

BYSS - STAPLES CORNER, LONDON

Preliminary Ecological Appraisal

ECO03309

01

27th October 2023

PRELIMINARY ECOLOGICAL APPRAISAL

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
01	Draft, for comment	Laura Taylor	KT	KT	27/10/2023

Approval for issue

Katy Thomas

27 October 2023

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EXECUTIVE SUMMARY

- RPS were commissioned by Big Yellow Self Storage Company Ltd. to undertake a Preliminary Ecological Appraisal (PEA) of the Land at Staples Corner, London. This comprised a desk study, Phase 1 habitat survey and an ecological scoping survey which assessed the potential of the site to support species of conservation concern or other species which could present a constraint to the development of the site.
- The site is approximately 0.84 hectares (ha) in size and currently comprises a central car dealership building, associated outbuildings, hardstanding and small amounts of ephemeral vegetation, introduced shrub, scattered scrub and scattered trees.
- The proposals for the site include the demolition of an existing car dealership and the construction of a six-storey self-storage facility (Use Class B8), flexible office space (Use Class E(g)(i)) and larger external storage units (Use Class B8), car parking area and landscaping.
- There were two overlapping statutory designated sites and 12 non-statutory sites located within the 2 kilometre (km) search radius of the site. Whilst the distance between the nearest designated sites and the red line boundary is very small (approximately 50 metres), there is no connecting green corridor between the red line boundary and designated sites. It is anticipated that there will be no adverse effects on designated sites, either as a result of the construction or operational phases of the development. Recommendations include the prevention of pollutants, resulting from the construction phase, from entering the River Brent which lies immediately adjacent to the site.
- The site comprised habitats that held limited suitability to support common species of foraging birds and nesting gull species therefore, any habitat removal should be done outside of the nesting season (March to September inclusive) or if this is not possible, should first be checked by a suitably qualified ecologist. If a nest is found, this should be left with a suitable buffer, until such a time that the chicks have fledged.
- The northern boundary and offsite River Brent held limited potential for foraging and commuting bats, therefore it is recommended that proposals do not increase the existing light spill onto this boundary, to reduce the risk of indirect impacts to bat species utilising this habitat.
- Recommendations for enhancements have been made, in line with local policy, to ensure that the scheme delivers a 10% biodiversity net gain (RPS, 2023a) and the recommended target for urban greening (RPS, 2023b). Under current proposals the biodiversity net gain requirement will be achieved in excess and the proposals will satisfy the urban greening factor target.

Contents

EXECUTIVE SUMMARY	I
1 INTRODUCTION	1
1.1 Purpose and Scope of this Report	1
1.2 Study Area and Zone of Influence	1
1.3 Development Proposals	2
1.4 Legislation and Policy	2
2 METHODS	3
2.1 Desk Study	3
2.2 Ecological Appraisal	3
2.3 Limitations	3
3 RESULTS	5
3.1 Designated Sites	5
3.2 Desk study – Protected Species	8
3.3 Phase 1 Habitat Survey	11
3.4 Ecological Scoping Survey.....	13
4 EVALUATION AND POTENTIAL IMPACTS	14
4.1 Designated Sites	14
4.2 Habitats	14
4.3 Protected Species	14
5 RECOMMENDED MITIGATION AND ENHANCEMENT	15
5.1 Designated Sites	15
5.2 Habitats	15
5.3 Protected Species	15
5.4 Enhancement Opportunities.....	15
REFERENCES	17

Tables

Table 3.1: Designated sites within 2 km of the study area	5
Table 3.2: Summary of species records from the last 10 years within 2 km of the site	9

Figures

Figure 3.1: Designated sites within 2 km	7
Figure 3.2: Phase 1 Habitat Survey Map.....	12

Appendices

Appendix A Relevant Legislation

Appendix B Summary desk study data for bird species within 2 km of the site, in the last 10 years.

Appendix C Site survey photographs

1 INTRODUCTION

1.1 Purpose and Scope of this Report

- 1.1.1 RPS was commissioned to undertake a Preliminary Ecological Appraisal (PEA) of a parcel of land on Staples Corner, London. This report has been prepared by RPS on behalf of Big Yellow Self Storage Company Limited to support a full planning application for demolition of an existing car dealership and the construction of a six-storey self-storage facility (Use Class B8), flexible office space (Use Class E(g)(i)) and larger external storage units (Use Class B8).
- 1.1.2 To undertake an initial assessment of the potential ecological impact of the proposals, a desk study, Phase 1 Habitat Survey, and a preliminary protected species assessment were carried out. This is termed as a Preliminary Ecological Appraisal Report (PEAR) in accordance with CIEEM (2017). This assessment is considered 'preliminary' until any required protected species, habitat or invasive species surveys are completed, and the results incorporated into a final Ecological Appraisal or Ecological Impact Assessment (EclA) which supports the planning application.
- 1.1.3 The PEA aims to:
- Undertake a desk-based review of designated sites and records of protected species and other species that could present a constraint;
 - Map and assess the habitats present on site;
 - Assess the site for potential to support protected species or other species that could present a constraint, and make appropriate recommendations for further survey work if necessary;
 - Provide outline options for mitigation measures as appropriate; and
 - Make recommendations for appropriate biodiversity enhancements in line with national and local planning policy.
- 1.1.4 This report pertains to these results only; recommendations included within this report are the professional opinion of an experienced ecologist and therefore the view of RPS. The surveys and desk-based assessments undertaken as part of this review and subsequent report are prepared in accordance with the British Standard for Biodiversity Code of Practice for Planning and Development (BS42020:2013).

1.2 Study Area and Zone of Influence

- 1.2.1 The site is located to the north of the Staples Corner West roundabout, which has the North Circular Road (A406) passing directly over it. The northeast of the site is bounded by railway lines, with a series of offsite garage units contained within the railway arches below. The River Brent frames the northwestern boundary of the site. The site is bounded to the west by Edgware Road (A5) with lanes at graded height and above ground level. The National Grid coordinates for the centre of the site are TQ 22620 87375.
- 1.2.2 The site is approximately 0.84 hectares (ha) in size and comprised a single building (currently in use as a car dealership), with a hardstanding car park and some small areas of scattered vegetation.
- 1.2.3 The term Zone of Influence is used to describe the geographic extent of potential impacts of a proposed development. The Zone of Influence is determined by the nature of the development and also in relation to designated sites, habitats or species which might be affected by the proposals.
- 1.2.4 For this site, the Zone of Influence is considered to be land on and immediately adjacent to the site.

1.3 Development Proposals

- 1.3.1 The proposed development includes the demolition of the existing building and the construction of a six-storey self-storage facility (Use Class B8), flexible office space (Use Class E(g)(i)), car parking and associated hardstanding and landscaping.

1.4 Legislation and Policy

- 1.4.1 Relevant legislation, policy guidance and both Local and National Biodiversity Action Plans (BAPs) are referred to throughout this report where appropriate. Their context and application are explained in the relevant sections of this report.

- 1.4.2 The relevant articles of legislation are:

- The National Planning Policy Framework (NPPF 2023);
- ODPM Circular 06/2005 (retained as Technical Guidance on NPPF 2021);
- The Conservation of Habitats and Species Regulations 2019 (EU Exit Amendment);
- The Wildlife and Countryside Act 1981 (as amended);
- The Environment Act 2021
- The Protection of Badgers Act 1992;
- The Countryside and Rights of Way Act 2000;
- The Hedgerow Regulations 1997;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- Mayor's London Plan 2021; and
- Barnet's Local Plan (2012) / Barnet's Draft Local Plan – Reg 22 .

- 1.4.3 A summary of legislation relevant to protected or other species identified as potential constraints in this report is provided in Appendix A.

2 METHODS

2.1 Desk Study

- 2.1.1 Ecological records within a 2 km radius of the site were requested from Greenspace Information for Greater London (GIGL). Data requests were limited to records for protected species recorded within the last ten years and sites of nature conservation interest within 2 km of the site. This included a review of existing statutory sites of nature conservation interest, such as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Area of Conservation (SACs) and National Nature Reserves (NNRs), and non-statutory sites, such as Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (LWSs).
- 2.1.2 Locations of statutory designated sites were accessed via the government 'MAGIC' website (MagicMap, 2023).
- 2.1.3 A 1:25,000 OS map was used to identify nearby features such as ponds or green corridors that could provide habitat or connectivity to other areas.

2.2 Ecological Appraisal

- 2.2.1 The ecological appraisal consisted of two components: a Phase 1 habitat survey and a scoping survey for protected species and other species of conservation concern which could present a constraint to development.
- 2.2.2 The survey was carried out on the 21st of July 2023, by Laura Taylor MRes ACIEEM, a suitably qualified RPS Senior Ecologist.
- 2.2.3 The Phase 1 habitat survey followed the standard methodology (JNCC, 2010), and as described in the Guidelines for Preliminary Ecological Assessment (CIEEM, 2017). In summary, this comprised walking over the survey area and recording the habitat types and boundary features present.
- 2.2.4 A protected species scoping survey was carried out in conjunction with the Phase 1 habitat survey. The site was assessed for its suitability to support protected species, in particular great crested newts (GCN), reptiles, birds, badgers, bats, and other species of conservation importance that could pose a planning constraint.
- 2.2.5 The surveyor looked for evidence of use including signs such as burrows, droppings, footprints, paths, hairs, refugia and particular habitat types known to be used by certain groups such as ponds. Areas of habitat considered suitable for protected species or those of conservation interest were recorded.

2.3 Limitations

Desk Based Assessment

- 2.3.1 The desk study data is third party controlled data, purchased for the purposes of this report only. RPS cannot vouch for its accuracy and cannot be held liable for any error(s) in these data.

Survey

- 2.3.2 It should be noted that whilst every effort has been made to provide a comprehensive description of the site, no investigation can ensure the complete characterisation and prediction of the natural environment.

- 2.3.3 The protected/notable species assessment provides a preliminary view of the likelihood of these species occurring on the site, based on the suitability of the habitat, known distribution of the species in the local area provided in response to our enquiries and any direct evidence on the site. It should not be taken as providing a full and definitive survey of any protected/notable species group.

Accurate Lifespan of Ecological Data

- 2.3.4 The majority of ecological data remain valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for up to two years, assuming no significant considerable changes to the site conditions.
- 2.3.5 A verification walkover could be required within this time to identify if the site has changed significantly. Guidance on the lifespan of ecological survey data is provided within the advice note published by CIEEM (2019).

3 RESULTS

3.1 Designated Sites

- 3.1.1 There were two overlapping statutory designated sites for nature conservation value within 2 km of the site, the Brent Reservoir (Welsh Harp) SSSI and Welsh Harp LNR which were located adjacent to the site, west of the A5 Edgware Road, 0.05 km from the site boundary.
- 3.1.2 A total of 12 non-statutory sites were located within the 2 km search radius of the site. The closest of these was the Brent Reservoir (Welsh Harp) SINC, located 0.05 km from the site.
- 3.1.3 A summary of these sites is provided in Table 3.1 below and the location of each site is detailed in Figure 3.1.

Table 3.1: Designated sites within 2 km of the study area

Site name (Map Reference)	Type	Approx. area (ha)	Interest Features	Distance from site (km)
Statutory Sites				
Brent Reservoir	SSSI	68.6	Significant breeding habitat for wetland birds, in particular, great crested grebe (largest colony in greater London) and kingfisher. Has recorded a diversity of wintering waterfowl with notable plant species in aquatic, emergent, riparian and grassland habitat. Toward the head of the northern and eastern areas where, respectively, the Silk Stream and Dollis Brook enter the reservoir, wetland plant communities are more extensive, in places covering large areas of inwashed silt deposits. Here there are varied gradations from open water, through swamp and mixed species fen to willow carr, with damp willow woodland occupying the higher ground. The juxtaposition and expanse of these habitats is of particular value in attracting a noteworthy variety of breeding wetland birds. Swamp habitat has recorded breeding reed and sedge warblers, reed bunting, redpoll and willow tit.	0.05
Welsh Harp (M035)	LNR	97.31		
Non-statutory Sites				
Brent Reservoir (Welsh Harp) (M035)	SINC	103.44	As described above. Over 40 nationally rare recorded invertebrate species present, and one of few London sites to support water shrew.	0.05
Clarefield Park (BaL16)	SINC	2.04	A small park with managed flower rich planted beds, shrubs and a small wildlife pond.	0.6
Clitterhouse Playing Fields (BaL06)	SINC	17.32	A large recreational ground with suggested ancient hedgerows, scrub and secondary woodland.	0.8
Dollis Hill Reservoir (BrBII17)	SINC	2.94	A covered reservoir with species rich wildflower grassland, scattered trees and shrubs.	0.97
Hendon Park and Northern Line Railway Cutting	SINC	14.75	A large hillside park with scattered trees, secondary woodland, ornamental gardens and a railway cutting.	1.1

PRELIMINARY ECOLOGICAL APPRAISAL

(BaL18)			Noted to attract a variety of bird species and pipistrelle bats.	
Dudding Hill Loop between Cricklewood and Harlesden (BrBI06C)	SINC	10.53	Railway lineside the semi-natural broadleaved or mixed woodland forming the main habitat, with areas of tall ruderal vegetation occurring intermittently along the embankments and cuts.	1.13
Silk Stream and Burnt Oak Brook (BaBII05)	SINC	8.74	The Silk Stream winds length extends from near Edgware Hospital to flow into the Welsh Harp. Its tributary the Burnt Oak Brook runs for about 1.5 kilometres from near the M1 motorway to meet the Silk Stream at Burnt Oak. Its banks are largely restrained by wood or concrete, but throughout its length there are at least narrow strips of scrub and grassland on either side, forming a green corridor. The rivers support little aquatic vegetation, though curled pondweed <i>Potamogeton crispus</i> , Nuttall's waterweed <i>Elodea nutallii</i> and floating sweet-grass <i>Glyceria fluitans</i> occur in places. Mallards and grey wagtails can often be seen, and three-spined sticklebacks are present.	1.22
Gladstone Park (BrBII03)	SINC	26.29	A large formal park, with grassland, woodland and pond habitats. The pond is noted for a diverse aquatic and emergent flora, supporting a varied assemblage of invertebrates. The site contains large parkland trees, deadwood and scrub habitat.	1.25
Lower Dollis Brook (BaBII16)	SINC	29.45	The Dollis Brook runs through a narrow strip of woodland between Woodside Park and Hendon, forming an important green corridor. Several waterfowl species are present with areas of rich ground flora and some patches of ancient woodland indicators.	1.26
Harp Island (BrBII06)	SINC	1.95	A linear site following the courses of the River Brent and Canal Feeder, with marsh/swamp, scattered trees, scrub and tall herbs present.	1.76
Old St Andrew's Churchyard, Kingsbury (BrBI04)	SINC	3.02	A churchyard with dense woodland including yew trees. Noted for species rich ground flora, providing abundant nesting and foraging habitat for invertebrates, birds, bats and other small mammals.	1.77
Grange Roundabout Nature Area (BrBII09)	SINC	0.24	A wildlife pond and wildflower meadow within a central roundabout in urban surroundings, partially enclosed by a species rich hedgerow, the site provides crucial foraging and nesting resources for invertebrates and birds.	1.86

Abbreviations used in Table 3.1: SSSI: Site of Special Scientific Importance LNR: Local Nature Reserve; SINC: Site of Importance for Nature Conservation, km: kilometres; Ha: Hectares.

Figure 3.1: Designated sites within 2 km

3.2 Desk study – Protected Species

- 3.2.1 Records of protected species were obtained from GIGL. A number of species of conservation importance or otherwise notable were recorded within the 2 km search radius of the site. A summary of these records is provided in Table 3.2.
- 3.2.2 In order to simplify the results, only records of species from the last 10 years are shown. In addition, only data with a six-figure grid reference resolution or higher are provided, since locations given at a lower resolution do not allow accurate calculation of distance to the site boundary.

Invertebrates

- 3.2.3 No invertebrate records were present within the site boundary. The closest records to the site boundary were nationally notable Adonis' Ladybird *Hippodamia variegata* and small copper *Lycaena phlaeas eleus*, both located 0.75 km from the site boundary.

Amphibians

- 3.2.4 No amphibian records were present within the site boundary. Four records for common toad *Bufo bufo* were found within the 2 km search area, the closest of which was located 0.83 km from the site boundary.

Birds

- 3.2.5 No bird species were recorded within the site boundary. A total of 90 bird species were recorded within 2 km of the site with accuracy of a six-grid reference, the closest record to the site was for swift *Apus apus* located within 0.03 km from the site. Due to the large number of bird species recorded in the desk study, the results have been omitted from Table 3.2 and a full list of all bird species found within 2 km is provided in Appendix B.
- 3.2.6 A total of 28 species listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) were found within 2 km of the site, the closest records were over 1 km from the site.

Bats

- 3.2.7 No bat records were present within the site boundary. The closest records to the site were for Daubenton's bat *Myotis daubentonii*, soprano pipistrelle *Pipistrellus pygmaeus* and Nathusius's pipistrelle *Pipistrellus nathusii*, found 0.81 km from the site.

Other Mammals

- 3.2.8 No mammal records were present within the site boundary. One record for European water vole *Arvicola amphibius* was located 1.34 km from the site boundary. No other mammals were recorded within the desk study.
- 3.2.9 The offsite River Brent was a straight channel with formalised concrete walls on both sides of the river, with no potential to support water vole breeding and burrow creation (evidenced in photographs in Appendix C). Therefore, water vole has not been considered further in this report.

PRELIMINARY ECOLOGICAL APPRAISAL

Table 3.2: Summary of species records¹ from the last 10 years within 2 km of the site

Common name	Scientific name	Nearest record from site (km)	Year of nearest record	Total Records (Max count)	Conservation Status
Invertebrates - Beetles					
Adonis' Ladybird	<i>Hippodamia variegata</i>	0.75	2014	2 (1)	Nationally Notable B
Stag Beetle	<i>Lucanus cervus</i>	1.03	2015	6 (1)	Hab&Spp Dir Anx 2 NERC Act Section 41 LPS
Invertebrates – Butterflies, Dragonflies and Moths					
Small copper	<i>Lycaena phlaeas eleus</i>	0.75	2018	10 (2)	Nationally Notable B
Common Darter	<i>Sympetrum striolatum</i>	0.89	2017	2 (2)	NERC Act Section 41, LPS , Local Spp of Cons Conc, RedList_GB-EN
Cinnabar	<i>Tyria jacobaeae</i>	0.92	2014	6 (2)	NERC Act Section 41, Local Spp of Cons Conc, RedList_GB-EN
Small Heath	<i>Coenonympha pamphilus pamphilus</i>	1.03	2019	2 (1)	Hab&Spp Dir Anx 2, NERC Act Section 41, LPS
White-letter Hairstreak	<i>Satyrrium w-album</i>	1.84	2015	51 (6)	NERC Act Section 41, LPS, Local Spp of Cons Conc, RedList_GB- Lr(NT)
Wood White	<i>Leptidea sinapis</i>	1.41	2014	1 (1)	NERC Act Section 41, LPS , Local Spp of Cons Conc, RedList_GB- Lr(NT)
Jersey Tiger	<i>Euplagia quadripunctaria</i>	1.11	2016	3 (1)	RedList_GB-DD
Amphibians					
Common Toad	<i>Bufo bufo</i>	0.83	2021	4 (2)	NERC Act Section 41 LPS, Local Spp of Cons Conc
Mammals					
Daubenton's Bat	<i>Myotis daubentonii</i>	0.81	2016	2 (20)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b,W&CA Sch5 Sec 9.4c, LPS , Local Spp of Cons Conc
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	0.81	2017	20 (2)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, NERC Act Section 41,

¹ Due to the high number of bird records, results have been omitted from Table 3.2 and can be found in Appendix B.

PRELIMINARY ECOLOGICAL APPRAISAL

					LPS , Local Spp of Cons Conc
Nathusius's Pipistrelle	<i>Pipistrellus nathusii</i>	0.81	2017	11 (3)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, LPS , Local Spp of Cons Conc, RedList_GB-Lr(NT)
Pipistrelle	<i>Pipistrellus pipistrellus</i>	0.81	2017	24 (1)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, LPS , Local Spp of Cons Conc
Nyctalus Bat species	<i>Nyctalus</i>	1.18	2020	5 (1)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, NERC Act Section 41, Local Spp of Cons Conc, RedList_GB-Lr(NT)
European Water Vole	<i>Arvicola amphibius</i>	1.34	2015	1 (1)	W&CA Sch5 Sec 9.4a, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, NERC Act Section 41, LPS , Local Spp of Cons Conc, RedList_GB-EN
Serotine	<i>Eptesicus serotinus</i>	1.77	2022	1 (3)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, LPS , Local Spp of Cons Conc, RedList_GB-VU
Lesser Noctule	<i>Nyctalus leisleri</i>	1.77	2022	1 (4)	Hab&Spp Dir Anx 4, Cons Regs 2010 Sch2, W&CA Sch5 Sec 9.4b, W&CA Sch5 Sec 9.4c, LPS , Local Spp of Cons Conc, RedList_GB-Lr(NT)

Higher Plants – Flowering Plants – No plants were recorded within the site boundary or within immediate area surrounding the site (closest records were over 1 km from the site) and therefore plant records have been omitted from this report.

Abbreviations used in Table 3.2: W&CA Sch 5 Section 9a/b/c/ Section 9.1i/k: Wildlife & Countryside Act Schedule 5, Section 9a/b/c/ Section 9.1i/k; NERC Act Section 41: Natural Environment & Rural Communities Act Section 41; LPS: Local Protected Species; Local Spp of Cons Conc: Local Species of Conservation Concern; RedList_GB-CR/DD/EN/Lr(NT)/VU: IUCN Red List Great Britain – Critically Endangered/Data Deficient/ Endangered/ Lower Risk (Near Threatened)/Vulnerable; Habs&SppDir Anx2/ Anx4: Habitats & Species Directive Annex 2/ Annex 4; Cons Regs 2010 Sch2: Conservation of Habitats and Species Regulations 2010 Schedule 2; BirdsDir Anx 1: Birds Directive Annex 1; Bird – Red: Bird Population Status – Red; Nationally Scarce/ Nationally Rare: Ramsar Convention Nationally Scarce/ Nationally Rare; Nationally Notable A/B: RedList/ Species Status Assessment; HSD5: Habitats and Species Directive Annex 5.

3.3 Phase 1 Habitat Survey

- 3.3.1 The site mainly consisted of hardstanding and a central building that operated as a car dealership, with scattered vegetation around the boundaries of the site. The survey results are presented in the form of a map with the habitat types and boundary features marked (Figure 3.2). Photographs can be found in Appendix C.
- 3.3.2 Descriptions of the habitat types and boundary features are detailed below. Habitat descriptions are defined by broad habitat types (JNCC, 2010).

Scattered Scrub and Trees

- 3.3.3 A total of seven hornbeam *Carpinus betulus* trees were present in a formal planting south of the central building. Signs of management were present (heavily pruned specimens and cleared ground beneath them). Scattered bramble *Rubra fruticosus* was present along the northwest boundary of the site encroaching over hardstanding and bare ground.
- 3.3.4 Stands of introduced buddleia *Buddleja davidii* and the invasive Japanese knotweed *Fallopia japonica* (*Reynoutria japonica*) were found to be encroaching around the boundary of the site, mainly along the offsite watercourse along the northwest boundary, and from behind the offsite garages along the northeast boundary.

Introduced Shrub

- 3.3.5 In the southeast corner of the site there was a small bed of ornamental shrubs, species included large-leaved avens *Geum macrophyllum*, wintercreeper *Euonymus fortune* and European box *Buxus sempervirens*.

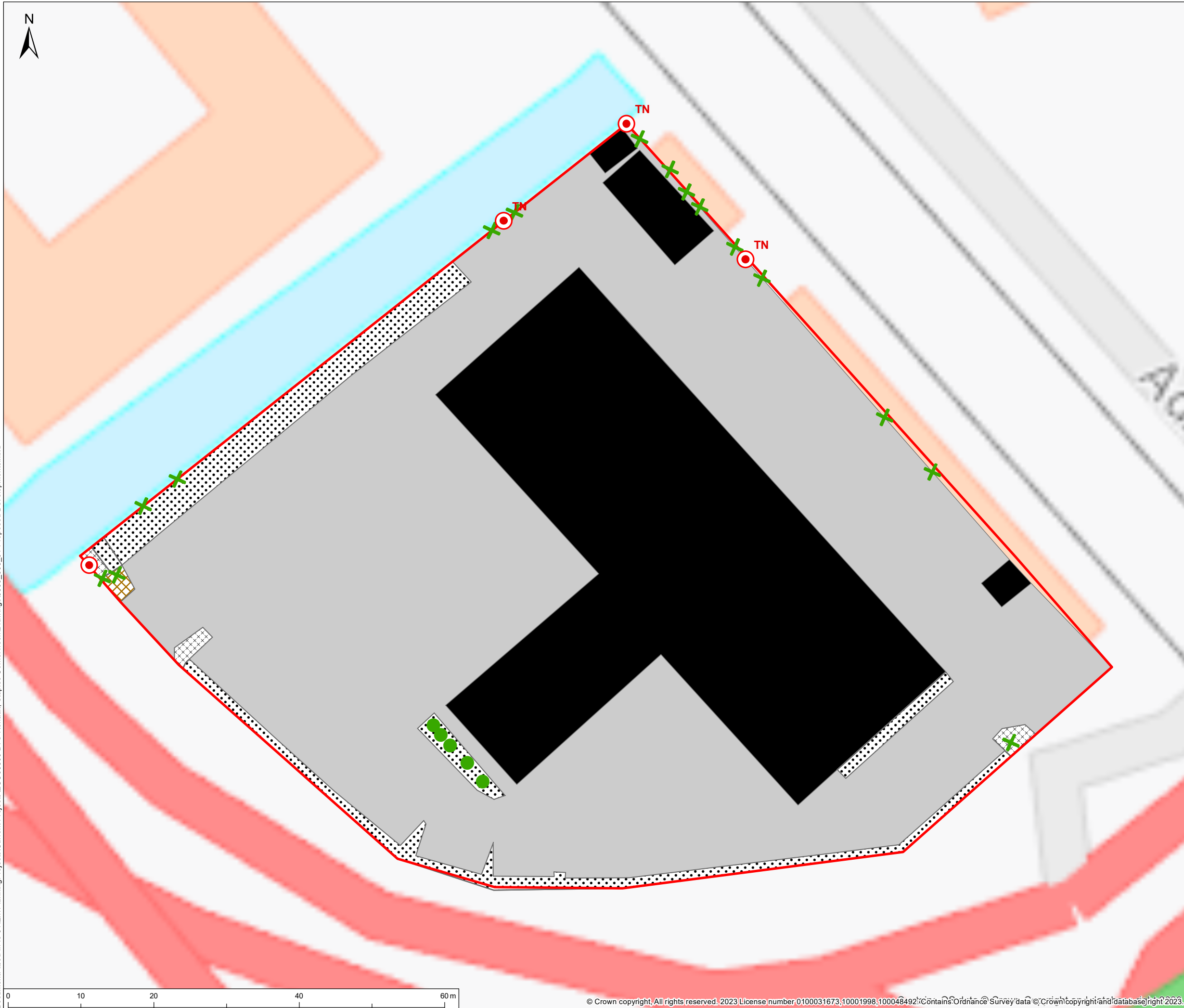
Bare Ground and Ephemeral Vegetation

- 3.3.6 Patchy vegetation within bare ground was present scattered around the edges of the car park; no clear dominant species was recorded, however white clover *Trofolium repens*, Oxford ragwort *Senecio squalidus*, common chickweed *stellaria major*, spear thistle *Cirsium vulgare* and herb Robert *Geranium robertianum* were recorded.

Buildings and Hardstanding

- 3.3.7 The majority of the site consisted of hardstanding and buildings, the central largest building was a formal car dealership with associated buildings and car parking surrounding it.

Figure 3.2: Phase 1 Habitat Survey Map



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- Legend**
- Red line boundary
 - Introduced shrub
 - Ephemeral vegetation
 - Bare ground
 - Building
 - Hard standing
 - Scattered scrub
 - Scattered urban tree
 - Target note - Location of Japanese knotweed

Rev	Description	By	CB	Date



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Project **BYSS - Staples Corner**

Title **Phase 1 Habitat Survey**

Status **For Issue** Drawn By **LT** PM/Checked By **KT**

Project Number **ECO03309** Scale @ A3 **1:500** Date Created **26/10/23**

Figure Number **3.2** Rev **01**

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3.4 Ecological Scoping Survey

Plants

- 3.4.1 Stands of introduced buddleia and the invasive Japanese knotweed were scattered around the northern boundaries of the site, encroaching from offsite over the red line. to be encroaching around the boundary of the site.

Amphibians and Reptiles

- 3.4.2 The site did not offer any suitable habitat for amphibian or reptile species; nor were there any suitable ponds within 500 m of the site. Four records for common toad were found within the desk study 0.83 km from the site boundary. The Brent Reservoir was located within 500 m from the site, however there was not suitable connecting habitat between the reservoir and the site.
- 3.4.3 The site held negligible potential for amphibian and reptile species, and therefore they are not considered further in this report.

Birds

- 3.4.4 The building did not offer any suitable nesting habitat for common bird species; however, the flat roof may hold potential to support gull species which favour open flat roofs to nest on.
- 3.4.5 Desk study results recorded 90 bird species within 2 km of the site, of which 28 were Schedule 1 species listed under the Wildlife and Countryside Act 1981 (as amended), however the habitats present on site would not support these species for breeding.
- 3.4.6 As areas of introduced shrub onsite were scattered and not dense, they were not considered to provide suitable habitat for nesting birds, however they were likely to provide limited foraging habitat.

Bats

- 3.4.7 The buildings did not offer suitable habitat for roosting or foraging / commuting bats. A total of five bat species were recorded in the desk study. The offsite River Brent held potential for foraging and commuting bats, however the area was well lit due to the overpass railway and main road within the immediate surrounding area of the red line boundary.
- 3.4.8 Due to the low suitability of habitat available to bats onsite there is negligible potential for roosting bats and low potential for foraging and commuting bats within the site and surrounding boundaries.

4 EVALUATION AND POTENTIAL IMPACTS

4.1 Designated Sites

4.1.1 Whilst there are designated sites considered to be close to the proposed development, there is no green corridor connecting the site with nearby designated sites. The River Brent immediately north of the site boundary does feed into the Brent Reservoir SSSI, LNR, SINC and therefore recommendations will be made to mitigate and control the risk of pollutants from the construction and operational phase of the proposed development, from entering the river. With these recommendations it is considered that the proposals will have a negligible impact on neighbouring designated sites.

4.2 Habitats

4.2.1 All of the habitats on site were considered to be of a low ecological value. However there will be a requirement for the project to follow Biodiversity Net Gain (BNG) / Urban Greening requirements.

4.2.2 Under Schedule 9 Part 2 of the Wildlife and Countryside Act 1981 (as amended) (WCA), it is an offence to cause Schedule 9 plants to grow in the wild and, if transported offsite, there is a duty of care for any part of the plant that can facilitate growth, including, for example, whole plants, seeds, rhizomes, bulbs, corms and cuttings.

4.2.3 Stands of the invasive plant species Japanese knotweed were found encroaching the northern boundaries of the site. The proposed development include works along these boundary features, with minimal vegetation clearance, therefore the current proposals are likely to be impacted by the presence of this species. Recommended mitigation is provided below in Section 5.

4.3 Protected Species

Birds

4.3.1 The building provides limited suitable habitat for breeding gulls, therefore recommendations to protect bird nests are made in Section 5 to ensure compliance with wildlife legislation pertaining to breeding birds. Should these measures be adhered to there is **low potential for impacts to nesting birds during the construction phase of the proposed development.**

Bats

4.3.2 A number of bat records were present within the 2 km search radius and the habitats onsite and the boundaries of the site provide limited suitable foraging and commuting habitat for bats, namely the offsite River Brent immediately adjacent to the red line boundary. There were no features on site considered suitable for roosting bats.

4.3.3 To reduce the potential impact to commuting and foraging bats, recommendations have been included in Section 5 of this report. With provided recommendations included in the proposals, **there will be negligible potential for indirect impacts to roosting, commuting and foraging bats.**

5 RECOMMENDED MITIGATION AND ENHANCEMENT

5.1 Designated Sites

5.1.1 Due to the proximity of designated sites to the red line boundary of the proposed developments, and presence of connecting running water course immediately adjacent to the northern site boundary (the River Brent) that flows directly into neighbouring designated sites, it is recommended that pollution control measures are to be provided for both construction and operational phases of the proposals. These will be formalised in a Construction Environment Management Plan (CEMP), which will detail pollution suppressants and methodology to mitigate for any risk to the water course from run off or construction and operational activities.

5.2 Habitats

5.2.1 To ensure the prevention of accidental dispersal of Japanese knotweed, RPS advise that, prior to any site works commencing, an invasive species site assessment and subsequent management plan is undertaken by a suitably qualified ecologist or invasive species surveyor and their advice followed.

5.2.2 Advice to be provided should include the application of preventative measures to avoid dispersal, as well as any mitigation should vegetation removal be required in areas of concern. Should the surveyor deem it necessary, further recommendations may include (but are not limited to) a management plan for the Japanese knotweed.

5.3 Protected Species

Birds

5.3.1 In order to protect bird nests and comply with the law protecting them, the demolition of buildings should take place outside of the breeding bird season, which is generally considered to be from March to August inclusive. If this is not possible, prior to removal, the building should first be checked for the presence of nesting birds by an experienced ecologist. If any nests are found, they will be left undisturbed until the chicks had fledged (usually around six weeks).

Bats

5.3.2 To ensure the foraging habitat along the River Brent has no indirect impacts from the proposals, the lighting to be installed as part of the development that will be situated along the northern boundary of the site or facing the River Brent should be in line with Guidance Note 08/18 Bats and Artificial Lighting in the UK (BCT, 2014).

5.3.3 Lux levels from the proposals should not exceed the present levels of light cast on the river and northern boundary of the site and should avoid lighting the new proposed landscaping elements.

5.4 Enhancement Opportunities

5.4.1 In line with local policy, a BNG Assessment (RPS, 2023a) and Urban Greening Factor (UGF) Assessment (RPS, 2023b) should be carried out on the site; which should aim to reach the recommended targets.

5.4.2 In order to enhance the site with respect to bird nesting opportunities, a series of bird boxes will be incorporated into the final scheme. These will be sited with the advice of a suitably qualified ecologist.

ECOLOGICAL ASSESSMENT

- 5.4.3 To encourage insect and bird foraging in proposed landscaping elements, five bee or bug hotels or one bug tower will be situated along the northern boundary within proposed new habitats.
- 5.4.4 Further, in order to enhance the scheme, suitable climbing shrubs should be included within the soft landscaping for the site, where appropriate.

REFERENCES

Bat Conservation Trust (2014). *Artificial lighting and wildlife Interim Guidance: Recommendations to help minimise the impact of artificial lighting on bats*. Bat Conservation Trust, London.

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JNCC (2010). *Handbook for Phase 1 Habitat survey: a technique for environmental audit (revised reprint)*. Joint Nature Conservation Committee, Peterborough.

RPS (2023a). *BYSS - Staples Corner – Biodiversity Net Gain Assessment*. RPS, Abingdon.

RPS (2023b). *BYSS - Staples Corner – Urban Greening Factor Report*. RPS, Abingdon.

MAGIC Interactive Map. Available from: <https://magic.defra.gov.uk/magicmap.aspx>



APPENDICES

Appendix A

Relevant Legislation

A.1 BIRDS

All birds, their nests and eggs are afforded protection under the Wildlife and Countryside Act 1981, as updated by the Countryside and Rights of Way Act 2000. It is an offence to:

- intentionally kill, injure or take any wild bird;
- intentionally take, damage or destroy the nest of any wild bird while it is in use or being built; and
- intentionally take or destroy the egg of any wild bird.

Schedule 1 birds cannot be intentionally or recklessly disturbed when nesting and there are increased penalties for doing so. Licences can be issued to visit the nests of such birds for conservation, scientific or photographic purposes but not to allow disturbance during a development even in circumstances where that development is fully authorised by consents such as a valid planning permission.

A.2 BATS

All British bat species are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981, as updated by the Countryside and Rights of Way Act 2000. All British bats are also included on Schedule 2 of The Conservation of Habitats and Species Regulations 2019 (as amended) as European Protected Species. It is an offence to:

- intentionally or recklessly kill, injure or capture bats;
- deliberately or recklessly disturb bats (whether in a roost or not); and
- damage, destroy or obstruct access to bat roosts.

A roost is defined as 'any structure or place which [a bat] uses for shelter or protection'. As bats tend to reuse the same roosts, legal opinion is that a roost is protected whether or not bats are present at the time of survey.

A licence will therefore be required by those who carry out any operation that would otherwise result in offences being committed.

The following bat species are listed as being of principal importance for the conservation of biodiversity in England, (commonly referred to as UKBAP Priority species): barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared *Plecotus auritus*, greater horseshoe *Rhinolophus ferrumequinum* and lesser horseshoe *Rhinolophus hipposideros*

Summary desk study data for bird species within 2 km of the site, in the last 10 years.

Common name	Scientific name	Nearest record from site (km)	Year of nearest record	Total Records (Max count)	Conservation Status
Swift	<i>Apus apus</i>	0.38	2019	537 (2500)	LPS , Bird-Red
Song Thrush	<i>Turdus philomelos</i>	0.53	2014	218 (394)	LPS , Local Spp of Cons Conc
Gadwall	<i>Mareca strepera</i>	0.53	2014	589 (477)	LPS
Pochard	<i>Aythya ferina</i>	0.76	2014	414 (310)	LPS , Local Spp of Cons Conc, Bird-Red
Ferruginous Duck	<i>Aythya nyroca</i>	0.78	2016	25 (1)	Birds Dir Anx 1
Redwing	<i>Turdus iliacus</i>	0.79	2019	435 (2099)	W&CA Sch1 Part 1
Grey Wagtail	<i>Motacilla cinerea</i>	0.79	2019	166 (21)	Local Spp of Cons Conc
Little Egret	<i>Egretta garzetta</i>	0.79	2019	572 (13)	Birds Dir Anx 1
Mistle Thrush	<i>Turdus viscivorus</i>	0.79	2019	137 (114)	LPS , Local Spp of Cons Conc, Bird-Red
Starling	<i>Sturnus vulgaris</i>	0.79	2019	338 (5711)	LPS , Local Spp of Cons Conc Bird-Red
Baltic Gull	<i>Larus fuscus fuscus</i>	0.79	2019	61 (80)	LPS
Lapwing	<i>Vanellus vanellus</i>	0.81	2014	972 (500)	NERC Act Section 41, LPS, Local Spp of Cons Conc, Bird-Red
Common Tern	<i>Sterna hirundo</i>	0.81	2014	578 (88)	Birds Dir Anx 1
House Martin	<i>Delichon urbicum</i>	0.87	2019	463 (3799)	LPS , Bird-Red
Lesser Black-backed Gull	<i>Larus fuscus</i>	0.87	2015	297 (101)	LPS
Scaup	<i>Aythya marila</i>	1.11	2017	125 (2)	W&CA Sch1 Part 1, NERC Act Section 41 Local Spp of Cons Conc, Bird-Red
Whimbrel	<i>Numenius phaeopus</i>	1.11	2019	52 (3)	W&CA Sch1 Part 1, Bird-Red
Fieldfare	<i>Turdus pilaris</i>	1.11	2019	298 (1802)	W&CA Sch1 Part 1, Bird-Red
Black-tailed Godwit	<i>Limosa limosa</i>	1.11	2019	52 (36)	W&CA Sch1 Part 1, LPS Local Spp of Cons Conc, Bird-Red
Little Ringed Plover	<i>Charadrius dubius</i>	1.11	2019	48 (2)	W&CA Sch1 Part 1, LPS
Hoopoe	<i>Upupa epops</i>	1.11	2013	1 (P)	W&CA Sch1 Part 1
Crossbill	<i>Loxia curvirostra</i>	1.11	2015	9 (15)	W&CA Sch1 Part 1

ECOLOGICAL ASSESSMENT

Garganey	<i>Spatula querquedula</i>	1.11	2019	51 (5)	W&CA Sch1 Part 1
Greenshank	<i>Tringa nebularia</i>	1.11	2019	146 (13)	W&CA Sch1 Part 1
Brambling	<i>Fringilla montifringilla</i>	1.11	2019	83 (65)	W&CA Sch1 Part 1
Black-necked Grebe	<i>Podiceps nigricollis</i>	1.11	2019	21 (50)	W&CA Sch1 Part 1
Green Sandpiper	<i>Tringa ochropus</i>	1.11	2019	980 (9)	W&CA Sch1 Part 1
Turtle Dove	<i>Streptopelia turtur</i>	1.11	2013	6 (1)	NERC Act Section 41, Local Spp of Cons Conc, Bird-Red
Curlew	<i>Numenius arquata</i>	1.11	2016	21 (8)	NERC Act Section 41, Local Spp of Cons Conc Bird-Red
Wood Warbler	<i>Phylloscopus sibilatrix</i>	1.11	2017	2 (1)	NERC Act Section 41, Local Spp of Cons Conc Bird-Red
Ring Ouzel	<i>Turdus torquatus</i>	1.11	2019	27 (3)	NERC Act Section 41, Local Spp of Cons Conc Bird-Red
Tree Pipit	<i>Anthus trivialis</i>	1.11	2019	25 (2)	NERC Act Section 41, Local Spp of Cons Conc Bird-Red
Grasshopper Warbler	<i>Locustella naevia</i>	1.11	2013	2 (1)	NERC Act Section 41, LPS , Local Spp of Cons Conc Bird-Red
Yellowhammer	<i>Emberiza citrinella</i>	1.11	2016	8 (1)	NERC Act Section 41, LPS , Local Spp of Cons Conc, Bird-Red
Cuckoo	<i>Cuculus canorus</i>	1.11	2017	35 (6)	NERC Act Section 41, LPS , Local Spp of Cons Conc Bird-Red
Spotted Flycatcher	<i>Muscicapa striata</i>	1.11	2019	133 (7)	NERC Act Section 41, LPS , Local Spp of Cons Conc Bird-Red
Skylark	<i>Alauda arvensis</i>	1.11	2019	150 (29)	NERC Act Section 41, LPS , Local Spp of Cons Conc Bird-Red
Woodcock	<i>Scolopax rusticola</i>	1.11	2019	41 (2)	Local Spp of Cons Conc, Bird-Red
Nightingale	<i>Luscinia megarhynchos</i>	1.11	2019	11 (2)	Local Spp of Cons Conc, Bird-Red
Yellow Wagtail	<i>Motacilla flava</i>	1.11	2019	168 (36)	Local Spp of Cons Conc, Bird-Red
Whinchat	<i>Saxicola rubetra</i>	1.11	2019	95 (6)	Local Spp of Cons Conc, Bird-Red
Pied Flycatcher	<i>Ficedula hypoleuca</i>	1.11	2017	13 (1)	Local Spp of Cons Conc
Bewick's Swan	<i>Cygnus columbianus bewickii</i>	1.11	2014	2 (4)	Birds Dir Anx 1, W&CA Sch1 Part 1, NERC Act Section 41, Bird-Red
Bittern	<i>Botaurus stellaris</i>	1.11	2014	16 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1 NERC Act Section 41, LPS , Local Spp of Cons Conc
Slavonian Grebe	<i>Podiceps auritus</i>	1.11	2013	3 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1, Bird-Red
Montagu's Harrier	<i>Circus pygargus</i>	1.11	2015	3 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1, Bird-Red

ECOLOGICAL ASSESSMENT

Ruff	<i>Calidris pugnax</i>	1.11	2015	38 (2)	Birds Dir Anx 1, W&CA Sch1 Part 1, Bird-Red
Merlin	<i>Falco columbarius</i>	1.11	2016	12 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1, Bird-Red
Osprey	<i>Pandion haliaetus</i>	1.11	2015	13 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1
Avocet	<i>Recurvirostra avosetta</i>	1.11	2015	6 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1
Black Tern	<i>Chlidonias niger</i>	1.11	2015	32 (6)	Birds Dir Anx 1, W&CA Sch1 Part 1
Honey-buzzard	<i>Pernis apivorus</i>	1.11	2016	11 (3)	Birds Dir Anx 1, W&CA Sch1 Part 1
Wood Sandpiper	<i>Tringa glareola</i>	1.11	2016	22 (2)	Birds Dir Anx 1, W&CA Sch1 Part 1
Marsh Harrier	<i>Circus aeruginosus</i>	1.11	2019	4 (1)	Birds Dir Anx 1, W&CA Sch1 Part 1
Little Gull	<i>Hydrocoloeus minutus</i>	1.11	2019	35 (22)	Birds Dir Anx 1, W&CA Sch1 Part 1
Mediterranean Gull	<i>Ichthyaetus melanocephalus</i>	1.11	2019	64 (85)	Birds Dir Anx 1, W&CA Sch1 Part 1
Red Kite	<i>Milvus milvus</i>	1.11	2019	35 (3)	Birds Dir Anx 1, W&CA Sch1 Part 1
Bar-tailed Godwit	<i>Limosa lapponica</i>	1.11	2014	15 (15)	Birds Dir Anx 1
Sandwich Tern	<i>Thalasseus sandvicensis</i>	1.11	2014	15 (10)	Birds Dir Anx 1
Short-eared Owl	<i>Asio flammeus</i>	1.11	2015	23 (3)	Birds Dir Anx 1
Arctic Tern	<i>Sterna paradisaea</i>	1.11	2017	55 (14)	Birds Dir Anx 1
Barnacle Goose	<i>Branta leucopsis</i>	1.11	2019	5 (1)	Birds Dir Anx 1
Golden Plover	<i>Pluvialis apricaria</i>	1.11	2019	10 (14)	Birds Dir Anx 1
Kittiwake	<i>Rissa tridactyla</i>	1.11	2016	10 (2)	Bird-Red
Dunlin	<i>Calidris alpina</i>	1.11	2019	171 (20)	Bird-Red
Goldeneye	<i>Bucephala clangula</i>	1.11	2019	50 (3)	Bird-Red
Lesser Spotted Woodpecker	<i>Dryobates minor</i>	1.11	2015	95 (3)	LPS Local Spp of Cons Conc Bird-Red
Ringed Plover	<i>Charadrius hiaticula</i>	1.11	2019	95 (17)	LPS Local Spp of Cons Conc Bird-Red
Shelduck	<i>Tadorna tadorna</i>	1.11	2016	183 (8)	LPS
Sand Martin	<i>Riparia riparia</i>	1.11	2019	304 (233)	LPS
Common Sandpiper	<i>Actitis hypoleucos</i>	1.11	2019	1024 (41)	LPS
Tawny Owl	<i>Strix aluco</i>	1.11	2019	104 (100)	LPS

Site survey photographs



Photograph 1. Central building onsite.



Photograph 2. Offsite River Brent, north of the red line boundary.



Photograph 3. Example of formal planting present onsite.



Photograph 4. Individual trees present on site.

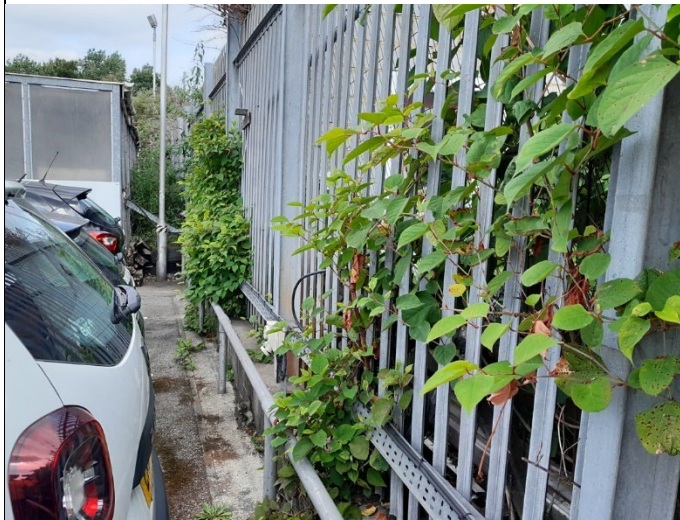
ECOLOGICAL ASSESSMENT



Photograph 5. Bare ground and gravel around the edge of the site.



Photograph 6. Scattered ephemeral vegetation.



Photograph 7. Example of encroaching stalls of Japanese knotweed, along the northeastern boundary.



Photograph 8. Example of encroaching stalls of Japanese knotweed, along the northeastern boundary.

ECOLOGICAL ASSESSMENT



Photograph 9. Northeast corner with encroaching buddleia scrub.



Photograph 10. Introduced shrub, scattered scrub and ephemeral vegetation.