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Part of the ES Group

LAND AT DAWLEY ROAD, HAYES

Ecological Assessment

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ecology solutions for planners and developers

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APPENDICES

1. INTRODUCTION

1.1. Background & Proposals

1.1.1. Ecology Solutions Limited was commissioned in February 2022 by Prologis to undertake an Ecological Assessment of Land at Dawley Road, Hayes, hereafter referred to as the application site (see Plan ECO1).

1.1.2. Proposals for the application site include the demolition of an existing building and provision of new areas of hardstanding.

1.1.3. The proposals are illustrated on the Proposed Site Layout Plan produced by Michael Sparks Associates, a copy of which is included at Appendix 1 of this assessment.

1.2. Application Site Characteristics

1.2.1. The application site is located off Dawley Road in Hayes and comprises part of an existing industrial estate. The application site is bounded by the Grand Union Canal to the north, Vinyl Place to the west and existing industrial development to the south and east.

1.2.2. The application site primarily comprises existing buildings with hardstanding. Planting within the application site is restricted to very small areas of amenity grassland and ornamental planting.

1.3. Ecological Assessment

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

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

[1] CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1*. Chartered Institute of Ecology and Environmental Management, Winchester.

2. SURVEY METHODOLOGY

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

2.2. Desk Study

2.2.1. To compile background information on the application site and its immediate surroundings, Ecology Solutions contacted Greenspace Information for Greater London (GiGL).

2.2.2. Information has been provided by GiGL, with a summary sheet included at Appendix 2. Due to publication conditions, the full reports from the record centres cannot be appended to this assessment. Desk study information is however referenced throughout this report, where appropriate. Information regarding designated sites is also shown on Plan ECO1.

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

2.3. Habitat Survey

2.3.1. Surveys were undertaken in April 2022 to ascertain the general ecological value of the application site and to identify the main habitats and associated plant species situated within and in close proximity to the application site boundary.

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

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

2.3.4. All the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent at different seasons. However, considering the developed nature of the application site, and the paucity of semi-natural habitats present, it is considered that an accurate and robust assessment has been made of the botanical interest that it supports.

[2] MAGIC website. Available at: http://magic.defra.gov.uk

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

2.4. **Faunal Survey**

2.4.1. General faunal activity observed during the course of the survey was recorded, whether visually or by call. Specific attention was paid to the presence or potential presence of any protected, rare, notable or Priority Species, and the extent to which the application site provides any potential opportunities for these species / groups. In addition, specific surveys were undertaken in respect of bats.

2.4.2. **Bats.** A comprehensive internal and external inspection survey was undertaken in April 2022 to assess the potential of existing trees and buildings within and immediately adjacent to the application site to support roosting bats. This work was undertaken by experienced bat workers and aimed to establish the likelihood of presence / absence of bats.

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

2.4.4. All accessible voids and areas within existing buildings and structures were surveyed, with evidence to indicate use by bats such as droppings, feeding remains or individual bats searched for. Furthermore, a detailed external survey was undertaken of all buildings within and adjacent to the application site, to identify any potential access points or features which could potentially be utilised by roosting bats.

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

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

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

2.4.7. The main requirements for a winter / hibernation roost site are that it maintains a stable (cool) temperature and humidity. Sites commonly utilised by bats as winter roosts include cavities / holes in trees, underground sites, and parts of buildings. Whilst different species may show a preference for one of these types of roost site, none are solely dependent on a single type.

2.4.8. In addition, trees present within and immediately adjacent to the application site were assessed for their potential to support roosting bats. For a tree to

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

be classed as having some potential for roosting bats it must usually have one or more of the following characteristics:

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

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

3. ECOLOGICAL FEATURES

3.1. The application site was subject to an ecological survey on 21st April 2022. The vegetation present enabled the habitat types to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken

3.2. The following main habitat types were identified within the application site:

- Existing Buildings;
- Hardstanding;
- Scrub;
- Amenity Grassland;
- Ornamental Planting; and
- Hedgerows and Treelines.

3.3. The location of these habitats is shown on Plan ECO2. Each habitat present is described below with an account of its representative plant species (where relevant).

3.4. Existing Buildings

3.4.1. The application site comprises a number of existing buildings; these are illustrated on Plan ECO2 and described below.

3.4.2. Building B1 comprises a single storey red brick industrial building with a flat or partly pitched corrugated metal roofs. This building supports large windows, sky lights and large roller shutter doors with no roof void present.

3.4.3. Building B2 is a smaller red brick office building to the west of B1. This building supports a partly pitched corrugated metal roof with skylights and no roof void present.

3.4.4. Buildings B1 and B2 are connected by a corridor which comprises a flat roof with floor-to-ceiling windows on both sides.

3.4.5. Buildings B3 comprises a small metal electric substation building.

3.5. Hardstanding

3.5.1. The vast majority of the application site comprises hardstanding in the form of tarmac and concrete which are devoid of any vegetation.

3.6. Scrub

3.6.1. An area of scrub is present to the north-west of the application site, adjacent to the Grand Union Canal. This habitat supports a number of semi-mature and scrubby trees, with species including Hornbeam, Bramble *Rubus fruticosus agg.*, Gelder Rose *Viburnum opulus,* Dogwood *Cornus sanguinea*, Hawthorn *Crataegus monogyna*, Sycamore *Acer pseudoplatanus*, Wild Privet *Ligustrum vulgare*, Willow *Salix* sp., Silver birch *Betula pendula* and Oak *Quercus robur.*

3.7. Amenity Grassland

3.7.1. The application site supports small areas of regularly managed amenity grassland. Species recorded within this habitat included Perennial Ryegrass *Lolium perenne*, Red Fescue *Festuca rubra*, Red Clover *Trifolium pratense*, Dandelion *Taraxacum officinale agg*., Daisey *Bellis perennis,* Ribwort Plantain *Plantago lanceolata,* Germander Speedwell *Veronica chamaedrys*, Creeping Buttercup *Ranunculus repens*, Herb Robert *Geranium robertianum*, Field Woodrush *Luzula campestris*, Mouse-ear Chickweed *Cerastium fontanum* and Bristly Oxtongue *Helminthotheca echioides*.

3.8. Ornamental Planting

3.8.1. There are multiple small areas of ornamental planting located around the perimeter of the existing buildings at the site. These areas are well managed and support a number of species, including Cherry Laurel, Hydrangea *Hydrangea petiolaris,* Ivy *Hedera helix subsp. helix,* Hebe *Hebe sp., Ceanothus* sp.*,* Dogwood*,* Holly *Ilex aquifolium,* Weigela *Weigela florida,* Badan *Bergenia crassifolia,* and Hawthorn.

3.9. Hedgerows and Treelines

3.9.1. The site is bounded by a number of regularly managed hedgerows and treelines.

3.9.2. Hedgerows H1 comprises a regularly managed hedgerow associated with the fence line along the western boundary of the application site. This feature primarily supports Hornbeam *Carpinus betulus.*

3.9.3. Hedgerow H2 is situated in front of T1 and comprises a regularly managed hedgerow supporting Hornbeam, Dogwood and Hawthorn.

3.9.4. Treeline T1 is situated along the eastern boundary of the application site. This feature supports a number of species, including Hawthorn, Cherry, Laurel, Hazel *Corylus avellana,* Elder *Sambucus nigra,* Willow and Field Maple *Acer campestre.* This feature supports very sparse ground flora, with species including Common Nettle *Urtica dioica* and Cleavers *Galium aparine*.

3.9.5. Hedgerow H3 comprises a small regularly managed Wild Privet hedgerow located to the south of the application site, adjacent to building B1.

3.9.6. Hedgerow H4 comprises a regularly managed Hornbeam hedgerow situated at the south-east of the application site, associated with the boundary fence line.

3.10. Background Records

3.10.1. The desk studies undertaken from GiGL did not return any records of protected or notable botanical species from within or immediately adjacent to the application site or immediate vicinity.

3.10.2. Notable species returned within the wider area included Galingale Cyperus *longus,* Loose Sily-bent *Apera spica-venti,* Stinking Hellebore *Helleborus foetidus,* Bluebell *Hyacinthoides non-scripta,* Dittander *Lepidium latifolium,*

Large-leaved Lime *Tilia platyphyllos,* Hoary Mullein *Verbascum pulverulentum* and Wild Pansy *Viola tricolor*.

4. WILDLIFE USE OF THE APPLICATION SITE

4.1. During the survey work, general observations were made with specific attention paid to the potential presence of protected species. Specific surveys were also undertaken in respect of bats.

4.2. Bats

4.2.1. The existing buildings and structures present within and immediately adjacent to the application site are not considered to offer any potential opportunities for roosting bats. This assessment is based on a number of factors, including: the construction of the building (large industrial buildings with corrugated metal roofs with no voids present); the light internal conditions that the buildings support due to supporting large windows and skylights); the good condition of the buildings and the lack of potential roosting features in the form of gaps, holes, crevices or cracks; and the presence of existing lighting, including security lighting in close proximity to all buildings.

4.2.2. No evidence to indicate the possible presence of roosting bats was recorded during the detailed internal and external inspection of the buildings undertaken in April 2022.

4.2.3. Furthermore, none of the trees present within or immediately adjacent to the application site boundary were considered to provide any potential opportunities for roosting bats, lacking features such as cracks, splits, holes, or a covering of dense Ivy.

4.2.4. Given the paucity of vegetation within the application site itself, and the presence of existing lighting both within the application site and surrounding area, it is considered that opportunities for foraging and commuting bats within the application site are extremely limited.

4.2.5. The Grand Union Canal to the north of the application site offers some opportunities for foraging and commuting bats passing through the local area. However, the stretch of the canal which adjoins the application site is well lit by existing lighting and supports no vegetation to the east. When compared to opportunities available for foraging and commuting bats, particularly north of the canal, it is considered that the habitats present within the application site are not of any intrinsic value for this group.

4.2.6. **Background Records.** The data searches from GiGL did not return any records of bats from within or immediately adjacent to the application site.

4.2.7. The nearest record returned pertains to a Common Pipistrelle *Pipistrellus pipistrellus,* recorded at a location approximately 0.4km south-east of the application site in 2015.

4.2.8. No records of other bat species were return within the local area.

4.3. Birds

4.3.1. During the survey, Feral Pigeon *Columba livia* and Magpie *Pica pica* were recorded within the application site. No evidence to indicate the presence

of nesting or roosting birds within any of the existing buildings was recorded during the course of the survey.

4.3.2. Given the habitats present within the application site, it is considered that opportunities for nesting birds within the application site are primarily restricted to small areas of hedgerows, trees, and ornamental planting.

4.3.3. **Background Records.** The data search received from GiGL did not return any records of notable bird species from within or immediately adjacent to the application site.

4.3.4. A number of records of notable birds were returned from within the wider area, the nearest of these being from a location approximately 0.4kn north-east of the application site, recorded between 2016 and 2017. Species records returned from this location include Lesser Redpoll *Acanthis cabaret*, Skylark *Alauda arvensis,* Swift *Apus apus*, Short-eared Owl *Asio flammeus,* Lesser Whitethroat *Curruca curruca,* House Martin *Delichon urbicum,* Reed Bunting *Emberiza schoeniclus,* Red-backed Shrike *Lanius collurio,* Herring Gull *Larus argentatus,* Lesser Black-backed Gull *Larus fuscus,* Linnet *Linaria cannabina,* Red Kite *Milvus milvus,* Yellow Wagtail *Motacilla flava,* Spotted Flycatcher *Muscicapa striata,* House Sparrow *Passer domesticus,* Black Redstart *Phoenicurus ochruros,* Dunnock *Prunella modularis,* Sand Martin *Riparia riparia,* Whinchat *Saxicola rubetra,* Woodcock *Scolopax rusticola,* Starling *Sturnus vulgaris,* Song Thrush *Turdus philomelos,* Fieldfare *Turdus pilaris,* Ring Ouzel *Turdus torquatus,* Mistle Thrush *Turdus viscivorus* and Lapwing *Vanellus vanellus.* These species were returned from a location approximately 0.4km north-east of the site from 2016-2017.

4.4. Invertebrates

4.4.1. As outlined above, the application site primarily comprises existing buildings and hardstanding. Whilst small areas of amenity grassland and treelines are present at the very margins of hardstanding, given the very limited extent and diversity of vegetation, there is no evidence to indicate that the application site would be of any particular interest for protected or notable species / assemblages of invertebrates.

4.4.2. **Background Records.**

The data search received from GiGL did not return any records from within or immediately adjacent to the application site. Multiple records of Stag Beetle *Lucanus cervus* were returned from a location approximately 0.6km east of the application site, with the most recent record being in 2020.

4.5. Other Species

4.5.1. No evidence of any other protected or notable faunal species was recorded within the application site during the survey. Given the lack of semi-natural habitats, it is considered highly unlikely that it would be used, even on occasion, by such species.

5. ECOLOGICAL EVALUATION

5.1. The Principles of Ecological Evaluation

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

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

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

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

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

5.1.6. In addition, habitats of local importance are often highlighted within a local Biodiversity Action Plan (BAP). The Berkshire Biodiversity Action Plan identifies and lists several priority species and habitats.

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

5.1.8. The legislative and planning policy context has also been given due regard throughout this assessment.

5.2. Designated Sites

Statutory Sites

5.2.1. There are no statutory designated sites of nature conservation within or adjacent to the application site. The nearest statutory designated sites are Yeading Meadows Local Nature Reserve (LNR), which lie approximately 2.3km to the north-east of the application site at its nearest point (see Plan ECO1).

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

5.2.2. Yeading Meadows LNR comprises a hundred-year-old Oak Quercus robur plantation over a Hazel coppice which forms Ten Acre Wood, which adjoins the botanically rich Yeading Brook Meadows. The LNR is noted to support nesting Hobby in the summer, as well as Kingfisher, Roesel's Bush Cricket, Long Winged Conehead, and Gatekeeper butterflies.

5.2.3. The nearest Site of Special Scientific Interest (SSSI) is Fray's Farm Meadows SSSI, located approximately 6.4km north-west of the application site.

5.2.1. Given the significant separation between the application site and these statutory sites by extensive areas of existing development and infrastructure, and the nature and small scale of the proposals, it is considered that the proposals would not lead to any adverse direct or indirect impacts on this statutory designated site from the development proposals (either during construction or operation).

Non-statutory Sites

5.2.2. There are no non-statutory designated sites of nature conservation situated within the application site. However, the application site is situated immediately adjacent to the Grand Union Canal, which form part of London's Canals Site of Metropolitan Importance for Nature Conservation (SMINC).

5.2.3. London Canal's SMINC is designated on account of the wide range of aquatic floral which it supports, which include a number of locally uncommon species and London rarities. The canals are also noted to support an assemblage of important invertebrate fauna, including several species of dragonflies and damselflies, a diverse fish community and several species of breeding waterfowl.

5.2.4. The section of the canal adjoining the application site primarily comprises built form, with a steep concrete wall along the northern boundary of the application site. The central and eastern sections of this wall do not support any aquatic or marginal vegetation. To the western end, the canal adjoins a treeline and area of scrub.

5.2.5. The development proposals for the application site will not result in any direct effects or losses to the section of the Grand Union Canal (London's Canals SMINC) which adjoins the application site. Furthermore, all areas of vegetation and existing built form situated immediately adjacent to the canal are to be retained.

5.2.6. Nonetheless, given the proximity of the application site to this non-statutory designated site, standard engineering measures and best practice shall be employed throughout the construction phase in order to minimise any potential for adverse effects to occur to off-site habitats (including the Grand Union Canal) via pathways such as contaminated run-off. Where deemed necessary, measures such as interceptor fencing shall be used to prevent materials from entering off-site habitats, with materials such as fuels, oils and construction materials stored well away from watercourses.

5.2.7. The impacts of dust will be mitigated for by best engineering practice adhering to current guidance and legislation, such as storing aggregated on

the far side of the construction site and away from the non-statutory designated site and spraying dry materials to limit airborne movement.

5.2.8. It is considered that the full detail of such measures may be secured as part of a Construction Environmental Management Plan (CEMP).

5.2.9. With the adoption of appropriate avoidance and mitigation measures as outlined above, it is considered that the proposed development would not be likely to lead to any adverse effects upon Basingstoke Canal SSSI.

5.2.1. As illustrated on Plan ECO1, there are a number of other non-statutory designated sites located in the local area of the application site. These are all separated from the application site by existing development, open space, and infrastructure. As such, taking into account the nature of the proposed development and measures to be adopted through the construction period as outlined above, it is not anticipated that any adverse effects would arise upon non-statutory designated sites as a result of the development proposals.

5.3. **Habitat Evaluation**

5.3.1. As outlined above, the vast majority of the application site comprises existing built form, including areas of hardstanding and existing buildings. These areas do not support any vegetation and are therefore not considered to be of any ecological value.

5.3.2. Habitats present which are of any ecological value within the context of the application site include areas of amenity grassland, small areas of scrub and ornamental vegetation. However, these support a very limited range of species, all of which are widespread and common, and given the small areas present offer negligible value in terms of botanical interest of the application site or indeed to faunal species (see below).

5.3.3. As illustrated on the Proposed Site Layout (see Appendix 1), the development proposals will retain the vast majority of the existing habitats within the site, including areas of scrub, hedgerows, and treelines. In particular, habitats within close proximity to the Grand Union Canal to the north of the application site will be fully retained.

5.3.4. The proposals will result in the loss building B3, areas of amenity grassland and hedgerow H4. However, given the limited species diversity of these habitats, it is considered that these losses will be of low significance.

5.3.5. The provision of new native bolster hedgerow and tree planting within the retained areas of the application site will provide enhancement both in terms of the quantity and quality of the habitats present within the site post-development. Furthermore, the implementation of suitable management measures of retained habitats will ensure these habitats achieve and are maintained in the desirable conditions would serve to maximise their biodiversity value.

5.4. Faunal Evaluation

Bats

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

- Deliberately to kill, injure or take (capture) bats;
- Deliberately to disturb bats in such a way as to be likely to significantly affect: -
  (i) the ability of any significant group of bats to survive, breed or rear or nurture their young; or to hibernate; or
  (ii) to affect significantly the local distribution or abundance of the species concerned;
- To damage or destroy any breeding or resting place used by bats;
- To intentionally or recklessly obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).

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

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

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

5.4.5. All bats are London Priority Species, and seven species of bat are Priority Species in England; specifically, Barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, Noctule, Soprano Pipistrelle, Brown Long-eared *Plecotus auritus*, Greater Horseshoe *Rhinolophus ferrumequinum,* and Lesser Horseshoe *Rhinolophus hipposideros*.

5.4.6. **Application Site Evaluation.** No evidence of roosting bats was identified within the buildings during the specific internal and external inspection survey. Furthermore, given the construction of the buildings, the lack of suitable voids and well-lit internal conditions, it is considered that they do not provide opportunities for roosting bats.

5.4.7. Furthermore, no trees within the application site are considered to provide potential opportunities for roosting bats. As such, the development proposals would not result in any potential loss or damage to any bat roosts.

5.4.8. Given the paucity of semi-natural habitats, it is considered that the application site itself is highly unlikely to be of any value for foraging or commuting bats. However, the Grand Union Canal to the north of the applications site provides some opportunities for this faunal group to pass through the local area.

5.4.9. **Avoidance and Mitigation.** Under the proposals for the application site, the vast majority of existing vegetation will be fully retained, including habitats immediately adjacent to the Grand Union Canal. This will therefore retain this corridor for use by foraging and commuting bats.

5.4.10. Notwithstanding the existing baseline situation, a sensitive lighting strategy shall be adopted to minimise the potential for additional light spillage to both off-site habitats and also areas of retained habitats (particularly alongside the Grand Union Canal). This will ensure that any existing opportunities for bats would be retained post-development. Measures such as hoods and cowls may be used to direct light below the horizontal plane, directing light to where it is required and thereby maintaining dark corridors.

5.4.1. As an enhancement, bat boxes, such as Schwegler 1FF boxes (see Appendix 3 for suitable examples), could be erected at suitable locations on retained buildings, particularly at a suitable height (5-6 metres) on the north-eastern and northern aspects. This model of bat box is known to be attractive to a number of the smaller bat species, including Pipistrelle species, which are known to be present in the local area. This measure would provide new roosting opportunities for bats which are currently absent from the site.

Birds

5.4.2. **Legislation.** Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, whilst Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection whilst nesting.

5.4.3. **Application Site Usage.** The vast majority of the application site does not offer any opportunities for nesting and foraging birds. No evidence of birds nesting within the buildings was identified during the survey undertaken in April 2022.

5.4.4. **Avoidance, Mitigation and Enhancements.** The vast majority of suitable bird nesting habitat within the application site will be fully retained. However, the proposals will result in minor losses to existing hedgerows and ornamental planting.

5.4.5. As all species of birds receive general protection whilst nesting, it is recommended that the clearance of any suitable nesting habitats should be undertaken outside of the main development of the main bird breeding season (typically considered to be March to July inclusive).

5.4.6. Should this not be possible, potential nesting habitat should be subject to a nesting bird survey undertaken by an experienced ecologist, immediately prior to its removal. Should any nesting birds be identified, then the nest should be fully safeguarded *in situ* and subject to an appropriate disturbance buffer (as advised by the ecologist), and only removed once it has been confirmed any fledglings have left the nest and it is no longer active.

5.4.7. The provision of new bird nesting boxes on existing buildings to be retained could provide enhancements compared to the existing situation. Using nest boxes of varying designs would maximise the species complement attracted to the site. Suitable examples of bird nesting boxes are included at Appendix 4.

Invertebrates

5.4.8. **Application Site Usage.** As outlined above, the habitats present within the application site are not considered likely to support any protected or notable invertebrate species or assemblages.

5.4.9. **Avoidance, Mitigation and Enhancements.** The vast majority of existing vegetation within the application site will be retained. The retention and enhancement of existing planting, in addition to the provision of new native bolster planting around the application site, could provide new and enhanced opportunities for a range of invertebrates.

5.4.10. By using a range of wildlife-beneficial species (for instance, including nectar-rich flower plants and those of known value), this will serve to maximise opportunities for this group, and in term deliver benefits for other groups such as birds and bats.

6. PLANNING POLICY CONTEXT

6.1. The planning policy framework that relates to nature conservation at Hayes is issued at two main administrative levels: nationally through the National Planning Policy Framework (NPPF); and locally through documents related to the Hillingdon Local Plan. The proposed development will be considered in relation to the policies contained within these documents.

6.2. National Policy

National Planning Policy Framework (2021)

6.2.1. The National Planning Policy Framework (NPPF) sets out the Government's requirements for the planning system and was adopted on 27th March 2012 and subsequently revised on the 24 July 2018, 19 February 2019, and 20 July 2021.

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

6.2.3. The revised NPPF is comparable to previous versions (which it replaces), including reference to minimising impacts on biodiversity and provision of net gains to biodiversity where possible (paragraph 179) and ensuring that Local Authorities place appropriate weight to statutory and non-statutory nature conservation designations, protected species, and biodiversity.

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

6.2.5. Paragraph 180 of the NPPF comprises a number of principles which Local Authorities should apply, including:

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

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

6.3. Regional Policy

The London Plan (March 2021)

6.3.1. The new London Plan was published in March 2021. This document sets out a framework for how London will develop over the next 20-25 years.

6.3.2. The policy areas within the London Plan are formed by six Good Growth objectives to ensure that London's growth is Good Growth. These policies are: GG1 Building strong and inclusive communities; GG2 Making the best use of land; GG3 Creating a healthy city; GG4 Delivering the homes Londoners need; GG5 Growing a good economy; and GG6 Increasing efficiency and resilience.

6.3.3. Of these objectives, GG2 is concerned with protecting and enhancing London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces. It also seeks to promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.

6.3.4. Six new policies have been introduced specifically relating to green infrastructure and the natural environment.

6.3.5. *Policy G1 Green Infrastructure* states that green features in the built environment, such as street trees and green roofs, should be planned, designed, and managed in an integrated way to achieve multiple benefits.

6.3.6. *Policy G2 London's Green Belt* states that the Green Belt should be protected from inappropriate development.

6.3.7. *Policy G5 Urban Greening* requires major developments to incorporate measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.

6.3.8. *Policy G6 Biodiversity and Access to Nature* requires the protection of Sites of Importance for Nature Conservation (SINCs). Boroughs should also support the protection and conservation of priority species and habitats that sit outside of the SINC network and promote opportunities for enhancing them using Biodiversity Action Plans.

6.3.9. *Policy G7 Trees and Woodlands* is concerned with the protection of these features, including 'veteran' trees and ancient woodland not already in a protected site and identifying opportunities for tree planting in strategic locations. It encourages the retention of existing trees, wherever possible, and the planting of new trees as part of new developments.

6.3.10. *Policy SI17 Protecting and Enhancing London's Waterways* states developments should support biodiversity improvements, and that proposals along London's canal network should respect their local character, environment, and biodiversity.

6.4. **Local Policy**

Hillingdon Local Plan

6.4.1. The Hillingdon Local Plan is split into two sections; Local Plan Part 1 'Strategic policies', adopted in 2012 and Local Plan Part 2 'Development Management policies' adopted in 2020. There are a number of

Environmental Improvement, protection, and enhancement policies, of which are relevant are outlined below.

Hillingdon Local Plan: Part 1 – Strategic Policies (Adopted November 2012)

6.4.2. The Hillingdon Local Plan: Part 1 – Strategic Policies is the key strategic planning document for Hillingdon which sets out the long-term vision and objectives for the Borough.

6.4.3. **Policy EM3: Blue Ribbon Network** states that the Council will continue to promote and contribute to the positive enhancement of the strategic river and canal corridors and the associated wildlife and habitats through the Biodiversity Action Plan and the Thames River Basin Management Plan, and developer contributions where appropriate.

6.4.4. **Policy EM7: Biodiversity and Geological Conservation** states that Hillingdon's biodiversity and geological conservation will be preserved and enhanced, with particular attention given to the protection and enhancement of all Sites of Importance for Nature Conservation, the protection and enhancement of populations of protected species, priority species and habitats, appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development, the provision of biodiversity enhancements within developments where feasible, the provision of green roofs and living walls and the use of sustainable urban drainage systems to promote ecological connectivity.

Hillingdon Local Plan: Part 2 – Development Management Policies (Adopted January 2020)

6.4.5. The Hillingdon Local Plan: Part 2 – Development Management Policies document provides detailed polices that will form the basis of the Council's decisions on individual planning applications.

6.4.1. **Policy DMHB 11: Design of New Development** states that all developments will be required to incorporate landscaping and tree planting in order to protect and enhance amenity, biodiversity, and green infrastructure.

6.4.2. **Policy DMHB 14: Trees and Landscaping** states that developments will be required to retain or enhance existing landscaping, trees, biodiversity, or other natural features of value. Proposals will also be required to provide a landscape scheme which includes character appropriate landscaping, which supports and enhances biodiversity and amenity. Where trees are proposed for removal, proposals for replanting of new trees on-site should be provided, or else include contributions to offsite provisions.

6.4.3. **Policy DMEI 7: Biodiversity Protection and Enhancement** states that the design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement. Proposals that result in significant harm to biodiversity which cannot be

avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

6.4.4. **Policy DMEI 8: Waterside Development** states that developments states that all development alongside or that benefits form a frontage on the Grand Union Canal will be expected to contribute to the improvement of the canal.

6.5. Discussion

6.5.1. Recommendations have been put forward in this report that would fully safeguard the existing ecological interest of the site. Based on the survey and assessment work undertaken, the presence and potential presence of protected and notable species has been given due regard and measures which may be incorporated within emerging proposals to enhance the site for such species have been put forward.

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

7. SUMMARY AND CONCLUSIONS

7.1. Ecology Solutions Limited was commissioned in April 2022 by Prologis to undertake an Ecological Assessment of Land at Dawley Road, Hayes.

7.2. There are no designated sites of nature conservation interest within the application site; however, the application site is situated immediately adjacent to a non-statutory designated site, the London's Canals SMINC.

7.3. As outlined above, given the nature of the proposals it is considered unlikely that any significant effects would arise, either during the construction or operational phases, when the proposals are considered alone or in combination with other plans and projects. In any event, the adoption of standard engineering protocols and best practice during the construction period would ensure that potential harm and disturbance will be avoided.

7.4. The application site primarily comprises hardstanding and existing buildings, with small areas of amenity grassland, scrub, ornamental planting, hedgerows, and trees. The retention and enhancement of the existing habitats within the application site will provide an opportunity to deliver biodiversity enhancements compared to the existing situation and ensure that existing opportunities for faunal groups are retained.

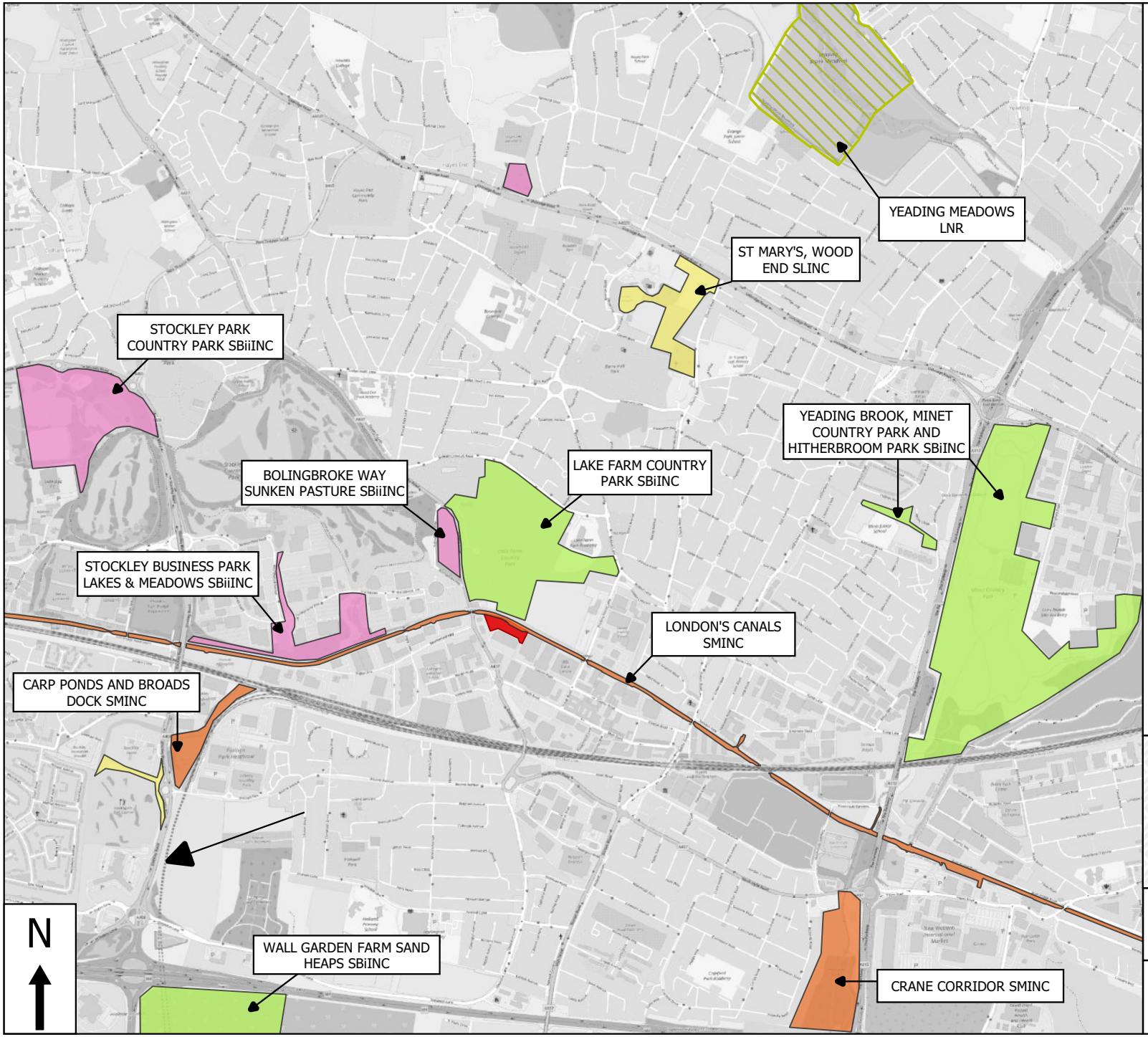
7.5. No evidence of roosting bats was recorded during the specific survey undertaken, and buildings present within the application site are not considered to offer suitable opportunities for this group. Through the delivery of new habitat and the provision of new bat roosting boxes, it is considered that adverse effects would be avoided, and enhancements provided. In addition, the provision of bird nesting boxes within the site would deliver improved opportunities for this group post-development.

7.6. In conclusion, the development proposals will avoid potential adverse effects and provide opportunities for the delivery of enhancements to biodiversity. On this basis, the development proposals accord with all legislation and planning policy of relevance to ecology and nature conservation.

PLANS

PLAN ECO1

Application Site Location and Ecological Designations



Key:

- APPLICATION SITE LOCATION
- LOCAL NATURE RESERVE (LNR)
- SITE OF BOROUGH IMPORTANCE GRADE 1 FOR NATURE CONSERVATION (SBiINC)
- SITE OF BOROUGH IMPORTANCE GRADE 2 FOR NATURE CONSERVATION (SBiiINC)
- SITE OF LOCAL IMPORTANCE FOR NATURE CONSERVATION (SLINC)
- SITE OF METROPOLITAN IMPORTANCE FOR NATURE CONSERVATION (SMINC)

ECOLOGYSOLUTIONS
Part of the ES Group

Farncombe House
Farncombe Estate | Broadway
Worcestershire | WR12 7LJ

+44(0)1451 870767
info@ecologysolutions.co.uk
ecologysolutions.co.uk

10387: LAND AT DAWLEY ROAD, HAYES

PLAN ECO1: APPLICATION SITE LOCATION AND ECOLOGICAL DESGINATIONS

Rev: A

JUN 2022

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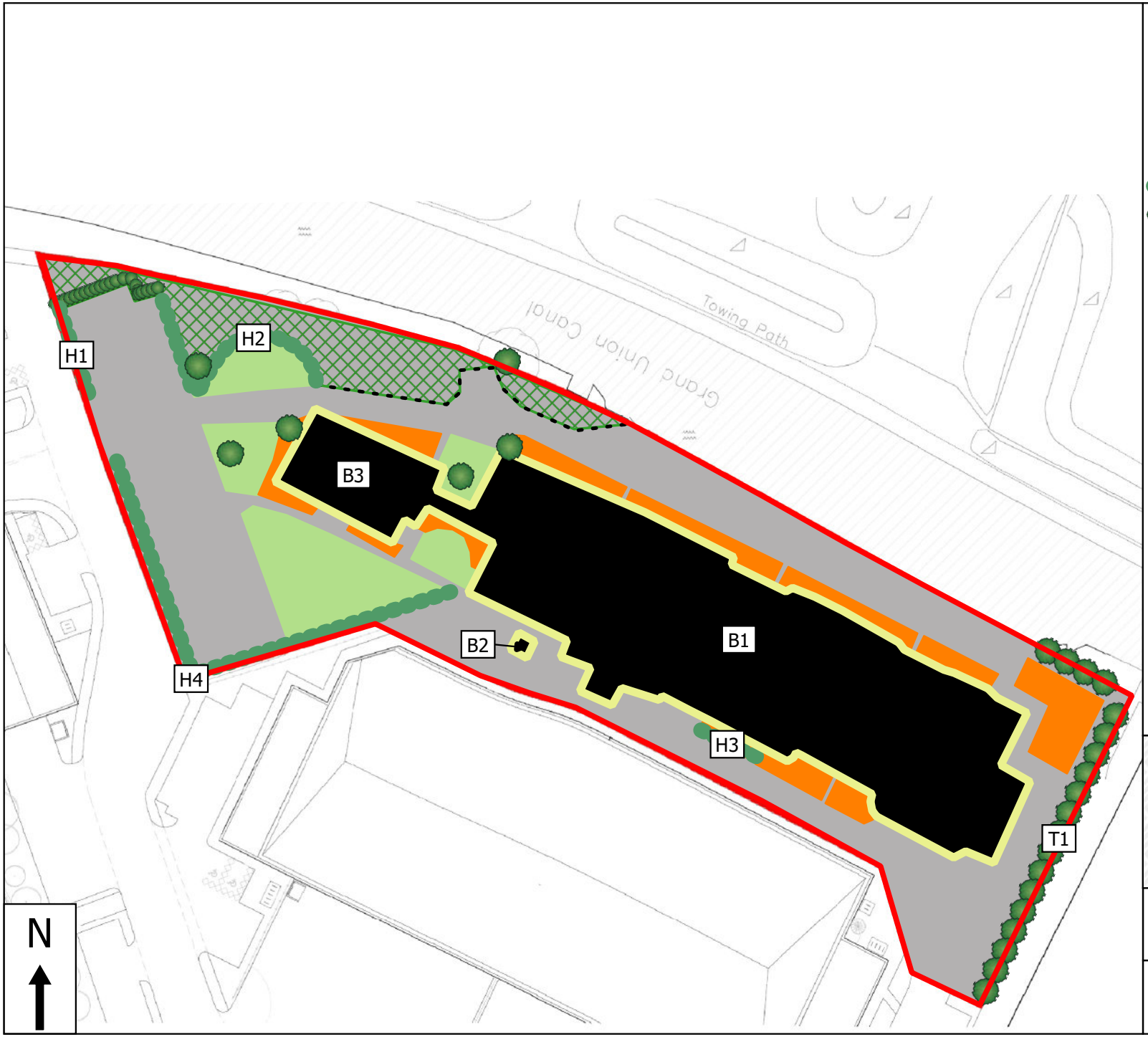
PLAN ECO2

Ecological Features



Key:

- APPLICATION SITE
- AMENITY GRASSLAND
- SCRUB
- HEDGEROW
- TREELINE
- TREE
- ORNAMENTAL PLANTING
- EXISTING BUILDING
- HARDSTANDING
- FENCE LINE

ECOLOGYSOLUTIONS
Part of the ES Group

Farncombe House
Farncombe Estate | Broadway
Worcestershire | WR12 7LJ

+44(0)1451 870767
info@ecologysolutions.co.uk
ecologysolutions.co.uk

10387: LAND AT DAWLEY ROAD, HAYES

PLAN ECO1: ECOLOGICAL FEATURES

Rev: A

JUN 2022

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APPENDICES

APPENDIX 1

Proposed Site Layout Plan (Michael Sparks Associates, August 2021, Drawing Number: 31515-FE-101 B)

NOTES:

SUBJECT TO STATUTORY CONSENTS

BASED ON TOPOGRAPHICAL SURVEY 16608 TOPO-2D (07-08-14)

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N

BASED ON: HOLLIS GLOBAL'S.
SITE PLAN AND FLOOR PLANS.
REF: 91748-HLS-00-01-M2-G-10200-A7-01, 91748-HLS-00-R1-M2-G-10200-A7-01, 91748-HLS-00-Z0-M2-G-10104-A7-01 & 91797-HLS-00-GF-M2-G-10200-A7-01.
DATED: 12.10.2020.

AREA SCHEDULE

GIA (Areas quoted from Hollis survey)

UNIT 7	sqm	sqft
Unit	2,375	25,570
Offices	254	2,730
TOTAL	2,629	28,300

SITE AREA	Ha	acres
	0.885	2.188

CAR PARKING SPACES TOTAL	26
NEW LEVEL ACCESS DOORS	2
EXISTING LEVEL ACCESS DOORS	4
HGV PARKING SPACES TOTAL	6

REV	DATE	NOTE	DRAW	CHCK

MICHAEL SPARKS ASSOCIATES
CHARTERED ARCHITECTS
11 PLATO PLACE
ST.DIONIS ROAD
LONDON SW6 4TU
TELEPHONE 020 7736 6162
FAX 020 7736 3896
www.msa-architects.co.uk

PROLOGIS

TITLE
DAWLEY RD, HAYES

DRAWING
PROPOSED SITE LAYOUT PLAN

CLIENT
PROLOGIS UK LTD

DATE	SCALE	DRAWN
AUG 2021	1:500@A1	PF
	STATUS: INFORMATION	CHECKED: MS/PB

DRAWING NUMBER
31515-FE-010 B

01/010 SITE LAYOUT PLAN
1:500

0 5 10 20 50 m

APPENDIX 2

Information obtained from GiGL (Summary Page)

eCountability
Managing your biodiversity risks and opportunities

In Partnership with

GiGL Greenspace Information for Greater London CIC
the capital's environmental records centre

THIS SUMMARY PAGE MAY BE PUBLISHED
THE FULL REPORT AND MAPS MAY NOT BE PUBLISHED IN THE PUBLIC DOMAIN

Ecological Data Search 23236dr - Summary Page

A 2000m ecological data search was carried out for site Dawley Road on behalf of Ecology Solutions on 08 Jun 2022.

The following datasets were consulted for this report:

- Statutory sites ✓
- Non-statutory sites ✓
- Non-statutory sites (Proposed) ✓
- Protected species ✓
- London invasive species ✓
- Notable Thames Structures ✓
- Habitats ✓
- Open space ✓

Results

Statutory sites	None present within search area
Non-statutory sites	
SINCs	15 SINCs
Proposed SINCs	None present within search area
Areas of Deficiency	Present within search area
Geological sites	1 site
Species	
Protected and notable species	1511 species records
London invasive species	234 species records
Notable Thames Structures	Not present within search area
Habitats	
BAP habitat suitability	Present within search area
Open space	Present within search area

The report is compiled using data held by GiGL at the time of the request. Note that GiGL does not currently hold comprehensive species data for all areas. Even where data is held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there.

Permission
This data search report is valid until 08/06/2023 for the site named above.

Prepared by
08 Jun 2022

APPENDIX 3

Suitable Examples of Bat Boxes

Bat Boxes

Schwegler bat boxes are made from ‘woodcrete’ and have the highest rates of occupation of all types of box. The 75% wood sawdust, clay and concrete mixture is ideal, being durable whilst allowing natural respiration and temperature stability. These boxes are rot and predator proof and extremely long lasting. Boxes can be hung from existing external walls at a height of 5-6 metres.

1FF Bat Box

The rectangular shape makes the 1FF suitable for attaching to the sides of buildings or in sites such as bridges, though it may also be used on trees. It has a narrow crevice-like internal space to attract Pipistrelle and Noctule bats.

Woodcrete (75% wood sawdust, concrete and clay mixture)
Width: 27cm
Height: 43cm
Weight: 8.3kg

Images and text adapted from manufacteres websites.

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APPENDIX 4

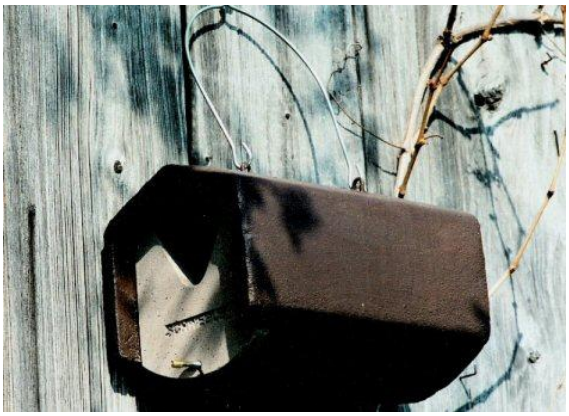
Suitable Examples of Bird Boxes

Bird Boxes

Schwegler bird boxes have the highest rates of occupation of all types of box.

They are designed to mimic natural nest sites and provide a stable environment with the right thermal properties for chick rearing and winter roosting.

Boxes are made from ‘Woodcrete’. This 75% wood sawdust, clay and concrete mixture is breathable and very durable making these bird boxes extremely long lasting.

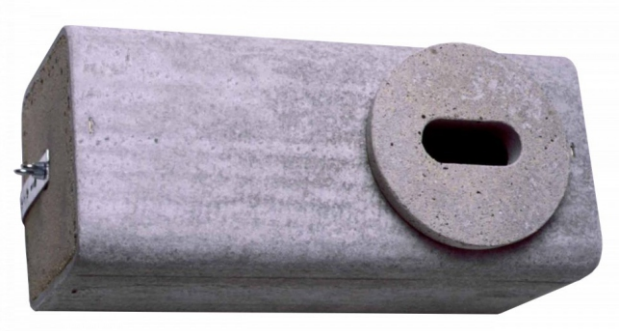


2HW Schwegler Bird Box

This is designed for species that nest in cavities or recesses, such as Redstart, Wagtail and Flycatchers, in addition to Robin and Wren. The box can be hung from walls using hanger and aluminium nail supplied.

No. 17 Schwegler Swift Nest Box

A Woodcrete bird box designed to appeal to Swifts. Due to its light weight these boxes can be easily mounted on existing external walls. Should be installed at least 6-7m above ground preferably under the shelter of eaves or overhanging roofs.



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01451 870767 | info@ecologysolutions.co.uk | www.ecologysolutions.co.uk