

AtkinsRéalis



Preliminary Ecological Appraisal Report

Ministry of Housing, Communities and Local
Government

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GRENFELL TOWER

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Executive Summary

Report purpose	<p>The aims of this report are to:</p> <p>Identify key ecological constraints to the development;</p> <p>Identify if additional ecological surveys are required to inform an ecological impact assessment; and,</p> <p>Identify avoidance, mitigation, compensation and enhancement measures.</p>
Proposed Scheme	<p>The information in this report will be used to confirm the mitigation required during the works to carefully take down Grenfell Tower.</p>
Desk studies and field surveys	<p>A desk study was undertaken on the 06/04/2021 using Greenspace information for Greater London (GiGL). A walkover survey and ground based tree assessment for roosting bats was undertaken on the 24/03/2021.</p> <p>An updated desk study using GiGL was undertaken on 06/01/2026. An updated walkover survey including a Daytime Bat Walkover, Ground Level Tree Assessment, and Preliminary Roost Assessment were undertaken on 17/11/2025 and 19/11/2025.</p>
Ecological features	<p>Habitats recorded on the Site included developed land – sealed surface, artificial unvegetated - unsealed surface and sparsely vegetated – ruderal/ephemeral.</p> <p>Habitat features within the Site have potential to support bats, nesting birds, and foxes. There is potential for non-native invasive species to be present on Site with cotoneaster recorded within the Site.</p> <p>A high number of potential roost features for bats were recorded within the building, most notably window crevices and crevices within supporting columns. No potential roost features were recorded in the trees on the Site.</p>
Recommendations	<p>The Proposed Scheme relates to the Grenfell Tower building, developed surfaces and two small areas of sparsely vegetated land.</p> <p>Endoscope surveys of all crevices/cracks/cavities and bat static surveys are being undertaken on each floor of the Grenfell Tower building before they are declared an exclusion zone for deconstruction.</p> <p>A Precautionary Method of Working is recommended as a minimum to check for the presence of bats and nesting birds during works.</p> <p>Other mitigation measures such as pollution control methods are required, including the use of plant mats for spill containment.</p>



Opportunities for biodiversity enhancements and biodiversity net gain

The Biodiversity Net Gain calculator has been used to calculate the baseline biodiversity value (in biodiversity units) of the habitats surveyed on the Site during the walkover. This is provided in a separate report.

Report Validity

In the event of scope or programme changes of the date of this report then updates to the surveys may be required to ensure the validity of the data, as per Chartered Institute of Ecology and Environmental Management guidance¹.

¹ CIEEM (2019) *Advice Note on the Lifespan of Ecological Reports and Surveys*.



1. Introduction

This Preliminary Ecological Appraisal (PEA), hereby referred to as the 'Report', has been prepared by AtkinsRéalis UK Limited on behalf of our client, the Ministry of Housing, Communities and Local Government (MHCLG) (the 'Applicant'), to support a non-urgent Crown Development application for full planning permission in respect of Grenfell Tower, Grenfell Road, North Kensington, London, W11 1TG (the 'Site'). The 0.51-hectare (ha) Site is located within the Royal Borough of Kensington and Chelsea.

The Site is now classified as 'Crown land', as land in which MHCLG has a relevant interest. MHCLG and the Secretary of State are responsible for its maintenance.

This application for Crown Development is submitted pursuant to Section 293D of the Town and Country Planning Act 1990 (as amended).

MHCLG's Principal Contractor is carefully and sensitively taking down the Grenfell Tower (the 'Tower'). These works are being conducted under permitted development (PD) rights granted to the Applicant by Part 19 Class Q of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015. This application aims to secure the necessary consent to complete the works, noting that this does not include the basement. Notification to utilise these PD rights was issued by MHCLG on the 23rd of September 2025.

1.1 Terms of Reference

AtkinsRéalis was commissioned by MHCLG to undertake a PEA in connection with the proposed works to carefully take down Grenfell Tower (hereafter referred to as the Proposed Scheme). The Proposed Scheme is located in North Kensington, London, as shown on Figure No. 1 in Appendix A (hereafter referred to as the Site).

This report has been undertaken with reference to current good practice² and provides an initial appraisal of any likely ecological constraints upon designated sites for nature conservation, protected/priority species and other features of ecological interest.

Following the principles of the mitigation hierarchy and British Standard (BS) 42020:2013³, this report also identifies the need for measures to avoid, mitigate or compensate for damage and disturbance to habitats and species.

This report is intended to inform the works to carefully take down the Tower. In addition, it provides the indicative scope for further ecological surveys, ecological assessment, and biodiversity net gain assessment required in connection with a non-urgent Crown Development Application.

² CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd Edition*. Chartered Institute of Ecology and Environmental Management, Winchester.

³ British Standards Institution (2013) *BSI Standards Publication BS 42020:2013 Biodiversity - code of practice for planning and development*. BSI Standards Limited.



1.2 The Site

The Site is centred at Ordnance Survey national grid reference (OSNGR) TQ 23908 80963, Greater London. The Site includes Grenfell Tower and associated public areas, and is located within the Royal Borough of Kensington and Chelsea (RBKC). The wider landscape is predominantly urban residential development of North Kensington, Notting Hill, and Holland Park. The A40 Westway dual carriageway lies approximately 200 m to the north and A3220 West Cross Route to the west, separating the residential areas from a retail and an commercial complex further west.

The Site is 0.51 ha and comprises Grenfell Tower and surrounding hardstanding and sparsely vegetated land. The Site is currently being maintained by MHCLG whilst the building is carefully being taken down and until the long-term future of the Site is determined.

1.3 The Proposed Scheme

The Proposed Scheme comprises the sensitive works to carefully take down Grenfell Tower. The basement will be retained and protected with a waterproof topping. An access point will be provided to ensure safe access into the existing (retained) basement.

The non-urgent Crown Development application for full planning permission is sought for the following description of development:

“The works to take down Grenfell Tower”.

The sensitive works to carefully take down Grenfell Tower are being carried out using the best practicable means, in accordance with BS:6187:2011 and the Code for Demolition at all times. This includes specialist deconstruction equipment, diamond drilling and wire sawing, coupled with traditional deconstruction methods. All works will be supported by a luffing jib tower crane located to the north-east of the building.

Larger building elements, including columns, spandrel panels/deep beams, roof-level crown and sections of the existing floor slab, are wire-sawn, detached, lifted down with the crane, then removed from the Site to suitable storage or laid to rest. Smaller materials are transported vertically within the structure, brought out using bobcat shovels, and removed from the Site to be laid to rest.

Ecological surveys were undertaken at the Site to identify existing flora and fauna, assess any potential ecological constraints on future works, and to provide recommendations for how these constraints are being managed. The results of the survey and biodiversity net gain baseline calculations will be used to inform potential redevelopment options.



1.4 Scope of the Assessment

This report presents ecological information obtained during the following:

- The desk study for the original PEA produced in 2021 was undertaken on the 06/04/2021 and the walkover survey was conducted on the 24/03/2021 by AtkinsRealis⁴;
- An updated desk-study was undertaken on 06/01/2026; and
- An updated walkover survey of accessible land within the Site, including an updated UKHab assessment, a Daytime Bat Walkover (DBW), Ground Level Tree Assessment (GLTA) and Preliminary Roost Assessment (PRA) of the building was undertaken on 17/11/2025 and 19/11/2025.

The walkover survey and identification of potential ecological constraints was based on the condition of the Site and its immediate surrounds encountered at the time of the walkover survey, and the information about the Proposed Scheme available at the time of producing this report. If information regarding the Proposed Scheme should change, the Site may need to be revisited to determine whether any further ecological constraints arise from those changes.

⁴ GrenfellSite&Programme_PEA_Atkins_April2021_ForIssue



2. Methods

2.1 Desk Study

The geographical area for obtaining ecological data through desk studies has been determined using good practice guidance (as set out in internal AtkinsRéalis guidance) and professional judgement. Baseline data has been gathered from a range of sources through data requests and using online resources as outlined below. This included data gathering in relation to statutory and non-statutory designated sites for nature conservation and protected and priority habitats and species (as defined by Chartered Institute of Ecology and Environmental Management (CIEEM) PEA guidance⁵), and an assessment of the likely importance of habitat features present for such species was also undertaken during the walkover survey.

The study areas used for the data gathering are detailed in Table 2-1. The desk study was undertaken on 06/01/2026. For species records collected, only those within 10 years of the data collection date have been considered in the assessment.

The following online resources were accessed:

- Multi-Agency Geographic Information for the Countryside (MAGIC) website⁶; and
- Woodland Trust Ancient Tree Inventory⁷.

Ordnance Survey maps and Grid Reference Finder⁸ were used to identify the presence of waterbodies within 500 m of the Site boundary, in order to establish if the land within and immediately surrounding the Site could be used as terrestrial habitat for great crested newts. This species typically uses suitable terrestrial habitat up to 500 m from a breeding pond⁹. However, there is a notable decrease in great crested newt abundance beyond a distance of 250 m from a breeding pond¹⁰.

Greenspace Information for Greater London (GiGL) were contacted to request records of protected and priority species and habitats and details of non-statutory designated sites for nature conservation.

⁵ As set out in Box 1 on page 4 of the CIEEM (2019) Guidelines for Preliminary Ecological Appraisal, priority species include those listed as a national and/or local priority for conservation (i.e. a Habitat of Principal Importance or Species of Principal Importance in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; International Union for the Conservation of Nature (IUCN) Red List or Amber List, Nationally Rare or Nationally Scarce, or endemic to a country or geographic location.

⁶ Multi-Agency Geographic Information for the Countryside (MAGIC) [Online]. Available at: <https://magic.defra.gov.uk/> [Accessed: 05/01/2026].

⁷ Woodland Trust *Ancient Tree Inventory* [Online]. Available at: <https://ati.woodlandtrust.org.uk/> [Accessed: 05/01/2026].

⁸ UK Grid Reference Finder (2011) [Online]. Available at: <https://gridreferencefinder.com/> [Accessed: 05/01/2026].

⁹ English Nature (2001) *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.

¹⁰ English Nature (2004). *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt (ENRR576)* [Online]. Available at: <http://publications.naturalengland.org.uk/publication/134002> [Accessed: 05/01/2026].



Table 2-1 - Data search areas

Data type	Search area – distance from Proposed Scheme boundary
Statutory designated sites for nature conservation	1 km
Non-statutory designated sites for nature conservation	1 km
Irreplaceable and priority habitats	500 m
Veteran trees	50 m
Protected and priority species	1 km, extended to 2 km for bats

2.2 Field Survey

The geographical area for undertaking ecological field surveys has been determined using the current survey guidance (as detailed in Section 2.1), professional judgement and the zones of influence, which have been determined based on likely effects arising from the Proposed Scheme.

Following CIEEM's Guidelines for PEA, a walkover survey was undertaken, focusing on protected and priority habitats and species.

The walkover survey was undertaken on 24/03/2021, and updated on 17/11/2025 and 19/11/2025. This included all land within the Site where access was allowed (the Survey Area).

2.2.1 Habitats

Habitats were mapped using the UK Habitat Classification (UKHab) v2.0 system¹¹. UKHab is a comprehensive and hierarchical habitat classification system for the UK that has been developed to benefit from recent changes in habitat categorisation, recording and analysis, and is suitable for digitally recording in the field using GIS. It is fully compatible with other major existing classifications, including Priority Habitat types (UKHab Level 4) and Habitats Directive Annex I habitat types¹² (UKHab Level 5)¹³.

All habitats were recorded to at least Level 3 of the UKHab hierarchy, i.e. broad habitats such as neutral grassland or dense scrub. Any Level 4 habitats and Level 5 habitats have also been recorded. In addition, 'Essential Secondary Codes' have been recorded to describe habitat mosaics, complexes and their origins. All habitat features have been digitally mapped, using QGIS, as either polygons, lines or points and assigned to a UKHab Primary Habitat Code.

An assessment of the possible presence of priority habitats (as defined by CIEEM PEA guidance) was also undertaken during the walkover survey.

Vascular plant names recorded during this survey follow Stace¹⁴.

¹¹ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://ukhab.org>)

¹² Council Directive 92/43/EEC (1992) on the conservation of natural habitats and of wild fauna and flora (known as the 'Habitats Directive').

¹³ UKHab has been chosen as the classification system for the majority of terrestrial area habitat types used in Defra's Statutory Biodiversity Metric. It is, therefore, essential to use UKHab when undertaking a project where Biodiversity Net Gain will be required.

¹⁴ Stace (2019) *New Flora of the British Isles* 4th edition.



Target notes (TNs) were used to record specific details on the plant species composition of the habitats, current management and quality. TNs were also used to record features of ecological importance (e.g. ponds, complex habitat mosaics).

2.2.2 Protected and Priority Species

An assessment of the possible presence of protected or priority species (as defined by CIEEM PEA guidance), and an assessment of the likely importance of habitat features present that could support such species was also undertaken during the walkover survey.

Surveyors used current guidance and methodologies, as referenced by CIEEM, for preliminary assessment of species.

The survey comprised assessing the suitability of the habitats present for, and recording any activity of the following species (in line with current guidance):

- Badgers¹⁵;
- Bats¹⁶;
- Hazel dormice¹⁷;
- Otters^{18,19};
- Water voles²⁰;
- Breeding birds,
- Reptiles²¹;
- Amphibians (terrestrial and aquatic habitats), including an assessment of aquatic habitat for its suitability to support great crested newts using the Habitat Suitability Index (HSI) assessment²²;
- Priority invertebrates^{23,24}
- Priority plants and fungi.²⁵

¹⁵ Harris S., Cresswell P. and Jefferies D. (1989) *Surveying badgers*. Mammal Society – No9.

¹⁶ Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

¹⁷ English Nature (2006). *The Dormouse Conservation Handbook (2nd edition)*.

¹⁸ Chanin and Smith (2003). *Monitoring the otter Lutra lutra*. Conserving Natura 2000 Rivers Monitoring Series No 10. Peterborough, English Nature.

¹⁹ Liles G. (2003). *Otter Breeding Sites. Conservation and Management*. Conserving Natura 2000 Rivers Conservation Techniques Series No. 5. English Nature, Peterborough.

²⁰ Dean, M. et al (2016) *The Water Vole Mitigation Handbook*. Mammal Society.

²¹ Froglife (1999) *Reptile Survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife advice sheet 10.

²² Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000) Evaluating the suitability of habitat for the Great Crested Newt (*Triturus cristatus*). *Herpetological Journal* 10 (4), 143-155 (2000).

²³ Buglife, Good planning practice for invertebrates: Surveys. Available at: <https://www.buglife.org.uk/resources/planning-hub/good-practice-planning-for-invertebrates/> [Accessed: 05/01/2026]

²⁴ English Nature, Organising surveys to determine site quality for invertebrates. Available at: <https://publications.naturalengland.org.uk/publication/69045/> [Accessed: 05/01/2026].

²⁵ At the present time there is no current survey guidance for priority plants and fungi. However, the SSSI selection guidelines for non-licensed fungi provide some survey methodologies for some groups. Available at: <https://hub.jncc.gov.uk/assets/d1fcb171-8086-4f5b-ade5-a34c5edc78c5>. [Accessed: 05/01/2026].



Evidence of the presence of the following invasive species was recorded where seen:

- Evidence of animal species as listed on the Invasive Alien Species (Enforcement and Permitting) Order 2019; Muntjac deer and grey squirrels.
- Evidence of the presence of the following invasive plant species: Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron²⁶, variegated yellow archangel and cotoneaster²⁷. These are listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and subject to strict legal control.

2.2.3 Bats

The extent of the bat surveys was based on the zone of sensitivity for this species and included all land within the Proposed Scheme boundary.

2.2.3.1 Daytime Bat Walkover

A DBW survey was undertaken across the Proposed Scheme on 17/11/2025 and 19/11/2025 in order to observe, assess, and record any habitats suitable for bats to roost, commute, or forage both within and adjacent to the Site. The DBW aimed to determine the suitability of the habitats present for bats and inform whether further bat surveys would be needed.

Roosting and foraging habitats and flight-paths were assessed separately and categorised for their potential suitability to support bats, in line with Table 2-2 below.

Table 2-2 - Guidelines for assessing the potential suitability of the Application Site for bats

Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.

²⁶ Although there are approximately 1200 species of rhododendron, just one species and one of its hybrids are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Rhododendron ponticum* and *Rhododendron ponticum x Rhododendron maximum*.

²⁷ There are approximately 100 species of cotoneaster found in the UK, but only five are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Cotoneaster horizontalis*, *Cotoneaster integrifolius*, *Cotoneaster simonsii*, *Cotoneaster bullatus* and *Cotoneaster microphyllus*.



Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitats that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Structures were also assessed for their potential suitability to support winter roosting bats during the hibernation period. This assessment follows the rationale provided in Figure 4.1 of good practice guidance²⁸, which assigns either Low, Moderate, or High potential to each structure. The assessment considers features for access and roosting, temperature and humidity conditions within the structure (where accessible), surrounding habitat, and presence of roosts at other times of the year.

For trees, the following categorisations were applied:

²⁸ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London



None – either no potential roost features in the tree or highly unlikely to be any;

Further Assessment Required – further assessment required to establish if potential roost features are present in the tree; and

Potential Roost Feature – a tree with at least one potential roost feature present.

The DBW informed subsequent further survey effort for roosts, flight-paths, and foraging habitats as detailed within the sections below.

2.2.3.2 Preliminary Roost Assessment of Structures

A PRA was undertaken on the Grenfell Tower building on the 17/11/2025 and 19/11/2025 by two bat licensed ecologists. The assessment involved a detailed visual internal and external examination of the building undertaken during daylight hours and aided with the use of an endoscope and high-powered torch. The building was searched for potential entry/exit points for bats and potential roost features such as holes in brickwork, cracks, and gaps in masonry, etc. The internal search aimed to locate any evidence of bats, such as live or dead specimens, bat droppings, urine splashes, feeding remains, fur-oil staining, bat-fly pupal cases, odour, and/or audible bats calls.

Based on the location, aspect, orientation, and characteristics of the features identified, the building was categorised in terms of its potential suitability for roosting bats. The assessment of potential suitability was carried out according to good practice guidance²⁹ which assigns each structure either None, Negligible, Low, Moderate, or High suitability for roosting bats as per Table 2-3 below.

Table 2-3 - Guidelines for assessing the potential suitability of structures for bats³⁰

Potential suitability	Description of roosting habitats in structures
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).

²⁹ Collins (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust. London. Available at: https://cdn.bats.org.uk/uploads/pdf/Resources/For-professionals/Bat-Survey-Guidelines-23-FINAL-NOPRINT10.10.23.pdf?v=1696925348&_gl=1*216q1j*_ga*NDQ5OTkxOC4xNjk2MjM2MDcw*_ga_G28378TB9V*MTcwMDU3NzcwNC4xNy4wLjE3MDA1Nzc3MDQuMC4wLjA.

³⁰ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London



Potential suitability	Description of roosting habitats in structures
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

2.2.3.3 Ground Level Tree Assessment

Trees identified as Further Assessment Required or Potential Roost Feature during the Daytime Bat Walkover were subject to a GLTA on 17/11/2025 and 19/11/2025. The Ground Level Tree Assessment involved the use of binoculars, a high-powered torch and endoscope to identify potential roost features such as woodpecker holes, rot holes, cracked limbs, dense ivy and flaking bark etc. If potential roost features were noted, their potential roost feature type, position on the tree (trunk or limb), height and orientation of the features were noted, and photographs were also taken. Trees with potential roost features were then recommended for a climbed/endoscope inspection to provide further indication of the potential suitability of each individual potential roost feature to support bats, see section below.

2.2.4 Surveyor Competencies

All the surveys were led by surveyors who have been assessed to be at least of capable experience following the CIEEM competency framework³¹. The DBW, GLTA and PRA were conducted by two surveyors who are accomplished for bats with a Level 2 Bat Licence.

2.2.5 Limitations

This section identifies any limitations to the surveys or assessment and provides an explanation as to the effect of these on the appraisal.

The search for waterbodies within 500 m of the Site was undertaken by using Ordnance Survey plans and aerial photographs only. These sources may not show all waterbodies within 500 m of the Site boundary and, therefore, some waterbodies may not have been identified.

The list of invasive plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is extensive and these plants are found in a range of different habitats. The field survey checked for the presence of Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron, variegated yellow archangel and cotoneaster. Other invasive species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) may not have been recorded.

The desk study reviewed the Woodland Trusts Veteran Trees inventory. This provides records of veteran trees, but it is not an exhaustive list, and other veteran trees may be present in the area. The walkover survey aimed to identify such features and as such this is not considered a constraint.

GiGL records are not exhaustive, and the absence of records does not necessarily demonstrate the absence of a species.

³¹ CIEEM's Competency Framework. Available at: <https://www.cieem.net/competency-framework> [Accessed 05/01/2026].



Works to carefully take the Tower down had commenced within the building and, therefore, surveyors could not access above floor 16 for the internal survey.

Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. Therefore, the ecological surveys undertaken to support this PEA have not produced a complete list of plants and animals, and the absence of evidence for any particular species should not be taken as conclusive proof that the species is not present or that it will not be present in the future. The above limitations have been addressed through taking the precautionary approach within the appraisal.



3. Results

3.1 Statutory and Non-statutory Designated Sites

The desk study survey found no statutory designated sites for nature conservation within 2 km of the Site and, therefore, they will not be discussed further within this report.

Table 3-1 details the non-statutory designated sites for nature conservation identified through the desk study.

Table 3-1 - Non-statutory designated sites for nature conservation within 1 km³² of the Site

Site name	Designation	Location of designated site ³³	Features of interest ³⁴
Avondale Park	Borough Grade II Site of Importance for Nature Conservation (SINC)	335 m south	Public park with a large playground, tennis courts and a café. Habitats within the park include priority woodland, planted shrubs and amenity woodland.
Ladbroke Grove Garden Squares Complex	Borough Grade II SINC	360 m south east	Complex of 16 private communal gardens forming a large private park. Supports a number of mature trees with woodland ground flora. The gardens support a variety of breeding birds, pipistrelle bats, fox and hedgehog.
Avondale Wildlife Garden	Local SINC	380 m south	A nature garden with scrub and meadow supporting a variety of native plant species.
Westway Wildlife Garden	Borough Grade II SINC	400 m north west	Narrow wildlife garden below the Westway flyover containing a well established meadow, scrub and scattered trees.
Railway West Of Ladbroke Grove Station	Borough Grade II SINC	410 m north east	Two sections of the embankment either side of Ladbroke Grove Station. Includes scrub, mature trees and unmanaged grassland.

³² This is the zone of influence for designated sites.

³³ Where designated sites are situated outside of the Site boundary, the distance and direction is given to the closest point that the designated site is from the Site.

³⁴ Including qualifying features of internationally designated sites and reasons for designation for SSSIs.



Site name	Designation	Location of designated site ³³	Features of interest ³⁴
Eynham Road Railway Embankments	Borough Grade II SINC	580 m north west	Two sections of the embankment for the Hammersmith and City Lines. Includes woodland, scrub and rough grassland.
Hammersmith And City Line	Borough Grade I SINC	590 m west	Part of a network of railway lines throughout Hammersmith and Fulham with scrub and grassy clearings.
St Mark's Park Community Kitchen Garden	Borough Grade II SINC	670 m north	Public park with planted shrubs, tennis courts, play area, scattered trees and a large area of amenity grassland.
Carmelite Monastery	Borough Grade II SINC	720 m north	Wall Monastery gardens include unmanaged grassland, scrub, mature trees and a pond.
Kensington Memorial Park	Local SINC	770 m north	Public park with planted shrubs, tennis courts, large play area and amenity grassland. Also contains some areas of unmanaged grassland and native hedgerows.
Hammersmith Park	Borough Grade II SINC	870 m south west	Public park with planted shrubs, tennis courts, play area and amenity grassland. Park also includes a large number of mature trees and a Japanese garden with a pond.

None of the non-statutory designated sites listed above are hydrologically connected to the Site. In addition, the Site is in an urban setting surrounded by residential developments and roads which act as a physical barrier between the Site and these non-statutory designated sites. Taking this into account, along with the distance between the Site and the non-statutory designated sites, and the localised nature of the proposed Scheme, it is not anticipated that the Proposed Scheme will affect any of these non-statutory designated sites. Therefore, the potential for the Proposed Scheme to affect non-statutory designated sites for nature conservation has been scoped out and they are not considered further in this report.



3.2 Irreplaceable Habitats

Table 3-2 details the locations of irreplaceable habitats³⁵ identified through the desk study and the findings from the field surveys.

Table 3-2 – Irreplaceable habitats within 500 m³⁶ of the Site

Irreplaceable habitat type	Irreplaceable habitat details	Location of irreplaceable habitat ³⁷
Deciduous woodland	0.68 ha ² of woodland situated between two residential roads.	300 m southeast of the Site, separated from the Site by residential houses and road networks.
Deciduous woodland	0.3 ha ² of woodland within Avondale Park, a local community greenspace.	340 m southeast of the Site, separated from the Site by residential houses and road networks.
Deciduous woodland	0.61 ha ² of woodland situated between two residential roads.	400 m southeast of the Site, separated from the Site by residential houses and road networks.

The desk study and field survey did not record any ancient or veteran trees within 50 m of the Site.

As no irreplaceable habitats are located within the Site and the impacts of the Proposed Scheme will be localised, there will be no direct impacts on the habitats listed above. As there will be no impact on the irreplaceable habitats identified, they are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.

3.2.1 Habitats and Priority Plants

The Site consists of Grenfell Tower and the associated external hardstanding. Habitats include artificially unvegetated surface, developed land and sparsely vegetated land. There are 12 semi-mature trees within the Site.

The Site is surrounded by residential housing and the associated greenspaces with a railway line running to the west of the Site.

Table 3-4 lists all of the UKHab Level 3 habitats present within the Survey Area. The table also provides details of the area³⁸ of each habitat within the Survey Area and the proportion of the Site this makes up. Habitats are mapped on the Habitat Survey Plan (Figure 1A).

³⁵ As defined in the National Planning Policy Framework (2021): Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

³⁶ This is the zone of influence for ancient woodland.

³⁸ Measurement was done in QGIS.



Table 3-3 - Habitat types within the Survey Area

UKHab level 3 habitat type	Location of habitat	Area of habitat	
		Ha	% of Site
Developed land; sealed surface	Within the Site	0.414	82
Artificial unvegetated, unsealed surface	Within the Site	0.089	17
Sparsely vegetated land – ruderal/ ephemeral	Within the Site	0.005	1

3.2.1.1 Priority Plants

GiGL provided six recent priority plant records from four species within 2 km of the Site. The species recorded were starved wood-sedge, strapwort, least lettuce and meadow clary. The closest record was for starved wood-sedge and meadow clary, both recorded 417 m south of the Site.

The field survey on the 17/11/2025 and 19/11/2025 did not identify any suitable habitat to support priority plant species within the Site. The urban environment surrounding the Site means it is not connected to any potential habitat that could support priority plant species.

As no suitable habitat for priority plants have been recorded within the Survey Area, they are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.

3.3 Protected and Priority Animal Species

Evidence of protected and priority species, or habitats with the potential to support protected and priority species, are indicated on the Habitat Survey Plan (Figure 1 in Appendix A), with specific features highlighted by TNs on the map. TN descriptions are provided in Table A.1 in Appendix A. Details of legislation relating to protected species is provided in Appendix B.

Protected and priority species are not discussed further within this report where the following applies:

- A species distribution range does not cover the Site location, and;
- No evidence of the species was recorded within the Survey Area and/or no potentially suitable habitat for the species has been recorded within the zone of influence of the species.



3.3.1 Badgers

GiGL provided no badger records within 2 km of the Site. The closest record is approximately 4 km northwest of the Site.

The field survey on the 17/11/2025 and 19/11/2025 assessed the survey area for evidence of badgers (setts, latrines, feeding signs and mammal track) and potential habitats to support badgers. The field survey did not identify any potential badger field signs or potential badger habitat. The Site has limited sett building opportunities due to the heavily urbanised habitats and is poorly connected to suitable badger habitat within the wider landscape.

As no suitable habitat for badgers has been recorded within the survey area, they are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.

3.3.2 Bats

GiGL provided 326 recent records of five species of bats within 2 km of the Application Site. Species recorded were soprano pipistrelle, common pipistrelle, Nathusius's pipistrelle, Nyctalus bat and Daubenton's bat. The closest record was for common pipistrelle, located 452 m southeast of the Site. Four pipistrelle roosts have been recorded within 2 km of the Site, however the distance between these and Site has not been provided by the records centre. There are no Natural England mitigation licences for bats within 2 km of the Site.

The field survey on the 17/11/2025 and 19/11/2025 was undertaken to determine the suitability of the habitat within the Site for roosting, foraging and commuting bats.

Roosting habitat

A total of 17 trees were identified during the walkover survey as indicated on the Habitat Survey Plan (Figure No. 1 in Appendix A). A GLTA was undertaken of these trees on the 17/11/2025 and 19/11/2025 by two bat licensed ecologists. No potential roost features were observed during the GLTA on any of the trees, and they were all classified as being of negligible suitability for roosting bats.

A PRA was undertaken on the Grenfell Tower building on the 17/11/2025 and 19/11/2025 by two bat licensed ecologists. The building is now a derelict concrete frame without a roof. Only 16 of the floors and the basement were accessible due to an exclusion zone on floors 17 to 21 where works to carefully take the Tower down were taking place. A Monarflex covering and debris netting has been installed on the outside of building (TN1) and a hoist is present on the eastern side, extending the full height of the building.

The building's windows and doors have been removed. Due to the lack of insulation and concrete construction, the temperature in the building was noted to be colder than the external temperature, and water sprayed on the deconstruction level for dust suppression has increased the humidity and saturated some of the floors and ceilings with water (TN2).

The ground floor of the building was a communal lobby area, giving access to the above residential floors. Each residential floor of the building (1-21) was made up of six flats, centred around a central staircase (TN3) and lift shaft which has been sealed (TN4) and is currently being used to transport debris from the floors being taken down to the ground floor. Four smaller air vents running the height of the building were accessible from the lobby and flat 2, 3, 5 and 6 on each floor.

The building is divided into floors and each accessible floor was subject to an individual Potential Roost Assessment as summarised in Table 3-5 below.



Table 3-5: Preliminary Roost Assessment Summary

Floor / Building feature	Summary of Potential Roost Features	Roosting Suitability
Central Stairwell	None	None - Stairwell is well sealed from external access and no potential roost features were present.
Lift shaft	None	None – lift shaft is well sealed.
Floors 4 to 16	<p>Narrow crevices between 5cm and 30cm deep were present where the windows have been removed (TN5).</p> <p>Crevices within the ceiling and concrete columns up to 30cm deep.</p> <p>Superficial and through holes present in walls and ceilings.</p> <p>Air vents accessible for bats.</p> <p>Ceilings were rough and exposed.</p> <p>One deep crevice within a concrete column on floor 14 (TN6).</p>	<p>Low – all holes and crevices expect for the one in the column on floor 14, could be fully inspected with no evidence of bats found. However, these crevices could offer potential roosting opportunities to individual bats.</p> <p>The air vents are unsuitable for bats due to the presence of a strong draft.</p>
Floor 3	Gaps around pipes in the walls and floors.	Low – not all gaps could be fully inspected due to the height of the features. Could be used by individual roosting and hibernating bats.
Floor 2	None.	None – no potential roost features recorded.
Floor 1	<p>Cavity into the wall.</p> <p>Rubble piled at the bottom of the rubbish chute (TN7).</p> <p>Voids and crevices in concrete columns.</p> <p>Electric room with gaps between the wires and walls (TN8).</p>	Low - not all gaps and crevices could be fully inspected due to the height of the features. Could be used by individual roosting and hibernating bats.
Ground floor	Some windows have been removed creating narrow crevices between 5 cm and 30cm deep.	Low – access was restricted so not all potential roost features could be inspected and therefore could be used by individual roosting and hibernating bats.
Basement	<p>Superficial and through holes present in walls and ceilings (TN9).</p> <p>Gaps/ crevices around pipes in the walls and ceiling.</p>	Low - not all gaps and crevices could be fully inspected due to the height of the features. Could be used by individual roosting and hibernating bats.

Overall, the building was recorded as having low suitability for bats with a number of potential roost features suitable for individual bats, particularly common and soprano pipistrelle which are known to hibernate in buildings.



Foraging & Commuting habitat

Scattered trees outside the Site could be used by foraging and commuting bats. Linear habitats within the Site are small in scale and have limited complexity, as they are separated from habitats within the wider landscape by residential properties and local roads. Artificial lighting within the Site and wider residential areas will also reduce the suitability of the Site for foraging and commuting bats. Therefore, the Site has low suitability for foraging and commuting bats.

As potentially suitable roosting habitat for bats has been recorded within the Survey Area this species may pose a constraint to the Proposed Scheme and recommendations are provided in Section 4.

3.3.3 Otters

GiGL provided no otter records within 2 km of the Site. The closest watercourse is the Grand Union Canal, located 1.3 km north. There are no records of Natural England mitigation licences for otters within 2 km of the Site.

The field survey on the 17/11/2025 and 19/11/2025 identified no potential otter habitat within the Site. The heavily urbanised environment and distance between the Site and the nearest watercourse make the Site unsuitable for otters.

As no suitable habitat for otters has been recorded within the Survey Area, this species is not discussed further within this report as it is not considered to pose a constraint to the Proposed Scheme.

3.3.4 Water Voles

GiGL provided no water vole records within 2 km of the Site. The closest watercourse was the Grand Union Canal, located 1.3 km north.

The field survey on the 17/11/2025 and 19/11/2025 identified no potential water vole habitat within the Site. The heavily urbanised environment and distance between the Site and the nearest watercourse make the Site unsuitable for water voles.

As no suitable habitat for water voles has been recorded within the Survey Area, this species is not discussed further within this report as it is not considered to pose a constraint to the Proposed Scheme.

3.3.5 Breeding Birds

GiGL provided 1240 recent records of 46 species within 2 km of the Site. Of the 46 species recorded, 19 were priority³⁹ bird species including peregrine falcon, barn owl, kingfisher and marsh harrier. The closest record was 190 m south of the Site.

The field survey on the 17/11/2025 and 19/11/2025 recorded 17 trees within the Site with the potential to support nesting birds, with an old bird nest noted in one of the trees (TN10). Pigeons have also been recorded within the Tower structure on Site.

³⁹ As set out in the Bird Survey Guidelines for assessing ecological impacts, v.0.1.7. <https://birdsurveyguidelines.org> [06/01/2026]



The Tower structure could support some priority bird species recorded within 2 km of the Site, most notably peregrine falcons and barn owl. However, due to the high levels of disturbance from the Proposed Scheme works that have already commenced, it is unlikely these species will be present.

There is no suitable habitat to support wintering and passage birds within the Site and, therefore, they are not considered further.

As potentially suitable nesting habitat for birds and evidence of breeding birds have been recorded within the Survey Area, breeding birds may pose a constraint to the Proposed Scheme and recommendations are provided in Section 4.

3.3.6 Reptiles

GiGL provided no reptile records within 2 km of the Site.

The field survey on the 17/11/2025 and 19/11/2025 identified no suitable reptile habitat within the Site. The sparsely vegetated land could offer potential for reptiles, however, these habitats are small in size and not large enough to sustain a viable reptile population. These habitats are also within areas of high disturbance and are poorly connected to the suitable reptile habitat within the wider landscape.

As the only recorded habitat for reptiles within the survey area is of poor quality and in an area of high disturbance, reptiles are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.

3.3.7 Great Crested Newts

GiGL provided no records of great crested newts (GCN) within 2 km of the Site. The closest waterbody is 220 m northwest of the Site. No records of Natural England mitigation licences for GCN were recorded within 2 km.

The field survey on the 17/11/2025 and 19/11/2025 did not identify any potential terrestrial or breeding habitat for GCN within the Site. The desk study identified one pond within 500 m of the Site, located 220 m northwest of the Site. Residential housing and local roads act as a barrier for dispersal between the pond and the Site. Due to the lack of terrestrial habitat and potential breeding ponds it is unlikely GCN will be present in the Site.

As no potentially suitable habitat for great crested newts has been recorded within the Survey Area, this species is not discussed further within this report as it is not considered to pose a constraint to the Proposed Scheme.

3.3.8 Priority Invertebrates

GiGL provided 67 recent priority invertebrate records of 34 species within 2 km of the Site. Species recorded included: stag beetle, common darter, small heath butterfly, cinnabar moth and Essex skipper.

The field survey on the 17/11/2025 and 19/11/2025 found that the habitats on Site are not large or complex enough to support priority invertebrates. The Site is not connected to any potential suitable habitats for priority invertebrates in the wider landscape due to roads and urban development.

As no suitable habitat for priority invertebrates has been recorded within the Survey Area, they are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.

3.3.9 Other Notable Mammals

GiGL provided six recent records of hedgehogs within 2 km of the Site.



The field survey on the 17/11/2025 and 19/11/2025 found no evidence of hedgehog activity within the Site and the sparsely vegetated areas provide limited foraging habitats. This along with the Site being poorly connected to suitable hedgehog habitat in the wider landscape means it is unlikely hedgehogs are present on Site and are not considered a constraint to the Proposed Scheme.

The Principal Contractor has advised that, prior to commencement of the Proposed Scheme, there was occasional evidence of a fox accessing the Tower up to the 3rd floor. However, since the commencement of the works to carefully take down the Tower, no evidence of sporadic use of areas above the ground floor has been observed.

The presence of foxes within the Site may pose a constraint to the Proposed Scheme and recommendations are provided in Section 4.

3.4 Invasive Non-native Species

GiGL provided 372 recent records of invasive non-native species within 2 km of the Site. The species recorded were ring-necked parakeet, tree-of-heaven, butterfly-bush, Stern's cotoneaster, Canadian waterweed, gallant soldier, giant hogweed, foxglove-tree, green alkanet, cherry laurel, turkey oak, evergreen oak, Japanese knotweed, false-acacia and snowberry. The closest record was 400 m east of the Site. No invasive non-native species were recorded within the Site.

As no invasive non-native species have been recorded within the Survey Area, they are not discussed further within this report as they are not considered to pose a constraint to the Proposed Scheme.



4. Constraints and Recommendations

4.1 Key Constraints

The Proposed Scheme has the potential to impact roosting bats, nesting birds and foxes that may be present within the Grenfell Tower building and the wider Site.

The works to carefully take down the Tower have the potential to result in the loss of bat roosts, should bats be present, and disturbance and displacement of any nesting birds or foxes utilising the building. An old bird nest was recorded within one of the trees within the Site and, therefore, any tree removal could result in the loss of nesting bird habitat.

4.2 Ecological Input into Design

Where possible, the Site compound is utilising areas of existing hardstanding within the Site. Access and storage of equipment/materials is not located within vegetated areas. Areas of hardstanding/bare ground are being used for this purpose or, if this is not possible, access and storage areas have been specifically agreed with an ecologist.

If the scope of the Proposed Scheme changes, additional mitigation measures might be required, and ecological input into the design will be revised.

4.3 Recommendations

The Tower building has the potential to support roosting bats, with potential roost features being recorded on all floors except the 2nd floor. During the walkover survey, there were several crevices with bat roost potential that could not be inspected, most notably a large crevice within a column on the 14th floor. At the time of writing this report, no evidence of bats has been recorded during the works to take down the Tower and therefore no mitigation is required.

A site visit to undertake an endoscope survey of any cracks/crevices/cavities on the highest accessible floor as a visual check for bats has been completed. Following this survey, two static monitors were placed to record any bat calls. At this time, a further static monitor was placed on the 14th floor (where a crevice could not be fully inspected). Monitors were left in place on the highest accessible floor for three weeks and removed before an exclusion zone was established on this floor.

Once the statics were removed from the highest accessible floor, the SD cards and batteries were replaced and the statics were re-deployed on the floor below. An endoscope survey of cracks/crevices/cavities on this floor was completed prior to the setting out of the two static monitors. These will be left on this floor for three weeks until it becomes part of the exclusion zone. This process will be repeated for all floors, including the ground floor.

The data from the SD cards removed from the statics between deployment on each floor will be reviewed to confirm the presence or likely absence of roosting bats within that specific floor.

If a bat or physical evidence of a bat is observed in a potential roost features during an endoscope survey or bat calls (if they indicate the presence of a roost within the Tower, rather than commuting or foraging bats) are recorded on the static detectors, further bat roost categorisation surveys may be required to inform a Natural England bat mitigation licence application. A mitigation strategy will be required for any licensed work. If mitigation is required, this would likely include sensitive timing of works during initial removal of potential roost features to avoid critical



periods for bats (i.e. maternity or hibernation season). In addition, bat boxes may need to be installed as a compensation or mitigation measure as close as possible to the Site on retained trees or buildings, but sufficiently far as not to be disturbed by the Proposed Scheme. The number of bat boxes required would be determined following further surveys.

New lighting will not be required as part of the Proposed Scheme. A separate application for the future of the site is to be submitted separately, which will address any lighting requirements.

The Proposed Scheme is proceeding under a Precautionary Method of Working (PMW) as provided by AtkinsRéalis for the following species:

- Bats; and
- Nesting birds.

Suitable habitat for the above species has been identified within the Site and within the footprint of the Proposed Scheme, a PMW is in place to ensure that no offences are committed. The PMW would ensure that contractors are made aware of the potential to encounter these species, through the provision of a Toolbox Talk.

Mitigation to minimise disturbance to nocturnal animals including foraging and commuting bats includes avoidance of night-time working and direct lighting on habitats with suitability for commuting and foraging bats, in line with the Bat Conservation Trust's lighting guidelines⁵¹. The ongoing monitoring relating to roosting bats will inform the mitigation required for roosting bats. As disturbance impacts to the potential roost features are considered unlikely and further surveys have not yet found any evidence of bats, mitigation measures detailing how to avoid potential impacts to roosting bats are included in the PMW.

Work to take down the Tower is required during the nesting bird season (the core bird nesting season is 1 March to 31 August). As a result, an inspection for nesting birds in the building before the works to carefully take down the Tower is to be undertaken by a suitably qualified ecologist, no more than 24 hours before floors become part of the exclusion zone. If any nesting birds are identified during the survey, they should be left in situ for their entire nesting period and alternative approaches to the work proposed. This may include leaving an exclusion zone around the nests to avoid disturbance.

Works are adhering to the Guidance for Pollution Prevention (GPPs)⁴⁰ and the Construction Industry Research and Information Association (CIRIA) Environmental good practice on site guide (fifth edition)⁴¹.

4.4 Opportunities for Ecological Enhancements and Biodiversity Net Gain

A separate BNG report has been produced for the Site.

⁴⁰ The GPPs provide environmental good practice guidance for the whole UK, and environmental regulatory guidance directly to Northern Ireland, Scotland and Wales only. For businesses in England, regulatory guidance is available from GOV.UK instead.

⁴¹ CIRIA Environmental good practice on site guide (fifth edition) provides advice on the management of a range of environmental issues that may be encountered on site and presents good practice to reduce the environmental impacts due to construction.



5. Conclusion

The UKHab survey found that the Site is predominantly comprised of hardstanding/developed sealed surfaces, with some small areas of sparsely vegetated land.

A disused bird's nest was recorded on one of the trees within the Site, and it was noted that pigeons and foxes are utilising the derelict Tower building. A number of potential roost features were recorded within the Tower building.

Due to the potential presence of protected species within the Site, works are being undertaken under a PMW covering bats and nesting birds to ensure that no offences are committed.

Endoscope and bat static surveys are being undertaken to determine presence/likely absence of bat roosts. At the time this report was produced no bats have been recorded as a result of this ongoing monitoring. However, if roosting bats are confirmed as present within the Site a bat mitigation licence will be required in advance of the works. A mitigation strategy would need to accompany any bat mitigation licence application.

A nesting bird check is being undertaken no more than 24 hours before each floor is declared an exclusion zone to ensure no nesting birds are present.

New lighting will not be required as part of the Proposed Scheme. A separate application for the future of the Site is to be submitted separately, which will address any lighting requirements.

A separate BNG report has been produced for the Site.

5.1 Report Validity

In the event of scope or programme changes within 12 months of the date of this Report then updates to the surveys may be required to ensure the validity of the data, as per CIEEM guidance⁴².

⁴² CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys



APPENDICES



Appendix A. Habitat Survey Plan

A.1 Habitat Survey Plan



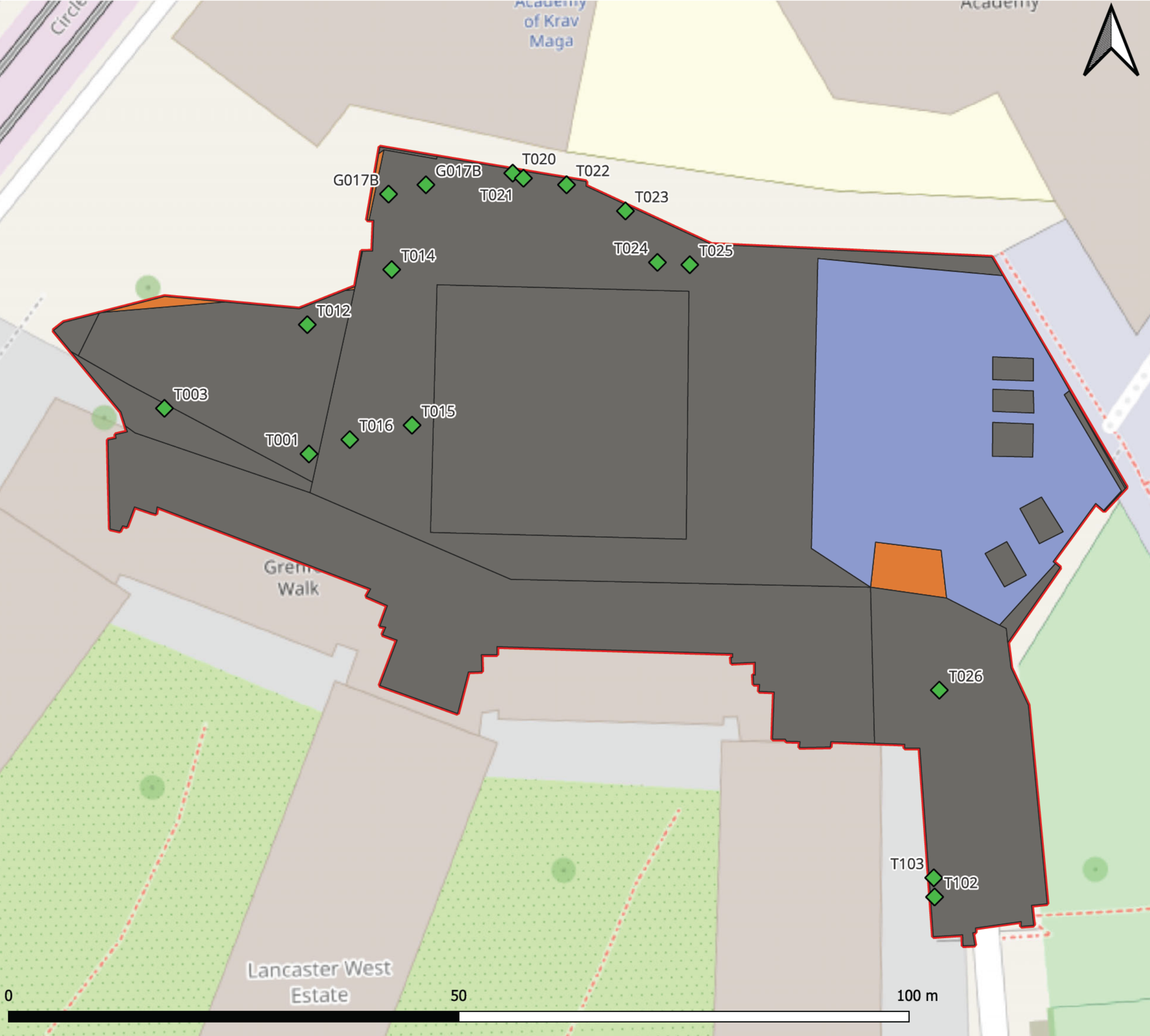


Legend

- Site boundary

- UKHab area habitats**
- Developed land; sealed surface
- Artificial unvegetated, unsealed surface
- Sparsely vegetated land- ruderal/ephemeral
- ◆ Individual trees; urban

OSM Standard



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Original scale: 1:700	Figure No. A-1
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AtkinsRéalis ©, Woodcote Grove, Ashley Road, Epsom, England, KT18 5BW

Project: Grenfell Tower Deconstruction

Client: MHCLG

Title: UKHab Survey Plan

Drawn by: SB Date: 20/01/2026	Checked by: VH Date: 19/01/2026	Reviewed by: Date:
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A.2 Target Notes

Table A-1 - Summary of target notes

Target note	Description
TN1	Grenfell Tower building covered in MonarflexMo.
TN2	Ceiling saturated with water.
TN3	Central staircase connecting all floors.
TN4	Sealed lift shaft.
TN5	Narrow cervices between 5 cm and 30 cm deep were present where the windows have been removed on floors 4 to 16.
TN6	Deep crevice that could not be fully inspected in a column on floor 16.
TN7	Rubble at the bottom of the rubbish chute on floor 1.
TN8	Electric room with gaps between the wires and walls
TN9	Through holes present in basement walls.
TN10	Old bird nest recorded in one of the trees on site.

Appendix B. Legislation Table

Summary of relevant species legislation in England

Species	Legislation	Relevant offences	Licensing procedures and guidance
Bats <i>European protected species</i>	Conservation of Habitats and Species Regulations 2017 (as amended) Reg 43.	Deliberately ⁴³ capture, injure or kill a bat; deliberate disturbance ⁴⁴ of bats; or damage or destroy a breeding site or resting place used by a bat. [The protection of bat roosts is considered to apply regardless of whether bats are present.]	Mitigation licences issued for development by Natural England (NE). Guidance documents: Bats: advice for making planning decisions (NE 2022) European Protected Species: Mitigation Licensing - How to get a licence (NE 2013) Bat Workers' Manual (JNCC 2004) Bat Mitigation Guidelines (Reason, P.F. and Wray, S. 2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT 2023)
	Wildlife and Countryside Act 1981 (as amended) Schedule 5, Section 9.	Intentionally kill, injure or take a bat; intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or	Licence from NE is required for surveys (scientific purposes) that would involve disturbance of bats or entering a known or suspected roost site.

⁴³ Deliberate capture or killing is taken to include “accepting the possibility” of such capture or killing.

⁴⁴ Deliberate disturbance of animals includes in particular any disturbance which is likely a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of hibernating or migratory species, to hibernate or migrate; or b) to affect significantly the local distribution or abundance of the species to which they belong.



Species	Legislation	Relevant offences	Licensing procedures and guidance
		disturb ⁴⁵ a bat in such a place.	
Birds	Wildlife and Countryside Act 1981 (as amended) Schedule 1 (some species only).	Intentionally kill, injure or take any wild bird; intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built; intentionally take or destroy the nest or eggs of any wild bird. Intentionally or recklessly disturb a Schedule 1 species while it is building a nest or is in, on or near a nest containing eggs or young; intentionally or recklessly disturb dependent young of such a species [e.g. most birds of prey, kingfisher, barn owl, black redstart, little ringed plover].	No licences are available to disturb any birds in regard to development. Licences are available in certain circumstances to damage or destroy nests, but these only apply to the list of licensable activities in the Act and do not cover development. General licences are available in respect of 'pest species' but only for certain very specific purposes, e.g. public health, public safety, air safety. Guidance documents: Wild birds: advice for making planning decisions (NE 2022)
Rabbits, foxes and other wild mammals	Wild Mammals (Protection) Act 1996.	Intentionally inflict unnecessary suffering to any wild mammal.	NE provides guidance in relation to rabbits, foxes (which are also protected under the Wildlife and Countryside Act 1981 (as amended) from live baits and decoys) and other wild mammals, on their website. Lawful and humane pest control of these species is permitted.

⁴⁵ Lower levels of disturbance not covered by the Conservation of Habitats and Species Regulations 2017 (as amended) remain an offence under the Wildlife and Countryside Act 1981 (as amended) although a defence is available where such actions are the incidental result of a lawful activity that could not reasonably be avoided.



Species	Legislation	Relevant offences	Licensing procedures and guidance
Plants Invasive species, e.g. Japanese knotweed, hybrid knotweed, giant knotweed, giant hogweed, rhododendron, Himalayan balsam	Wildlife and Countryside Act 1981 (as amended) Schedule 9, Section 14.	It is illegal to plant or otherwise cause these species to grow in the wild.	<p>Guidance documents:</p> <p>Guidance on protecting property from foxes, moles and mink (NE 2023)</p> <p>Guidance on protecting property from rabbits (NE 2023)</p> <hr/> <p>Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with Section 34 of the Environmental Protection Act 1990.</p> <p>Guidance documents:</p> <p>How to stop invasive non-native plants from spreading (NE, Defra & Environment Agency 2022)</p> <p>Guidance on section 14 of the Wildlife and Countryside Act (Defra 2011)</p> <p>GB Non-Native Species Secretariat</p>



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