

**560 SIPSON ROAD,
WEST DRAYTON
LONDON
UB7 0JF**

**PRELIMINARY ECOLOGICAL
APPRAISAL**

JUNE 2022

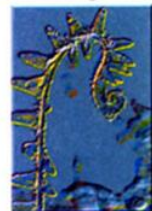
**FINAL
Revised 4th July 2022**

Produced by

*Ecology and Land
Management*

For and on behalf of
Phull Empire Ltd

Henriette
Westergaard



Ecology & Land
Management

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Summary

Background

The proposed site comprises land at 560 Sipson Road, West Drayton, UB7 0JF off the A408 Sipson Road. The development site is located in an area dominated by London Heathrow Airport terminals. At the time of the survey the area proposed for development comprises an area of derelict land with one static and one mobile caravan, boundary hedging and debris from demolition of small club house. The site was viewed from the perimeters only, through gaps in the hoarding. Additional photographic evidence was supplied by client.

Archaeology

There are no known sites of archaeological importance within 1km of the site.

Listed Buildings

There are several Grade II listed buildings within 1km of the proposed site.

Designations

The site is not designated for its Importance for Nature Conservation. It is within an Area of Deficiency for Access to Nature. Field Close Open Space Roughs, a Local Site of Importance of Nature Conservation is located c. 300m east of the proposed site.

Habitats

The site comprises a mixture of trees, hedges, introduced shrubs and tall ruderal/short ephemeral vegetation.

Protected Species

Records from Greenspace Information for London (GiGL) were obtained. The site has potential to support nesting birds and invertebrates.

Birds

There is habitat for nesting birds mainly within trees and hedgerow boundaries. Further survey work is not considered necessary. **All bird species are protected by the Wildlife & Countryside Act, 1981 (and amendments) vegetation clearance should not be undertaken during the bird-breeding season from March to September inclusive.**

Bats

Mature trees may support roosting bats. ***Where proposals include felling of mature trees bat inspections are recommended.***

Reptiles

Available habitat offers low opportunities for reptiles. Further survey work is not considered necessary. Precautionary mitigation is recommended.

Amphibians

There are no ponds located within the site and no known ponds within 500m of the proposed site. Additional survey work for great crested newt is not considered necessary.

Badgers

There are no records of badgers within 1km of the site. No evidence of badgers and their setts was observed within the site. Further survey work is not considered necessary.

Dormice

Habitat within the site is considered unsuitable for dormouse. Additional survey work is not considered necessary.

Water vole

There are no waterbodies located within the proposed development area suitable for water vole. Additional survey work for water vole is not considered necessary.

Invertebrates

Available habitat within the site offers limited opportunities for notable and scarce invertebrate species. Stag beetle may inhabit deadwood. Additional survey work is not considered necessary. However, ***where trees are to be felled or deadwood/log piles removed or disturbed the presence of stag beetle should be investigated.***

Other Considerations

Hedgehog are unlikely to be present within close proximity to the site due to major roads and industrial activities. However, ***consideration should be given to hedgehogs and where they are found during works they should be moved to a secure site nearby.*** It is advised that the proposed landscape design should ensure that hedgehogs can move within the site and into surrounding areas without physical barriers.

On the basis of the site assessment it is not expected that other protected species will be present on the site. Should new evidence be found this assessment would require updating.

Outline biodiversity enhancement has been proposed for the site to include habitat for birds, badgers, bats, widespread amphibians, reptiles and invertebrates.

Site Name: 560 Sipson Road, West Drayton - the site; Fig. 1

Grid Reference: TQ07697719

County: London Borough of Hillingdon

Planning Authority: London Borough of Hillingdon

Natural Character Area: Inner London Natural Character Area

Client: Phull Empire Ltd.

Proposed Disturbance: Proposed residential units within existing site

Survey Request: Preliminary Ecological Appraisal

Surveyor: Henriette Westergaard, MSc, BSc (Hons), MCIEEM, CMLI, CEnv

For and on behalf of Ecology & Land Management

Assessment Period: June 2022

Limitations: This assessment did not include detailed surveys of protected species.

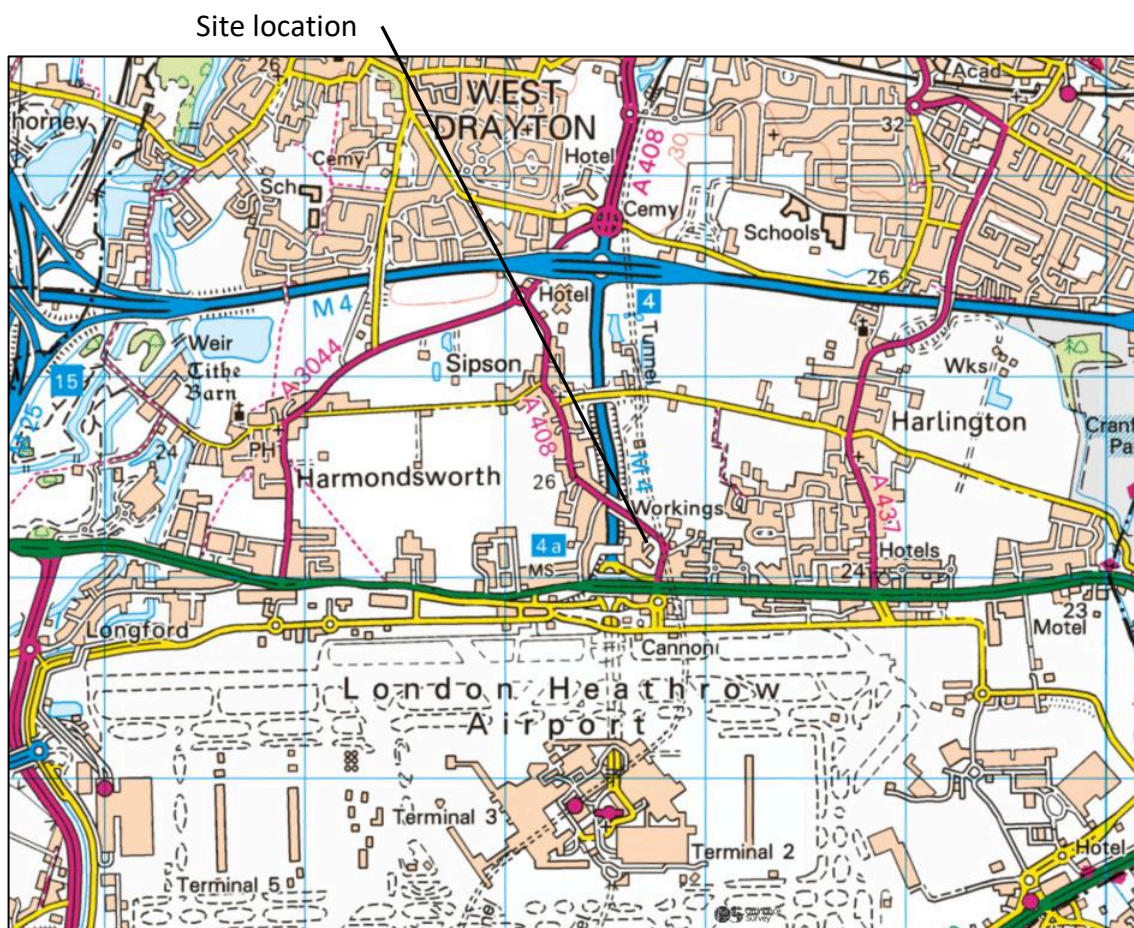
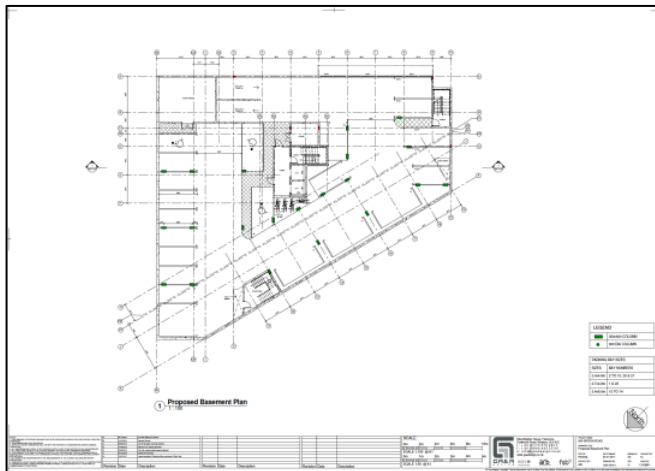
Scoping surveys assess likely presence of species on a site and recommend follow-up survey work, management and mitigation as appropriate. This report may need to be updated if new information becomes available (e.g. ponds not previously known to be present).

Reliance: Information, including any survey data, contained within this report must only be relied upon for a maximum period of one year from the date of the report.

Section 1 - Introduction

- 1.1 Ecology and Land Management were commissioned Phull Empire Ltd. to undertake a Preliminary Ecological Appraisal of land associated with the proposed development at 560 Sipson Road, West Drayton UB7 0JF. The proposed development currently includes construction of residential units within the existing site. The proposed site layout can be found on the Proposed Ground Floor GA Plan 19040/S4/P03.
- 1.2 This report is required in response to guidance notes set out by the local council to ensure that adequate ecological information accompanies the planning application for the proposed development. The findings of this study have informed, where necessary the design and layout of the proposed development.
- 1.3 The aims of the preliminary ecological appraisal are:
- to identify the ecological habitats at the study site, and potential for protected species,
 - to provide recommendations for further protected and notable species surveys as necessary,
 - to identify significant features for retention and protection, where possible or appropriate,
 - to identify features for enhancement, and where possible
 - to provide outline recommendations for mitigation and/or compensation where relevant.
- 1.4 The appraisal included undertaking a desk study and preliminary ecological appraisal. The findings have been reviewed in light of relevant legislation, planning policy and biodiversity contextual information. The key findings and recommendations are set out in Section 6.
- 1.5 Assessment of biological records data is recommended as part of the overall assessment of protected species and habitats within close vicinity to the site. Biological records have been obtained from the local records centre. In addition, biological data has been assessed from National Biodiversity Atlas and the Multi-Agency Government Information Centre (MAGIC).

Figure 1 – Site Location and Proposed Scheme
NTS



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Section 2 - Methodology

Desk Study

- 2.1 This section summarises the methodology used in undertaking the appraisal, which included a desk study and Extended Phase 1 Survey (based on JNCC, 2010 guidance) with reference to the Preliminary Ecological Appraisal guidance (CIEEM, 2012).
- 2.2 The desk study is an important element of undertaking an initial ecological appraisal of a site proposed for development, since it enables the initial collation and review of contextual information such as designated sites together with known records of protected and priority species.
- 2.3 In order to compile information on the site and immediate surroundings a search for relevant background information such as: biological records, history, planning designations, current and past management was undertaken.
- 2.4 The desk study involved collating relevant information from organisations, websites and documents including:-
- i) Multi-Agency Government Information Centre (MAGIC).
 - ii) National Biodiversity Network (nbn Gateway)¹.
 - iii) London and UK Biodiversity Action Plans.
 - iv) London Borough of Croydon Biodiversity Action Plan.
 - v) The London Plan 2021.
 - vi) Croydon Local Plan 2018.
- 2.5 A search of the Multi-Agency Government Information Centre (MAGIC) website was undertaken to identify statutory designations within 5km for European sites and 2km for UK sites. The nbn (National Biodiversity Network) Gateway website was searched for information on protected species in the Ordnance Survey 10km Grid Square TQ07.
- 2.6 Local and UK Biodiversity Action Plans were consulted and their relevance to the site outlined, where relevant.

Preliminary Ecological Appraisal

- 2.7 The survey technique adopted for the habitat assessment is at a level intermediate between the standard Phase 1 Survey technique, based on habitat mapping and description, and a Phase 2 survey, based on detailed habitat and species surveys. The survey technique is commonly known as an extended Phase 1 Survey.
- 2.8 The survey is adapted from the guidelines referenced in the Handbook for Phase 1 Habitat Survey - A Technique for Environmental Audit (JNCC. 2010). The site is walked initially to assess the overall habitat types. The extent of each habitat is then recorded and compared to the surrounding area to demonstrate the status of each habitat type. Subsequently, a preliminary assessment is made of the floristic composition of each habitat indicating rarity, where

¹ nbn Gateway data transferring to nbn Atlas on August 2021.

appropriate. Overall, the survey provides an evaluation of wildlife interest and conservation priority. It should be noted that the survey is based principally on vegetation, although habitats on site are searched for obvious signs of faunal activity and an assessment is made of their potential to support protected species.

- 2.9 The survey has also been compared to the UK Habitat Classification (UKHab P) v. 1.1 (2020), where applicable (See Appendix II). This assessment method allows categorization of habitats at different levels using primary and secondary codes. Each area is assigned a UKHab at appropriate level. The evaluation allows certain comparisons to UK priority habitat and/or Annex I habitat types.

Evaluation

- 2.10 The evaluation process used in this report follows broadly the guidance on Guidelines for Preliminary Ecological Appraisal developed by the Institute of Ecology and Environmental Management (CIEEM guidelines, December 2017). Habitats present within the site have been assigned ecological values on a scale between international and local (immediate zone of influence). Values do not take account of economic values or ecological resources; they are based entirely on the innate value of the flora, fauna and habitats in terms of the conservation of the genetic resource. See Appendix I.
- 2.11 The value of areas of habitats and species has been measured against published selection criteria where possible. A level of importance has been assigned to the key ecological features, which occur at the site. In those instances where the potential presence of scheduled or protected species has been identified, a preliminary value is attributed based on a prediction of population size.

Section 3 - Legislation, Planning Policy

Legislation and Policy

- 3.1 This section sets out the relevant legal, planning policy and biodiversity context of the Site and proposed development. The occurrence of species, which are specifically protected by law or otherwise listed as threatened, although not necessarily strictly rare, can also be helpful in establishing the conservation value of sites. A number of habitats and species in the UK receive varying levels of statutory protection under several elements of legislation. The principle mechanism for the legislative protection of wildlife in Britain is shown in Table 1.

Legislation	Species and Habitats
<i>International</i>	
Bern Convention 1979	Protects important populations of listed species and their habitats. Aims to conserve wild flora and fauna and their natural habitats.
IUCN (Red List)	The world conservation unit assesses the conservation status of species, sub-species and varieties.
<i>European</i>	
Council Directive 92/43/EEC on the Conservation of Natural Habitat, Wild Fauna and Flora	This is implemented in the UK by the Conservation of Habitats and Species Regulations or Habitat Regulations, 2010.
Birds Directive 1979	This provides a framework for the conservation and management of, and human interactions with, wild birds in Europe. In England the Birds Directive is implemented through the WCA, 1981 and the Habitat Regulations, 2010.
<i>UK</i>	
Wildlife & Countryside Act, 1981 (Schedules 1, 5, and 8) and amendments	Protection of wild plants, animals and habitats in the UK.

Legislation	Species and Habitats
Government Circular 06/05	Protected species are also covered by the requirements of the Government Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System
NERC Act 2006	Section 41 of the Act requires the Secretary of State to publish a list of habitat and species, which are of principal importance for the conservation of biodiversity in England. This list has been drawn up in consultation with Natural England and forms the basis of the UK Biodiversity Action Plan.
The CroW Act, 2000	This piece of legislation provides for public access on foot to certain types of land, amends the law relating to public rights of way, increases measures for the management and protection for Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation, and provides for better management of Areas of Outstanding Natural Beauty (AONB).
The Hedgerow Regulations, 1997	Under the Hedgerows Regulations 1997 it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. The local planning authority is also the enforcement body for offences created by the Regulations. Local planning authority permission is normally required before removing hedges that are at least 20 meters (66 feet) in length, more than 30 years old and contain certain plant species. The authority will assess the importance of the hedgerow using criteria set out in the regulations.

Table 1 – Principle legislative mechanism for wildlife protection in the UK.

Below is a table illustrating how particular biological groups are protected by legislation.

Table 2

Biological Groups	Relevant Legislation
Flora	A number of plant species are protected under Section 13 of the amended 1998 Wildlife & Countryside Act, 1981. It is an offence to intentionally pick, uproot or destroy any wild plant listed in Schedule 8 of the Act. The list includes both higher plants such as rare orchids and lower plants such as lichens and mosses.
Bats	All species of bat in Britain and their breeding sites or resting places are protected under Regulation 41 of the Conservation of Habitats and Species Regulations, 2010 and under Section 9 of the Wildlife and Countryside Act, 1981 (WCA). It is an offence for anyone to intentionally kill, injure or handle a bat, to possess a bat (whether live or dead), deliberately disturb a roosting bat, or sell or offer a bat for sale, without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not. All bat species in Britain are protected under the Wildlife and Countryside Act 1981 through inclusion on Schedule 5. They are also protected under the Conservation (Natural Habitats &c.) Regulations 1994 (which were issued under the European Communities Act 1972), through inclusion on Schedule 2. On 1 st April 2010, these Regulations, together with subsequent amendments, were consolidated into the Conservation of Habitats and Species Regulations 2010. European protected animal species and their breeding sites or resting places are protected under Regulation 39. Since August 2007, building development that affects bats or their roosts needs a Protected Species Licence under The Conservation (Natural Habitats &c.) (Amendment) Regulations 2007 administered in England by Natural England.
Birds	All wild birds (birds in a wild state resident or visiting Great Britain) and their nests and eggs are protected under the WCA, 1981. Particular emphasis is given to the protection of breeding birds. With certain exceptions, it is an offence to intentionally kill, injure or take wild birds, take, damage or destroy the nest of wild birds while in use or being built, take or destroy the eggs of wild birds, disturb wild birds listed in Schedule 1 when nest building or at a nest containing eggs or young or disturb dependent young of wild birds.
Badgers	Badgers and their setts are protected by the Protection of Badgers Act, 1992. It makes it illegal to kill, injure or take badgers or to interfere with a badger sett or any part of a sett. The term 'badger sett' is normally understood to mean the system of tunnels and chambers in which badgers live and their entrances and immediate surrounds. The 1992 Act specifically defines a sett as "any structure or place, which displays signs indicating current use by badger."

Biological Groups	Relevant Legislation
Hazel Dormouse	Individual animals, their breeding sites or nesting places (nests) are protected under Regulation 41 of the Conservation of Habitats and Species Regulations, 2010 and under Section 9 of the Wildlife and Countryside Act, 1981 (WCA). It is an offence for anyone to intentionally kill, injure or handle a dormouse, to possess a dormouse (whether live or dead), deliberately disturb a dormouse, or sell or offer a dormouse for sale without a licence. It is also an offence to damage, destroy or obstruct any place used by dormice for shelter, whether present or not.
Hedgehog	Hedgehogs receive partial protection on Schedule 6 of the Wildlife and Countryside Act, 1981, which stipulates that animals may not be killed or taken by certain methods. In addition, the Convention on the Conservation of European Wildlife and Natural Habitats also lists hedgehog prohibiting the use of all indiscriminate means of capture and killing.
Water Vole	Water vole and their breeding/resting places are fully protected by the Wildlife and Countryside Act, 1981 (as amended in 2008). It is an offence to deliberately capture, injure or kill a water vole or to damage, destroy or obstruct their breeding or resting places. It is also an offence to disturb them in their breeding or resting places.
Reptiles	<p>All native reptiles are listed on Schedule 5 of the Wildlife and Countryside Act, 1981. It is an offence for anyone to intentionally kill or injure a 'widespread' reptile species (viviparous lizard, grass snake, adder or slow worm), or sell or offer for sale without a licence.</p> <p>The sand lizard and smooth snake, their breeding sites or resting places (any structure that may offer refuge), are protected under Regulation 41 of the Conservation of Habitats and Species Regulations, 2010. It is an offence for anyone to intentionally kill, injure or handle either of these two species, to possess an animal (whether live or dead), deliberately disturb a sheltering animal, or sell or offer an animal for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by sand lizards and smooth snakes for shelter, whether they are present or not.</p>

Biological Groups	Relevant Legislation
Amphibians	<p>All native amphibians are listed on Schedule 5 of the Wildlife and Countryside Act, 1981. It is an offence to sell or offer for sale any native amphibian species.</p> <p>The great crested newt and natterjack toad, their breeding sites (typically ponds) and nesting places (typically terrestrial that offers refuge) are protected under Regulation 41 of the Conservation of Habitats and Species Regulations, 2010. It is an offence for anyone to intentionally kill, injure or handle either of these two species, to possess an animal (whether live or dead), deliberately disturb a sheltering animal, or sell or offer for sale without a licence. It is also an offence to damage, destroy and obstruct access to any place used by great crested newts and natterjack toads whether they are present or not.</p>
Invertebrates	<p>A small number of invertebrates including beetles, crickets, butterflies and moths are protected under Section 9, Schedule 5 of the Wildlife and Countryside Act, 1981 against deliberately killing, injuring or taking. Other species receive partial protection under the same act. For example it is an offence for anyone to sell or offer for sale a stag beetle without a licence. Others are highlighted for conservation concern through IUCNs red list data and UK and local biodiversity action plans. In addition, a number of invertebrates are listed under Section 41 of the NERC Act 2006. These species are regarded as of principal importance for the conservation of biodiversity in England.</p>

Table 2 – Legislative protection for particular biological groups.

Planning Policy Context

National Policy Planning Framework (NPPF)

- 3.2 The NPPF was published in March 2012 (amended July 2021) and sets out the Government's planning policies for England and how these are expected to be applied. Policies set out in NPPF are taken into account by local planning authorities in the preparation of local development documents. They may also be material to decisions on individual planning applications. Amendments in 2021 requires details on impact and biodiversity net gain.

Tandridge District Council

- 3.3 The site is within Hillingdon Council. The site is covered by A Vision for 2026, Strategic Policies. A full understanding of the extent of the biodiversity present on site or within the site's zone of influence and the measures needed to overcome any potential detrimental impact during construction and operation is likely to be essential. Relevant policies in the Core Strategy are set out below.

Table 3

Hillingdon Strategic Policies	Relevance to Site
Policy EM2: Green Belt, Metropolitan Open Land and Green Chains:	
"The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies. Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD. Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test. Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain."	Green Belt is located immediately north of the development site.
Policy EM7: Biodiversity and Geological Conservation	
Strategic Objectives SO5: Safeguard and promote areas of geological importance and make a proportionate contribution to West London's target to extract 0.5 million tonnes of minerals. SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.	There are opportunities to enhance the site for biodiversity.

Hillingdon Strategic Policies	Relevance to Site
<p>The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority. Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:</p> <ol style="list-style-type: none"> 1. The conservation and enhancement of the natural state of: Harefield Gravel Pits Colne Valley Regional Park Fray's Farm Meadows Harefield Pit. 2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation. 3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans. 4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan. 5. The provision of biodiversity improvements from all development, where feasible. 6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change. 7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats. 	<p>There are opportunities to enhance the site for biodiversity.</p>
<p>DME17 Biodiversity Protection and Enhancement</p> <p>"The design and layout of new development should retain and enhance any significant existing features of biodiversity 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 offsite improvements.</p> <p>If development is proposed on or near the vicinity of a site considered to have features of ecological value, applicants must submit an appropriate independent habitat assessment to demonstrate that the proposed development will not have unacceptable ecological effects.</p> <p>All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.</p> <p>Proposals that would be detrimental to sites designated for nature conservation will be resisted."</p>	<p>The site provides opportunities for biodiversity enhancement within the local area.</p>

Table 3 – Core Strategy and Development Management Policies

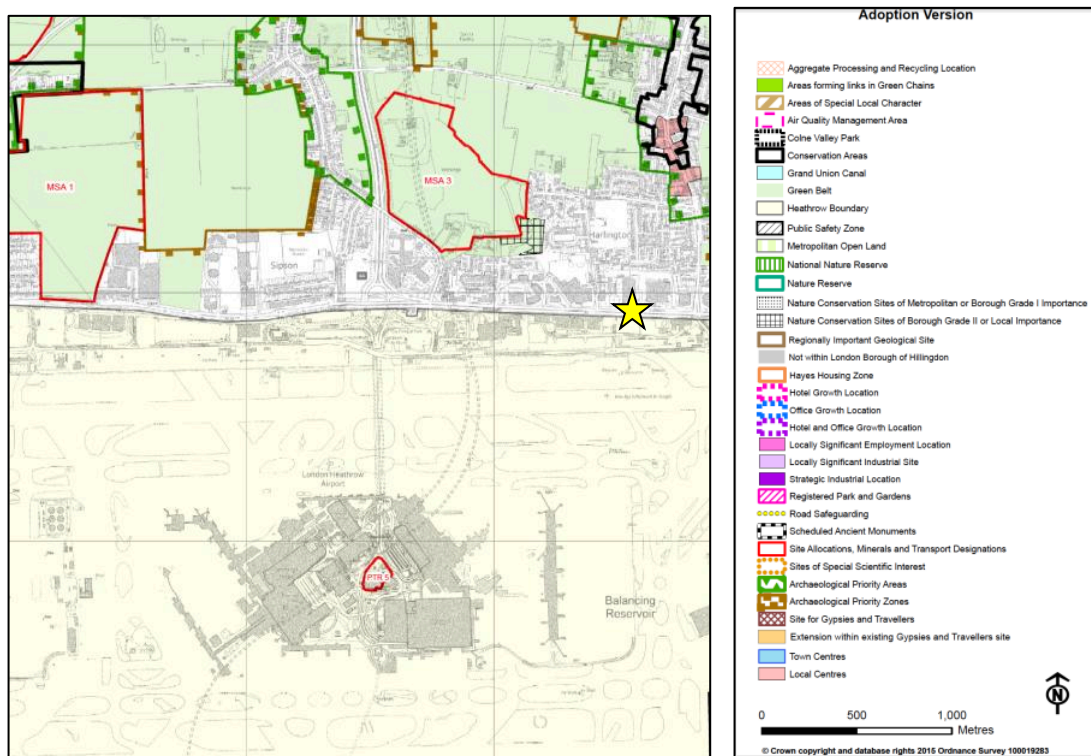


Figure 2 –Proposals Map (online, June 2022). Source: Hillingdon Council.

Site Location: ★

The London Plan – Spatial Development Strategy for Greater London (2021)

- 3.4 The London Plan is part of the development strategy for Greater London. Amongst other things, The London Plan states that it is:

- *setting out an integrated social, economic and environmental framework for the future development of London, looking forward 15– 20 years;*
- integrating the physical and geographic dimensions of the Mayor's other strategies, including broad locations for change and providing a framework for land use management and development, which is strongly linked to improvements in infrastructure, especially transport;*
- providing the London wide context within which individual boroughs must set their local planning policies;*
- setting the policy framework for the Mayor's involvement in major planning decisions in London;*
- setting out proposals for implementation and funding; and being London's response to European guidance on spatial planning.*

- 3.5 The London Plan, 2021 includes policies relating to the Green Infrastructure and Natural Environment relevant to the Site as follows:

G1: Green Infrastructure

“A London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should

be planned, designed and managed in an integrated way to achieve multiple benefits.

B Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

C Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to: 1) identify key green infrastructure assets, their function and their potential function.

2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.”

D Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network.

G2 London’s Green Belt

“The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.”

G5 Urban Greening

“Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.”

G6 Biodiversity and access to nature

“Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should: 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2) identify areas of deficiency for access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: 1) avoid damaging the significant ecological features of the site
2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

3) deliver off-site compensation of better biodiversity value.

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E Proposals which reduce deficiencies in access to nature should be considered positively.”

G7 Trees and Woodlands

“London’s urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London’s urban forest – the area of London under the canopy of trees.

In their Development Plans, boroughs should: 1) protect ‘veteran’ trees and ancient woodland where these are not already part of a protected site¹³⁹

2) identify opportunities for tree planting in strategic locations.

Development proposals should ensure that, wherever possible, existing trees of value are retained.¹⁴⁰ If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species, which provide a wider range of benefits because of the larger surface area of their canopy.”

Section 4 - Biodiversity Context

Natural Areas

4.1 Natural Areas are a subdivision of England each with a characteristic association of wildlife and natural features. They provide a way of interpreting the ecological variations of the country in terms of natural features, illustrating the distinctions between one area and another. Each Natural Area has a unique identity resulting from the interaction of wildlife, landforms, geology, land use and human impact. Natural Areas have been formally defined as bio geographic zones which reflect the geological foundation, the natural systems and processes and the wildlife in different parts of England, and provide a framework for setting objectives for nature conservation (Biodiversity: The UK Steering Group Report, HMSO 1995).

4.2 “The Site lies within the Inner London Natural Character Natural Area. “Predominantly urban, the Inner London National Character Area (NCA) lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London’s skyline from the clay plateau and ridges in the north at the border with the Northern Thames Basin. Inner London can be described as being one of the ‘greenest’ cities in the world. Its allotments, rivers, reservoirs, parks and gardens often support a varied range of wildlife such as sand martins and hedgehogs, and peregrine falcons can be found nesting in some inner-city locations. Climate change, population growth and development are just some of the pressures facing Inner London and it is important that urban greening methods are supported and enhanced, including through London’s green infrastructure which comprises the natural and designed green spaces and vegetated surfaces across Inner London NCA.”

4.3 Statements of Environmental Opportunities relevant to the proposed site include:

“SEO 2: Protect and enhance the network of Inner London’s green spaces so that it provides services where people need them, promotes recreational and educational opportunities, supports biodiversity, reinforces local character and is resilient to future challenges such as climate change.”

“SEO 4: Reconnect people with nature by providing opportunities and access to engage with nature close to where they live, work and play, reinforcing sense of place, improving recreation and providing benefits for biodiversity and climate regulation.”

Table 4 - Natural Character Area Profile.

Biodiversity Action Plans

4.4 The UK post 2010 Biodiversity Framework replaces the UK Biodiversity Action Plan and aims to address the underlying causes of biodiversity loss and improve and enhance biodiversity and ecosystem services. The UKBAP biodiversity habitats and species background information is still widely used at a county level. UKBAP biodiversity habitats and species have been considered within this report and enhancement measures have been suggested within the recommendations sections. The UKBAP sets out targets for a number of Priority Species and Habitats as well as for broad habitat types. Priority species listed in

the London and UK action plans include several species of bat, birds and invertebrates.

- 4.5 The Countryside and Rights of Way (CROW) Act (2000) provides legislation to promote the further conservation of habitat types and species considered of principle importance for biodiversity. In the NPPF it is stated that local plans should “promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.” The lists of habitats and species of principle importance comprise those identified as priorities under the UKBAP. This list forms Annex C of Government Circular 06/057.

London Biodiversity Action Plans

- 4.6 London Biodiversity Partnership is a group of public, private and voluntary organizations. “They aim to conserve and enhance the capital's wildlife and natural places for future generations to benefit from and enjoy.” The London Biodiversity Partnership was set up in 1996 with a view to continue the auditing of London's habitats and to develop action plans for the full range of habitats and species included in the audit. The London Biodiversity Audit consists of various audits and statements for London's key habitats and species. Action plans have since been produced and common issues have been addressed generically. “However, the review of the first round of Action Plans has shown that in many areas the Partnership could be more effective. Despite their efforts, wildlife in London still faces major challenges from development, lack of management, lack of awareness and so on - and in some ways their work is still beginning. There are also a number of Biodiversity Action Plans for Greater London. The habitats and species highlighted within the London BAP, which may be relevant to the Site include ‘Wasteland’, ‘House sparrow’ and ‘Bat’.

Hillingdon Biodiversity Action Plan

- 4.7 “Hillingdon is one of the most biodiverse boroughs in London. Its rich mixture of woodlands and scrubs, grasslands, wetlands, rivers, gardens and parklands are home to many rare as well as common species of plants, birds, butterflies, dragonflies, mammals and reptiles. Even the wasteland in Hillingdon have a lot to offer for wildlife.” The site is derelict and provides opportunities for biodiversity enhancement.

UK Biodiversity Action Plan

- 4.8 There are a number of action plans within the UK and local BAPs. The following may be of relevance to the proposed site:

	UK Priority BAP	UK Broad BAP	London BAP	Hillingdon BAP
Habitats				
The Built Environment		None	None	
Wasteland				

Table 5 - Relevant habitat action plans related to both UK and local plans

Action Plan	Aim	Relevance
House Sparrow	Ensure consideration of house sparrow in building design and maintenance.	There are records of this species from GiGL.
Song Thrush	Ensure consideration of song thrush in the landscape design.	There are records of this species from GiGL. There are opportunities for enhancement within the proposals.
West European Hedgehog	Consider creation of hedgerows of hedgehog friendly habitats within the design.	There are records of this species from GiGL. There are limited opportunities for this species within the site.
Bats	To reverse the current population declines of bats in the UK. To redress public misconceptions about bats and secure their status as culturally value species.	There are records of bat from GiGL. B1 building is unlikely to support roosting bats.
Stag Beetle	To protect, conserve and enhance nationally significant populations of stag beetle. To ascertain the reasons for uneven distribution of stag beetle populations. To increase public awareness of the importance of stag beetle and that of the dead wood habitat.	There are records of this species from GiGL. There is may be suitable dead wood within the site.

Table 6 – Relevant UK and local Species Action Plans.

Areas of Deficiency for Access to Nature

- 4.9 The proposed development site is within an Area of Deficiency (AoD) for Access to Nature.

Section 5 - Site Location and Proposed Development

- 5.1 This section sets out the findings of the desk study and extended Phase 1 survey and should be read in conjunction with Indicative Habitat Plan (Appendix III).

Context

- 5.2 The site is associated 560 Sipson Road, West Drayton as shown in Figure 1 (OSGR: TQ07697719). The existing site is approximately 0.11ha in extent. The land lies at approximately 26m AOD. The soils are described in Soilscales (Cranfield University) as freely draining, slightly acid loamy soils.
- 5.3 The area proposed for development consists of a derelict site with building rubble, one static and one mobile caravan and ruderal vegetation with trees and boundary hedge. The development proposals for the site involve the construction of residential apartment building with associated infrastructure, including vehicular access, landscaping and lighting. It is likely that existing trees or hedges would require removal.
- 5.4 The wider landscape is characterised by the area of West Drayton with hotel building adjacent, some residential housing, industrial activity and road and other infrastructure associated with London Heathrow Airport. The site is within 300m of a Local Site of Importance for Nature Conservation.

Protected Species and Designated Sites

- 5.5 The background data confirms that the proposed site is not designated for its nature conservation value. Four designated sites are located within 1km of the site. See Table 7 below.

Statutory designated sites include:

- 5.6 There are no statutory designated sites within 1km of the proposed site.

Non-statutory designated sites include:-

- 5.7 Two Sites of Importance for Nature Conservation are located within 1km of the proposed site. These are listed in the GiGL Data Search document.

SBIC Data Research Results	Number of Sites within 1km	Relevance to Site
European Statutory Designated Site	-	n/a
National Statutory Designated Site	-	n/a
Non Statutory Designated Site (SINC)	2	Wall Garden Farms Sand Heaps SINC Field Close Open Space Roughs SINC
Proposed Statutory Designated Site (SINC)	-	n/a
Ancient Semi-Natural Woodlands	-	n/a

Table 7 – Designations. Source: GiGL, June 2022.

- 5.8 The records of protected species and sites is summarised in the tables below.

	GiGL Number of Protected Species and Species of Conservation Concern within 1km	Likely presence on site
Higher Plants	1	Negligible
Lower plants	0	Negligible
Fungi	0	Negligible
Birds	38 (of which 7 Schedule 1 & 4 confidential)	Moderate
Mammals (excl bats)	1	Low
Bats	2	Trees to be assessed
Fish	0	Negligible
Amphibians	0	Negligible
Reptiles	0	Negligible
Invertebrates	5	Low

Table 8 – Protected Species and Species of Conservation Concern within 1km of the site received from GiGL.

- 5.9 A tool has been created by Natural England accessed via Magic to determine the risk of development impact on designated areas such as SSSI's, SAC, SPAs and Ramsar sites. Available information indicates that the proposed development is located within the SSSI risk zone of Staines Moor SSSI. Natural England will provide advice on any potential impacts and how these might be avoided or mitigated. Table 9 below shows when to consult Natural England.

Does planning proposal fall into one or more of the categories below	LPA should consult NE on likely risks from the following:
Infrastructure	Airports, helipads and other aviation proposals.
Air Pollution	Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, Livestock & poultry units with floorspace > 500m ² , slurry lagoons and digestate stores > 750m ² , manure stores > 3500t.
Combustion	General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
Discharges	Any discharge of water or liquid waste of more than 20m ³ /day to ground (ie seep away) or to surface water, such as a beck or stream.

Table 9 – SSSI Risk Zone (Source: Magic.defra.gov.uk, online June 2022)

Section 6 - Potential Ecological Interest and Recommendations

Habitats

- 6.1 The site was surveyed on 15th June 2022 on a sunny and warm and sunny day (ca. 24^o C). The site was surveyed by a qualified ecologist. Access into the site was not possible. Instead the site was viewed from boundaries. The aim was to identify the main habitat types within the area proposed for development including the general species composition and structure of the vegetation as well as areas of potential ecological interest. Habitats types and landscape features adjacent to the site were also noted. In addition, notes were made with regard to biodiversity enhancement potential within the site with a view to informing the overall assessment.
- 6.2 The site is not designated for its nature conservation interest but is within 300m of a Local Site of Importance for Nature Conservation. The site is within an Area of Deficient for Access to Nature.
- 6.3 The habitats identified are listed below. Habitats were searched for obvious signs of faunal activity or potential to support particular biological groups.

Key to Site and Habitat Descriptions

Trees

Non-native Hedgerow

Tall Ruderal/Short ephemeral

Buildings and Hard Surfaces

Scattered Trees

- 6.4 A tree survey is not available for the site. There are trees within the southern section of the site. Although there appear to be no significant trees on site, mature trees are on located on the boundary. A view from the northern boundary identified sycamore (*Acer pseudoplatanus*) and ash (*Fraxinus excelsior*) regeneration within the site.
- 6.5 The trees provide some value as a refuge for wildlife, due to their age, deadwood content and location as a wildlife corridor along the eastern boundary of the site. However, where trees are deemed unsuitable for retention and felling is recommended, the resulting deadwood should where possible, be stacked on site to provide value habitat for invertebrates. Trees are important in the landscape and provide a refuge for birds, small mammals and invertebrates. Bats may roost in suitable crevices and this is discussed in the chapter on fauna. Where possible, trees should be retained, protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework and in accordance with local Biodiversity Action Plans.
- 6.6 An arboricultural implications plan is not available for the site. During construction trees should be protected by vertical and horizontal tree protection to be specified by a qualified arboriculturist. All tree protection, work to trees and any work in the vicinity of trees is to accord with the relevant sections of the following standards:
BS 3998 - Recommendations for Tree Work.

BS 4428 - Code of practice for general landscape operations.

BS 5837 - Guide for Trees in Relation to Construction.

BS 1722 - Fences.

Non-native Hedgerows

- 6.7 A line of mature trees and hedging approximately 4m in height is present along the eastern boundary. This tree line is located between the proposed site and Park Inn hotel. Trees include *Cupressus sp.*, sycamore (*Acer pseudoplatanus*), cherry (*Prunus sp.*), beech (*Fagus sylvatica*) and laurel (*Prunus laurocerasus*). The hedge comprises mainly non-native species and it is therefore not listed as a UK priority habitats. However, it still provides links for dispersal of animals including small mammals, birds and invertebrates. It is not known whether the hedge would be retained as part of the proposals.

Tall Ruderal/Short ephemeral

- 6.8 The derelict and unmanaged site has allowed a range of herbaceous and woody species to colonise along the edges of the site and within cracks in concrete. To the south of the building is a small fenced yard, where plants have grown taller. Patches of ephemeral vegetation were observed inside the boundary fence on the western side of the site. Although access was not possible species identified from the boundary include false oat grass (*Arrhenatherum elatius*), plantains (*Plantago sp.*), dandelion (*Taraxacum officinale*), yarrow (*Achillea millefolium*), nettle (*Urtica dioica*), thistle (*Cirsium sp.*), mugwort (*Artemisia vulgaris*), sowthistle (*Sonchus sp.*), common mallow (*Malva sylvestris*) ragwort (*Senecio sp.*), cow parsley (*Anthriscus vulgaris*) Buddleja (*Buddleja sp.*) and hawkweeds (*Hieracium sp.*). Small patches of scrub with bramble (*Rubus fruticosus*), ash seedlings and ivy (*Hedera helix*). These short, patchy plant associations are typical of derelict urban sites. They are mainly of value for invertebrates. However, the extent of this habitat is limited to very small areas and is unlikely to provide a significant habitat for invertebrates.

Buildings and Hard Surfaces

- 6.9 There is one building on site. This building, B1 is a static caravan and B2 is a mobile caravan in the north eastern corner of the site. These could not be fully examined as access was not possible. However, viewed from the boundary and additional photographs from client the caravans did not appear to have any potential bat roost features and their bat roosting potential is regarded as negligible. The boundaries have close boarded wooden fences and metal rail fencing. Buildings can be valuable for a range of species including birds, bats and lower plants that find refuge in crevices and within loft spaces. Generally, the significant street/car park lighting, major road networks and sand and gravel extraction nearby is likely to be unattractive to bats.

Invasive Non-native Species

- 6.10 There are five notifiable (injurious) weeds listed in the Weeds Act, 1959. These are: *Cirsium vulgare*, *Cirsium arvense*, *Rumex crispus*, *Rumex obtusifolius* and *Senecio jacobaea*. These must not be allowed to spread. Guidelines issued by the Ministry of Agriculture, Fisheries and Food should be used for their disposal. Some of these may be growing within the derelict site.

- 6.11 There are three plants not listed in the Weeds Act that must not be allowed to spread. These plants are listed in Schedule 9 Part II of the Wildlife and Countryside Act, 1981 and must not be released or allowed to escape into the wild. They are Japanese knotweed (*Fallopia japonica*), Giant hogweed (*Heracleum mantagazzianum*) and Himalayan balsam (*Impatiens glandulifera* Royle). Guidelines issued by Natural England (formerly Defra) should be used for its disposal. None of these were seen on site, although access to the site was not possible, the use of binoculars did not reveal any of these.
- 6.12 A number of plants are listed as invasive non-native species. These must not be planted in the wild, or be caused to grow in the wild. This can include moving contaminated soil or plant cuttings. If invasive non-native plants are present they must be stopped from spreading and causing a nuisance or damage to other land or property. These plants are also listed in Schedule 9 Part II of the Wildlife and Countryside Act, 1981 and must not be released or allowed to escape into the wild. The most common are Japanese knotweed (*Fallopia japonica*), Giant hogweed (*Heracleum mantagazzianum*), Himalayan balsam (*Impatiens glandulifera* Royle) and rhododendron (*Rhododendron ponticum*). Guidelines issued by Natural England (formerly Defra) should be used for its disposal. None of these were observed on site.

LISI

- 6.13 The London Invasive Species Initiative (LISI) lists invasive species relevant to London. "Species of high impact or concern, which are widespread in London and require concerted, coordinated and extensive action to control and/or eradicate. These species are species currently causing large scale impacts across London and LISI supports area or catchment wide partnership working to ensure their control." There are records of 5 species of plant (Category 2 to 4) and 1 species of bird (category 4) found within 1km of the site. Buddleja (Category 3) was seen on site. For further details see GiGL data search.

Summary

- 6.14 This survey has assessed the site's importance for floral and faunal communities and provides information on habitat features of particular value to different biological groups, including features of conservation interest. The following provides a summary of the potential presence of protected species.
- 6.15 Detailed Impact Assessment and mitigation proposals would be required where protected species are found. This assessment is based on available information. Where new evidence becomes available this assessment may need to be updated.

Fauna

Species	Relevance to Site	Recommendation
Badger	There are no records of badger within 1km of the site and no evidence of badgers and their sett .	Further survey work is not considered necessary.
Bat	<p>There are records of bats and records of bat licence applications within 1km of the site.</p> <p>Building B1 is a static caravan and B2 is a mobile caravan. A view from the northern boundary and additional photographic evidence from client did not reveal any potential bat roost features that could provide access for crevice dwelling bats. The building B1 and B2 are likely to have negligible potential for roosting bats.</p> <p>There are no trees on site that can support roosting bats.</p> <p>Local area provides limited foraging and commuting corridors for bats.</p>	<p>Additional survey work is not considered necessary.</p> <p>Mitigation associated with bat enhancement should be put forward in accordance with findings.</p> <p>Any proposals should incorporate a sensitive lighting scheme to facilitate foraging in the vicinity of the site. The lighting strategy should include dark buffers, illuminance limits and zonation, appropriate luminaire specifications, screening, dimming and part night lighting. Ideally design should include LED lighting <2700 Kelvin such as warm e.g. lighting, directional and time, where possible.</p>
Hazel Dormouse	<p>There are no know dormouse populations within 1km of the site.</p> <p>The current habitat associated with the proposed site has limited value for dormice.</p>	<p>The habitat within the site provides sub-optimum opportunities for dormouse.</p> <p>The likelihood of finding dormice on site is therefore regarded as negligible.</p>

Species	Relevance to Site	Recommendation
Birds	The development site presents opportunities for passing birds. Birds may nest and forage in trees and hedges. There are no records of black redstart within 1km of the site and no obvious signs of this species on site.	All bird species are protected by the Wildlife & Countryside Act, 1981 (and amendments) vegetation clearance should not be undertaken during the bird-breeding season from March to September inclusive. Where this is not possible, great care should be taken to avoid damage to nesting birds. In addition, should there be any signs of nesting birds at the time of building/clearance works advice should be sought from a qualified ecologist. It is recommended that nesting boxes for song birds are installed as part of the proposed scheme. Future enhancement and long-term management should ensure that habitats provide a varied food source and nesting opportunities for a range of birds.
Amphibians	There are no records of amphibian species within 1km of the site. There are no ponds within the proposed site and no known ponds within 500m of the proposed site.	Additional survey work for great crested newt is not considered necessary.
Reptiles	There are no records of reptile species within 1km of the site. There is a large pile of brick rubble with scattered ruderal vegetation, which could provide shelter for reptiles. The likelihood of reptiles being present is considered low.	No further survey work is considered necessary. Due to the presence of a large pile of brick rubble precautionary mitigation is recommended.
Hedgehog	There are records of hedgehog within 1km of the site. There is limited potential habitat for hedgehogs within the proposed site.	Consideration should be given to hedgehogs, a local BAP species. The presence of hedgehog is not an obstacle to development. No further survey work is recommended. However, a precautionary working method is recommended during site clearance works. If hedgehog is found on site they should be carefully removed to a suitable or purpose-built habitat close by.

Species	Relevance to Site	Recommendation
Invertebrates	Widespread invertebrates are likely to use the site for pollination. There are records of Stag beetle (<i>Lucanus cervus</i>) within 1km of the site. This species may be present within rotting wood. There are no records of bombardier beetles and the site is limited in size to sustain a population.	Any grubbing out of tree roots or movement of stored logs should investigate presence of stag beetle. If beetles are found these should be moved to a safe habitat already created, so any larvae or adults that are disturbed/dug up can be placed out of harm's way and/or the log pile moved at the same time to form the safe habitat. Future enhancement and long-term management should ensure that proposed habitats provide a varied food source including plants for pollinators to suit a range of invertebrates species.
White clawed crayfish	No rivers are present within the site.	Further survey work is not considered necessary.
Fish	No rivers or lakes are present within the site.	Further survey work is not considered necessary.

Table 10 – Potential presence of protected species of fauna.

Section 7 - Outline Impact Assessment & Biodiversity Enhancement

- 7.1 This chapter provides an outline impact assessment and enhancement recommendations. Where protected species are confirmed on site, specific mitigation and enhancement may be required and this would be outlined in connection with mitigation reports. Table 11 below provides an outline impact assessment.

Impact requiring mitigation	Outline of Mitigation/Compensation Measures
Construction near trees/permanent structural change to main entrance.	Trees to be retained or within the root protection zone should be protected by fencing during construction. Compensation measures should include planting of native trees should be considered.
Disturbance to nesting birds	Vegetation where birds are likely to nest should be cleared outside of nesting season (generally March-September). Compensation measures could include bird and bat boxes erected on trees and/or buildings. Creation of native hedges and/or planting.
Reptile sheltering places	Due to the large pile of brick rubble precautionary mitigation is recommended. The likelihood of reptiles being present is considered low. If reptiles are present, population sizes are likely to be very small and precautionary mitigation work can be undertaken to minimise the risk of reptiles being killed or injured by proposed development works. This would require phased clearance of brick rubble in advance of construction activities. Clearance should be phased removing approximately 1/3 each time to allow any animals to escape. Habitat should only be cleared between mid-March and October (i.e. outside of the reptile hibernation period). All work should follow suitable good practice. Reptile exclusion fencing is not considered necessary. In the unlikely event that a reptile is encountered, all works should stop and further advice be sought from a suitably experienced ecologist.
Competition from alien species (and noxious weeds)	Imported materials should be carefully sourced to ensure they are not contaminated by invasive plants.
Long-term disturbance from potential lighting.	Low-level lighting should be considered as part of the scheme. Potential impact of lighting on wildlife should be carefully considered to ensure that lux levels remain low.

Table 11 – Outline Impact Assessment

- 7.2 It is recommended that management should enhance the biodiversity of the site and to link the site with national and regional objectives on habitat creation. In particular, the objectives within London and local Biodiversity Action Plans should be promoted. In addition, initiatives such as Living Landscapes and Accessible Greenspace should be used to safeguard wildlife and promote connectivity in the landscape.

- 7.3 General biodiversity enhancement recommendations prior to protected species surveys include the following:
- i) Retention of mature trees and hedges, where possible.
 - ii) Ensure the aims and objectives of Biodiversity, Green Infrastructure and Trees, Woodland and landscapes policies are promoted through positive management.
 - iii) Planting of ornamental shrubs with a known value for wildlife within the external soft landscape with particular emphasis on native species or plants suitable for pollinators.
 - iv) Installation of wildlife shelters for birds to include flagship species such as swifts, house sparrow and song thrush.
 - v) Installation of roosting boxes for bats preferably integrated into the buildings, where possible.
 - vi) Installation of wildlife shelters for invertebrates.
 - vii) Create deadwood for saproxylic invertebrates including stag beetle within garden spaces.
 - viii) Omit the use of pesticides and herbicides within the proposed external landscape.
 - ix) Ensure sensitive lighting is implemented to minimise disturbance to bats.
- 7.4 Conservation-orientated management following the prescriptions and guidelines of a management plan should be implemented to ensure the long-term commitment to biodiversity.

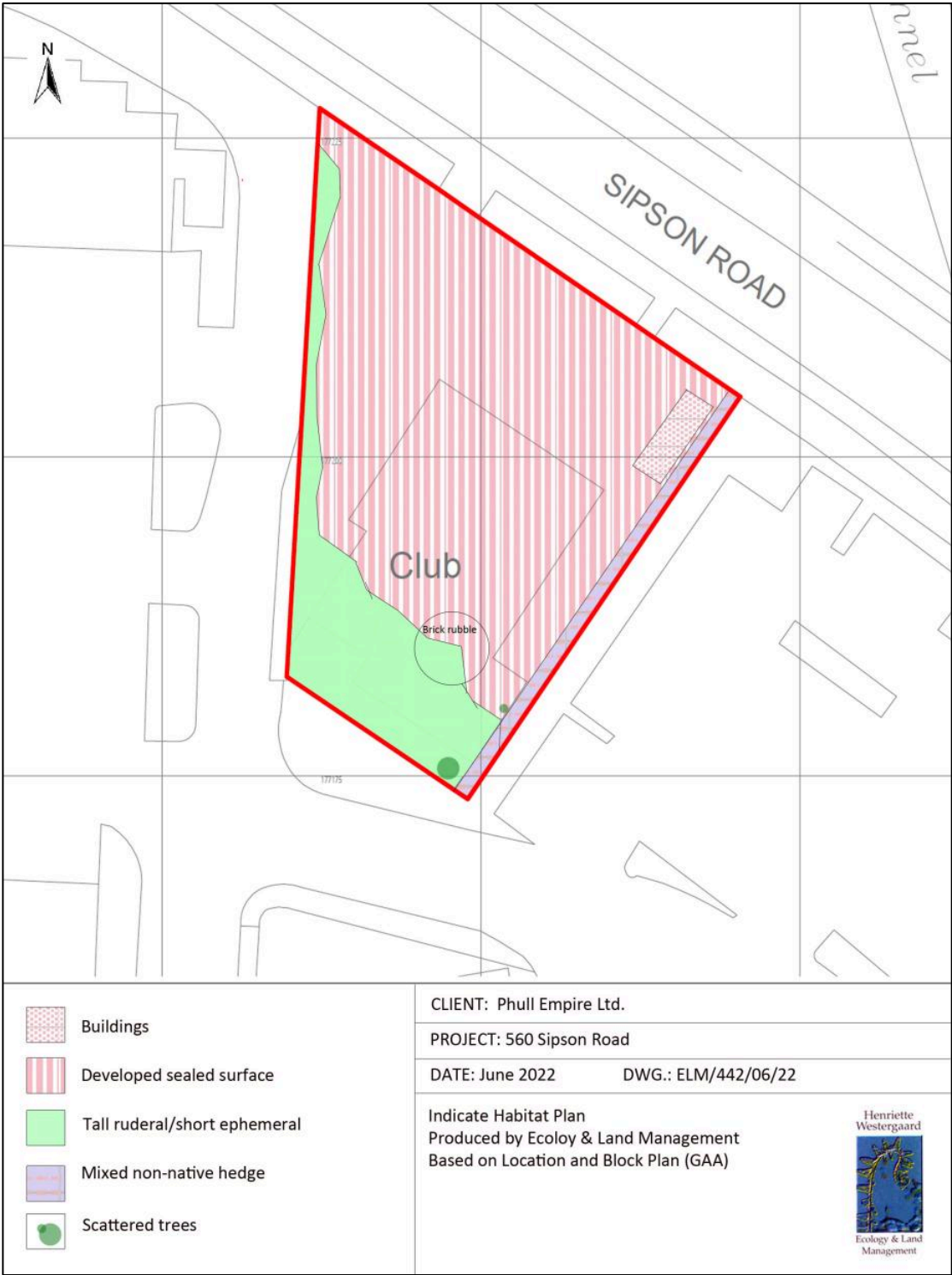
Appendix I - Guidance on Valuation of Ecological Importance

Level of Value	Examples
International	<p>An internationally designated site or candidate site (SPA, pSPA, SAC, cSAC, pSAC, Ramsar site, Biogenetic Reserve) or an area which the country agency has determined meets the published selection criteria for such designation, irrespective of whether or not it has yet been notified.</p> <p>A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat which are essential to maintain the viability of a larger whole.</p> <p>Any regularly occurring population of an internationally important species, which is threatened or rare in the UK. i.e. it is a UK Red Data Book species or listed as occurring in 15 or fewer 10km squares in the UK (categories 1 and 2 in the UK BAP) or of uncertain conservation status or of global conservation concern in the UK BAP.</p> <p>A regularly occurring, nationally significant population/number of any internationally important species.</p>
National	<p>A nationally designated site (SSSI, ASSI, NNR, Marine Nature Reserve) or a discrete area, which the country conservation agency has determined meets the published selection criteria for national designation (e.g. SSSI selection guidelines) irrespective of whether or not it has yet been notified.</p> <p>A viable area of a priority habitat identified in the UK BAP, or of smaller areas of such habitat which are essential to maintain the viability of a larger whole.</p> <p>Any regularly occurring population of a nationally important species, which is threatened or rare in the region or county (see local BAP).</p> <p>A regularly occurring, regionally or county significant population/number of any nationally important species.</p> <p>A feature identified as of critical importance in the UK BAP.</p>
Regional	<p>Viable areas of key habitat identified in the Regional BAP or smaller areas of such habitat which are essential to maintain the viability of a larger whole;</p> <p>Viable areas of key habitat identified as being of Regional value in the appropriate Natural Area profile;</p> <p>Any regularly occurring, locally significant population of a species listed as being nationally scarce which occurs in 16-100 10km squares in the UK or in a Regional BAP or relevant Natural Area on account of its regional rarity or localisation;</p> <p>A regularly occurring, locally significant number of a regionally important species;</p> <p>Sites, which exceed the County-level designations but fall short of SSSI selection guidelines, where these occur.</p>
County / Metropolitan	<p>Semi-natural ancient woodland greater than 0.25 ha;</p> <p>County/Metropolitan sites and other sites which the designating authority has determined meet the published ecological selection criteria for designation, including Local Nature Reserves selected on County / metropolitan ecological criteria (County/Metropolitan sites will often have been identified in local plans);</p> <p>A viable area of habitat identified in County BAP;</p> <p>Any regularly occurring, locally significant population of a species which is listed in a County/Metropolitan "red data book" or BAP on account of its regional rarity or localisation;</p> <p>A regularly occurring, locally significant number of a County/Metropolitan important species.</p>
District / Borough	<p>Semi-natural ancient woodland smaller than 0.25 ha;</p> <p>Areas of habitat identified in a sub-County (District/Borough) BAP or in the relevant Natural Area profile;</p> <p>District sites that the designating authority has determined meet the published ecological selection criteria for designation, including Local Nature Reserves selected on District/ Borough ecological criteria (District sites, where they exist, will often have been identified in local plans)</p> <p>Sites/features that are scarce within the District/Borough or which appreciably enrich the District/Borough habitat resource;</p> <p>A diverse and/ or ecologically valuable hedgerow network;</p> <p>A population of a species that is listed in a District/Borough BAP because of its rarity in the locality or in the relevant Natural Area profile because of its regional rarity or localisation;</p> <p>A regularly occurring, locally significant number of a District / Borough important species during a critical phase of its life cycle.</p>
Parish/ Neighbourhood	<p>Areas of habitat considered to appreciably enrich the habitat resource within the context of the Parish or neighbourhood, e.g. species-rich hedgerows.</p> <p>Local Nature Reserves selected on Parish ecological criteria.</p>

Appendix II - UKHab Comparative Table

Phase 1	UKHab	UKHab Code
Scattered trees	Urban tree/line of trees	w1g6
Non-native hedgerow	Other hedgerow	h2b
Introduced shrub	Urban – Introduced Shrub	u1d (1160)
Tall Ruderal/short ephemeral	Grassland – Tall ruderal	g4
Buildings & Hard Surfaces	Urban – Developed Sealed surface Built areas/gardens Buildings	u1b u1 u1b5

Appendix III - Indicative Habitat Plan



Appendix IV - Proposed Site Plan



Appendix V - Photographic Evidence



Central area of site looking south



Western boundary looking south



Pile of brick rubble (GAA Design)



Caravans in northeast corner (GAA Design)



Hoarding on Sipson Road, northern boundary

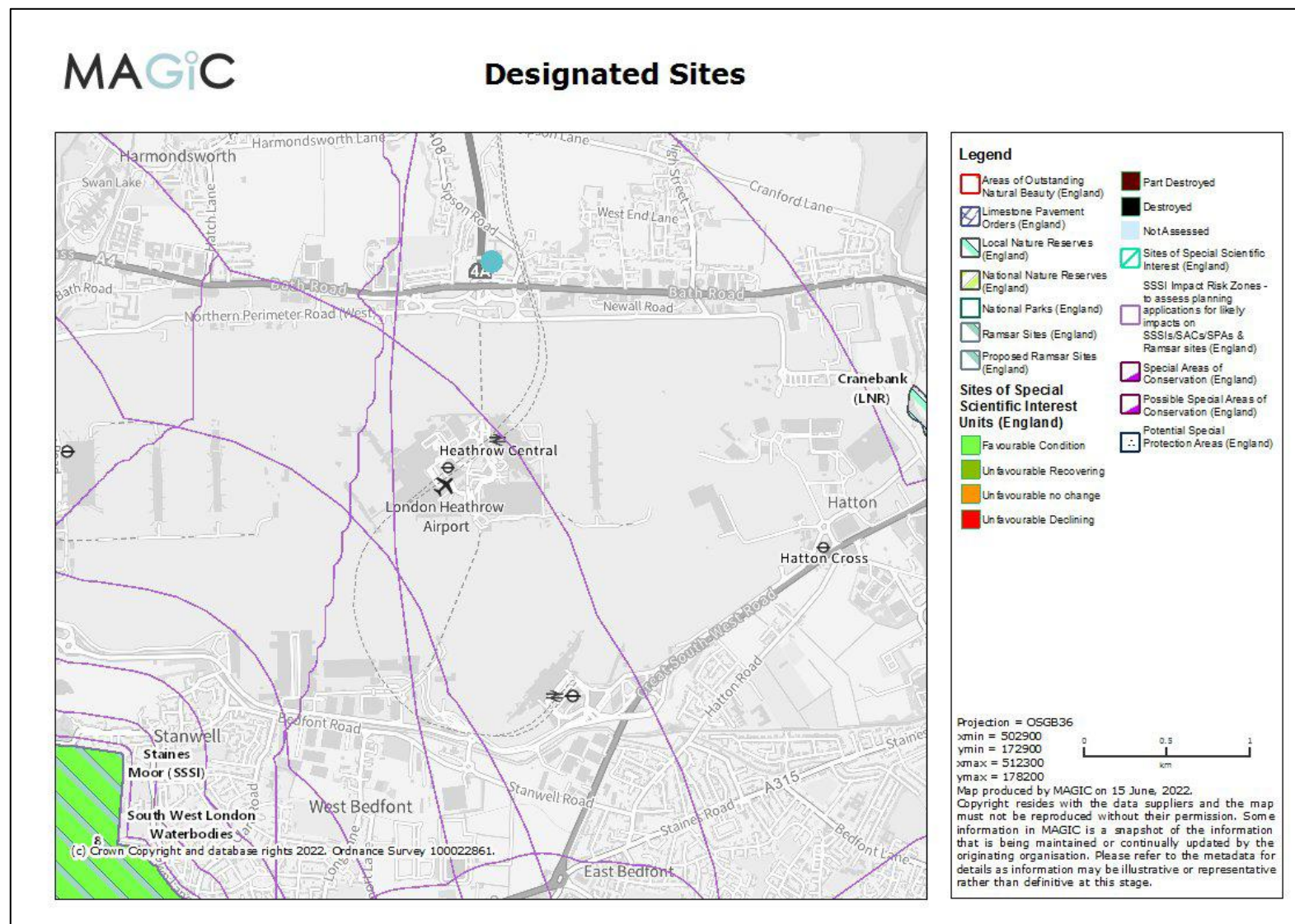


Outside western boundary



Fencing preventing access to eastern boundary

Appendix VI - Statutory Designated Sites

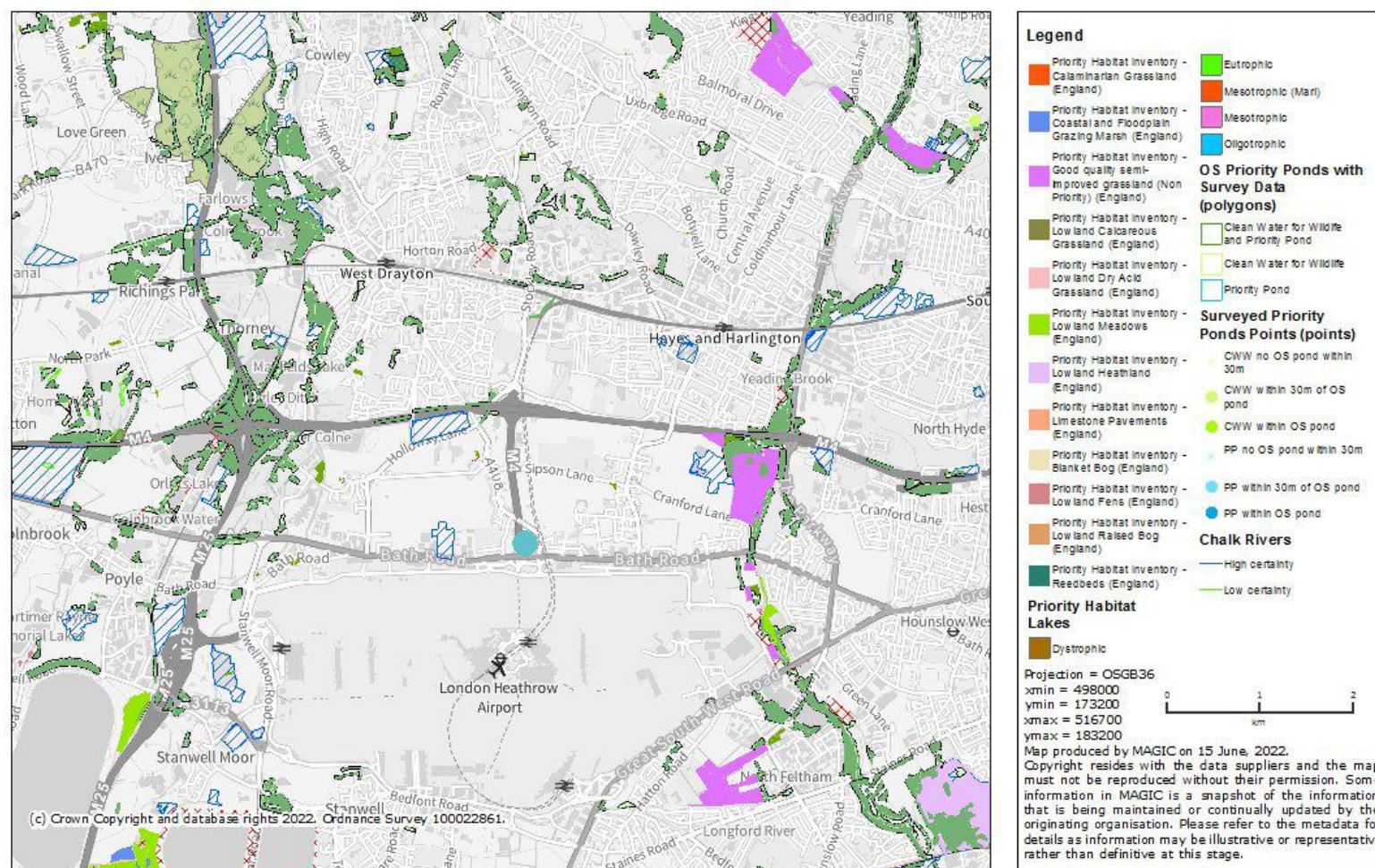


Source: Magic.defra.gov.uk, online June 2022

Appendix VII - Priority Habitats

MAGiC

Priority Habitats

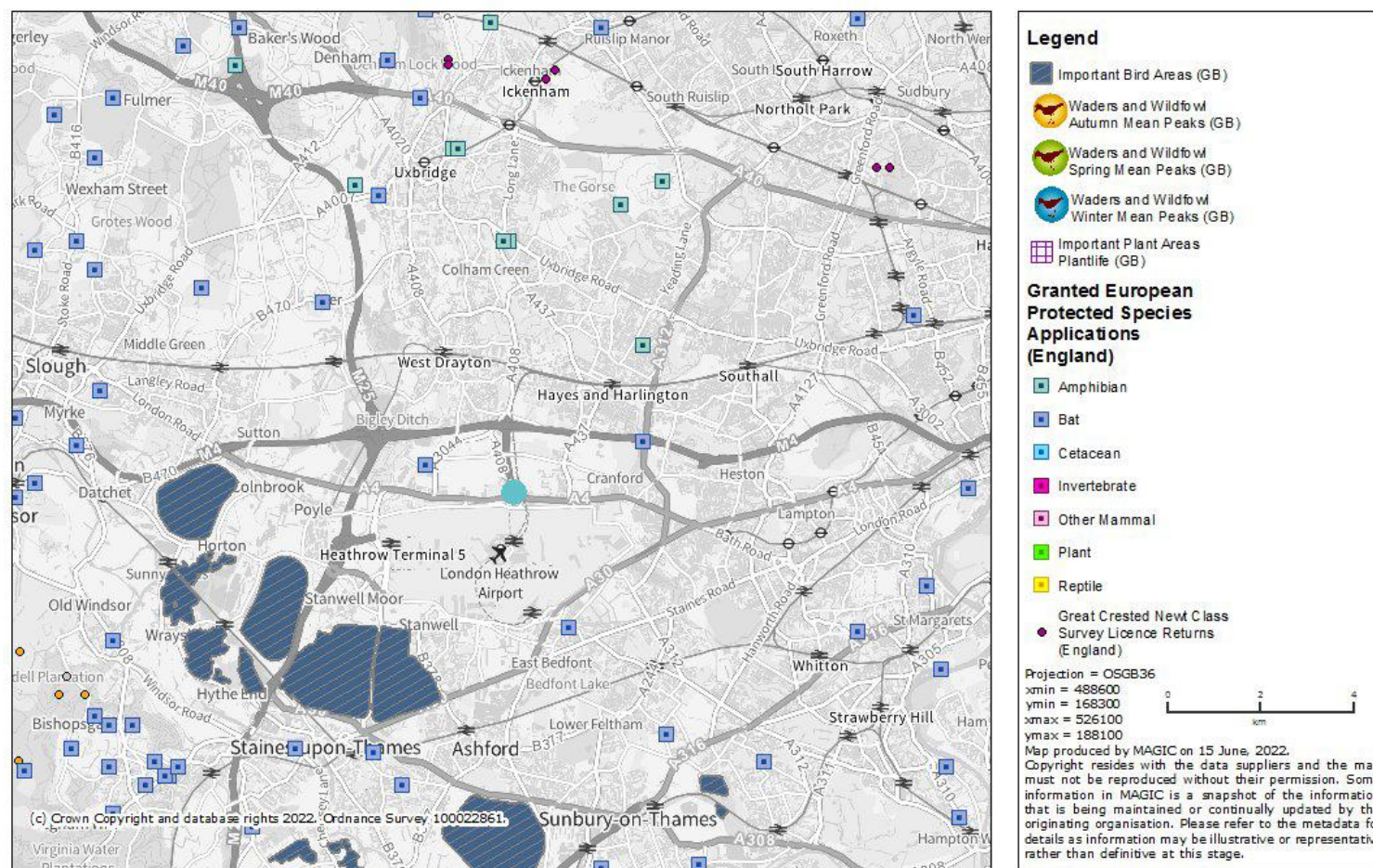


Source: Magic.defra.gov.uk, online June 2022

Appendix VIII - Protected Species

MAGiC

Protected Species



Source: Magic.defra.gov.uk, online June 2022

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