Biodiversity and Ecology Statement

40 Vernon Drive, Harefield, Uxbridge UB9 6EG

Item	Detail
Local planning authority	London Borough of Hillingdon
Application type	Full planning application (minor)
Proposal	Subdivision of the existing dwelling into two three-bedroom houses, with single-storey rear extensions and associated access, parking, boundary and garden works
Stated site area	557 m² (0.0557 ha)
Document purpose	To discharge the ecology limb of the Council's Local Planning Validation Checklist and to record the applicant's biodiversity net gain exemption statement
Date and version	9 September 2026 — Version 2

Status of this document. This is an applicant's desk-based biodiversity and ecology statement prepared to meet the Council's validation information requirement. It is not a Preliminary Ecological Appraisal, a completed field survey or a preliminary roost assessment, and it does not certify the absence of any species. Its scope, evidence base and limitations are stated expressly at section 3.1, and its conclusions should be read subject to them. Please accept this report as formal confirmation on habitat degredation: "We formally confirm that no habitat degradation or clearing has occurred on the site since 30 January 2020".

1 Summary and conclusions sought

This statement supports a full planning application for the subdivision of an existing two-storey dwelling into two three-bedroom houses, with single-storey rear extensions and associated access, parking, boundary and garden works. It does three things: it records the applicant's statutory biodiversity net gain exemption; it answers, limb by limb, the ecology information requirement in the Council's published validation checklist; and it specifies the avoidance, mitigation and enhancement measures that form part of the proposal.

The applicant does not contend that ecology is irrelevant to this application. The frontage hedge is altered, garden land is affected and there is localised work to the roof and eaves. Each of those matters engages the checklist and each is addressed here. What the applicant does contend is that the information supplied in this statement is sufficient to determine the application, and that a broader survey programme is not proportionate to the scale and nature of the development.

1.1 Conclusions sought

Matter	Conclusion sought from the Council
Biodiversity net gain	Accept the statutory exemption for development on a site of 0.2 hectares or below. The stated complete site area is 557 m² (0.0557 ha), 27.9% of the maximum. No impact on an on-site priority habitat is identified.
Ecology information requirement	Accept this statement as the ecological information required by the validation checklist, on the basis that it addresses each triggered limb of the requirement and supplies information on species present, potential impacts and mitigation.

Matter	Conclusion sought from the Council
Frontage hedge	Accept the assessment that the hedge is non-native ornamental hedging and is not a priority hedgerow, and that the 2.9 m opening and visibility trimming are addressed by the retention and timing measures at sections 9 and 10.
Off-site woodland	Accept that the mapped deciduous woodland lies outside the site, that no works are proposed within it, and that no impact pathway to it has been identified.
Bats	If the Council considers that a building-specific issue remains outstanding, seek a targeted preliminary roost assessment as the appropriate first step. Whether seasonal follow-up is then required should depend on its findings. Do not require seasonal emergence or activity survey as the starting requirement.
Other species	Secure the construction method statements and enhancements at sections 9 and 10. No seasonal survey programme is justified by the supplied species records.

Sections 2 to 8 set out the requirement, the evidence and the assessment. Sections 9 and 10 set out the construction controls and the ecological specification. Section 11 states the decision requested. Section 12 is the source register, with direct links. Appendix A records appeal decisions relied on as illustrative of the approach to survey scope.

2 Response to the Council's validation requirement

The local planning authority is the London Borough of Hillingdon. The relevant local list is the Local Planning Validation Checklist, February 2024. For a full planning application (major and minor), "Ecological survey & reports" appears in the Local Requirement List at pages 5 to 7. The requirement itself is defined in the Definitions table under the heading "Ecological Survey and Report" at pages 32 to 33. [1]

2.1 The requirement, limb by limb

The checklist does not set a site-area threshold, a dwelling-number threshold or any other numeric trigger for ecological information. It sets qualitative triggers. The applicant has therefore taken each limb of the published requirement in turn and stated whether it is engaged and, if so, where in this statement it is answered.

Limb of the published requirement	Engaged?	Applicant's response
Applications that could directly or indirectly potentially impact on rare, protected, invasive or notable species or habitats	Partly	Engaged for nesting birds (including swift, for which local records exist) and for potential bat use of the building. Not engaged, on the evidence assessed, for rare or invasive species. See sections 7 and 8.
and/or on Local Wildlife Sites or Green Links	Not engaged	The site is a residential plot within the built-up area of Harefield. No site designation covering the application land is identified in the evidence assessed. The nearest mapped habitat is off-site deciduous woodland, considered at section 6.
This includes all major applications	Not engaged	The proposal creates one additional dwelling on 0.0557 ha. It is a minor application and is not major development on any limb of the definition.
… and some smaller applications, particularly those within or close to Local Wildlife Sites, green links or those that will impact upon garden or overgrown land	Engaged	Accepted. The extensions, parking, access and boundary works affect garden land, and the frontage hedge carries substantial climber growth. This is the principal reason the requirement applies to a scheme of this size, and this statement is the response to it.

Limb of the published requirement	Engaged?	Applicant's response
Proposals that involve the demolition of buildings or alterations to roofs or lofts will often need to be accompanied by a bat survey	Engaged	No demolition of the building is proposed. There is localised roof and eaves work, including installation of the proposed bat access tiles and the junctions of the rear extensions. Section 8 sets out the applicant's position: a targeted preliminary roost assessment is the appropriate and proportionate response, and seasonal survey is not the starting requirement. The checklist wording is "often", not "always", and invites a judgement on the works actually proposed.
Proposals that involve the removal of trees, scrub, hedgerows or alter water courses will need to supply information on species present and potential impacts and the mitigation for such impacts	Engaged (hedgerow only)	Accepted for the 2.9 m hedge opening and the visibility trimming. No tree removal, scrub clearance or watercourse works are proposed. The information the checklist asks for — species present, potential impacts, mitigation — is supplied at sections 5, 9.1 and 10.1. The checklist requires that information; it does not, for this limb, require a seasonal survey.
Statements and surveys will also be required in respect of sites with known protected or priority species and habitats as identified in the UK	Partly	Local records include swift, a notable building-associated bird, and smooth newt. Both are addressed at section 7 and both are covered by the construction method statement at section 9. No priority habitat is identified within the site.
Natural England has issued standing advice as to when further appraisal work is required	Applied	The checklist expressly adopts Natural England's standing advice as the test for when further appraisal is required. Section 7.3 works through the standing advice species groups and states the screening outcome for each.

2.2 Proportionality

The Council's own introduction to the checklist records that, under the Growth and Infrastructure Act 2013, local information requirements must be reasonable having regard to the nature and scale of the proposed development, and the information required must be a material consideration in the determination of the application. [1] The applicant relies on that principle and on the equivalent national position. Policy DM2(2) of the August 2026 Framework addresses the information reasonably required to determine an application, and Policy DM3(1)(b) requires the level of assessment to be proportionate to the nature and scale of the proposal and to the effects likely to arise. Annex C links nature information requirements to Policy N2. [3] The submission is not that ecological information can be dispensed with. It is that the information supplied here is the information this development reasonably requires.

2.3 Related checklist items answered in this statement

Checklist item	Where addressed
External lighting details	Section 10.4 specifies the lighting approach for the retained hedge, trees, eaves and the proposed nesting and roost features, and for temporary construction lighting.
Landscape Strategy — item (e), boundary treatments to ensure that hedgehogs and other wildlife can traverse the site	Section 10.2 specifies the 13 cm by 13 cm openings at the base of new dividing fences and their maintenance.
Landscape Strategy — retention of existing trees and other vegetation and protection during construction	Sections 10.1 and 10.3 specify hedge retention, exclusion of storage and washout from rooting areas, and the arboricultural trigger.

Checklist item	Where addressed
Tree Survey / Arboricultural report	No tree removal is proposed. Section 10.1 sets out the position where a retained tree on or adjacent to the site could be affected by the works, and the point at which arboricultural advice is obtained.

3 Site, proposed development and evidence base

3.1 Evidence base, and what it does and does not establish

This assessment draws on the following material:

- the Planning and Heritage Statement for 40 Vernon Drive;
- the applicant's stated complete site area of 557 m²;
- a photograph of the frontage hedge and dwelling, identified by the applicant as dating from 2024, reproduced at Figure 1;
- a supplied context map showing Priority Habitat Inventory deciduous woodland within a 500 m search area, reproduced at Figure 2;
- the existing and proposed site, block, floor, elevation and roof plans submitted with the application;
- the applicant's confirmation of existing site conditions, identified as such wherever it is relied on;
- the species-record extract reproduced at section 7; and
- published policy and guidance, checked on 9 September 2026 and listed at section 12.

The limitations of that evidence are stated openly, because the weight the Council can give to the conclusions depends on them. The photograph is a single external view from the highway. It is not a current inspection, it does not show concealed roof features, the rear elevations, the roof void or the rear garden, and it cannot support a stem-by-stem identification of the hedge. The species extract does not state its search period, radius or precise locations, and record counts indicate entries, not populations, on-site presence or confirmed breeding; it is used as positive contextual evidence and not as an absence search. The context map is indicative and is not a scaled application plan. Statements about the presence or absence of a physical feature on the site — a waterbody, rough grassland, a sett or other field sign — rest on the submitted plans and on the applicant's confirmation, and are identified as such where they appear. No conclusion in this statement is expressed more strongly than that evidence allows.

3.2 Works relevant to ecology

Element	Description and ecological relevance
Building works	Subdivision of the existing two-storey dwelling into two houses, with single-storey rear extensions 3.0 m deep. No demolition of the building and no wholesale replacement of the principal hipped roof is described in the Planning and Heritage Statement.
Roof and eaves	Two bat access roof tiles are proposed on the rear pitched slopes and two bird nesting features at the rear eaves. Installation involves localised interference with the roof covering and eaves. The junctions of the rear extensions with the existing elevations and eaves are also relevant.
Hedge and access	A 2.9 m section of the frontage hedge is removed to form the new parking access. Boundary treatment beside the new crossover is reduced to 0.6 m for visibility. Both the removal and the height reduction are assessed.

Element	Description and ecological relevance
Gardens and boundaries	Rear or side gardens of 124.02 m² and 111.85 m² are retained. New timber dividing fences incorporate 13 cm by 13 cm hedgehog gaps. Cycle and refuse facilities occupy parts of the plot.
Trees and water	No tree felling, pond removal, watercourse works or woodland works are described. Trees are visible beyond the rear of the building; they are relevant to construction protection where roots or crowns extend into the works.
Lighting	New external lighting is limited to what is needed for safe access and is controlled as specified at section 10.4.

3.3 Site area and habitat extent

The 557 m² figure is the applicant's site-area evidence, confirmed by the applicant as the complete application red line including all land required for the new access. It has not been independently remeasured against the submitted location plan for the purposes of this statement. The two retained garden areas total 235.87 m², approximately 42.3% of that area. That is an amenity-space figure, not a measurement of vegetated habitat, because garden space can include paving and other hard surfaces; it is not relied on as a habitat calculation. No area of habitat loss has been inferred from the 3.0 m extension depth alone.

The conclusions in this statement concern the development described above, taken as a whole. They do not rest on any contention that the planning history precludes consideration of ecology in this application.

4 Biodiversity net gain — statutory exemption

4.1 The exemption relied on

The applicant relies on the exemption for development on sites of 0.2 hectares or below, introduced with effect from 6 August 2026 and applying to planning applications made on or after that date, provided the development does not impact an on-site priority habitat. [5, 6] This statement supports a new full application submitted after that date.

Test	Evidence for this application	Assessment
Complete site area	557 m² ÷ 10,000 = 0.0557 ha. The limit is 0.2 ha (2,000 m²).	1,443 m² below the limit; approximately 27.9% of the maximum area.
Application timing	New full application supported by this statement, dated 9 September 2026.	The exemption route in force from 6 August 2026 is relied on.
On-site priority habitat	Residential plot. Frontage hedge assessed as non-native ornamental hedging (section 5). Mapped woodland lies outside the site (section 6).	No affected on-site priority habitat is identified in the evidence assessed.
Extent of the development	Subdivision, extensions, parking, access, boundaries and ancillary facilities are treated as a single proposal.	The claim concerns the whole development, not a selected works area.

4.2 The priority habitat question

The hedge is the material habitat-classification issue, and it is decisive: if the frontage were a priority hedgerow that the development impacts, the exemption would not be available. Section 5 sets out why, on the evidence

assessed, apparent dominance by non-native garden privet supports exclusion from the JNCC priority hedgerow definition. That conclusion rests on species composition, not on the hedge being clipped, not on its garden location and not on the short length being removed.

The mapped woodland polygons lie outside the site. No woodland clearance or encroachment is proposed. Section 6 considers the remaining potential off-site effects.

4.3 Exemption statement for the planning application

> *The applicant considers that the statutory biodiversity gain condition does not apply to this application. The application site comprises 557 m², equivalent to 0.0557 hectares, and is therefore below the 0.2 hectare limit. The application is a new full planning application made after 6 August 2026. The evidence assessed identifies no impact on an on-site priority habitat; in particular, the frontage hedge is assessed as predominantly non-native ornamental hedging and is not a priority hedgerow. The development accordingly falls within the small-site exemption described in current government guidance.*

Policy N2(3) of the August 2026 Framework is also material: a development plan policy requiring biodiversity gain beyond the statutory framework should carry no weight unless it is a valid site-allocation policy meeting Policy N1. [3] Acceptance of the exemption removes the requirement for a statutory 10% gain calculation and a Biodiversity Gain Plan. It does not describe the site as having no biodiversity value, and it does not displace the protected-species provisions of the Wildlife and Countryside Act 1981 or the Conservation of Habitats and Species Regulations 2017. The safeguards and enhancements set out in this statement remain part of the proposal and are offered for condition.

The separate de minimis route is not relied on: the 2.9 m hedge removal alone would not establish it without accounting for all other hedge and garden impacts across the scheme. [6]

5 Frontage hedge and priority habitat status



Figure 1. Frontage hedge and principal roof, 40 Vernon Drive. Applicant-supplied image identified as 2024; reproduced as historical photographic evidence of character.

5.1 What the photograph shows

The image records a rendered dwelling with a hipped tiled roof, seen from the highway behind a continuous frontage hedge of roughly uniform height along the full plot width; the hedge conceals the lower part of the front elevation in this view, and only the upper storey and roof are visible. The dominant component is a dense, small-leaved shrub with an even, previously clipped outline, consistent in leaf form and habit with garden privet, Ligustrum ovalifolium, which the RHS identifies as non-native to Great Britain and Ireland. [9] Larger-leaved twining climber growth extends over substantial parts of the hedge, particularly towards the right of the frame, and the hedge was not closely clipped at the date of the image. Mature trees stand beyond the rear of the building.

The photograph supports an assessment of apparent garden-privet dominance. It does not support a precise percentage figure, and it does not amount to a stem-by-stem identification. That limitation is stated because the composition of the hedge is the point on which the biodiversity net gain exemption turns.

5.2 The decisive criterion

The JNCC UK BAP priority habitat description for hedgerows brings within the definition hedgerows with at least 80% cover of native woody species. Two consequences follow. A native single-species hedge can qualify, so being a monoculture is not itself a ground for exclusion; and climbers do not supply the qualifying woody component and cannot be counted towards it. [7]

Applying that criterion here, the apparent predominance of non-native garden privet supports the conclusion that the required 80% native woody cover is not present. On the photographic evidence available, the frontage is assessed as non-priority ornamental hedging.

5.3 Supporting classification

UKHab h2b covers non-native and ornamental hedgerows, defined by more than 20% canopy cover of non-native woody species. It does not require a pure monoculture, and the observed character is consistent with it. [8] The assessment does not use the short length being removed to exclude a longer hedge from consideration, and it does not equate non-priority status with an absence of nesting value. The hedge remains credible nesting habitat, and retention and timing measures apply accordingly.

5.4 Effect of the proposal on the hedge

The proposal removes a 2.9 m section to form the parking access and reduces boundary treatment beside the new crossover to 0.6 m for visibility. The remainder of the frontage hedge is retained. In the terms of the checklist limb on hedgerow removal, the information supplied is: the species present, so far as the evidence allows, at sections 5.1 and 7; the potential impacts, namely loss of a short length of ornamental hedge, a localised height reduction and the risk of disturbance to nesting birds; and the mitigation, namely retention of the remainder, seasonal timing, pre-works checks and the stop-work procedure at section 9.1.

6 Off-site woodland and ecological connections

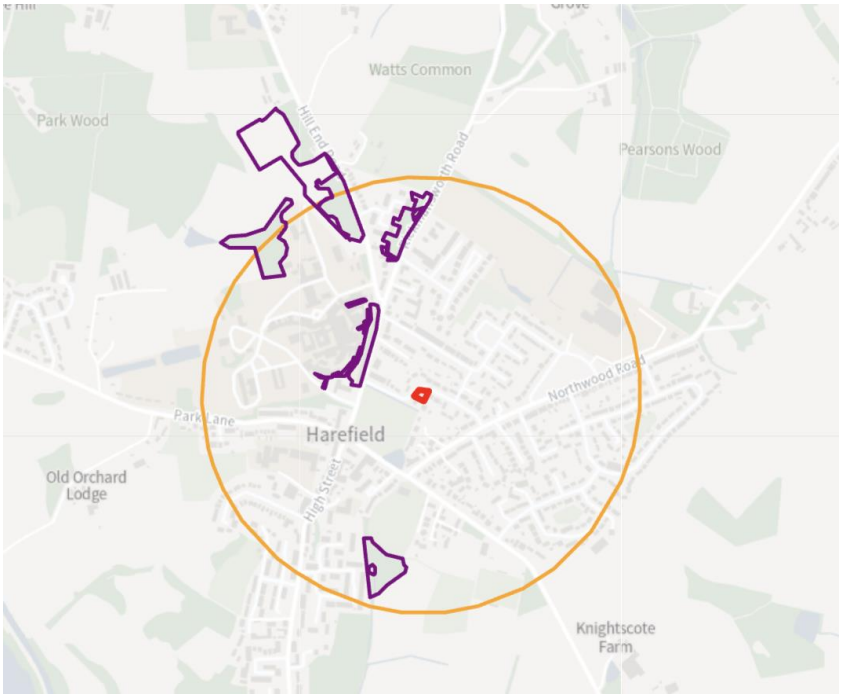


Figure 2. Applicant-supplied context map. Red indicates the site, orange the stated 500 m search area, purple the supplied deciduous woodland inventory polygons. Indicative context only; not a scaled application plan.

The supplied inventory extract repeats deciduous woodland entries within 500 m. The map shows several separate polygons, none of which overlaps the indicated site; the nearest lie to the west and north-west, with one to the south. Repeated rows in the extract are not treated as separate verified habitats. Priority Habitat Inventory mapping is relevant habitat evidence, but it does not by itself establish a statutory nature-conservation designation or ancient woodland status.

6.1 Impact pathways

No works are proposed within the mapped woodland, and no direct land take, encroachment or severance of any polygon is identified. Streets and developed residential plots separate the application property from each of them. The addition of one dwelling, with substantial garden space retained, does not identify a mechanism by which significant woodland damage would occur. Construction storage, waste and runoff remain within the application site under the controls at section 9.

Birds and bats move across this urban landscape, and the site is therefore spatially separate from the mapped woodland rather than ecologically sealed off from it. The measures that respond to that reality are retention of most of the hedge, maintenance of permeable garden boundaries and control of new lighting. The 500 m radius on the supplied map is a screening distance used to identify context. The presence of inventory woodland within it does not of itself create an automatic requirement for further survey; what matters is whether an impact pathway to that woodland is identified.

This map does not assess every designation or every on-site habitat. If the Council identifies a particular designated site, Local Wildlife Site or green link that it considers affected, together with the pathway by which it would be affected, the applicant will address that feature specifically. On the evidence presently available, no basis for woodland field survey or landscape-scale bat activity survey is identified.

7 Species records and screening

7.1 The supplied extract

The following is the species extract supplied for the application. Record counts indicate entries, not populations, on-site presence or confirmed breeding, and the extract is used as positive contextual evidence rather than as an absence search.

Species	Entries	Relevance and response
Swift Apus apus	3	Building-associated nesting is relevant to this proposal. Protect the eaves and any occupied nest access; provide two permanent integrated nesting units (section 10.3). The records do not identify nests at this property.
Smooth newt Lissotriton vulgaris	Count not stated	Shelter in garden vegetation and debris is possible. Addressed by the careful clearance procedure at section 9.2. A smooth newt record is not evidence of great crested newt.
Box tree moth Cydalima perspectalis	1	A garden insect record. It does not establish a protected-species constraint on the works and does not justify a targeted survey.
Harlequin ladybird Harmonia axyridis f. succinea	1	A widespread non-native ladybird. Its presence does not identify a specialist habitat impact requiring a separate survey.
Lily beetle Lilioceris lilii	1	A garden insect record. It does not establish a material protected-species effect. Retained planting continues to provide ordinary invertebrate habitat.

7.2 Birds and amphibians

The hedge is credible nesting habitat and the swift records make the eaves relevant. A breeding-bird census across the wider neighbourhood would not resolve the practical question, which is whether the particular hedge section and the affected eaves are occupied at the time the work occurs. Retention, seasonal timing and pre-works checks of the affected features are the focused response. Evidence of a nest within fabric to be altered would require a specific retention or replacement approach to be settled before those works proceed. [10]

Smooth newts can occupy gardens and shelter well away from ponds. In Great Britain their statutory protection concerns sale and trade rather than the general protection afforded to great crested newt. [11] No pond or watercourse alteration is proposed, and the record does not justify aquatic survey or great crested newt licensing. Damp refuges and any newt encountered during clearance are dealt with under section 9.2.

7.3 Screening against Natural England standing advice

The Council's validation checklist expressly adopts Natural England's standing advice as the test for when further appraisal work is required. [1] That advice sets three grounds on which an authority should ask for a survey: there is suitable habitat or foraging area on the development site to support protected species; protected species are likely to be present and may be affected by the proposal; or protected species are present but it is not clear whether they will be affected. It does not require an adverse effect to be established first. [12]

The advice also states that a detailed survey may not be needed where the developer can show that protected species are unlikely to be affected even if present on or near the site, by reference to working methods, the timing of development, and the life cycle and sensitivity of the species concerned. [12] Two limits on that route are acknowledged. It goes to whether a species would be affected; it does not answer the suitable-habitat limb. And it requires specified and secured working methods, of the kind set out at sections 9.1 and 9.2 — a contingency procedure for unexpected discoveries is not itself evidence that a survey trigger is absent.

The table below applies those tests to the works described at section 3.2 and identifies, for each group, the evidence the position rests on. Where the position depends on a physical site condition, the source is stated — the submitted plans, the applicant's confirmation, or both — so that the Council can test it. Where the available evidence does not support a conclusion, none is drawn.

Species group	Evidence relied on	Position
Bats	Figure 1; the submitted elevation and roof plans; mapped woodland and trees nearby	Survey trigger engaged. The building has features potentially suitable for bats and localised roof and eaves work is proposed. Addressed in full at section 8.
Breeding birds	Figure 1; the supplied species extract, including swift records; the submitted site plan	Survey trigger engaged on the suitable-habitat limb. The applicant relies on the "unlikely to be affected" route: the specified seasonal timing, pre-works inspection of the affected hedge section and eaves, and prompt completion of clearance at section 9.1, secured by condition, together with the provision at section 10.3.
Great crested newts — aquatic habitat	The submitted existing and proposed site plans; the applicant's confirmation	No pond, ditch or other waterbody lies within the application site, and none is created, altered or infilled by the proposal. No aquatic survey arises from the works themselves.
Great crested newts — terrestrial habitat	Not established by the evidence assessed	The applicant has not carried out a search for waterbodies within 500 m linked to the site by semi-natural habitat, and does not assert that none exists. The points made are narrower: the works are confined to garden and hard-surfaced ground within a built-up residential frontage; no semi-natural habitat is converted; and the supplied extract records smooth newt, which does not indicate great crested newt. If the Council considers the terrestrial limb engaged, the applicant will address it before determination.
Badgers	The applicant's confirmation that no sett, run, latrine or other field sign is present in the rear or side gardens	The applicant does not rely on garden size, and accepts that Natural England sets no minimum. The position rests on the absence of field signs as confirmed by the applicant, which is capable of being tested on a site visit. It is not established by the photographic evidence, which does not show the rear garden.
Reptiles	The applicant's confirmation of the character of the rear and side gardens; the submitted existing site plan	The applicant confirms that the affected ground is maintained garden and hard surfacing rather than rough grassland, scrub or accumulated refugia. On that basis the suitable-habitat limb is not engaged. If the Council's own knowledge of the site indicates otherwise, the applicant will provide a reptile habitat assessment rather than rely on this statement.
Otters and water voles	The submitted site plans; the applicant's confirmation	No watercourse, ditch or waterbody lies within the application site and none is affected by the works. The site offers no habitat associated with either species.
Hazel dormice	Figure 1; the submitted site plan; the context map at Figure 2	The affected vegetation is a clipped ornamental boundary hedge within a residential street frontage, separated from the mapped woodland by streets and developed plots. It is not woodland, scrub or a connected native hedgerow of the kind Natural England associates with the species.

Species group	Evidence relied on	Position
Invertebrates	Figure 1; the supplied species extract	No ancient or veteran tree, decaying timber or specialist assemblage is identified in the evidence assessed, and the supplied records are of common garden species. Retained planting, the retained hedge and the retained gardens continue to provide ordinary invertebrate habitat.
Protected plants, fungi and lichens; invasive non-native plants	Figure 1; the applicant's confirmation	No Schedule 9 or protected species is identified in the evidence assessed. Contractors are briefed to stop and report any suspected invasive species before ground works continue.
Designated sites and priority habitats	The context map at Figure 2; the submitted location plan	No designation covering the application land is identified in the evidence assessed. Off-site mapped woodland is considered at section 6, where no impact pathway is identified.

Two of the entries above rest on the applicant's confirmation of conditions in the rear and side gardens, which the frontage photograph does not show. They are identified as such rather than presented as survey findings, and the applicant will supply current photographs of those areas on request. Where the position depends instead on working methods, the measures relied on are those at sections 9.1 and 9.2, which the applicant offers for condition so that they are secured rather than assumed. [12]

8 Bats

8.1 What the evidence shows, and what it does not

Figure 1 shows a substantially continuous tiled roof surface and rendered elevations. It does not show extensive dereliction, and it does not show an obvious large opening in the visible roof slopes. The proposal retains the principal building and describes modest single-storey rear extensions, with no wholesale roof replacement. Those facts limit the likely scale of intervention. They do not establish an absence of small crevices, concealed access points at ridge, hip or eaves, or an existing roost.

The nearby trees and the mapped woodland make local bat activity plausible. They do not demonstrate a roost in this dwelling. Equally, continued domestic occupation and an apparently maintained roof cannot rule bats out. The absence of bat entries from the short species extract has not been used to assign a negligible or low roost-suitability category, and this statement assigns no suitability category at all: that is a matter for a competent ecologist inspecting the building.

8.2 The precise scope of potential disturbance

The applicant identifies the following as the features where the works could interact with a roost, and confines the issue to them:

- the two proposed bat access roof tiles on the rear pitched slopes, whose installation involves lifting the covering at precisely the kind of location a bat would use;
- the junctions of the rear extensions with the existing rear elevations and eaves;
- any soffit, fascia, insulation or roof-void work arising from the subdivision or from the extensions; and
- new external lighting, where it would fall on the roof, eaves or the proposed features.

The proposed bat access tiles are a beneficial enhancement, but an enhancement cannot substitute for assessment of a possible existing roost. Natural England's standing advice identifies building features suitable for bats, and nearby habitat, as reasons to seek survey evidence. [12, 13]

8.3 The proportionate first step

If the Council considers that a building-specific issue remains outstanding, the proportionate response is a targeted preliminary roost assessment by a suitably competent ecologist, scoped to the affected features: the rear roof slopes and eaves, the extension interfaces and any accessible relevant roof void. It should record roost features, evidence of use, the effect of the works on any feature identified, and the limitations of the inspection.

Such an inspection does not need to await the emergence season. Natural England's survey timetable states that a preliminary roost assessment for bats may be carried out at any time of year. [12] The assessment should follow current good practice guidance on method and reporting. [14] Where the assessment establishes negligible roost suitability in the affected features, or demonstrates that identified opportunities will remain unaffected by the works as designed, a reasoned recommendation for no seasonal follow-up may properly be accepted.

8.4 Why seasonal survey should not be the starting requirement

No confirmed roost, affected flight line or substantial loss of foraging habitat has been identified. The hedge opening is 2.9 m within an existing residential frontage; the great majority of the hedge and both retained gardens remain; and lighting is controlled. On that basis, the information presently available does not establish a need for repeated activity transects, static monitoring or emergence surveys simply because deciduous woodland is mapped within 500 m.

A finding of low suitability does not automatically dispense with emergence survey, and an incomplete inspection may leave relevant uncertainty. Where further survey is genuinely necessary to determine the application, it should be supplied before permission rather than deferred to a condition. [2, 12] The submission is therefore for a preliminary-roost-assessment-first approach, with seasonal follow-up requested only where the findings of that assessment and the likely effects justify it.

9 Construction method statement

Before works begin the developer will provide these measures to the principal contractor. The site supervisor will brief operatives, mark clearance limits on the ground, and record checks, discoveries and ecological instructions. The measures cover hedge removal, visibility trimming, garden clearance and affected roof or eaves work. They are offered for condition.

9.1 Nesting birds

Programme hedge removal, heavy trimming and any work that could obstruct occupied nest access for the period September to February wherever practicable. This is a preferred working period and not a legal exemption: an active nest is protected whenever it occurs. [10]

Immediately before works, check the affected hedge section and the accessible eaves for nesting activity. For work between March and August, or wherever activity is suspected or dense growth prevents a reliable check, a competent ecologist will inspect before clearance. Complete clearance promptly after a satisfactory check, normally the same day, and repeat the check after any delay or change in activity.

If a nest is active or being built, stop the relevant operation, retain the vegetation or structure supporting it, and have an ecologist define an undisturbed buffer. Resume only after the ecologist confirms that nesting has finished and dependent young have left.

Do not remove nests, seal entrances, deploy deterrents, or position scaffolding, sheeting or netting so as to obstruct an occupied nest. Swift activity at the eaves will trigger inspection of the relevant entrance and of the

construction detail affecting it. Retain a known nest access where possible; any alternative provision must address the actual nest affected. The two enhancement units do not authorise damage to an active nest.

9.2 Garden fauna and clearance

Confine clearance to the permitted works and do not strip unaffected boundary vegetation. Lift loose debris, timber and potential refuges carefully by hand before mechanised ground preparation, inspect beneath them, and allow animals to move into retained cover. Avoid leaving cut vegetation in heaps where later operations will crush them.

If a newt, or any animal whose identity is uncertain, is discovered, stop work in its immediate vicinity and obtain competent ecological identification before disturbing it further. Do not undertake indiscriminate capture or relocation. A suspected great crested newt, badger sett, or other protected feature requires the relevant works to remain stopped while the lawful response is determined. No trapping programme is proposed or implied.

Cover excavations securely when unattended or provide a stable escape ramp; check open excavations at the start of each working day; cap stored pipes; and prevent animals entering foundations before they are closed. Retain access to undisturbed garden refuge areas throughout phased works.

9.3 Bats — works procedure and contingency

Any bat assessment required to determine the application must be resolved before the affected works proceed; this contingency does not substitute for it.

If a bat, a suspected roost, or credible evidence of one is discovered during work, stop the affected operation immediately, leave the feature and its access undisturbed, and contact a suitably licensed bat ecologist. Do not handle bats, seal openings, or dismantle adjacent material until advice and any necessary licence are in place. [13]

10 Retention, enhancement and ecological specification

10.1 Retention and protection

Retain the frontage hedge other than the 2.9 m opening described and the trimming required for the 0.6 m visibility treatment. Keep material storage, plant washout and spoil away from retained planting and from tree rooting areas. No additional tree removal forms part of this proposal. Where a retained root system or crown, on the site or on adjacent land, cannot be protected by the layout as drawn, obtain arboricultural advice before the relevant construction detail is implemented.

10.2 Permeability

Maintain both retained garden areas and provide the proposed 13 cm by 13 cm openings at the base of new dividing fences, connecting accessible garden space without creating a route directly into a new hazard. Keep the openings clear of stored materials during construction, and explain their purpose to future occupiers.

10.3 Nesting and roost provision

The two proposed bird nesting features are specified as permanent integrated swift nesting units at the rear eaves, with a clear flight approach and no direct illumination. This refines the generic swift or sparrow box description in the Planning and Heritage Statement and responds to the national policy expectation of integrated nesting provision. [3] Use purpose-designed units suitable for the eaves construction, install them before first occupation of the additional dwelling, and retain them thereafter. A preference for a particular external finish is not relied on as a reason to depart from integrated provision.

Retain the proposal for two rear bat access tiles and to a compatible roof detail that provides safe, usable roost accommodation behind the tile. A tile opening on its own is not a complete roost specification. Avoid

entanglement hazards from exposed or loose-weave roofing membrane, and ensure the provision can remain available without conflicting with the separation and fire protection required between the two dwellings. Incorporate the features before occupation and retain them thereafter.

Please note that the applicant formally confirms that the proposed single-storey rear extensions attach solely at ground-floor level and do not touch, modify, or disturb the main roof structure, main eaves, or loft void of the existing building. As the main roof remains entirely in situ and unaltered, there is no risk of impact or disturbance to potential bat roosts then, under Natural England's standing advice, a formal Preliminary Roost Assessment (PRA) is not triggered, and no further survey effort is required for this application.

10.4 Lighting

Limit new external lighting to the locations needed for safe access. Direct luminaires downwards and shield them from the retained hedge, the trees beyond the rear boundary, the eaves and the proposed nesting and roost features. Use warm-white fittings at the lowest practical output with short-duration controls. Avoid floodlighting the gardens and avoid illuminating neighbouring vegetation. Temporary construction lighting will follow the same approach; construction will normally take place in daylight hours.

11 Decision requested

Submission matter	Position requested from the Council
Statutory biodiversity net gain	Accept the 0.2 ha exemption on the stated complete site area of 0.0557 ha and the reasoned assessment that no on-site priority habitat is impacted.
Ecology information requirement	Accept this statement as satisfying the ecological information required by the February 2024 validation checklist for this application.
Habitat information	Accept the hedge and off-site woodland assessment, and the retention measures, as proportionate to the identified effects.
Bat information	Identify any outstanding building-specific issue and, if one remains, seek a targeted preliminary roost assessment. Require seasonal follow-up only if the findings of that assessment justify it.
Other species	Secure the method statements at section 9 and the enhancements at section 10 by condition. No seasonal survey programme is justified by the supplied species records.

The scheme has identifiable but localised ecological considerations. Each has been addressed through the evidence assessed, an express statement of what that evidence does and does not establish, and practical construction controls offered for condition. The Council is asked to determine the application on that basis, applying its published checklist alongside current national and development plan policy.

12 Source register

Policy and online guidance checked on 9 September 2026. Bracketed numbers in the text refer to these sources. Titles are direct hyperlinks.

[1] Hillingdon Local Planning Validation Checklist, February 2024
Introduction and validation criteria pp 3–4; Full Planning Applications (Major and Minor) pp 5–7; Ecological Survey and Report definition pp 32–33.

[2] Hillingdon Local Plan Part 2 — Development Management Policies
Adopted January 2020. Policy DMEI 7 (Biodiversity Protection and Enhancement) and supporting text; Policy DMHB 14 (Trees and Landscaping).

[3] National Planning Policy Framework, August 2026

Decision-making policies DM1 to DM3; nature policies N1 and N2, including integrated nesting provision and the limit on gain requirements beyond the statutory framework; Annex C information requirements.

[4] The London Plan 2021, Chapter 8 — Green Infrastructure
Policy G6 Biodiversity and access to nature.

[5] Defra — Biodiversity net gain: exempt developments
Small-site area exemption in force from 6 August 2026 and the on-site priority habitat exception.

[6] Planning Practice Guidance — Biodiversity net gain
Exemptions and the information supporting an exemption claim, including the de minimis route.

[7] JNCC — UK BAP Priority Habitat Descriptions: Hedgerows
2008 description, uploaded 2016. Definition, including the 80% native woody cover criterion, at PDF page 2.

[8] UKHab Version 2 — Hedgerows, Lines of Trees and Green Roof definitions
March 2023. h2b Non-native and ornamental hedgerow, p 7.

[9] RHS — Ligustrum ovalifolium
Garden privet species profile and native status.

[10] Natural England — Wild birds: advice for making planning decisions
Survey considerations, protection of nesting birds and mitigation.

[11] Amphibian and Reptile Conservation — Smooth newt
Ecology and level of protection of Lissotriton vulgaris.

[12] Natural England — Protected species and development: advice for local planning authorities
Standing advice, survey proportionality, timing, and information required at the decision stage.

[13] Natural England — Bats: advice for making planning decisions
Standing advice on bats, updated 7 April 2025.

[14] Bat Conservation Trust — Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)
Survey method, timing, and the role of evidenced professional judgment in departing from standard methods.

Application evidence relied on: Planning and Heritage Statement for 40 Vernon Drive; the applicant's stated site area of 557 m²; the 2024 frontage photograph; the supplied woodland context map; and the supplied species-record extract. Figures 1 and 2 reproduce the supplied images.

Appendix A Appeal decisions on survey scope

These decisions are recorded because they illustrate the approach taken to survey scope where the effect of the development on the affected feature is the question in issue. They are case-specific planning judgments, not binding rules, they do not exempt small residential schemes from survey, and the older decisions applied the policy and technical guidance current at the time. Their factual findings cannot be transferred to this building.

A.1 134 Lime Walk, Oxford

APP/G3110/W/22/3296517, 2 February 2023, appeal allowed. Paragraphs 14 to 18 address bats in the conversion and extension of a domestic outbuilding; paragraph 22 addresses the request for further bat survey work. The Inspector accepted a submitted assessment concluding that further surveys were unwarranted, notwithstanding concerns about crevices and nearby woodland, having had supporting information about internal and external features together with site visit observations. [15]

Relevance: proximity to woodland did not automatically override a reasoned building assessment. The parallel here is the sequence of evidence, beginning with a targeted inspection of the affected features where one is required. The finding about limited potential in that case is not a substitute for inspecting this building.

A.2 Maple House, Stebbing

APP/C1570/D/23/3324498, 15 November 2023, appeal allowed. Paragraphs 7 to 9 concern a first-floor extension and external alterations. A bat report of May 2023 found no evidence of bats during inspection while recognising

probable foraging across the site, and the Inspector accepted that the development would not disturb that use. [16]

Relevance: probable foraging and an adverse development effect are separate questions. That supports the approach taken here to the limited garden and lighting changes. The decision is not presented as authority that the report in question was only a preliminary roost assessment.

A.3 Marlow Bridge

APP/T0355/W/25/3369954 and related appeals, 3 December 2025, appeals allowed. Paragraphs 16 to 17 accepted the effects of a lighting proposal on the basis of existing evidence and controls; paragraph 22 rejected additional preliminary roost assessment, emergence and night-walkover conditions as unnecessary to establish the lighting effects, bat survey evidence having already been submitted. [17]

Relevance: further survey should answer an unresolved impact question. This is a lighting case rather than a direct analogue for roof alteration, and it is not relied on as authority for omitting an initial building assessment.

A.4 Okebrook, Forest Green

APP/C3620/W/25/3375055, 2 February 2026, appeal dismissed. Paragraphs 14 to 17 record a preliminary roost assessment finding negligible potential, but the Inspector did not have before him an earlier report containing the recommended avoidance measures and enhancements. [18]

Relevance: this is why the present statement sets out its construction controls in full at section 9 rather than cross-referring to them. Taken together, these decisions support proportionate and sufficient evidence. They do not support a contention that further survey can never be required.

[15] Planning Inspectorate — 134 Lime Walk, Oxford
APP/G3110/W/22/3296517; 2 February 2023; paragraphs 14–18 and 22.

[16] Planning Inspectorate — Maple House, Stebbing
APP/C1570/D/23/3324498; 15 November 2023; paragraphs 7–9.

[17] Planning Inspectorate — Marlow Bridge
APP/T0355/W/25/3369954 and related appeals; 3 December 2025; paragraphs 16–17 and 22.

[18] Planning Inspectorate — Okebrook, Forest Green
APP/C3620/W/25/3375055; 2 February 2026; paragraphs 14–17.