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Client: Ealing Council

Project: Recreation Road

Report: Ecological Constraints and Opportunities Plan

QUALITY ASSURANCE

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Comments:		
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1.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned in January 2025 to produce an Ecological Constraints and Opportunities Plan (ECOP) by Ealing Council for an area of land known as Recreation Road in the London Borough of Ealing, UB2 5PE, hereafter referred to as 'the site'.

This ECOP document has been produced to inform discussions and landscaping proposals for the site.

At the time of writing, proposals relate to the demolition of the garages in the south of the site, the construction of up to three dwelling plots, and additional soft landscaping.

This ECOP aims to establish the ecological and biodiversity value of the site and the potential presence of legally protected species, in order to inform on constraints that may be associated with the site, general opportunities for biodiversity that could be incorporated within the site design, and appropriate mitigation, compensation and enhancement actions in relation to proposed development works.

No statutory designated sites are present within 2km. The site falls within the Impact Risk Zone (IRZ) of Synon Park Site of Special Scientific Interest (SSSI), 5.5km southeast of the site. Two internationally designated sites were identified within 10km; South West London Waterbodies Ramsar and Special Protection Area (SPA) located 8.5 km southwest, and Richmond Park Special Conservation Area (SAC) located 8.3km southeast of the site.

In terms of non-statutory sites, the closest Site of Importance to Nature Conservation (SINC) is the Grand Union Canal located 250m south, and additionally Havelock and Hortus Cemeteries are located 560m northeast and 930m northeast respectively. Due to the relatively small size of the development and the distance of the site from the closest statutory and non-statutory sites, indirect impacts to designated sites are considered highly unlikely.

Three constraints have been identified regarding the site. Achieving Biodiversity Net Gain (BNG) under the Statutory Biodiversity Metric (SBM) may be difficult due to potential requirements to achieve 10% legally mandated BNG, trees on site should be retained as far as possible. Constraints related to protected species were identified as roosting bats and nesting birds. The garages on site provide crevices spaces and cavity spaces which may be used by roosting bats. Similarly the trees on site provide opportunities for nesting birds. As a result, a Preliminary Roost Assessment (PRA) is recommended, focusing on the garages which may inform the need for further bat surveys. To mitigate impacts to nesting birds, tree clearance (if required) should be outside the bird nesting season only, which is typically recognised as March to August (inclusive). If these months cannot be avoided, a Nesting Bird Check (NBC) by a Suitably Qualified Ecologist (SQE) should be conducted a maximum of 48 hours prior to tree removal.

N.B. This report is for scoping purposes only. Should the site be taken forward as a formal planning application and submitted to the Local Planning Authority, a full Preliminary Ecological Appraisal (PEA) and/or BNGA will be required. As such, recommendations within this scoping report may change, as further data and information is gathered.

Recommendations to influence the design of the development (and to work towards maximising BNG delivery on site via the site design) are given below:

- The site design should maximise replacement of any habitats lost such as individual trees by replacing them with the same habitat types, or habitats of a higher distinctiveness within the soft landscape planting;
- Additional modified grassland and mixed scrub should be implemented into the landscaping designs where feasible for active management;
- Plans should look to integrate built-in bat and bird boxes into the development design; and
- Sensitive lighting to reduce light spill on the surrounding area will limit any potential negative impacts to foraging or commuting bats.

1.1 SITE DESCRIPTION

The site extends to approximately 275m^2 and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 12156 78802, OS co-ordinates 512156, 178802.

The site is comprised of buildings, developed land; sealed surface, scattered scrub and individual trees. The immediate area surrounding the site consists of residential houses and gardens, this extends further to the north, south and east with an educational facility to the west with further residential housing and gardens beyond this.

Residential gardens are the primary habitat surrounding the site. More naturalised green spaces include a large playing field 150m west, and the Grand Union Canal 250m south acting as a vegetated corridor across the wider area. Havelock and Hortus Cemeteries located 560m northeast and 930m northeast act as stepping stone habitats within the wider area. Lowland meadows is the closest priority habitat to the site, found 1500m east.

1.2 METHODOLOGY

A desk-based assessment of the site was undertaken, including a review of OS mapping, aerial imagery and Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website[1] to source information on statutory designated sites[1] and granted European Protected Species Licences (EPSL) within 2km of the site. This search radius was extended out to 10km for internationally designated sites. Information on locations of non-statutory sites was reviewed from Greenspace Information for Greater London using the Discover London page[2].

A site walkover was carried out on 18th February 2025 in dry and cool weather conditions. During the survey, habitats were mapped based on the standard UK Habitat Classification survey (UK Hab survey) methodologies[3] supplemented with secondary codes, e.g. [510] where appropriate, and target notes (TN) describing any features of particular ecological interest. This survey also included an assessment to identify the potential value for notable, rare, and protected species at the site. This involved identifying potential habitats in terms of their suitability for refuge, breeding and foraging in the context of species known to be present locally and regionally.

1.3 LIMITATIONS

The site walkover was undertaken in February, outside of the peak botanical season (May to September inclusive). However, this is not considered a constraint as the site possessed very limited natural habitats consisting of minimal scrub and individual trees, and the majority of the site was dominated by buildings and developed land; sealed surface with limited areas for other perennial species to germinate in the botanical season. Therefore, the information obtained during the site walkover was considered sufficient for categorisation and to provide a robust evaluation of the habitats, their importance and ecological value for supporting protected and notable species.

1.4 SURVEYOR DETAILS

Oliver Hamilton, Graduate Consultant, has a degree in Zoology (BSc Hons) and 1 years' experience in ecological surveying. Oliver assists in a variety of field surveys and related reports such as preliminary Ecological Appraisals and Protected Species Reports, providing recommendations on biodiversity enhancements.

[1] Local Nature Reserves (LNR), Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)

Abbie Case, Senior Consultant, has a BSc (Hons) in Ecology and Conservation, an MSc in Conservation Biology and is an Associate member of CIEEM. Abbie has over seven years in ecological survey and assessment.

Alexandra Wadia, Principal Consultant, has a BSc (Hons) in Biology, and a MSc in Ecology & Environmental Management, and is a Full member of CIEEM. Alexandra holds a Natural England Great Crested Newt Licence and has over eight years' experience in ecological survey, assessment and reporting.

2.0 ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES

Findings of the desk-based assessment and site walkover and recommended mitigation, compensation and enhancement actions, as well as recommendations for potential further surveys are summarised in Table 2.1 below.

The constraints (risks) for each ecological receptor have been colour coded using the risk assessment gauge traffic light system to highlight the degree of impact that a particular factor may have as follows:

- Red - Further survey required;
- Amber - Possible further works required but does not need a further survey; and,
- Green - No further works or surveys required.

Table 2.1 Results and Evaluation of Ecological Constraints and Opportunities at the Site

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
Habitats			
Habitats/Biodiversity Net Gain (BNG)	Based on the site walkover undertaken on the 18th February 2025, habitats on site consist of developed land; sealed surface, with scattered scrub and individual trees. No UK priority habitats, or habitats with high distinctiveness, were identified within or immediately adjacent the site. Within the site, very low, low and medium distinctiveness habitats	*Mitigation* Trees on site should be retained where possible to ensure net gain can be achieved. If trees do need to be removed, landscaping plans need to ensure a greater number of trees are planted in an area publicly accessible to conform with 30-year management under the Statutory Biodiversity Metric (SBM) User Guidelines[4] .	Due to the limited size and diversity of vegetation on site, a further site visit is not required as all the information needed for the PEA and BNGA was assessed during the initial site visit. However, the requirement for the PEA and the BNGA reports still stands.

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	were recorded. Very low distinctiveness habitats include buildings developed land; sealed surface. Medium distinctiveness habitats include three poor condition individual urban trees and scattered elder scrub *Sambucus nigra*. *Constraints* If the proposed design for the site requires habitats on site to be removed, a greater number of trees and additional soft landscaping such as grassland or introduced shrub would need to be replanted to compensate for their removal, which may not be feasible. *Opportunities* Enhancements can be incorporated into the design that will be publicly accessible, to be	*Compensation* Not applicable at this current time *Enhancements* Additional wildlife friendly landscaping such as a biodiverse green roof, modified grassland or mixed scrub are recommended where feasible facing the street.	

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	managed for 30 years. Therefore, areas of modified grassland, mixed scrub or biodiverse roofs are recommended where feasible to allow active management.		
Designated sites	*Description* No statutory designated sites have been identified within 2km of the site. The site falls within the Impact Risk Zone (IRZ) of Synon Park SSSI, 5.5km southeast. Additionally South West London Waterbodies Ramsar and Special Protection Area (SPA) and Richmond Park Special Area of Conservation (SAC) can also be found within a 10km radius. *Priority Habitats* The closest priority habitat is lowland meadow 1500m east, present within Tentlow Lane and Woodland Meadow, a Site of	*Mitigation* Not applicable at this current time *Compensation* Not applicable at this current time *Enhancements* Not applicable at this current time	Not applicable at this current time

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	Importance to Nature Conservation (SINC). *Constraints* The site lies within the IRZ for Synon Park. However, due to the size of this small-scale residential development and distance of the development from these conservation areas, consultation with Natural England for statutory sites is not required. The size and distance of the development from the sites means indirect effects such as air, water or dust pollution are unlikely to impact statutory or non-statutory sites. *Opportunities* Not applicable at this current time		
Foraging and Commuting bats	*Description* The site consists primarily of buildings and developed land; sealed surface (Plate 3.1) with	*Mitigation* The lighting used during both construction and operation will need to be sympathetic to foraging and commuting bats. This will	Not applicable at this current time

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	small areas of scattered scrub and individual trees (**Error! Reference source not found.**) which provide limited vegetation for invertebrate prey species. Light disturbance from the street light opposite the site may further limit foraging on site. The wider landscape consists of residential gardens which provide vegetation to support communities of invertebrate species, furthermore the Grand Union Canal 250m south acts as a linear commuting corridor for commuting bats. However, the site itself has limited vegetation and would be subject to light disturbance from the streetlight adjacent. *Constraints* Not applicable at this current time *Opportunities*	require lighting levels to remain the same level, or below what is currently present. *Compensation* Areas of modified grassland or mixed shrub are recommended where feasible facing the street to support communities of invertebrate prey species. *Enhancements* There is potential for lighting to help create 'dark corridors' through the development to aid the movement of bats through the urbanised landscape. Lighting design can be arranged so that no potential commuting or corridor habitats becomes lit above current levels. Light sources should feature peak wavelengths higher than 550nm to avoid light most disturbing to bats. Lighting should be angled no more than 90o to limit light spill across the development. Furthermore, additional wildlife friendly landscaping such as a biodiverse green roof would support invertebrate prey species which would otherwise be lost if trees and	

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	Increased greening on site will improve connectivity of the site to the wider landscape, while also supporting invertebrate populations for foraging bats.	scrub on site are going to be removed. Furthermore, additional wildlife friendly landscaping such as a biodiverse green roof would support invertebrate prey species which would otherwise be lost if trees and scrub on site are going to be removed.	
Roosting bats	*Description* One record on MAGIC identified a granted European Protected Species Licence pertaining to the destruction of a resting place for common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* 1850m west in 2018. The site consisted of nine garages used by residents or businesses from the surrounding area. The garages consisted of concrete cladding and tin roofs. Three of the garages held potential roosting features. Garage 1 (TN1 shown in Appendix B had a sealed plywood door with a hole leading inside	*Mitigation* To assess the requirement for further bat surveys a Preliminary Roost Assessment (PRA) should be conducted for further assessment of the garages for roosting potential. This will inform whether further emergence surveys are required. Should the PRA confirm suitability of the garages for roosting bats emergence surveys should be conducted in line with BCT best practice guidelines[5]. *Compensation* Compensation of habitats and opportunities for bats will be determined once further assessment has been undertaken and the presence/likely-absence of roosting bats has been determined. Compensation	A PRA should be conducted between summer roosting season (May-September inclusive) to further assess the garages for roosting bats, particularly focusing on garage 1 (TN1) which held a cavity space suitable for supporting large numbers of roosting bats, and lacks disturbance. Once the PRA has taken place, this will inform the requirement for further emergence surveys according to BCT guidelines[5] . Buildings would be assigned None, Negligible, Low, Moderate or High Ecological Receptor Risk Assessment Gauge Description - Constraints and / or Opportunities Mitigation and Compensation Recommendations Further Survey/Timings support roosting bats, further surveys will be required to determine

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	creating a cavity space for multiple individuals (Plate 3.2 left). Garage 2 (TN2) (Plate 3.2 right) had an open door with gaps in the concrete cladding providing small crevice spaces for a small number of individuals. Garage 3 (TN3) had raised tin roofing providing a cavity area, potentially leading inside the garage. Trees on site were small and contained no ecological features such as crevice spaces for roosting bats. *Constraints* Garages with the exception of Garage 1 are likely used by residents providing levels of disturbance that would limit roosting on site. *Opportunities* If light levels differ post development a wildlife friendly	measures may include supplementary bat boxes if roosting is confirmed. *Enhancement* Aside from a wildlife sensitive lighting scheme, further enhancement on site is limited due to the proposed residential use of the site. Therefore, additional enhancements other than the compensatory bat boxes or lighting may not be feasible.	mitigation/compensation actions (as appropriate). suitability following the PRA. Buildings with Low suitability would require one dusk emergence survey visit from May to August. Moderate suitability buildings would require two dusk emergence survey visits, undertaken a minimum of three weeks apart and with at least one of the surveys undertaken between May and August. Buildings with High suitability would require three dusk emergence survey visits, undertaken a minimum of three weeks apart and with two of the surveys undertaken between May and August. The results of the emergence survey/s would inform the requirement for/scope of any bat-specific mitigation measures.

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	lighting scheme should be recommended. Bat boxes could also be installed on the proposed residential housing.		
Birds	*Description* There was limited vegetation cover within the site. (Plate 3.1.) Residential gardens surrounding the site are more likely to provide a good quality foraging and nesting habitats than the limited extent of vegetation present within the redline boundary. However, the trees on site do provide some suitable nesting habitat for birds. The scrub was considered not dense enough to provide suitable cover or support for nesting birds. Furthermore, starlings *Sturnus vulgaris* were seen flying between residential houses in close proximity to the site. *Constraints*	*Mitigation* Works should take place outside of the bird nesting season where possible, especially works that are likely to impact locations where birds may nest. If works are to be undertaken during the nesting season, which is typically recognised as March to August inclusive, an NBC for active bird nests would need to be carried out by a SQE no less than 48 hours prior to the commencement. If an active nest is identified, a suitable exclusion zone would be agreed and implemented, where works cannot proceed until an ecologist has confirmed that chicks have fledged and/or the nest is no longer in use. *Compensation* Nesting opportunities in trees may be lost, therefore a range of bird boxes may be	If redevelopment of the site is to occur during the nesting bird season, then an NBC is required and should be undertaken by a Suitably Qualified Ecologist (SQE) before any works take place.

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	Timing of works affecting the trees on site should avoid the bird nesting season, which is typically recognised as March to August inclusive. If these months cannot be avoided, a Nesting Bird Check (NBC) for active bird nests would need to be carried out by an ecologist no less than 48 hours prior to the commencement. *Opportunities* Starling and house sparrow *Passer domesticus*, swift *Apus apus* or generalist bird boxes can be included within building designs to accommodate the surrounding residential garden habitats.	supplied to accommodate a variety of bird species. *Enhancements* Nest boxes for starling, house sparrow, swift or generalist bird boxes can create opportunities for bird species to utilise the surrounding residential gardens and vegetated habitats within the wider landscape.	
Species			
Invasive Non-Native Species	No invasive, non-native species were identified on site. *Constraints*	*Mitigation* Not applicable at this current time *Compensation* Not applicable at this current time	Not applicable at this current time

Ecological Receptor	Description - Constraints and / or Opportunities	Mitigation, Compensation and Enhancement Recommendations	Further Survey Timings
	The site visit was outside of the optimal botanical season (May to September inclusive). Vegetation on site was restricted to trees and scattered scrub on the fringes of developed land; sealed surface, limiting areas for invasive species to propagate. These areas were checked, and no evidence of invasive species was identified.	*Enhancements* Not applicable at this current time	

Based on the use of aerial imagery during the desk top study and site visit, several species have been considered likely-absent from the site due to the highly urbanised location of the site, the lack of connectivity between the site and the wider landscape, absence of waterbodies or watercourses within or immediately adjacent to the site, and the geographical location of the site. These include great crested newt *Triturus cristatus*, hazel dormouse *Muscardinus avellanarius*, red squirrel *Sciurus vulgaris*, water vole *Arvicola amphibius*, otter *Lutra lutra*, white-clawed crayfish *Austropotamobius pallipes*, badger *Meles meles*, reptiles and invertebrates. However, it is possible that through further survey and assessment using a data search from the Local Environmental Records Centre as part of a PEA, constraints and opportunities may present themselves for these species

3.0 CONCLUSION

This ECOP provides a high-level assessment of ecological constraints and opportunities at the site. Further survey is required for roosting bats, which may need additional survey, mitigation and/or compensation. Mitigation for nesting birds is recommended. Due to the limited size and diversity of vegetation on site, a further site visit to establish the baseline habitats and condition assessments for the PEA and BNGA is not needed, however PEA and BNGA reports will still be required for planning.

No statutory designated sites are present within 2km. The site falls within the Impact Risk Zone (IRZ) of Synon Park Site of Special Scientific Interest (SSSI), 5.5km southeast of the site. Additionally, two internationally designated sites were identified within 10km; South West London Waterbodies Ramsar and Special Protection Area (SPA) located 8.5 km southwest, and Richmond Park Special Conservation Area (SAC) located 8.3km southeast of the site.

In terms of non-statutory sites, closest Site of Importance to Nature Conservation (SINC) is the Grand Union Canal located 250m south, and additionally Havelock and Hortus Cemeteries are located 560m northeast and 930m northeast respectively. Due to the relatively small size of the development and the distance of the site from the closest statutory and non-statutory sites, indirect impacts to designated sites are considered highly unlikely.

Three constraints have been identified regarding the site. Achieving Biodiversity Net Gain (BNG) under the Statutory Biodiversity Metric (SBM) may be difficult due to potential requirements to achieve 10% legally mandated BNG, trees on site should be retained as far as possible.

Constraints for protected species include roosting bats and nesting birds. The garages provide crevices spaces and cavity spaces which may be used by roosting bats. Similarly the trees on site provide opportunities for nesting birds. As a result, A PRA is recommended, which will inform the need for further surveys. To mitigate impacts to nesting birds, tree clearance should be outside the bird nesting season, which is typically recognised as March to August. If these months cannot be avoided, a Nesting Bird Check (NBC) should be conducted a maximum of 48 hours prior to tree removal.

Due to the anticipated loss of individual trees, a BNGA will be required to support a planning application. It is recommended that the BNGA is undertaken early in the project lifecycle to help inform the final designs. Through the recommendations set out within this document it is considered that an appropriate level of BNG can be delivered, either on site or in combination with off-site compensation, providing that valuable habitats within the site are retained and enhanced where possible.

N.B. This report is for scoping purposes only. Should the site be taken forward as a formal planning application and submitted to the Local Planning Authority, a full Preliminary Ecological Appraisal (PEA) and/or BNGA will be required. As such recommendations within this scoping report may change, as further data and information is gathered.

Recommendations to influence the design of the development (and to work towards maximising BNG delivery on site via the site design) are given below:

- The site design should maximise replacement of any habitats lost such as individual trees by replacing them with the same habitat types, or habitats of a higher distinctiveness within the soft landscape planting;
- Additional modified grassland and mixed scrub should be implemented into the landscaping designs where feasible for active management;
- Plans should look to integrate built-in bat and bird boxes into the development design; and
- Sensitive lighting to reduce light spill on the surrounding area will limit any potential negative impacts to foraging or commuting bats.

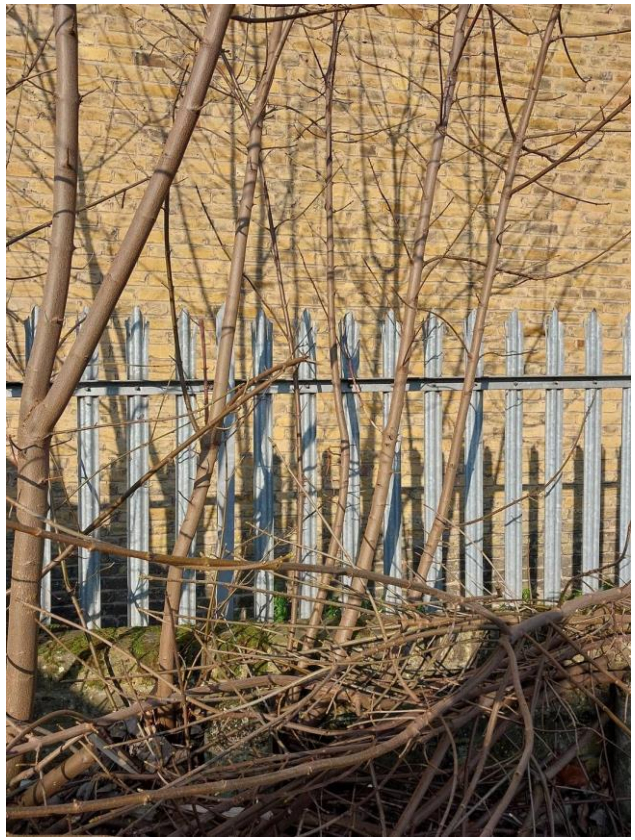
APPENDIX A SITE PHOTOS

Plate 3.1 (Left) Showing developed land; sealed surface, building and shrub species on site. (Right) showing a garage with individual trees behind.

Plate 3.2 (Left) Plywood sealed garage with hole leading inside (TN1). (Right) crevice spaces between roof and garage wall (TN2).

Plate 3.3 Left (TN3) a small crevice between roofing tin.

Plate 3.4 Scattered scrub on the western and eastern boundaries of the site



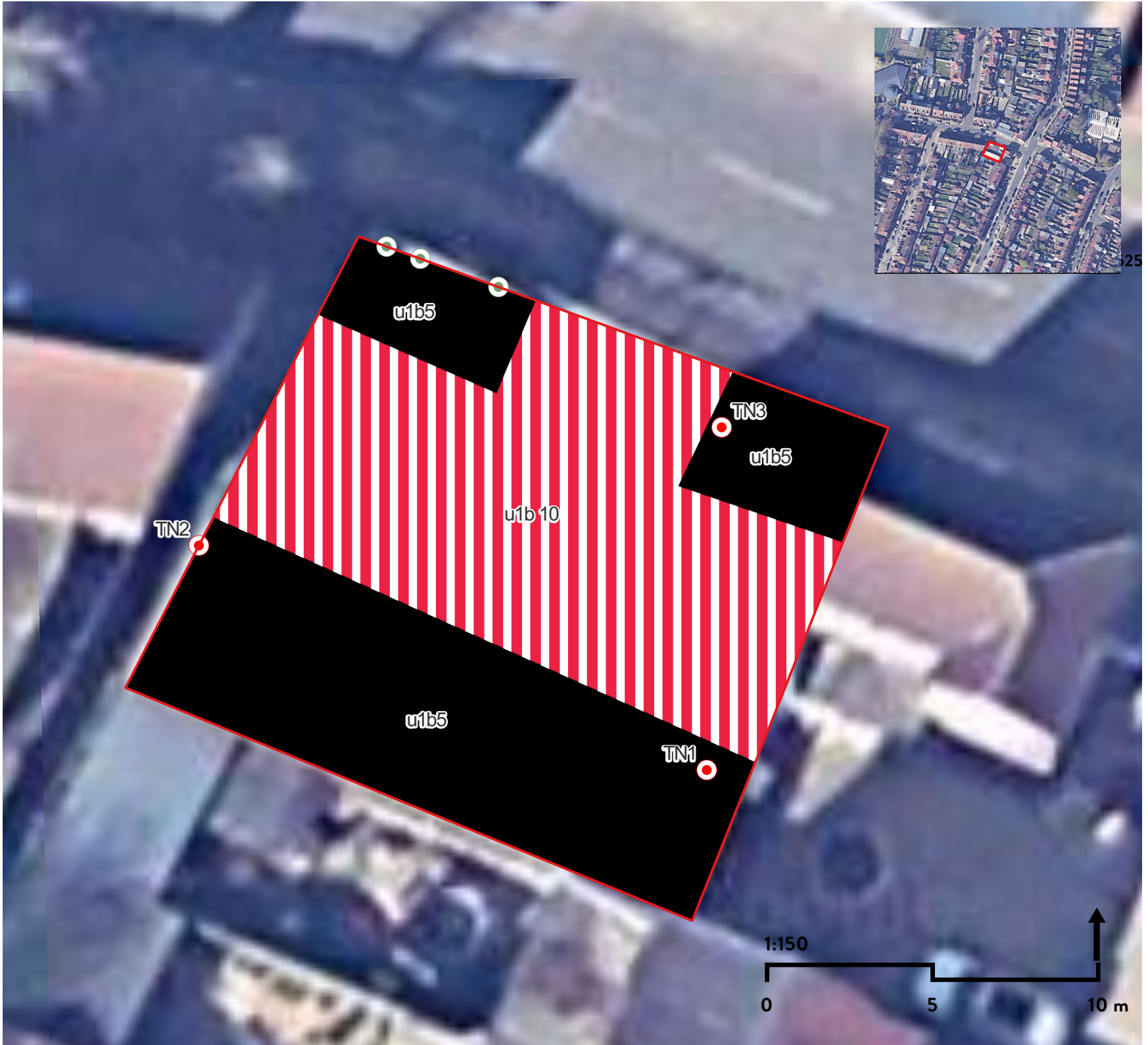
APPENDIX B UKHAB MAP

RECREATION ROAD

- Site Boundary
- Trees
- Target Notes

Habitats

- u1b - Developed land; sealed surface [10 - Scattered Scrub]
- u1b5 - Buildings



Title: Figure A.1

Drawn by: Oliver Hamilton
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Reviewed by: Paul White
Date: 24/02/2025

Project number: 553077
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL), Natural England

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[2] *Greenspace Information for Greater London (2022). Available at: Wildlife Sites | DiscoverLondon Experience*

[3] *UKHab Ltd. (2023) UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*

[4] *Department for Environment Food and Rural Affairs (2024) The Statutory Biodiversity Metric User Guide. Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool*

[5] *Bat Conservation Trust, (2023); Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.*