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Dear George

STONE CLOSE PRELIMINARY ECOLOGICAL APPRAISAL

Date 06/12/2017

Introduction

Ramboll Environ UK Ltd (Ramboll Environ) was commissioned by St James's Place UK Plc (the Client) to provide a Preliminary Ecological Appraisal (PEA) of land at Stone Close, West Drayton, London Borough of Hillingdon (the application site), in advance of the application site's redevelopment for commercial use (the proposed development). The pre-development application site is comprised of three industrial/office buildings with associated car parking, hardstanding and grassland, in a suburban area to the north of Heathrow Airport.

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This PEA has been produced to accompany a planning application for the proposed development. The content of this report is based on the findings of an extended Phase 1 habitat survey undertaken on 23 November 2017. The objectives of this Ecological Appraisal are to:

Ref 1700001305

- assess the ecological importance of the application site;
- provide an assessment of potential impacts of the proposed development on the application site's ecological features;
- provide recommendation for the protection and enhancement of the application site's ecology; and
- report on mitigation and enhancement measures to be incorporated within the proposed redevelopment.

Proposed Development

The proposed development comprises the removal of the existing buildings, and replacement with a single large building comprising a workshop area with attached offices, associated car parking and access points. Areas of landscape planting will be provided around the perimeter of the car park areas.

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Method

Baseline Conditions

The purpose of the desk study was to collect existing baseline data about the application site and the surrounding area, such as the location of designated sites or other natural features of potential ecological value such as woodland or waterbodies, using publicly available online information. The following zone of influence has been considered:

- internationally, nationally and locally designated sites, up to 2 km from the application site; and
- international and national statutory designated sites with bats as a reason for designation, up to 10 km from the application site.

The Multi Agency Geographic Information for the Countryside (MAGIC) website¹ was viewed for information on statutory sites and for information on European Protected Species (EPS) licences. Supplementary information on the application site and its surroundings were obtained from aerial images available from Google™ Earth and publicly available maps.

An extended Phase 1 habitat survey of the application site was undertaken by Laura Sanderson CEnv MCIEEM on 23 November 2017. Laura has a BSc in Zoology and an MSc in Wildlife Management and Conservation and has worked professionally as a consultant ecologist since 2005. The weather during the survey period was mild, dry and sunny with a light breeze. The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features, particularly focusing on areas of natural interest which would potentially be affected by the proposed development.

The main habitats present were recorded using standard Phase 1 habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2010²). The application site was inspected for signs of any invasive plant species subject to legal controls. The application site was also assessed for its potential to support protected and notable species such as birds, bats and badgers *Meles meles*. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

In addition, the buildings were subject to an external and internal inspection for bat roosting potential during the extended Phase 1 habitat survey by Laura Sanderson. Laura is licensed to survey bats in England (Natural England licence number CLS00969). The exterior elevations and all internal voids of the buildings were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016) each building was assessed for its potential to support bats. Each building/structure has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost and High, Medium, Low and Negligible Potential for use by bats.

¹ <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>, accessed 15 November 2017

² Joint Nature Conservation Committee (JNCC), 2010. Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC Peterborough. Stace, C. 2010. New

Assessment of Importance of Ecological Features

Habitats and species (i.e. ecological features) identified within the application site boundary were assigned ecological importance values based on the scale that classifies ecological features within a defined geographic context (Chartered Institute for Ecology and Environmental Management, CIEEM 2016³). The classification uses recognised and published criteria (e.g. Ratcliffe, 1977⁴, Wray et al. 2010⁵) where the habitats and application site were assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential value. The following geographic criteria were used:

- International Level Importance;
- National Level Importance (England);
- Regional Level Importance;
- Borough Level Importance (within London Borough of Hillingdon);
- Local Level Importance;
- Site Level Importance (limited to the application site boundary); and
- Negligible Importance.

Limitations

The ecological assessment has been undertaken based on CIEEM's 2013 Preliminary Ecological Appraisal guidelines⁶, with elements of 2016 Ecological Impact Assessment Guidelines, taking a proportional approach to the level of survey effort and reporting required due to the small size and suburban nature of the application site. The survey was undertaken outside of the optimal March to October period for completing Phase 1 habitat surveys, when most plants are visible above ground. However, October 2017 was relatively mild, and there was a limited amount of vegetation present on the application site, with many species present within the grassland area identifiable. Conducting the survey in mid-November is therefore not considered to be a constraint to the assessment of the site.

Ramboll Environ is satisfied that this PEA represents a robust appraisal of the application site. In the event that no action is taken at the application site within 12 months of the date of the first issue of this PEA, the findings of the extended Phase 1 Habitat Survey should be reviewed and may need to be updated.

Baseline

No Special Areas of Conservation (SACs), Special Protected Areas (SPAs), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) or Local Nature Reserves (LNRs) are located within a 2 km radius of the application site. No designated sites for bats are present within 10 km of the application site. There are no records of EPS licences granted for sites within 2 km of the application site.

³ CIEEM, 2016. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal. Chartered Institute for Ecology and Environmental Management, Winchester.

⁴ Ratcliffe, D. 1977. A Nature Conservation Review. Cambridge University Press

⁵ Wray, S., Wells, D., Long, E. and Mitchell-Jones, T. 2010. Valuing Bats in Ecological Impact Assessment. In Practice, pp 23-25

⁶ Chartered Institute of Ecology and Environmental Management (CIEEM), 2013. Technical Guidance Series: Guidelines for Preliminary Ecological Appraisal. CIEEM, Winchester

The application site is located in a suburban area with industrial units and roads to the immediate north, east, south and west, as well as residential buildings to the south-east. Industrial units, residential areas and green open space are present in the wider surroundings. A recreation area and Stockley Park Golf Course are present to the north and north-east of the application site, with grassland, trees and scrub. Street trees on Stone Close (on the far side of the road from the application site, to the north and west) include young ornamental cherry *Prunus* sp.

The following habitats are shown in Appendix 1: Phase 1 Habitat Plan and Appendix 2: Site Photographs.

A small area of semi-improved grassland (likely to be former amenity grassland which has not been managed in recent times) is present in the south of the application site, around the parking area of Building B3. Abundant grasses include perennial ryegrass *Lolium perenne*, red fescue *Festuca rubra* and annual meadow-grass *Poa annua*. Frequent forb species distributed within this include deadly nightshade *Atropa belladonna*, Canadian fleabane *Conyza canadensis*, ribwort plantain *Plantago lanceolata*, broad-leaved plantain *P. major*, yarrow *Achillea millefolium*, dandelion *Taraxacum officinale* agg., smooth sow-thistle *Sonchus oleraceus*, creeping thistle *Cirsium arvense* and white-dead nettle *Lamium album*, and occasional creeping cinquefoil *Potentilla reptans*, common mallow *Malva sylvestris*, broad-leaved dock *Rumex obtusifolius*, common ragwort *Senecio jacobaea*, narrow-leaved ragwort *S. inaequidens*, common nettle *Urtica dioica*, herb-robert *Geranium robertianum*, butterfly bush *Buddleija davidii* and greater stitchwort *Stellaria holostea*. Semi-improved grassland/amenity grassland has a diversity of common plant species and is likely to support a small number of nectar-feeding insects, and is of importance at the Site Level.

Large areas of concrete, tarmac and compressed gravel hardstanding are present around buildings. Hardstanding is of negligible ecological importance. Vegetative species recorded growing in cracks in areas of hardstanding within the application site include mosses and scattered tall ruderal vegetation including Canadian fleabane, willowherb *Epilobium* sp., groundsel *Senecio vulgaris*, hairy bittercress *Cardamine hirsuta* and butterfly bush.

No invasive species were identified within the application site.

Three buildings are present on the application site. Building B1 is a large flat-roofed warehouse/factory type building, primarily one storey high with a two-storey section to the south. It is of concrete and metal structure, with external cladding of corrugated metal and corrugated fibre. The building is light and open within, with no roof void. The fascia board around the roof is wood and is largely intact. A small flat-roofed plant-room extension on the north side has metal louvre openings, presumably providing ventilation to plant within. A small polypody fern *Polypodium vulgare* was observed growing in a section of gutter.

Building B2 is a single-storey brick warehouse/factory type building with a shallow pitched corrugated concrete roof and metal doors with no windows. The southern side of the building has some young ivy *Hedera helix* covering it. A small single-storey extension on the east side has wood fascia board and a felt roof.

Building B3 is a two-storey brick office building with a flat (likely concrete) roof and concrete lintels, with no fascia boards.

The buildings are of negligible importance for nature conservation.

The semi-improved grassland and scattered tall ruderal vegetation at the application site is suitable for use by a small number of common invertebrate species, and the application site is therefore of importance for invertebrates at the Site Level.

The application site is largely hardstanding and buildings and is isolated from suitable habitat for amphibians or reptiles in the wider area, and is therefore considered to be of negligible importance for these species.

The application site is suitable for use by common bird species, with limited foraging potential in the semi-improved grassland and scattered tall ruderal vegetation. Feral pigeon *Columba livia domestica*, carrion crow *Corvus corone* and magpie *Pica pica* were recorded on and close to the application site during the survey, with house sparrows *Passer domesticus* in the wider area. Evidence of roosting feral pigeons was observed within building B2, with droppings and old nests within it. The application site is of importance at the Site Level for common bird species.

The buildings are considered to be of negligible potential for use by roosting bats and no evidence of bats was recorded on or within them. Building B1 is light and airy within, with no apparent openings suitable for bats to enter the main internal area. Metal louvres on the northern extension have the potential to allow entrance within the plant room to the north; however, this area is also light and airy within, and is north-facing (making it likely to be cool year-round) with no internal crevices for bat roosting. Small areas of the fascia board have rot or slight gaps, but are considered unlikely to provide roost locations for bats. Building B2 is open within with no internal or external crevices suitable for roosting. Building B3 has no external crevices and no openings into the building that bats could use to enter. The habitat on the application site is of very limited suitability for use by foraging bats, with the small area of semi-improved grassland likely to support a limited number of invertebrate prey. The golf course and recreation ground to the north of the application site are likely to be of greater suitability for use by foraging bats. Further surveys to assess the importance of the application site for use by bats are not considered to be necessary, and it is likely that the application site is of at most Site Level importance for foraging bats.

No other protected or notable species were identified on the application site or considered likely to be present.

Ecological Constraints and Recommendations for Mitigation

The proposed development would lead to the loss of a small amount of semi-improved grassland habitat of Site Level importance for nature conservation. Provision of wildlife-friendly landscape planting (including native and non-native nectar and fruit producing species) would provide habitat of similar importance.

There is potential for pollution events to affect adjacent retained habitats including street trees. Standard construction environmental management measures should be undertaken to reduce run-off, noise and dust often associated with construction works, to avoid impacts on surrounding habitats. No impacts on designated sites are expected due to their distance from the application site.

A small amount of habitat (the semi-improved grassland) suitable for use by common invertebrates will be removed during the clearance and construction process. It is expected that landscape planting with nectar-producing species would provide habitat of equivalent or greater value for use by invertebrates.

All wild birds are protected whilst nesting, with disturbance and destruction of active nests constituting an offence under the Wildlife and Countryside Act 1981 (as amended). Building B2 is used by nesting feral pigeon, which can nest all year round. Prior to demolition the buildings should be checked for nesting birds, and if active nests are identified, work should be delayed until the nests are no longer active. Pest control specialists may be consulted to provide advice on making the buildings unsuitable for use by pigeons to prevent delays to the project.

No evidence of bats was identified during the survey and the buildings are considered to be of negligible suitability for use by roosting bats in their current state. The wood fascia boards around Building B1 have some evidence of rot in places. It is possible that with time the building may decay further, with the fascia boards becoming suitable for bats to roost behind. It is therefore recommended that the buildings are re-surveyed for bat suitability if no work has been undertaken on the site within one year of the date of this PEA. Provision of landscape planting within the proposed development is likely to be of equivalent or greater importance for use by foraging bats to the existing habitat.

Enhancement

In order to comply with planning policy⁷⁸ to achieve no net loss of biodiversity and net gain where possible, additional biodiversity enhancement measures could be introduced to the application site.

Enhancement for invertebrate species could be provided through provision of log piles, pebbles or insect boxes ('bug hotels') within the landscape planting. Additional enhancement for birds and bats could be provided through the inclusion of bird boxes (such as those suitable for house sparrow⁹) and bat boxes¹⁰ attached to the building.

A native wildflower seed mix could be applied to any areas of grassland within the landscape planting, to provide an additional foraging resource for pollinating bees and other insects.

Consideration should be given to green infrastructure provision at the application site, such as a green wall, planters on the southern aspect of the building, or a green roof. Such provisions would enable BREEAM credits to be maximised if a BREEAM assessment is undertaken.

Conclusions

The ecological assessment has confirmed that the application site is of nature conservation importance at up to the Site Level, with semi-improved grassland habitat of importance at the Site Level, supporting invertebrates, bird species and foraging bats of Site Level importance. Impacts on these ecological features as a result of the proposed development relate to the loss of habitats from the site, as well as dust, run-off and noise impacts during the construction process. Commitments to ecological mitigation and enhancement include appropriate timing of work, appropriate planting and potentially bird and bat boxes.

⁷ Department for Communities and Local Government, 2012. National Planning Policy Framework (NPPF). London. HMSO

⁸ Defra, 2011. Natural Environment White Paper. The natural choice: securing the value of nature <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>

⁹ Such as <https://www.nhbs.com/1sp-schwegler-sparrow-terrace>; <http://www.habibat.co.uk/category/bird-boxes/habibat-terraced-sparrow-box>.

¹⁰ Such as <http://www.habibat.co.uk/category/bat-boxes>

By undertaking the work in accordance with the mitigation and enhancement measures outlined in this report, no significant residual effects on ecological features will occur, and the proposed development will be in conformity with relevant planning policy and legislation relating to ecology.

Should you require any additional information regarding this PEA, please do not hesitate to contact me.

Yours sincerely



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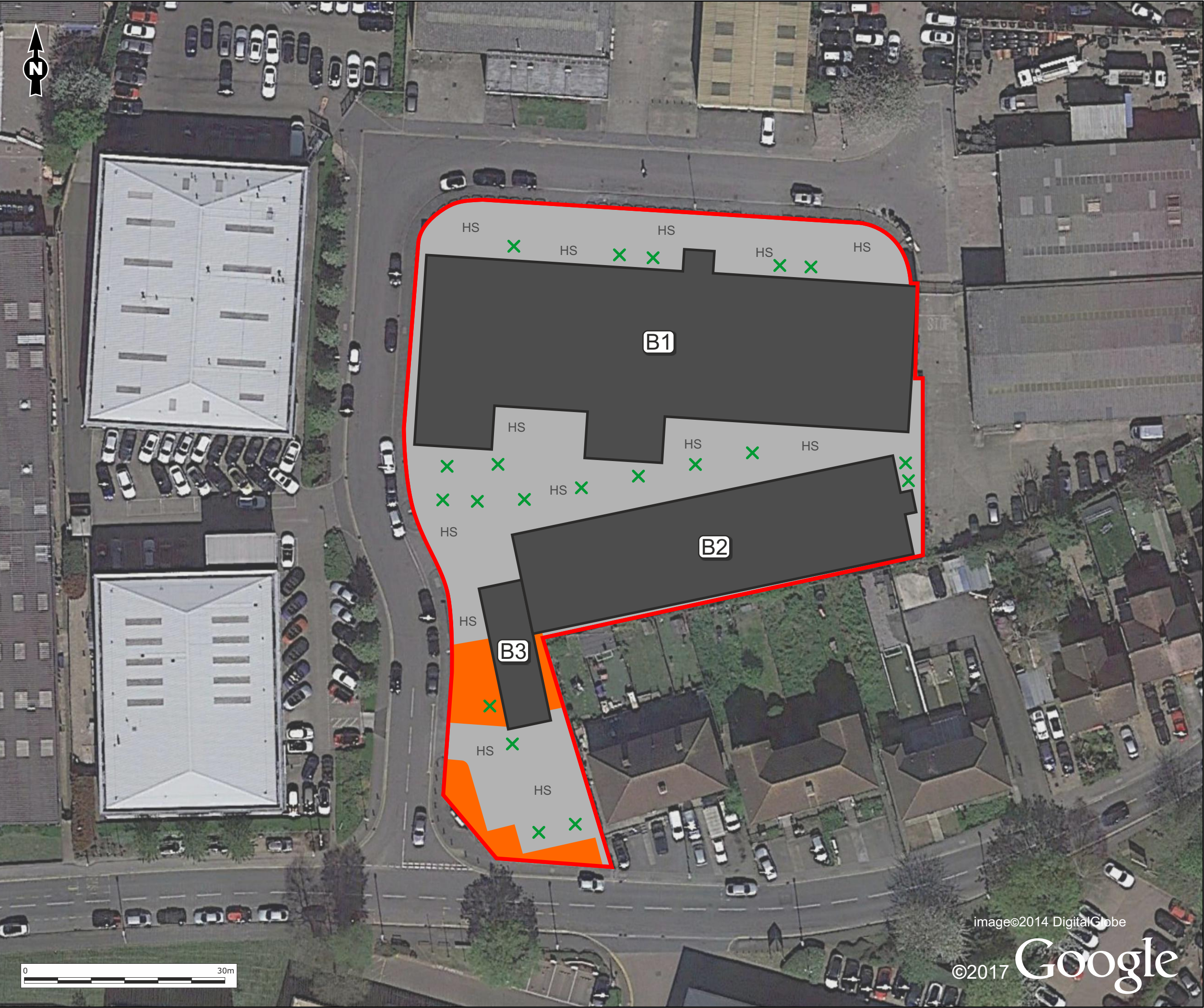
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Encl. Appendix 1: Phase 1 Habitat Plan

Appendix 2: Site Photographs

Appendix 1

Phase 1 Habitat Plan



Legend

- Site Boundary
- Building
- B1 Building Number
- HS Hardstanding
- Semi-improved Grassland
- X Scattered Ruderal Vegetation

Figure Title

Phase 1 Habitat Plan

Project Name

Land at Stone Close

Project Number

1700001305

Figure No.

1

Date

December 2017

Prepared By

BVK

Scale

Refer to scale bar

Issue

1

Client

St James's Place UK Plc

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Appendix 2

Site Photographs



Photo 1. Building B1 from northeast, with hardstanding to north.



Photo 2. Northern single-storey extension of building B1 with metal louver openings.

Title: Photographic Log	Client: St James's Place UK Plc
Site: Land at Stone Close	Date: December 2017



Photo 3. Southern two-storey extension of building B2.



Photo 4. Building B2 from west, with hardstanding in front.

Title: Photographic Log	Client: St James's Place UK Plc
Site: Land at Stone Close	Date: December 2017



Photo 5. Building B3 from southwest, with semi-improved grassland and hardstanding in front.



Photo 6. Unmanaged semi-improved grassland and hardstanding in south of application site, with buildings B1, B3 and B2 in background.

Title: Photographic Log	Client: St James's Place UK Plc
Site: Land at Stone Close	Date: December 2017



Photo 7. Internal areas of building B1.



Photo 8. Eastern end of building B2.

Title: Photographic Log	Client: St James's Place UK Plc
Site: Land at Stone Close	Date: December 2017



Photo 9. Internal view of building B2.



Photo 10. Remains of pigeon nests in internal area of building B2.

Title: Photographic Log	Client: St James's Place UK Plc
Site: Land at Stone Close	Date: December 2017