September 2020

SYON GARDENS

HOMEBASE BRENTFORD SITE, TW7 5QE

Ecology and Biodiversity Assessment

Consultant: Derek Finnie Associates

St Edward
Designed for life

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Ecological and Biodiversity Assessment

September 2020

Report Ref: DFA19103V8

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1 INTRODUCTION

1.1 Background

1.1.1 Derek Finnie Associates was commissioned by St Edward Homes Limited, which is a joint venture between M&G Investment and Berkeley Group, to undertake an ecological assessment of the site located at the juncture of Great West Road and Syon Lane in Brentford, herein referred to as the ' Site'. The Site is currently in use as a Homebase superstore with associated car parking. St Edward Homes Limited is bringing forward the redevelopment of both the Tesco Osterley and Homebase Brentford sites. The existing Tesco store would be re-provided on the Homebase site as part of a mixed-use development with residential above, which releases the opportunity to deliver a comprehensive residential-led mixed-use development on the Tesco site.

1.1.2 The application will be for "*Full planning application for the demolition of existing building and car park and erection of buildings to provide residential units, a replacement retail foodstore, with additional commercial, business and service space, and a flexible community space, and ancillary plant, access, servicing and car parking, landscaping and associated works*"

1.1.3 As St Edward Limited are looking to re-develop the Site, there is a need to assess any potential adverse ecological impacts of the proposal, as well as identify areas where biodiversity enhancements can be achieved. To this end, an Extended Phase 1 Habitat survey of the Site was undertaken December 2018 and March 2019, comprising a Site walk over survey giving special attention to the Site's potential to support protected species. A breeding bird survey was also conducted throughout the spring 2019; a linear band of woodland that runs along the railway line which is outside the Site boundary was also included in the bird survey.

1.1.4 The following report outlines the methodologies employed throughout the ecological assessment, describes the current ecological status of the Site and discusses the ecological constraints to any future development, as well as options for biodiversity enhancement.

2 LEGISLATIVE FRAMEWORK

2.1 National policy and Guidance

Legal Framework

2.1.1 The legislative framework applicable to this assessment is summarised below and outlined in Appendix 1.

International Conventions and Directives

- Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (EC Habitats Directive);
- Council Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive);
- The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) 1979;
- The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) 1983; and
- Convention on Biological Diversity 1992.

National Legislation

- The Wildlife and Countryside Act 1981 (WCA);
- The Conservation of Habitats and Species Regulations 2017;
- The Countryside and Rights of Way Act 2000 (CRoW);
- Natural Environment and Rural Communities Act 2006 (NERC);
- The Protection of Badgers Act 1992; and
- The Hedgerow Regulations 1997.

Statutorily Protected Sites

2.1.2 Local Nature Reserves (LNRs); National Nature Reserves (NNRs); Sites of Special Scientific Interest (SSSIs); Special Areas of Conservation (SAC); and Special Protection Areas (SPAs) contain examples of some of the most important natural and semi-natural ecosystems in Europe and receive strict protection under United Kingdom (UK) legislation. Although not strictly protected under legislation, Ramsar sites are given the same level of protection through policy.

Non-Statutory Sites

2.1.3 Non-statutory sites of county conservation value are designated by Local Planning Authorities (LPAs); within Berkshire these are known as Local Wildlife Sites (LWS). Such sites are afforded a measure of protection in local development plans.

Protected Species

2.1.4 Under UK legislation, a number of species, including bats *Chiroptera* sp. and great crested newts *Triturus cristatus* are strictly protected from death, injury or harm; whilst places used for their shelter or rest are protected from damage, disturbance and destruction. Certain species such as some reptiles and birds only receive partial protection under UK legislation, e.g. protection from killing / injuring only or protection at certain times of the year only.

Invasive Weeds

2.1.5 The WCA 1981 makes it an offence to plant or otherwise cause to grow in the wild numerous species including Japanese knotweed Fallopia japonica and giant hogweed Heracleum mantegazzianum.

Non-Statutory Policies

2.1.6 The UK Biodiversity Action Plan (UK BAP) was established in response to the global Convention on Biological Diversity, 1992. Individual Action Plans define actions and measures to meet the conservation objectives defined in the strategy and specify measurable targets. They determine the broad habitats and species that are of value to the natural environment of the UK and identify actions and projects that could be undertaken to help protect or enhance the national biodiversity.

2.1.7 Local Biodiversity Action Plans (LBAPs) are implemented through planning policy, identifying habitats and species in need of conservation action at the local or regional level. BAPs in the UK have no statutory status but provide a framework for implementing conservation requirements.

Planning Policy

National Planning Policy

National Planning Policy Framework

2.1.8 The following objectives relating to biodiversity conservation are considered relevant to this assessment. The National Planning Policy Framework (NPPF) seeks to:

- Protect and enhance valued landscapes, geological conservation interests and soils;
- Recognise the wider benefits of ecosystem services;
- Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, contribute to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;
- Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate; and
- Prevent the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Regional Planning Policy

The London Plan (March 2016)

2.1.9 The following section of the London Plan may be relevant to the current proposal.

Policy 7.19 Biodiversity and Access to Nature

Paragraph A

The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

Paragraph B

Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 5.14, 5.15, 5.17, 5.20, 6.3, 7.14, 7.15, 7.25, and 7.26. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Paragraph C

Development proposals should:

a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity;

b. prioritise assisting in achieving targets in biodiversity action plans (BAPs) set out in Table 7.3 and/or improve access to nature in areas deficient in accessible wildlife sites;

c. not adversely affect the integrity of European sites, and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species, or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

Paragraph D

On Sites of Importance for Nature Conservation development proposals should:

a. give the highest protection to sites with existing or proposed international designations (SACs, SPAs, Ramsar sites) and national designations (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations;

b. give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance;

c. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

Paragraph E

When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1. avoid adverse impact to the biodiversity interest;

2. minimize impact and seek mitigation;

3. only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

Paragraph F

In their LDFs, boroughs should:

a. use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.

b. identify areas deficient in accessible wildlife sites and seek opportunities to address them.

c. include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets.

d. ensure sites of European or National Nature Conservation Importance are clearly identified.

e. identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

<u>Emerging London Plan 2019</u>

2.1.10 Some consideration is also given to policy G6 is the emerging London Plan 2019:

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.

B In developing Development Plan policies, boroughs should:

1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board

2) identify areas of deficiency in 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) seek opportunities to create habitats that are of particular relevance and benefit in an urban context

4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations

5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.

C Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:

1) avoid adverse impact to the special biodiversity interest of the site

2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site

3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.

D Biodiversity enhancement should be considered from the start of the development process.

London Borough of Hounslow: Local Plan 2015 - 2030

2.1.11 Within the London Borough of Hounslow: Local Plan 2015 – 2030 Policy GB7 is relevant.

Policy GB7 – Biodiversity
Our approach:

We will protect and enhance the London Borough of Hounslow's natural environment and seek to increase the quantity and quality of the borough's biodiversity.

We will achieve this by

(a) Permitting development only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated;

(b) Protecting designated international, national and local nature conservation areas, as set in supporting facts, and supporting new designations;

(c) Promoting the qualitative enhancement of biodiversity sites, including improvements to access, connectivity and the creation of new habitat;

(d) Working with partners, including the Hounslow Biodiversity Partnership, the Crane Valley Partnership, the Brent Catchment Partnership and the Thames Landscape Strategy to improve conditions for biodiversity; and

(e) Encouraging the greening of the borough, through landscaping and tree planting, and protecting existing trees through Tree Preservation Orders (TPOs).

We will expect development proposals to:

(f) Contribute to the greening of the borough, by incorporating green roofs and walls, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the preparation of ecological plans and strategies where major developments are proposed, thereby resulting in a gain for biodiversity in the borough; and

(g) Contribute to the action plans set out in the Hounslow Biodiversity Action Plan.

3 METHODOLOGY

3.1 Data Search

3.1.1 A review of the Government's MAGIC website was undertaken for the location and extent of statutory protected sites within 2km of the Site, extending to 5km in the case of Natura 2000 sites.

3.2 Habitat Survey

3.2.1 An 'extended' Phase 1 Habitat Survey was carried out on 8th December 2018 and 21st March 2019; this followed the methodology presented by the JNCC (2010). The Phase 1 technique aims to classify each habitat into categories based on the assemblage of plant species present, with the dominant plant species for each habitat being noted. In some cases, sub-divisions or modifications of the standard categories can be made where this is useful in providing further detail.

3.2.2 An 'extended' form of the basic methodology was employed to determine whether any notable or protected species of fauna utilise the study area, in particular badgers, bats, amphibians, reptiles and birds. In the absence of direct evidence of these species, an assessment was made on the potential for the site to support such species.

3.3 Breeding Bird Survey

3.3.1 Territory mapping, as described by Bibby *et al* (2000) was used to assess the breeding bird assemblage within the Site. A transect was walked across the Site on three separate occasions, with the route being reversed on the second visit. The transect came within 50m of all points of the Site to ensure an adequate survey effort was achieved.

3.3.2 Observations of all bird species encountered, with the number, sex (where possible) and any breeding or territorial behaviour being noted on a large-scale field map. The transects were undertaken first thing in the morning, although care was taken to avoid the first hour after sunrise as this is the time of highest bird activity and may skew the results in favour of the area at the start of the transect. The survey was conducted in fine weather on the, 21st March, 11th April and 14th May 2019.

Signs of breeding activity, such as nests themselves or parents carrying food or faecal sacs, as well as repeated territorial behaviour allows the potential breeding status of individual birds to be determined as shown in Table 1, subject to certain assumptions (after IBCC 1969).

Table 1. Breeding Status Criteria

Breeding Status	Criteria
Confirmed	Active nest, dependent young, parents carrying food, parents carrying faecal sacs.

Breeding Status	Criteria
Probable	Pair observed in suitable habitat, repeated territorial behaviour/display in the same area.
Possible	Individual observed in suitable habitats, single observation of territorial behaviour/display
Non-breeding	Individual observed in un-suitable habitat.

3.4 Survey Constraints

3.4.1 Phase 1 survey can be undertaken at any time of the year and as the survey was undertaken across two seasons, confidence in the results is high.

3.4.2 Access was available to all areas of the Site.

3.4.3 The survey data is less than 18 months hold so is still consider valid in line with CIEEM guidance.

3.4.4 The assessment was undertaken in line with the latest sectoral guidance produced by the Chartered Institute of Ecology and Environmental Management (CIEEM), as well as BS 42020: 2013 *Biodiversity – Code of Practice for Planning and Development*.

4 SITE DESCRIPTION

4.1 Data Search

4.1.1 No part of the Site or the immediate surrounding area is designated on conservation grounds. The closets statutory designated site is Syon Park Site of Special Scientific Interest (SSSI), which lies approximately 1.1km to the south east of the Site. Syon Park is designated as it is the only known area of tall grass washland along the Thames in Greater London. The Site is outside the SSSI Impact Risk Zone.

4.1.2 Richmond Park Special Area for Conservation lies some 4km to the south east which is likely to be outside the zone of ecological influence of the proposed development. However, potential indirect impacts upon Richmond Park may need to be explored further through a Habitat Regulations Assessment.

4.2 Phase 1 Survey

4.2.1 The Site is situated to the east of the Great West Road in Brentford with a rail line forming the south eastern boundary of the Site. The surrounding land is dominated by existing residential and commercial properties.

4.2.2 The following Phase 1 habitats were encountered within the Site:

- Scattered trees;
- Introduced shrub; and
- Building and hardstanding.

4.2.3 Each habitat is described in turn below and depicted on Figure 1.

Scattered trees

4.2.4 There ae several individual semi-mature trees around the periphery of the Site, set amongst the introduced shrub. Species noted included cherry *Prunus* sp., ash *Fraxinus excelsior* and sycamore *Acer pseudoplatanus*. There is also a line of young oak *Quercus* sp. set within the pavement, outwith the Site boundary, along the south west boundary.

Introduced Shrub

4.2.5 There are various areas of introduced shrub around the periphery of the car park which comprise mainly non-native species, however the occasional patch of holly *Ilex aquilinium*, rose *Rosa* sp. and dogwood *Cornus sanguinea* was noted; butterfly bush *Buddelja davidii* was also recorded throughout the shrub beds.

4.2.6 Some native, ruderal species have begun to exploit the areas under the planted shrubs, with Yorkshire fog *Holcus lanatus*, ivy *Hedera helix*, dandelion *Taraxacum officinale* agg. common nettle *Urtica dioica*, creeping thistle *Cirsium arvensis* and bramble *Rubus fruticosus* agg being noted.

Building and hardstanding

4.2.7 The vast majority of the Site is given over to buildings and hardstanding. A large superstore constructed principally from prefabricated, corrugate metal sheet, occupies approximately half of the Site. Car parking areas, in the form of tarmacked hardstanding, surround the superstore structure on more or less three sides. The south eastern side of the store is given over to a delivery area and garden centre, below which is an underground car park which is currently used to store vehicles from the neighbouring car dealership.

Invasive species

4.2.8 A small stand of Japanese knotweed was encountered within a flower bed at the north east of the Site (Figure 1).

4.3 Fauna

Breeding Bird Survey

4.3.1 No bird species were identified breeding within the Site itself due to the paucity of semi-natural habitats. Wood pigeon robin and blackbird were encountered feeding in and around the car park, taking advantage of the introduced shrub around the periphery of the Site.

4.3.2 Along the railway line blackcap (2 pairs), robin, blackbird, blue tit and great tit were all noted displaying at least probable breeding activity as defined by IBCC (see table 1).

Other Fauna

4.3.3 No specially protected species or species of a raised conservation status were encountered throughout the December 2018 survey and the Site was assessed as having negligible potential to support such species due to the domination by building and hardstanding. The store itself is constructed principally from metal; no potential features that could be exploited by roosting bats were noted.

5 EVALUATION

5.1 Definition of ecological value

5.1.1 While some level of subjectivity is unavoidable when apportioning value to ecological features and resources, certain parameters and points of reference can be used to help ensure consistency. Those used in this appraisal are explained below.

5.1.2 Sites already possessing statutory or non-statutory nature conservation designations will have been subjected to some form of evaluation process in the past, and their importance defined at a geographical scale (e.g. international, national, local). For these, evaluation will generally reaffirm their qualifying attributes, or in some cases may identify where designation may no longer be appropriate.

5.1.3 Factors such as extent, naturalness, rarity, fragility and diversity are all relevant to the determination of ecological value, and for the evaluation of sites and habitat features outside designated sites, these and other criteria as described by Ratcliffe (1977), may be applied. Ratcliffe's criteria are integral to the procedure for selecting both Sites of Special Scientific Interest and many non-statutory designation systems in the UK, and therefore remain an accepted standard for site evaluation.

5.1.4 In applying these criteria, attention may be drawn to the relative scarcity or abundance of features within the survey area and in the wider geographical context. Some criteria are however absolute and not relative to scale. Ancient woodland, for example, is fragile irrespective of whether it is being considered in an international or local context. Similarly, the value of an otherwise poor habitat may be elevated if it is central to the survival of a rare species.

5.1.5 Where evaluation is important for the purposes of informing decisions related to land-use planning and development control, the above approach needs to be supplemented by consideration of whether individual species are subject to legal protection, or whether habitats or species are present which have been identified as 'priorities' for biodiversity conservation in the UK. Planning authorities have a statutory duty to further biodiversity objectives and the presence of such resources may be material to the determination of development control decisions.

5.1.6 Further indications of conservation status for individual species are provided by reference to the Red Data Book system, the Vascular Plant Red Data List for Great Britain (Cheffings and Farrell 2006) or for birds by reference to the Birds of Conservation Concern (Eaton et al. 2015) This divides birds into three lists; Red List (birds of high conservation concern), Amber List (birds of moderate conservation concern) and Green List (not of conservation concern).

5.1.7 Scales of comparison varying from the international to the context of the local area may be used to define the measure of importance attached to individual features. The definition of geographic terms can vary, but in this evaluation the geographic frame of reference contained within the CIEEM guidelines (CIEEM 2018) is used.

5.2 Site evaluation

5.2.1 No part of the Site or the immediate surrounding area is designated on conservation grounds. Syon Park Site of Special Scientific Interest (SSSI), which is designated as a SSSI as it is the only known area of tall grass washland along the Thames in Greater London, is located some 1.1km to the south east. The Site is outside the SSSI Impact Risk Zone. Richmond Park Special Area for Conservation lies some 4km to the south east which is likely to be outside the zone of ecological influence of the proposed development.

5.2.2 No habitats or species of value were identified within the Site and the Site has been assessed as being of negligible ecological value.

5.2.3 The small area of Japanese knotweed is currently being treated.

5.2.4 No ecological constraints to re-development of the Site have been identified to date. It is likely that biodiversity gains can be delivered through appropriate landscaping within any future development.

6 IMPACTS AND ENHANCEMENTS

6.1 Predicted impacts

6.1.1 The existing building and hardstanding area within the Site have been assessed as being of Negligible ecological value. There the loss would result in a negligible ecological impact resulting in non-significant effect.

6.2 Ecological Enhancements

6.2.1 Biodiversity gains will be achieved through the inclusion of ecological valuable habitats within the landscape strategy. Approximately 239m^2 of native hedgerow will be incorporated into the scheme along with over 1500m^2 of wildlife friendly shrub and perennial planting and almost 40m^2 of wildflower meadow. There will also be a rockery with alpine planting covering over 180m^2, over 1100m^2 of species rich lawn which will complement the proposed 4500m^2 of green/brown roof. The layout of the biodiversity improvements within the scheme has been designed so as to create increased ecological permeability through and around the Site. The proposed ecological enhancement within the Site result in a significant positive gain, creating over 7500m^2 of new, species rich habitat (equivalent to an increase in 4.53 biodiversity units).

6.2.2 Furthermore, a total of 159 trees and multi-stem shrubs will be incorporated throughout. Whilst these are not necessarily native stock, many will provide some ecological benefit through, for example, the provision of nectar sources.

7 SUMMARY

7.1.1 An ecological assessment, comprising an Extended Phase 1 Habitat survey, was undertaken across the Site in Brentford. The Site was found to comprise building and hardstanding surround by introduced shrub planting.

7.1.2 Overall, the Site was found to be of negligible ecological value with no ecological constraints to re-development being identified.

7.1.3 Significant biodiversity gains will be achieved through with over 7500m^2 of new, species rich habitat being created within the Site.

7.1.4 Bat and bird boxes, as well as insect hotels, will also be installed in suitable locations wherever possible.

7.1.5 The biodiversity enhancements are shown on the Landscape Masterplan produced by Murdock Wickham (Drawing No: 1553/004) submitted with this application.

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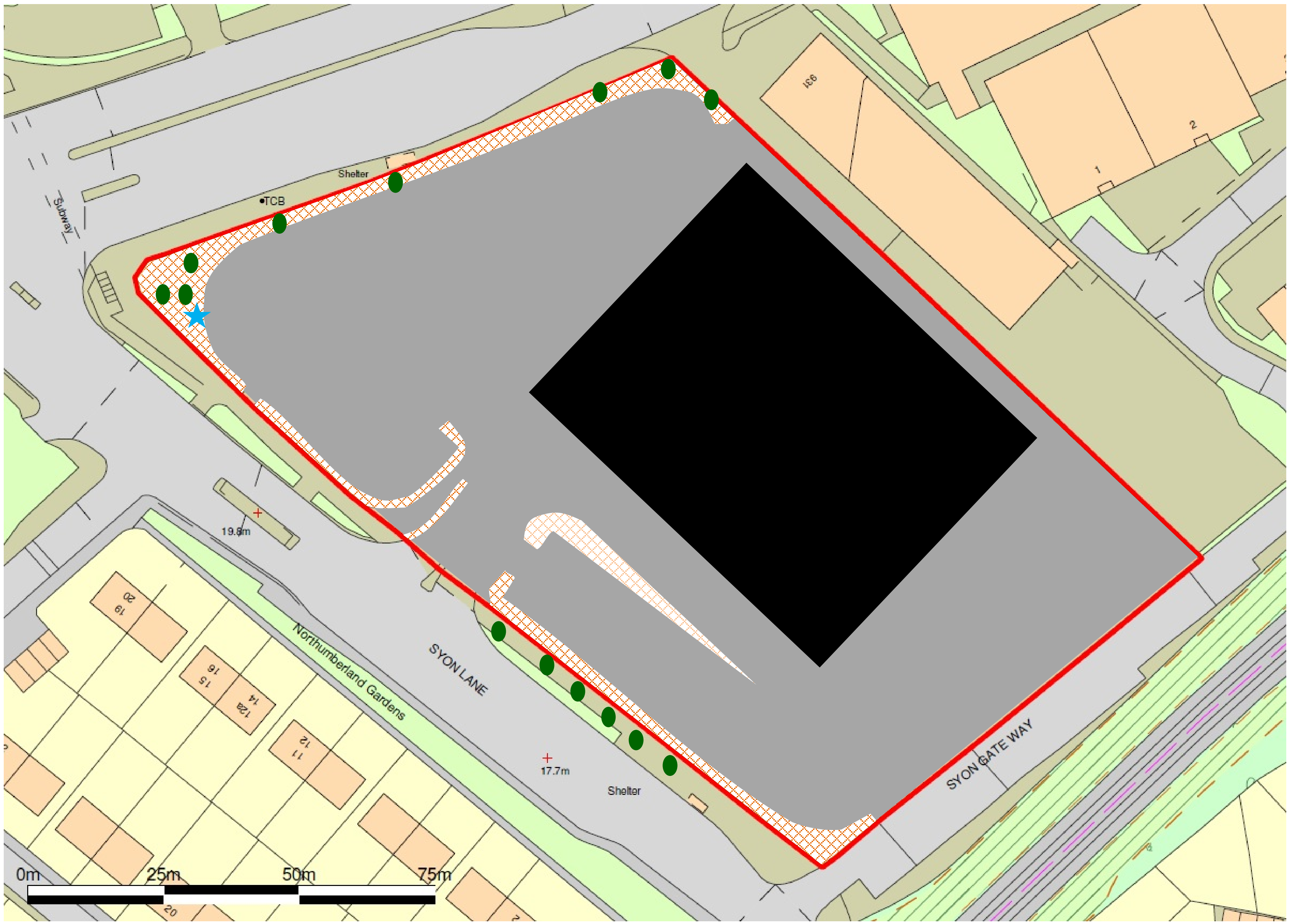

Legend:

- Introduced shrub
- Hardstanding
- Building
- Scattered scrub
- Japanese knotweed
- Site boundary

Do not scale

N

Drawing No: Figure 1

Title: Phase 1 Habitat Map

Date: September 2020

Project: Brentford

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