



**The Old Telephone
Exchange at
Elmsleigh Road,
Staines**

**Ecological
Appraisal**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
Inland Homes Ltd

September 2020
Report Reference
edp6235_r001b

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	Report Ref: edp6235_r001			
	Author	Formatted	Peer Review	Proofed by/Date
001_DRAFT	MMc/JL	FJ	JG/JB	-
001a	MMc/JL	-	-	FD 150920
001b	MMc/JL	-	-	-

Executive Summary

- S1 This Ecological Appraisal has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Inlands Homes Ltd (hereafter referred to as 'the Applicant'). This report considers the implications of the proposed re-development of the former Masonic Hall and cleared land which previously included The Old Telephone Exchange at Elmsleigh Road, Staines (hereafter referred to as 'the Site').
- S2 The development proposals include the demolition of the former Masonic Hall and redevelopment of the Site to provide 206 dwellings comprising two buildings of 13 and 15 storeys in height, provided together with car and cycle parking, hard and soft landscaping and other associated works.
- S3 To establish the ecological baseline of the Site and subsequently inform a planning application for the proposed development, a desk study, Extended Phase 1 Habitat survey, bat roost inspection survey and subsequent emergence surveys were completed by EDP in 2020.
- S4 With respect to designated sites three international statutory designations are located within 10km and seven national statutory designations are located within 5km of the Site. The River Thames Site of Nature Conservation Interest lies c. 150m to the west of the Site. There are no significant adverse impacts anticipated to any designated sites. With respect to habitats, the Site comprises a building, hard standing, bare ground, as well as small areas of scattered scrub and a few scattered trees of very low-negligible ecological interest. Some of these habitats have potential to support protected and notable species including roosting bats and nesting birds.
- S5 No bats were recorded roosting within the building during the surveys. Given the absence of roosting bats, there is no requirement for development works to be completed under a Natural England (NE) European Protected Species Mitigation Licence (EPSML). However, it is advised that given the potential of the building (albeit limited) to support roosting bats, demolition should be preceded by a toolbox talk and pre-commencement inspection by a bat licenced ecologist, with internal strip out of the building in advance of demolition where possible.
- S6 In addition to the above, ecological enhancements are to be incorporated into the development proposals including the installation of bird and bat boxes and provision of new native planting within the Site, to enhance the development for biodiversity and deliver a net gain to biodiversity.
- S7 Subject to the implementation of the above recommendations, it is considered that the proposed development of the Site can be delivered in compliance with all relevant wildlife legislation and planning policy.

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Section 1

Introduction, Purpose and Context

- 1.1 This Ecological Appraisal has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Inlands Homes Ltd (hereafter referred to as 'the Applicant'). This Appraisal considers the ecological implications of the proposed re-development of the former Masonic Hall and surrounding land at The Old Telephone Exchange, Elmsleigh Road, Staines (hereafter referred to as 'the Site').
- 1.2 This report has been informed and prepared with reference to the following industry standard guidelines:
- BSI (2013) *Biodiversity. Code of Practice for Planning and Development. BS Standard. BS42020:2013*. British Standards Institute;
 - CIEEM (2013). *Guidelines for Preliminary Ecological Appraisal*. Chartered Institute of Ecology and Environmental Management (CIEEM), Winchester; and
 - CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. CIEEM, Winchester.
- 1.3 EDP is an independent environmental planning consultancy with offices in Cirencester, Shrewsbury, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website www.edp-uk.co.uk.

Site Context

- 1.4 The Site is centred approximately at Ordnance Survey Grid Reference (OSGR) TQ 03574 71470 in the centre of Staines town, Surrey. It measures approximately 0.3 hectares (ha) and is bounded by Elmsleigh Road on all three sides. The Local Planning Authority (LPA) is Spelthorne Borough Council. The Site consists of a former Masonic Hall building surrounded by hardstanding, scattered scrub and scattered broadleaved trees. The habitats present within the Site are illustrated on **Plan EDP 1**. Surrounding the Site are multi-level carparks and commercial buildings, with the River Thames located approximately 125m to the south west.

Historical Ecology Survey Work

- 1.5 A Preliminary Ecological Appraisal was produced by Mott MacDonald in August 2014 as part of the planning application for the demolition of the former telephone exchange building, which was previously located adjacent to building B1 (see **Plan EDP 1**), the Masonic Hall, and has since been demolished. The Appraisal confirms that bat droppings

were found within the telephone exchange building during the internal roost inspection carried out in June 2014, however the droppings were not subject to DNA analysis and so the species is unknown.

Development Proposals

- 1.6 The proposals are to be the subject of a full planning application for the demolition of the Former Masonic Hall and redevelopment of the Site to provide 206 dwellings comprising two buildings of 13 and 15 storeys in height, provided together with car and cycle parking, hard and soft landscaping and other associated works.
- 1.7 The Combined Hard and Soft General Arrangement showing the proposed layout is provided as **Appendix EDP 1**.

Scope of Appraisal

- 1.8 This Ecological Appraisal summarises the current ecological interest within and around the Site, which has been identified through standard desk- and field-based investigations. More specifically, the report assesses the current suitability of the Site and associated buildings to support roosting bats.
- 1.9 The report then considers the potential impacts of the development proposals on bats and other ecological features of interest and proposes opportunities for enhancement based on the illustrative masterplan, in the context of relevant legislation and planning policy. Finally, this Appraisal identifies the necessary additional measures to avoid, mitigate or provide compensation for potential impacts.
- 1.10 The remainder of this report is structured as follows:
 - **Section 2** summarises the methodology employed in determining the baseline ecological conditions within and around the Site (with further details provided within appendices and plans where appropriate);
 - **Section 3** summarises the baseline ecological conditions and identifies and evaluates any pertinent ecological features/receptors;
 - **Section 4** assess the predicted impacts and provides mitigation and enhancement measures with regard to relevant legislation and planning policy; and
 - **Section 5** summarises the ecology strategy for the proposed development and provides the overall conclusions.

Section 2

Methodology (Baseline Investigations)

- 2.1 This section of the Ecological Appraisal summarises the methodologies employed in determining the baseline ecological conditions within and around the Site. Full details of the techniques and process adopted are, where appropriate, provided within appendices and on plans to the rear of this report.

Desk Study

- 2.2 A desk study was undertaken during July 2020, which collated and reviewed information on the following;

- International designations within 10km of the Site;
- National designations within 5km of the Site;
- Non-statutory designations within 2km of the Site; and
- Records of protected and priority species within 1km of the Site.

- 2.3 Information was obtained from the following sources;

- Multi-Agency Geographic Information for the Countryside (MAGIC) website¹;
- National Biodiversity Network (NBN) website²;
- Records from the demolition of the previously adjacent building on Site; and
- Review of the Thameside House planning application (Application reference: 20/00344/FUL).

Extended Phase 1 Habitat survey

- 2.4 The survey technique adopted for the initial habitat assessment was at a level intermediate between a standard Phase 1 Habitat survey technique³, based on habitat mapping and description, and a Phase 2 survey, based on detailed habitat and species surveys. The survey technique is commonly known as an Extended Phase 1 Habitat

¹ www.magic.gov.uk

² <https://nbnatlas.org/>

³ Joint Nature Conservation Council (2010) *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit* (reprinted with minor corrections for original Nature Conservancy Council publication).

survey. This level of survey does not aim to compile a complete floral and faunal inventory for the site.

- 2.5 This level of survey involves identifying and mapping the principal habitat types and identifying the dominant plant species present in each principal habitat type. In addition, any actual or potential protected species or species of principal importance are identified and scoped.
- 2.6 The Extended Phase 1 Habitat survey of the Site was undertaken by a suitably experienced surveyor on 27 January 2020. Although January is within the sub-optimal period for undertaking an Extended Phase 1 Habitat survey (April to September), the land largely consists of hardstanding and therefore the survey was not considered to be limited by seasonal or climatic factors.

Detailed (Phase 2) Surveys

- 2.7 The scope of Phase 2 surveys undertaken at the Site was defined following the initial studies described above (desk study and Extended Phase 1 Habitat survey). The surveys 'scoped in' are summarised in turn below and a brief explanation of those surveys 'scoped out' is provided thereafter.

Bat Surveys

Investigations of Bat Roosting – Buildings and Trees

- 2.8 To determine the potential impacts of the proposed development upon bats potentially roosting within the Site, the Masonic Hall and all trees within the Site were subject to a preliminary roost assessment with reference to current best practice guidance⁴.
- 2.9 A ground-level tree roost assessment and an external visual inspection of the building (B1, see **Plan EDP 1**) were undertaken by a Natural England (NE) bat licenced ecologist on 27 January 2020. A follow up internal inspection of the building was undertaken by a bat licenced ecologist on 27 July 2020.
- 2.10 With reference to best practice guidelines, the building and trees were searched using a high-powered Clulite, binoculars and endoscope where necessary, with all elevations covered where accessibility allowed.
- 2.11 Suitable features for roosting bats in trees include:
- Loss/peeling/fissured bark;
 - Natural holes e.g. rot holes and holes from fallen limbs;

⁴ Collins, J. (ed.) (2016). *Bat Surveys: for Professional Ecologists: Good Practice Guidelines* (3rd edition). The Bat Conservation Trust, London.

- Woodpecker holes;
- Cracks/splits or hollow tree trunks/limbs;
- Thick-stemmed ivy;
- Signs of roosting bats sought for included;
- Bat/s roosting in-situ;
- Bat droppings within or beneath a feature;
- Staining around or beneath a feature;
- Oily marks (staining) around roost access points;
- Audible squeaking from the roost;
- Large/regularly used roosts or regularly used sites may produce an odour; and
- Flies around the roost, attracted by the smell of guano.

2.12 Suitable features for roosting bats in buildings include:

- Large uncluttered roof spaces (preferably free of cobwebs), particularly when lined and insulated;
- Gaps in mortar of brickwork;
- Gaps under cracked/lifted/slipped roof/ridge/hanging tiles;
- Crevices between sheets of roofing felt or other materials;
- Gaps around window frames and door lintels;
- Access points in the apex, under the eaves or beneath/between tiles; and
- Ridge beam/main rafters with timber joists and free of cobwebs.

2.13 Signs of roosting bats include:

- Bat/s roosting in-situ (live, dead or parts of);
- Bat droppings within or beneath a feature/access point;
- Staining around or beneath an access point/feature;

- Oily marks (staining) around roost access points/features;
- Audible squeaking/chattering from the roost (particularly on hot summer days);
- Large/regularly used roosts or regularly used sites may produce an odour; and
- Flies around the roost, attracted by the smell of guano.

2.14 Based upon the results of the assessments and the features/evidence identified (as above), the building and trees were assigned with a bat roost potential category as per the BCT guidelines⁵, as shown in **Table EDP 2.1**.

Table EDP 2.1: Bat Roost Potential Categories.

Bat Roost Potential	Description
Confirmed Roost	Evidence of bats found.
High Potential	Many of the potential roosting features (listed above) present, with good foraging habitat nearby that is well connected to the site.
Moderate Potential	A few potential roosting features (listed above) present with some foraging habitat nearby that is connected to the site.
Low Potential	One or two roosting features present with foraging habitat nearby, but with limited connectivity.
Negligible Potential	No features present.

Limitations

- 2.15 Visual assessments of buildings and tree for roosting bats can be undertaken at any time of year and the assessment was therefore not limited by seasonal or climatic factors.
- 2.16 One small loft void within the building was inaccessible for survey due to the lack of any loft hatch leading into the void. Although this is a limitation to the internal inspection, the subsequent emergence surveys which were undertaken are considered sufficient to negate this limitation.

Investigations of Bat Roosting – Emergence Surveys

- 2.17 Detailed dusk emergence surveys were carried out to identify the presence or likely absence of roosting bats in building **B1**. On the basis of the visual inspection, the building was considered to have *moderate potential* to support roosting bats (see Section 3 for further details). As such, it was subject to two dusk emergence surveys, in accordance with best practice guidelines for buildings with moderate bat roosting potential. These surveys were completed within the optimal survey months of June and July.
- 2.18 Full details including the survey type, date, timing, and weather conditions during each of the emergence surveys in 2020 is given in **Table EDP 2.2**.

⁵ Collins, J. (ed.) (2016). *Bat Surveys: for Professional Ecologists: Good Practice Guidelines* (3rd edition). The Bat Conservation Trust, London.

Table EDP 2.2: Date, timing and weather conditions of the bat emergence surveys.

Survey date	Emergence /Re-entry	Survey time	Sunrise/sunset time	Weather conditions			
				Temp (°C)	Cloud (%)	Rain	Wind (Beaufort scale)
25.06.20	Emergence	21:07-22:52	21:22	25-29	2	Nil	3
27.07.20	Emergence	20:41-22:26	20:56	19-20	25-90	Nil	3-4

- 2.19 Four surveyors were positioned at appropriate locations to cover the entirety of the building and were in position from 15 minutes before sunset until 1.5 hours after sunset, to ensure emergence times for all bat species were covered. All observations of bat activity were recorded and their behaviour marked on survey maps.
- 2.20 Emergence surveys were conducted using Elekon Batlogger M devices. Bats were identified on the basis of their characteristic echolocation calls, which were recorded and analysed using computer sonogram analysis (BatExplorer 1.11.4.0, 2015) to confirm species identification. Species of *Myotis* bats and long-eared (*Plecotus* sp.) bat are difficult to tell apart solely from their echolocation calls and were therefore grouped as such where they were recorded.

Limitations

- 2.21 Weather conditions on each visit were optimum for bat emergence surveys, being relatively warm with light winds and no rain. The surveys are therefore not considered to be constrained by weather conditions or survey timing.

Other Phase 2 Surveys

- 2.22 Other Phase 2 surveys scoped out, with reasons provided as to why they were not considered necessary/appropriate, are described in **Table EDP 2.3**.

Table EDP 2.3: Ecology Surveys Scoped Out.

Survey Type	Reasons for Scoping Out
Botanical surveys	Extended Phase 1 Habitat survey information sufficient to confirm habitat value, with no indication of particularly high value habitats present.
Bird surveys	Owing to the small size and limited value of habitats present, coupled with the highly urban location, the Site is considered unlikely to support a notable bird assemblage.
Badger	No suitable habitat within the Site and surrounding areas.
Great Crested Newt	No suitable waterbodies within the Site and suboptimal terrestrial habitat
Reptile	No suitable habitat within the Site and surrounding areas.
Dormouse	No suitable habitat within the Site and surrounding areas.
Otter and water vole	No suitable waterbodies within the Site and in the surrounding area as well as unsuitable terrestrial habitat.
Invertebrate surveys	No suitable habitat within the Site and surrounding areas.

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Section 3

Results (Baseline Conditions)

- 3.1 This section of the Ecological Appraisal summarises the baseline ecological conditions determined through the course of desk- and field-based investigations described in **Section 2**. In particular, this section identifies and evaluates those ecological features/receptors that lie within the Site's potential zone of influence and which are pertinent in the context of the proposed development.
- 3.2 Where a particular ecological feature/receptor has been confirmed to be present, or presence is inferred based on habitat suitability, the ecological value or significance of the population or assemblage is assessed on the following geographic scale:
- International importance (ecological features which if impacted, would affect the distribution and/or conservation status of this feature in Europe);
 - National importance (ecological features which if impacted, would affect the distribution and/or conservation status of this feature in England);
 - Regional importance (ecological features which if impacted, would affect the distribution and/or conservation status of this feature in the South East);
 - County Importance (ecological features which if impacted, would affect the distribution and/or conservation status of this feature in Surrey); and
 - Local importance (ecological features which if impacted, would affect the distribution and/or conservation status of this feature in the borough of Spelthorne).
- 3.3 Any other ecological features/receptors will be assessed as of less than local level importance.

Designations

- 3.4 Information regarding designations was obtained during the desk study. Statutory designations (those receiving legal protection) and non-statutory designations (those receiving planning policy protection only) are discussed in turn below.

Statutory Designations

- 3.5 Statutory designations represent the most significant ecological receptors, being of recognised importance at an international and/or national level. International designations include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites. National designations include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs).

- 3.6 No part of the Site is covered by any statutory designation. Three international designations are present within 10km of the Site and seven national designations are located within 5km of the Site. These are listed within **Table EDP 3.1**.

Table EDP 3.1: Statutory Designations within 10km of the Site.

Name	Approximate Distance from the Site	Description
International (10km)		
South West London Waterbodies SPA	Various reservoirs to the north, east and one to the south. Includes several to north, closest being c. 800m	Staines Reservoir, King George VI Reservoir, Wraysbury Reservoir, St Ann's Lake.
Windsor Forest and Great Park SAC	5.3km west	Old oak woods with largest number of veteran oaks <i>Quercus</i> spp. in Britain. Importance for its range and diversity of saproxylic invertebrates.
Thursley, Ash, Pirbright and Chobham SAC	8.2km south-west	Large fragments on once-continuous heathland; both dry and wet. Several rare plants and an important assemblage of animal species, including numerous rare invertebrate species, European nightjar (<i>Caprimulgus europaeus</i>), Dartford warbler (<i>Sylvia undata</i>), sand lizard (<i>Lacerta agilis</i>) and smooth snake (<i>Coronella austriaca</i>).
National (5km)		
Staines Moor SSSI (forms part of the South West London Waterbodies SPA)	1.5km north	Semi-natural stretch of the River Colne which flows through Staines Moor and three adjacent reservoirs. Largest area of alluvial meadows in Surrey and supports rich flora and holds nationally important populations of wintering wildfowl. A pond at the site carries aquatic flora of national importance; includes several rare plants.
Thorpe Hay Meadows SSSI	1.6km south-west	Diverse, hay meadow lying on the alluvial gravels of the Thames Flood Plain, surrounded by ditches and high hedges. Thought to be the last remaining example of a Thames valley hay meadow in Surrey.
Wraysbury Reservoir SSSI (forms part of the South West London Waterbodies SPA)	3.1km north-west	Artificially embanked reservoir which supports a nationally important number of wintering cormorant (<i>Phalacrocorax carbo</i>), great crested grebe (<i>Podiceps cristatus</i>) and shoveler (<i>Anas platyrhynchos</i>).

Name	Approximate Distance from the Site	Description
Wraysbury & Hythe End Gravel Pits SSSI (forms part of the South West London Waterbodies SPA)	3.1km north-west	Mosaic of open water, islands, grassland, scrub and woodland within an area of former gravel extraction. Supports nationally important numbers of three species of wintering wildfowl and an important assemblage of breeding birds. Also supports two nationally scarce invertebrates: riffle beetle (<i>Oulimnius major</i>) and caddisfly (<i>Leptocerus lusitanus</i>), and a number of locally uncommon plants.
Langham Pond SSSI	3.4km west	Langham Pond and surround alluvial meadows lie on the Thames flood plain with rich aquatic, marginal and meadow floras. Supports several nationally scarce invertebrates. The adjacent woodland support a rich community of breeding birds.
Wraysbury No.1 Gravel Pit SSSI (forms part of the South West London Waterbodies SPA)	3.4km north-west	Woodland and scrub surrounding gravel pits support a range of woodland birds including hobby (<i>Falco subbuteo</i>), garden warbler (<i>Sylvia borin</i>), tree creeper (<i>Certhia familiaris</i>) and great spotted woodpecker (<i>Dendrocopus major</i>). Shoveler, goldeneye (<i>Bucephala clangula</i>) and smew (<i>Mergus albellu</i>) are regular winter visitors in small but significant numbers and of national importance for wintering gadwall (<i>Anas strepera</i>).
Thorpe Park No1. Gravel Pit SSSI (forms part of the South West London Waterbodies SPA)	3.5km south	Former gravel pit which has matured to a relatively stable ecological state with banks entirely dominated by trees and shrubs, Of national importance for wintering gadwall.

Non-statutory Designations

- 3.7 Non-statutory designations are also commonly referred to in planning policies as 'local sites', although in fact these designations are typically considered to be important at a County level. Additionally, Ancient Semi-Natural Woodland (ASNW) should be considered at this level where it is not covered by other designations, such as Local Nature Reserves (LNR).
- 3.8 There are no 'local sites' located within the Site, however the River Thames Site of Importance for Nature Conservation (SNCI) lies approximately 150m to the west of the Site. With regard to the potential for adverse hydrological impacts on the SINC mitigation measures are provided within the proposed surface and foul water drainage strategy included within the site-specific Flood Risk Assessment prepared by Rogers Cory Partnerships Ltd (Report ref: TRS/INL/E4445/17728). The proposed foul water discharge from the new development will be conveyed to the existing Thames Water foul water sewers, managed by Thames Water the Local Sewerage Authority for this area. The

surface water run-off from the impermeable areas will receive the appropriate level of treatment in accordance with the recommendations in the SuDS manual prior to discharging into the receiving existing downstream Thames Water surface water network. Therefore, based on the information provided, there are considered to be no potential impacts upon non-statutory designations, and these are not discussed further in this Appraisal.

- 3.9 Several areas of Priority Habitats⁶, namely several small, localised 'deciduous woodlands'; are present within 500m of the Site, the closest being approximately 425m northwest of the Site. Owing to the relatively small size of the development, there are no perceived impacts on these habitats as a result of the proposed development.

Habitats

- 3.10 The distribution of different habitat types within and adjacent to the Site, as identified through the Extended Phase 1 Habitat survey, is illustrated on **Plan EDP 1**. In addition, detailed descriptions of these habitat types, together with illustrative photographs, are provided below.

Bare Ground/hardstanding

- 3.11 The majority of habitat within the Site consists of bare ground, recently colonised by ephemeral/short perennial vegetation including docks (*Rumex* sp.), ribwort plantain (*Plantago lanceolata*) and mosses. Several buddleia (*Buddleia davidii*) bushes have also colonised the bare ground. A car park comprising an area of hard standing is present in the south west corner of the Site (as illustrated in **Image EDP 3.1** and **3.2**).
- 3.12 The bare ground and hardstanding are considered to be of negligible ecological value.

⁶ In the context of this report, Priority Habitats refers to the list of habitats of principal importance for conservation in England, a list that is required to exist under Section 41 of the Natural Environment and Rural Communities Act 2006. The MAGIC website contains a rationalised suite of such habitats known as the priority habitat Inventory administered by Natural England



Image EDP 3.1: Bare ground with an overlay of Ephemeral/Short Perennial vegetation dominating the majority of the Site.



Image EDP 3.2: Hardstanding footprint from the previously demolished building.

Scattered Scrub

- 3.13 The Site supports an area of scattered bramble (*Rubus fruticosus* agg.) scrub, along the western boundary. (see **Image EDP 3.3**).
- 3.14 Overall, scrub habitats on the Site are considered to be of negligible ecological value given their lack of species diversity, small size, urban location and isolation.



Image EDP 3.3: Scattered bramble scrub along the western Site boundary.

Trees

- 3.15 The Site supports seven sycamore (*Acer pseudoplatanus*) saplings which are scattered throughout the Site (see **Image EDP 3.4**). Given their age, the trees are considered of very low ecological value.



Image EDP 3.4: Example of sycamore saplings within the Site

Building

- 3.16 There is one two-storey building, the Masonic Hall (**B1**), located in the south of the Site (**Image EDP 3.5** and **3.6**).
- 3.17 The building is considered to be of negligible intrinsic ecological importance.



Image EDP 3.5: Northern aspect of building B1 showing pitched roof with dormer windows.



Image EDP 3.6: Internal image of the roof void and vents at the western end of building B1.

Protected and/or Notable Species

- 3.18 The likelihood of presence, or confirmed presence, of protected/and or notable wildlife species within the site is summarised below, habitat suitability and detailed surveys where relevant.

Birds

- 3.19 MAGIC and NBN returned records for 91 bird species, including 14 species on the red list of birds of conservation concern⁷ and 21 on the amber list.
- 3.20 The Site supports a small isolated area of scattered scrub and seven young trees considered to provide very low quality nesting habitat for birds. The building has some potential, albeit limited due to its structure. Due to the relatively small size of the Site and the type of habitats present, coupled with the central urban location, it is considered highly unlikely that the Site supports large numbers of notable species, and any population of birds within the Site is likely to be of less than Local level ecological importance.

Bats

- 3.21 MAGIC and NBN returned two records of bats from a 1km radius around the site; both records were of common pipistrelle (*Pipistrellus pipistrellus*). It is not specified whether these records relate to confirmed roost sites or field records.
- 3.22 As described in **Section 1**, a bat roost was previously identified in the former Telephone Exchange Building which was located adjacent to the Masonic Hall and which has since been demolished. The type of bat roost which was present is not known, however droppings were found in the roof void in 2014.

Investigations of Bat Roosting – Ground Level Tree Assessment

- 3.23 All trees within the Site were considered to have negligible potential to support roosting bats owing to the fact they are saplings and lack any suitable roosting features.

Investigations of Bat Roosting – Preliminary Building Roost Assessment

- 3.24 No bats or evidence of bats were found during the internal and external assessment of building **B1**.
- 3.25 The two-storey building has a pitched roof with clay tiles, some of which are lifted and/or broken. There are dormer windows on both aspects of the roof with gaps under the lead flashing. The wooden fascias and soffits present are for the most part in good condition with the exception of holes leading into the soffit on the eastern gable end. The walls are

⁷ Eaton, M.A., Aebischer, N.J., Brown, A.F., Hearn, R.D., Lock, L., Musgrove, A.J., Noble, D.G., Stroud, D.A. and Gregory, R.D. (2015). Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds, Vol. 108, 708-746.

a combination of brick, pebble dash rendering and smooth white rendering. There is a single-storey flat roofed extension on the south and a part single-, part two-storey, flat roofed extension on the north of the building. Internally, the pitched roof section has a roof void which is lined with good condition timber cladding with timber beams throughout and is insulated with rock wool. The larger void to the western end of the building is connected to a smaller inaccessible void. There is potential access through the eaves and open vent slats at the west end.

- 3.26 The building was assessed as having moderate potential to support roosting bats due to the features mentioned above and its proximity to the river Thames, as well as the confirmation of a bat roost previously recorded in an adjacent building.

Investigations of Bat Roosting – Emergence/Re-entry Surveys

- 3.27 No bats were recorded emerging from or entering the building on either of the dusk surveys. Very low levels of bat activity were recorded during both surveys with a couple of noctule (*Nyctalus noctula*) passes towards the end of the survey on 27 July 2020.
- 3.28 During the surveys, surveyors also noted that the building was subject to very high levels of artificial lighting.

Other Species

- 3.29 During the emergence survey carried out on 25 June 2020, a single stag beetle (*Lucanus cervus*) was briefly recorded flying within the Site.
- 3.30 Stag beetles prefer oak woodlands, but can be found in gardens, hedgerows and parks. Due to the relatively small size of the Site and the limited suitable habitats present, the Site is not considered suitable to support a viable stag beetle population, and the sighting is considered most likely to be an individual just flying through the Site rather than permanently residing.

Section 4

Predicted Impacts and Mitigation

- 4.1 This section of the Ecological Appraisal considers the likely impacts of the proposed development (included as **Appendix EDP 1**) on the existing ecological resource and provides recommendations for mitigation and/or enhancement measures which, if implemented, would as a minimum enable the proposed development to meet legislative and/or planning policy requirements. EDP's overall summary and conclusions, based upon the above, are given in **Section 5**.
- 4.2 In accordance with the NERC Act 2006, within England, LPAs have a statutory duty to have regard to effects upon biodiversity when exercising their functions; this includes consideration of effects upon ecological features such as designations, and Priority Habitats/Priority Species when determining planning applications. In accordance with planning policy at all levels, LPAs must also consider whether or not 'significant harm' to biodiversity may occur due to effects upon such ecological features. This, and the statutory protection afforded to certain designations and species, is explored in further detail below.

Designations

Statutory Designations

- 4.3 Statutory designations receive legal protection under various international and national legislative instruments. This protection is also reflected in policies included within the National Planning Policy Framework (NPPF) (February 2019), notably paragraph 170a (extracted below), as well as paragraphs 171, 174 and 175, which are given material consideration during the planning application process:

NPPF Paragraph 170a

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)..."*

- 4.4 Furthermore, Policy EN8 of the Spelthorne Borough Council Core Strategy⁸ states:

"The Council will seek to protect and improve the landscape and biodiversity of the Borough by:

⁸ Spelthorne Borough Council (2009). Core strategy and policies development plan document.

a) safeguarding sites of international and national importance....”

- 4.5 The three international designations, Windsor Forest and Great Park SAC, Thursley, Ash, Pirbright and Chobham SAC, and South West London Waterbodies SPA and Ramsar, are all located more than 5km from the Site. It is not considered that there would be any direct impacts on these designations due to the spatial distance and the lack of any receptor pathways. These sites are already subject to recreational pressures, which are managed through the creation of designated access routes and the presence of dedicated management companies. Furthermore, public access to the majority of the South West London Waterbodies SPA is restricted through fencing and security, with several areas being privately owned. Owing to the small size of the proposed development, it is not considered that there will be any significant increase in recreational pressure on these statutory designations.
- 4.6 With regard to those nationally designated sites detailed in **Table EDP 3.1**, it is not considered that there would be any direct impacts upon these sites as a result of development of the Site due to the spatial distance between the Site and these designations, the closest being located 1.5km away. Furthermore, as there is either no public access or public access is controlled through designated pathways, it is not anticipated that there will be any impacts on the designations as a result of increased recreational pressure.

Habitats

- 4.7 There are several mechanisms through which habitats receive protection with the statutory and non-statutory designated site frameworks. For instance, certain habitats are identified in policies within the NPPF. Furthermore, the NPPF states:

“175. when determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

...

- c) Development proposals resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and*

around developments should be encouraged, especially where this can secure measurable net gains in biodiversity.”

4.8 Furthermore, Policy EN8 of the Spelthorne Borough Council Core Strategy states:

“The Council will seek to protect and improve the landscape and biodiversity of the Borough by:

- c) ensuring that new development, wherever possible, contributes to an improvement in the landscape and biodiversity and also avoids harm to features of significance in the landscape or of nature conservation interest”*

4.9 Policy E4 of the emerging local plan⁹ states:

“The Council will encourage development proposals which restore, maintain and enhance habitat connectivity and will seek opportunities for habitat creation particularly within Biodiversity Opportunity Areas. Development proposals will be expected to contribute to biodiversity through clearly demonstrating improvements when submitting a planning application as part of securing biodiversity net-gain.

The Council will require development to contribute to the delivery and maintenance of a high-quality green infrastructure network by requiring proposals to provide and make enhancements to on-site assets.”

4.10 Habitats within the Site have been assessed through an Extended Phase 1 survey and are all of less than Local level ecological importance.

4.11 With respect to anticipated impacts, the proposals will result in the loss of a two-storey building, as well as a small area of scattered scrub and several tree saplings. Impacts of such losses are not considered to be significant overall given the relatively small extent of the Site and the limited value of habitats present.

4.12 The proposed development will include areas of new landscaping to provide benefits to visual and recreational amenity, including the planting of new trees, “green screens” and areas of wildflower planting, as shown in **Appendix EDP 1**. The planting scheme includes native flowering species such as Old Man’s Beard (*Clematis vitalba*) and musk mallow (*Malva moschata*) which provide a food resource for invertebrates thereby providing benefits to biodiversity. Tree species proposed within the development include Turkish hazel (*Corylus colurna*), black birch (*Betula nigra*), sweetgum (*Liquidambar styraciflua*) and tulip tree (*Liriodendron tulipifera*). Although not UK natives, these species have been selected for inclusion due to their ability to cope with drought, heat, hard paving and restricted root space as is present in an inner-city location.

4.13 New habitat features for nesting birds and roosting bats are also provided as discussed in the following sections.

⁹ Spelthorne Borough Council (November 2019). Spelthorne Local Plan. Preferred options consultation. Policies.

Protected and/or Notable species

- 4.14 Certain species receive legal protection in the United Kingdom and are commonly known as 'protected species'. In reality, the level of protection for different species varies considerably, from protection solely against 'killing and injury' to full protection of the species and their places of refuge. Where pertinent, details of legal protection afforded to species/species-groups are provided below.
- 4.15 In addition to protected species, there are other species/species-groups that do not receive legal protection, but which are notable owing to their conservation status. In particular, UK Priority Species, which, in England, planning authorities have a duty to have regard to, under the NERC Act 2006. Details of any actual or potential notable species within the site are identified below.
- 4.16 Baseline investigations have identified potential protected species implications for the Application Site relating to bats and nesting birds.

Birds

- 4.17 All wild birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:
- i. Intentionally kill, injure or take any wild bird;
 - ii. Take, damage or destroy the nest of any wild bird while it is in use or being built;
 - iii. Take, damage or destroy the egg of any wild bird; or
 - iv. To have in one's possession or control any wild bird (dead or alive) or egg or any part of a wild bird or egg.
- 4.18 In addition, further protection is afforded to those wild bird species listed on Schedule 1, prohibiting any intentional or reckless disturbance to these species while it is nest building, or at a nest containing eggs or young, or to recklessly disturb the dependent young of such a bird.
- 4.19 Given the protection afforded to all breeding birds, their nests, eggs and young, any required vegetation clearance should be timed to avoid the main bird breeding season as far as possible (i.e. March to August inclusive). Should this seasonal constraint prove impractical, then a pre-commencement check for active bird nests should be undertaken by a suitably qualified ecologist/Ecological Clerk of Works (EcOW) immediately prior to the commencement of works. Where an active bird nest is identified, a 5m buffer (dependent on individual species requirements, and potentially greater, as specified by the ECoW at the time) will be established around the active nest, with no demolition works permitted within this buffer until all young have fledged and the nest confirmed inactive by the ECoW.

- 4.20 To enhance the Site for breeding birds, bird boxes will be installed within the development to encourage nesting of native birds. The following is included in the proposals:
- 3 no. x Schwegler 2GR nest box (or similar) - attached to the “green screens” located in the eastern corner of the development, close to newly planted trees which will provide some cover (proposed locations shown at **Appendix EDP 1**); and
 - 4 no. x Ibstock Eco Habitat for Swifts (or similar) - incorporated into the roof parapet of the proposed tower blocks (proposed locations shown at **Appendix EDP 2**). These will be sited high up and will be located away from windows with a clear drop below the entrance. These boxes have been sited on a north-east aspect of each building to increase the likelihood of them being used by swifts.
- 4.21 In addition to the above, the planting of new trees and areas of wildflower planting will encourage a more diverse invertebrate assemblage within the Site which will provide an additional foraging resource for birds than currently present.

Bats

- 4.22 All species of British bat are listed as a European Protected Species (EPS) on Schedule 2 of the Conservation Regulations (Annex IV(a) to the Habitats Directive). This affords it protection under the Conservation of Habitats and Species Regulations 2017 (as amended), making it an offence to:
- i. Deliberately capture, injure or kill a wild animal of an EPS;
 - ii. Deliberately disturb wild animals of an EPS wherever they are occurring, in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, to affect significantly the local distribution or abundance of the species to which they belong, or in the case of hibernating or migratory species, to hibernate or migrate; or
 - iii. Damage or destroy a breeding site or resting place of a wild animal of an EPS.
- 4.23 Additional protection for bats is also afforded under the Wildlife and Countryside Act 1981 (as amended), making it an offence to intentionally or recklessly disturb bats whilst they are occupying a structure or place which is used for shelter or protection, or to obstruct access to this structure or place. In addition, eight of the eighteen species of bat resident in the UK (greater horseshoe (*Rhinolophus ferrumequinum*), lesser horseshoe (*Rhinolophus hipposideros*), barbastelle (*Barbastella barbastellus*), Bechstein’s (*Myotis bechsteinii*), soprano pipistrelle (*Pipistrellus pygmaeus*), common pipistrelle, brown long-eared (*Plecotus auratus*) and noctule) are also listed as Priority species.
- 4.24 All trees within the Site have negligible potential to support roosting bats and no further consideration for bats is required prior to their removal.

- 4.25 Within the existing building, suitable roosting features are present which include slipped and broken roof tiles, gaps under lead flashing, open vents and gaps leading into soffit boxes.
- 4.26 Since no evidence of roosting bats has been identified through the survey work undertaken there is no requirement for development works to be completed under a Natural England (NE) European Protected Species Mitigation Licence. However, given the potential of the building to support roosting bats (albeit limited), and the potential for bats to use the building for roosting in the future, the following precautionary measures are advised:
- Prior to any works commencing on the building, a licenced bat worker will provide a 'toolbox talk' to site contractors to make them aware of the legal protection afforded to bats and the precautionary measures to be implemented during construction to ensure no bats are harmed. The toolbox talks will seek to ensure works are carried out with care and vigilance for bats and birds, whilst ensuring that an ecologist is immediately contacted, and appropriate measures are followed in the unlikely event that a bat or nesting bird is uncovered during the demolition works;
 - Prior to any works commencing on the building, a licenced bat worker will undertake a pre-commencement inspection of the building, including the roof void, to confirm if any new evidence of bats is present;
 - Where possible, the demolition of the building should be proceeded by an internal strip of the building so, in the very unlikely event that bats are present and have gone unnoticed they would be disturbed rather than killed and their roosts destroyed; and
 - In the unlikely event that any bats are discovered during the course of demolition works all works must cease immediately and a licenced bat ecologist notified.
- 4.27 The demolition of the building will result in the loss of potential roosting resource for bats within the Site. Therefore, although no mitigation is required as no roost is present, bat roosting features will be included within the development to enhance the Site for roosting bats. The following features are therefore included in the proposals:
- 4 no. x Ibstock Enclosed Bat Box – incorporated into the external walls of the podium parapet (proposed locations shown at **Appendix EDP 3**). Boxes have been sited in the areas of the Site which are expected to be the quietest and darkest locations, on a south-west and south-east aspect to maximise the likelihood of being used by bats. Boxes will be installed at a height of approximately 4.5m above ground level, with a clear drop below the entrance.
- 4.28 In addition to the above, the planting of new trees and areas of wildflower planting will encourage a more diverse invertebrate assemblage within the Site which will provide an additional foraging resource for bats.

Section 5 Summary and Conclusions

- 5.1 This section of the Ecological Appraisal summarises the Ecology Strategy for the proposed development, in terms of inherent and recommended additional mitigation measures, and then provides the overall conclusions of the Appraisal.

Summary of Ecology Strategy

- 5.2 It is recommended the following measures are secured by a suitably worded condition attached to planning consent;
- Demolition of building to take place following pre-commencement inspection and a toolbox talk given to site contractors by a suitably qualified ecologist, with internal strip out in advance of demolition where possible;
 - Removal of vegetation to take place between September and February to avoid nesting bird season, or following checks for active nests;
 - Provision of native planting within the Site to enhance the development for biodiversity; and
 - Bird and bat boxes to be included within the development.

Overall Conclusions

- 5.3 EDP's desk- and field-based baseline investigations have demonstrated that the habitats and species present within and around the Site do not pose an 'in principle' constraint to the proposed development that is the subject of this Appraisal. There are no statutorily protected nature conservation interests within the proposed development site and no anticipated impacts on any nearby designations.
- 5.4 EDP's surveys have identified habitat features and protected species that will need to be respected. Policy for the conservation and enhancement of the natural environment at all levels aims to achieve this by "*minimising impacts on and providing net gains for biodiversity*" (NPPF, paragraph 170d). Proposals for the avoidance, mitigation and compensation of any predicted impacts are considered in this report and summarised above.
- 5.5 Overall, EDP finds that due to the limited constraints posed by the Site's habitats and protected species, and through the enhancements proposed that the scheme is capable of compliance with relevant planning policy for the conservation of the natural environment at all levels, and capable of delivering a net gain to biodiversity. There is therefore no reason, in ecological terms, why planning permission should be refused.

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Appendix EDP 1

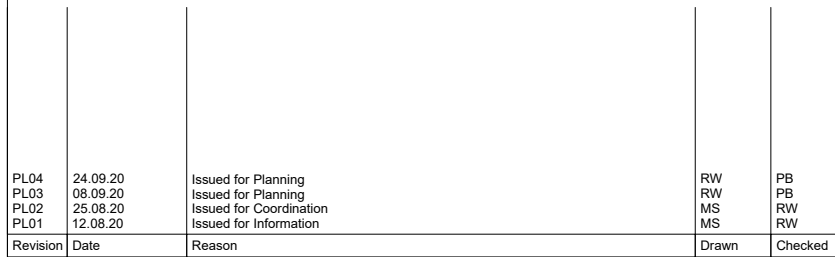
Combined Hard and Soft General Arrangement – Ground Floor

(Fabrik Landscape Architects, Aug 2020, Dwg: 0200, Rev: PL04)

Combined Hard and Soft General Arrangement – Podium Level

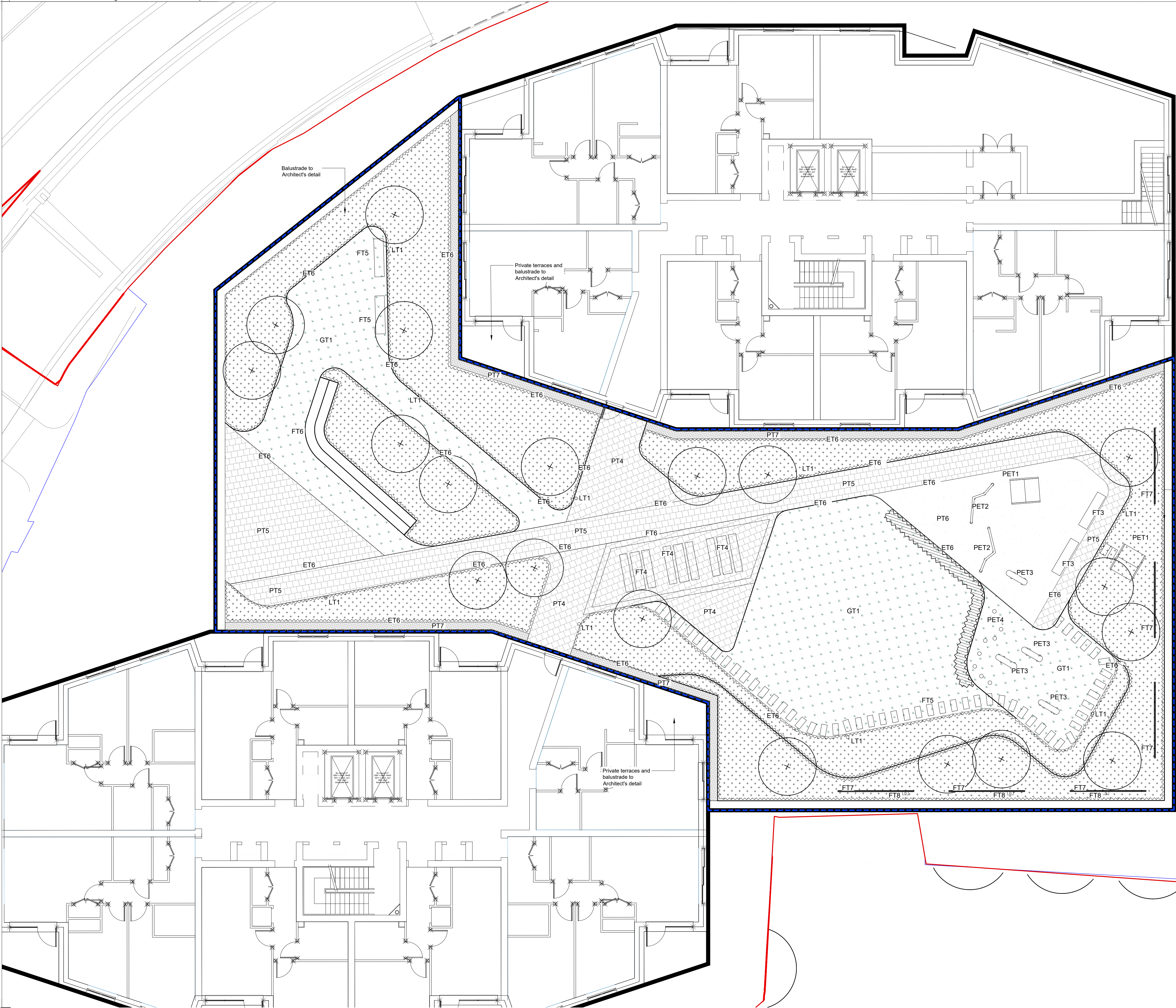
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	post Innsleigh Road, Staines	Client Inland Homes		
what is combined Hard and Soft General Arrangement - Ground Floor	Drawn By MS	Checked By PB	Drawn Scale 1:200 @ A1	Date of First Issue AUG 2020
scope of Issue SUED FOR PLANNING APPROVAL				





- Application Boundary

1st Floor Podium Boundary

PT4

Paving Type 4 - Concrete Flag Paving
Natural Stone Aggregate

PT5

Paving Type 5 - Concrete Flag Paving
Natural Stone Aggregate

PT6

Paving Type 6 - Artificial Lawn
Shock pad below

PT7

Paving Type 7 - Decorative Gravel
Strip

ET6

Edge Type 6 - Flush Metal Edge

GT1

Grass Type 1 - Amenity Lawn

FT4

Furniture Type 4 - Timber and
Steel Bench

FT5

Furniture Type 5 - Timber and
Steel Bench

FT6

Furniture Type 6 - Double Step
Timber Bench

FT5

Furniture Type 5 - Stepping Stones
Precast Concrete Slabs
- FT6

Furniture Type 6 - Metal Pergola
- FT7

Furniture Type 7 - Green Screen
Corten Steel Frame
Steel Wires for Climbers
- FT8

Furniture Type 8 - Bird boxes
- LT1

Lighting Type 1 - Lighting Column
- PET1

Play Equipment Type 1 - Play House
Timber - role playing
- PET2

Play Equipment Type 2 - Balance
Beams
Timber
- PET3

Play Equipment Type 3 - Timber
animals - climbing/ role playing
- PET4

Play Equipment Type 4 - Play Spheres
Multi-coloured
- Proposed Tree Planting
Refer to indicative planting
schedule for details
- Proposed Shrub Planting
Refer to indicative planting
schedule for details
- Proposed Hedge Planting
Refer to indicative planting
schedule for details

PLANT SCHEDULE

Proposed Tree Planting			
Species	Size	Size/Spec	Condition
Cercis 'Forest Pansy'	2-2.5m	Multistem	RB
Koeleruteria paniculata	3-4m	Multistem	RB
Pyrus 'Chanticleer'	4-5m	20-25cmg	RB, 2m clear stem
Amelanchier lamarckii	3-3.5m	Multistem	RB
Proposed Shrub Planting			
Species	Size/Spec	Condition	Density
Viburnum lina 'Eve Price'	40-80cm Height	C5	7/m²
Skinnia rubella	40-60cm Height	C5	7/m²
Pittosporum tobira 'Nanum'	30-40cm Height	C5	7/m²
Berberis thunbergii 'Atropurpurea'	40-60cm Height	C5	7/m²
Cornus alba 'Sibirica'	80-100cm Height	C10	Counted
Proposed Ornamental Grasses			
Species	Condition	Density	
Miscanthus sinensis	C5	7/m²	
Pennisetum alopecuroides	C5	7/m²	
Proposed Herbaceous Planting			
Species	Condition	Density	
Lavandula 'Hidcote'	C3	9/m²	
Rudbeckia 'Goldsturm'	C3	9/m²	
Kniphofia rooperi	C3	9/m²	
Eremurus himalaicus	C3	9/m²	
Pensicaria bistorta 'Superba'	C3	9/m²	
Iberis sempervirens	C1	12/m²	
Proposed Fern Planting			
Species	Condition	Density	
Polystichum setiferum 'Proliferum'	C3	9/m²	
Polypodium vulgare	C3	9/m²	

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1:100

Location Plan

fabik

landscape architects

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Project: Elmsleigh Road, Staines

Client: Inland Homes

Drawing Title: Combined Hard and Soft General Arrangement - Podium Level

Drawn By: MS

Checked By: PB

Drawn Date: 1:100 @ A1

Date of First Issue: AUG | 2020

ISSUED FOR PLANNING APPROVAL

MS

PB

0210

PL04

Project Number: D2864

Design: FAB

Zone: XX

Level: 01

File Type: DR

Scale: L

Number: 0210

Revision: PL04

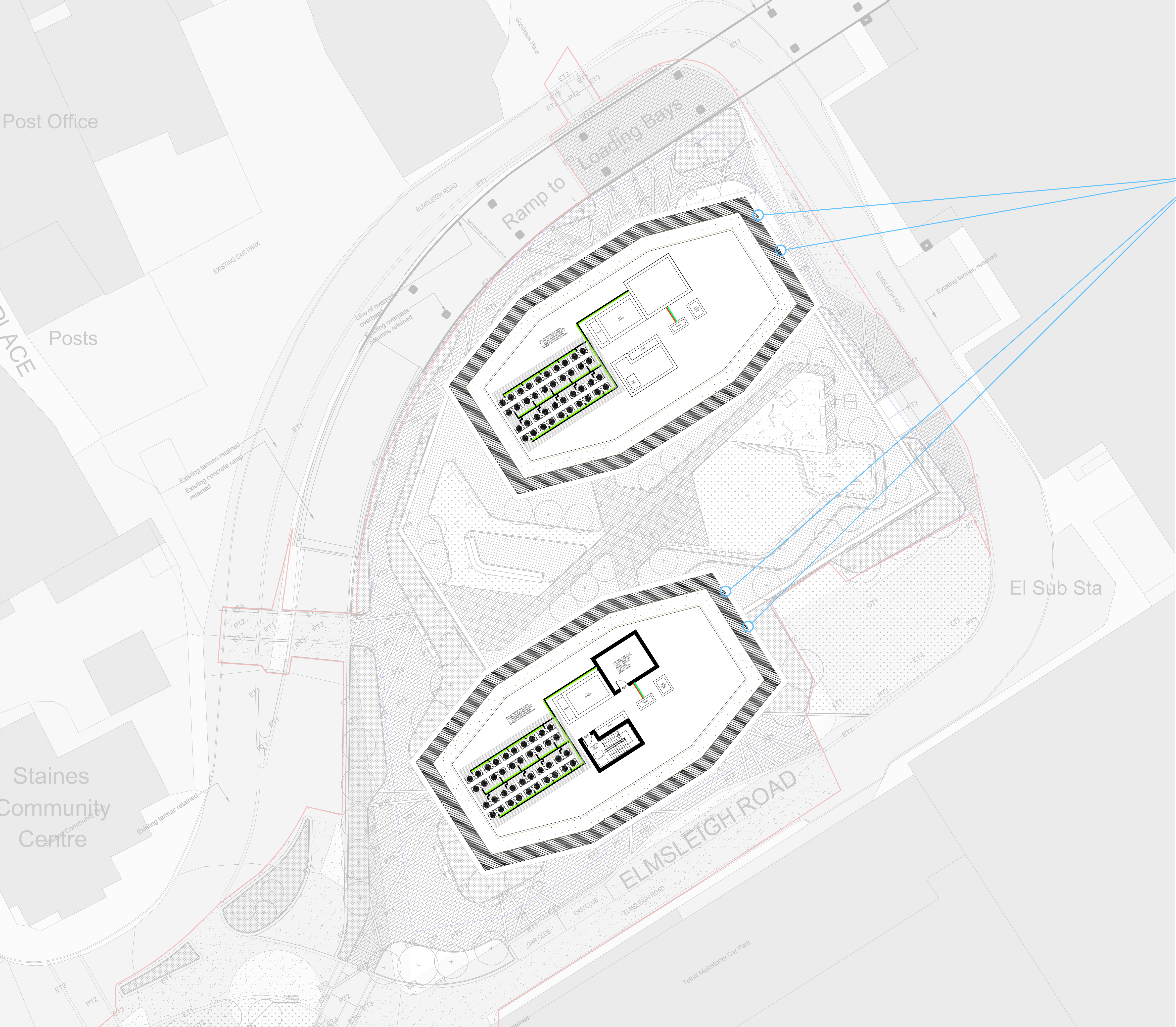
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Appendix EDP 2

Swift Box Location Plan Proposed

(Assael, Sep '20, Dwg: ERS-A-SK-200901JM01-R01)

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0m

5m

10m

1m

5m

10m

N

I

NOTES

- To be read in conjunction with Design and Access Statement and consultant reports.
- Site ownership taken from relevant title deed plans.
- Context taken from OS data.
- All layouts to suit design brief.
- Private and balcony provision as per design brief.
- Spatial requirements to suit relevant nationally described housing standards.
- External landscape design by others.
- All structure, external and internal walls shown in black.
- Refer to compliance plans for furniture and flat layouts. To suit relevant Part M requirements.
- Structure indicative only and subject to change

Key

Proposed Swift Box Location

4 x swift boxes in roof parapet

Boundary Key

Site Boundary

Application Boundary

General notes

All setting out must be checked on site

All levels must be checked on site and refer to Ordnance Datum Newlyn unless alternative Datum given

All fixings and weatherings must be checked on site

All dimensions must be checked on site

This drawing must not be scaled

This drawing must be read in conjunction with all other relevant drawings, specification clauses and current design risk register

This drawing must not be used for land transfer purposes

Calculated areas in accordance with Assael Architecture's Definition of Areas for Schedule of Areas

This drawing must not be used on site unless issued for construction

Subject to survey, consultation and approval from all statutory Authorities

Revision Status:
P=Preliminary
C=Contract

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Drawing notes

Electronic file reference

AA A3445 200 Plans

Status R: Revision

Date

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Sketch

01/09/2020

JM

MR

Purpose of information		
The purpose of the information on this drawing is for:	Planning	<input type="checkbox"/>
	Information	<input checked="" type="checkbox"/>
	Comment	<input type="checkbox"/>
	Client approval	<input type="checkbox"/>
All information on this drawing is not for construction unless it is marked for construction.	Client approval	<input type="checkbox"/>
	Construction	<input type="checkbox"/>

Client

Inland Homes

Project title

A3445 - Elmsleigh Road
Staines-Upon-Thames

Drawing title

Swift Box Location Plan
Proposed

Scale @ A1 size

Date

1:200

Sep '20

Drawing N°

ERS-A-SK-200901JM01-R01

Status & Revision

R01

Assael

Appendix EDP 3

Bat Box Location Plan Proposed

(Assael, Sep '20, Dwg: ERS-A-SK-200901JM02-R01)

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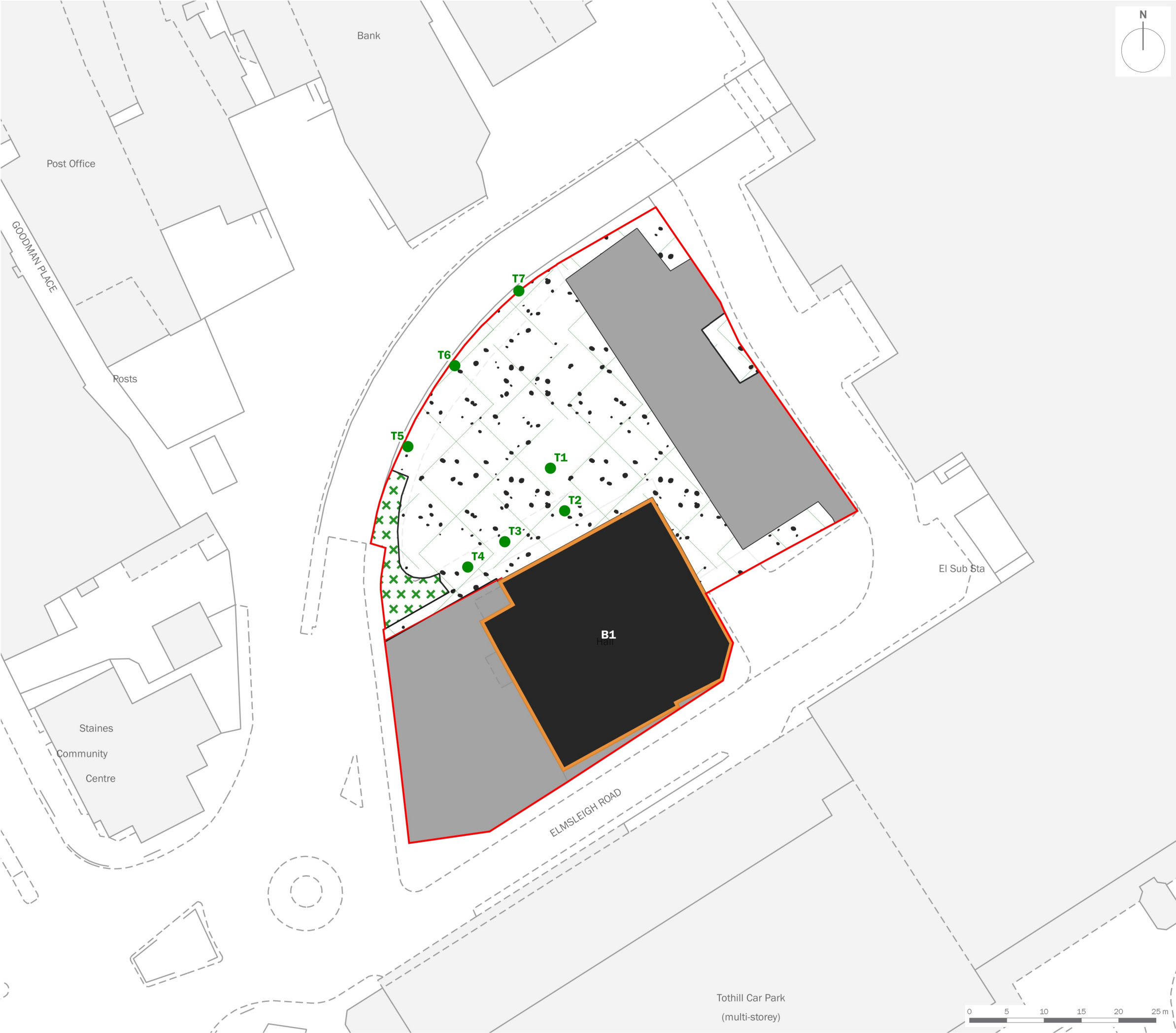


Plan

Plan EDP 1

Extended Phase 1 Habitat Survey
(edp6235_d001a 16 September 2020 GY/MMc)

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Site Boundary

B1

Building with Moderate Bat Roost Potential

Scattered Scrub

Scattered Scrub

Bare Ground and Ephemeral/Short Perennial

Bare Ground and Ephemeral/Short Perennial

Hardstanding

Hardstanding

Wall

Wall

Scattered Trees (Broad-leaved)

Scattered Trees (Broad-leaved)

client			
Inlands Homes			
project title			
The Old Telephone Exchange at Elmsleigh Road, Staines			
drawing title			
Plan EDP 1: Extended Phase 1 Habitat Survey			
date	16 SEPTEMBER 2020	drawn by	GY
drawing number	edp6235_d001a	checked	MMc
scale	1:500 @ A3	QA	RB



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