole and certain species of invertebrates). A number of protected plant species are also listed within Schedule 8.

The Conservation of Habitats and Species 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) provide domestic implementation of the EU Habitats Directive 1992. Under the Regulations, species listed in Annex II of the Directive are given strict protection in the UK as European Protected Species and it is an offence intentionally or recklessly to disturb or to harm a European protected species.

Projects which are likely to affect European Protected Species are subject to assessment criteria. Under Part 5 of the Regulations a licence may be granted for a project affecting a European Protected Species for specific purposes.

Natural England is the licensing authority for derogation licences. A derogation licence may only be granted, provided:

- that there is no satisfactory alternative; and
- the action authorised will not be detrimental to the maintenance of the population of a European Protected Species at a favourable conservation status in its natural range.

All public authorities are required to have regard to the provisions of the Habitats Directive in the exercise of their functions under Regulation 9 of the Habitats Regulations. Guidance on the application of the Habitats Regulations is set out in the Joint ODPM and Department for the Environment, Food and Rural Affairs (DEFRA) circular 06/2005 & 01/2005.

Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act came into force on 1st October 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of Principal Importance for the conservation of biodiversity in England.

The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Protection of Badgers Act 1992

Under the Protection of Badgers Act 1992 all badgers and their setts are protected from disturbance. The Act also includes provisions to allow Natural England to grant licences permitting interference with a badger sett in the course of development. Such a licence will normally incorporate conditions to ensure that undue disturbance and suffering to badgers is avoided during the development works.

Hedgerow Regulations 1997

Under the Hedgerow Regulations 1997, provision is made for the notification of “important” hedgerows. To



qualify for notification, hedgerows must fulfil a range of criteria relating to their historical, landscape or wildlife character. In accordance with the Regulations, the intention to remove any hedgerow should be notified to the Local Planning Authority (LPA) via a hedgerow removal notice. The LPA may issue a Hedgerow Retention Notice to prevent the loss of an “important” hedgerow. Where permission is granted to remove an “important” hedgerow, the LPA may impose conditions to mitigate the loss.

The Environment Act 2021

In England, Biodiversity Net Gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general Biodiversity Gain condition (a pre-commencement condition) that requires developments to deliver at least a 10% increase in biodiversity value (relative to the pre-development biodiversity value of all onsite habitats). The condition requires a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

Planning Policy

National Planning Policy Framework

The National Planning Policy Framework (2025) sets out the Government’s planning policies for England and how these are expected to be applied. Paragraph 192 is of particular relevance and is copied below.

‘To protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) 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.’

Buckinghamshire Council (2025) Local Plan – Draft Plan Consultation Part B – Development Management Policies

Policy NE2: Watercourses and associated corridors states that:

1. Development is required to conserve and enhance the functions and setting of any affected watercourse and associated corridor, including in terms of biodiversity, landscape, flood management and recreational/amenity value.
2. Opportunities for de-culverting and re-naturalising watercourses should be actively pursued when planning applications present the opportunity through works on site works or through making s106 contributions to help enable works on areas of a river in the vicinity.
3. Proposals will only be supported where they do not involve the canalising or culverting of watercourses and do not prejudice future opportunities for de culverting / re-naturalising.
4. Development proposals for new development adjacent to or containing a watercourse must provide or retain at least a 10 metres buffer between the top of the riverbank and the development and include a long-term landscape and ecological management plan for this buffer. Where the watercourse is a Chalk Stream as listed in this policy, this buffer must be at least 15 metres.
5. Chalk streams (including headwaters) in Buckinghamshire are:



- a. Hughenden Stream
 - b. River Chess
 - c. River Misbourne
 - d. River Wye
 - e. Upper Colne
 - f. Escarpment chalk streams
6. A long-term management plan must be in place for the watercourse and its buffer zone, including the management of invasive non-native species. In new developments, publicly accessible space must be designed to include watercourses to ensure adequate maintenance of the watercourse.



Appendix B. Photographs



Photograph 1. Developed land; sealed surface



Photograph 2. Artificial unvegetated, unsealed surface.