Hayes Park

Bat Survey Report

May 2023

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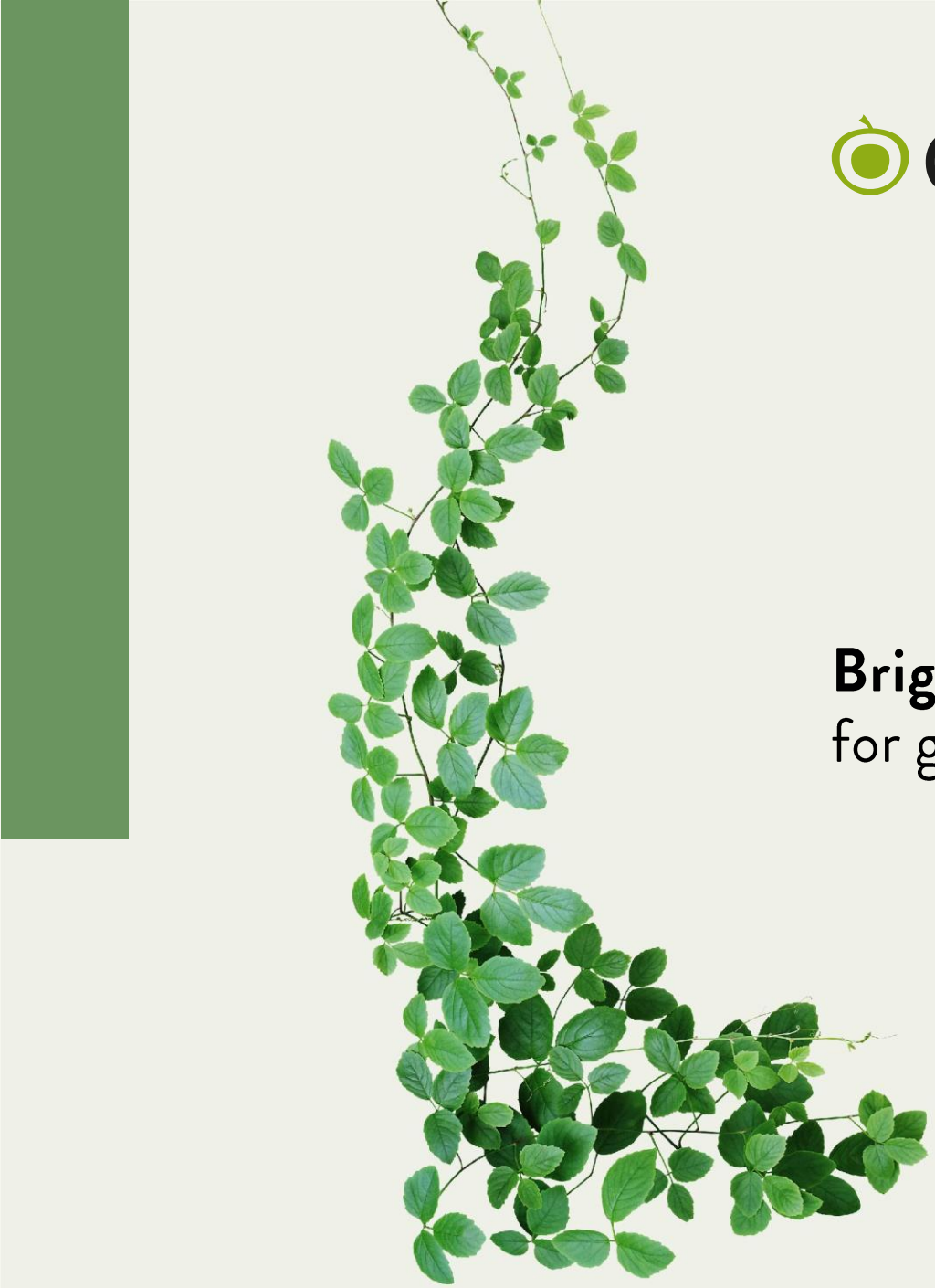

Client: Shall Do Hayes Developments Limited

Project: Hayes Park

Report: Bat Survey Report

QUALITY ASSURANCE

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Prepared by:	Jordan McNulty	Jordan McNulty
Authorised by:	Stephanie Harper	Stephanie Harper
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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake bat emergence/re-entry surveys by Shall Do Hayes Developments Limited ('the Applicant') of a site known as Hayes Park, Hayes End Road, Hayes, UB4 8FE ('the site') in the London Borough of Hillingdon.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks a change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.

The survey area extends to approximately 3.73 hectares and comprises two former Grade II listed office buildings, associated carparking, access driveways and footpaths surrounded by low-cut well maintained grassland, introduced shrub, scattered trees and species poor hedgerow.

A Preliminary Ecological Appraisal (PEA), which included a detailed systematic daytime external inspection of the building and surrounding trees, was undertaken on 8th April 2022 and noted low potential value for roosting bats within damaged brickwork in the main building on site, and moderate potential value for roosting bats just off site within a tree that has numerous bat features. Two emergence surveys were therefore undertaken in accordance with best practice guidelines[1], to determine the presence/likely absence of roosting bats within the building and tree.

No bat roosts were identified from the surveys. Low levels of foraging and commuting activity were recorded on site at the time of the survey for four common bat species.

No mitigation actions in relation to roosting bats are required, however, in accordance with planning policy and good practice, measures to enhance the site for both roosting and foraging bats are described in section 5 of this report. These measures include:

- Bat-sensitive lighting regime following guidance from The Institute of Lighting Professionals (ILP) and Bat Conservation Trust (BCT).
- Provision of bat boxes on the building, suitable for summer roosting for crevice and cavity dwelling species; and
- Wildlife-friendly landscaping to enhance the site as a foraging and commuting resource, in particular by strengthening boundary planting with additional shrubs, trees and by seeding with understorey wildflowers.

With roosting bats confirmed as likely-absent, the development is predicted to have a negligible impact upon roosting bats. Furthermore, the enhancements measures to be implemented will likely result in the development providing long term positive impacts for bats at a local scale. Detail on these measures could be secured through planning condition, to be outlined within an Ecological Management Plan (EMP).

2.0 INTRODUCTION

Greengage Environmental Ltd was commissioned to undertake bat emergence/re-entry surveys by Shall Do Hayes Developments Limited ('the Applicant') of a site known as Hayes Park, Hayes End Road, Hayes, UB4 8FE ('the site') in the London Borough of Hillingdon.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks a change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.

The survey area extends to approximately 3.73 hectares and comprises two former Grade II listed office buildings, associated carparking, access driveways and footpaths surrounded by low-cut well maintained grassland, introduced shrub, scattered trees and species poor hedgerow.

2.1 AIMS OF SURVEY

The purpose of the survey was to further determine if there are any features or habitats on site that could potentially support bats, and to determine whether any bats are roosting in the building on site. The surveys aimed to:

- Determine the presence/absence of bat species;
- Determine the intensity of bat activity both spatially and temporally to help estimate bat populations; and
- Determine the type of activity, most usually:
    - Roosting;
    - foraging (by feeding buzzes); and
    - commuting (by high directional pass rates).

By using a collation of existing data for the area to support the survey, it is possible to determine the presence/likely-absence of bats across the site and in the wider area. This information can then be used to determine the form and extent of any mitigation, compensation or enhancement that may be appropriate.

2.2 SITE DESCRIPTION

The survey area extends to approximately 3.73 hectares and is centred on National Grid Reference TQ 08887 82434, OS Co-ordinates 508887, 182434.

The site forms part of the Hayes Park Business Estate which encompasses three former office buildings, associated carparking and soft landscaping. This report supports the development associated with Hayes Park Central and Hayes Park South buildings, which includes two concrete Grade II listed former office buildings associated carparking, access driveways and footpaths surrounded by low-cut well-maintained grassland, introduced shrub, scattered trees and species poor hedgerow.

Immediately off-site to the north-east is a woodland that comprises a part of the Hayes Shrub Site of Importance for Nature Conservation (SINC). To the east is a large expanse of rough grassland parkland habitat before residential housing. To the south lies horse-grazed fields and arable fields abut the north and western boundaries.

In the wider context the site lies within the heavily residential London Borough of Hillingdon. Notable greenspace is concentrated north of the site and includes Local Nature Reserves (LNRs) Yeading Brook Meadows LNR 1.09km northeast, Yeading Meadows LNR 1.16km east and Yeading Woods (LNR) 1.49km north, a patchwork of open greenspace, arable fields and pockets of woodland.

2.3 PROPOSALS

The proposals seek change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.

2.4 PREVIOUS SURVEY

Desk Based Assessment

Biological records were analysed to determine the records of bat species in the local area. Records were obtained from Greenspace Information for Greater London (GiGL) on the 14th March 2022. An assessment of the local area using aerial photography and available maps and biological data was also undertaken.

Records for the following bat species were identified within 2km of the site:

- Serotine (*Eptesicus serotinus*);
- Noctule (*Nyctalus noctule*);
- Common pipistrelle (*Pipistrellus pipistrellus*); and
- Soprano pipistrelle (*Pipistrellus pygmaeus*).

Site Assessment

The survey was undertaken on the 8th April 2022 in dry and sunny weather conditions. Full access to the external areas of the site was gained.

During the PEA (report ref: 552014LTMay23FV03_PEA.pdf), a number of features of potential value for bats were noted. These included the following;

- Moderate potential for bat roosting within the tree found just off-site; and
- Low potential for bat roosting within a small area of damaged brickwork in the main building.

Figure 2.1 Roosting features within the tree located just off-site.

The tree located just off-site possessed several potential roosting features (Figure 2.1) suitable for roosting bats. As such, the tree was classified as having moderate potential to support roosting bats.

Figure 2.2 Damaged brickwork under a window on the main building.

A small area of damaged brickwork was the only feature offering roosting potential within the main building, with the rest of the building and brickwork in good condition. The building was however, located immediately next to a Site of Importance for Nature Conservation (SINC) with suitable foraging habitat, potentially resulting in larger populations of bats being present nearby. As such, the site was classified as having low potential to support roosting bats.

In accordance with the Bat Conservation Trust (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines[2] and the Bat Workers Manual (2004)[3], for the reasons listed above, and given the legal protection afforded to bats (see Appendix C), the requirement for two emergence surveys was confirmed for the tree, and one for the building. The surveys are required in order to establish the relative importance of the site for local bat populations, and to identify the presence/ likely absence of roosting bats.

The methodology of the surveys is described in the below section.

3.0 METHODOLOGY

3.1 EMERGENCE SURVEY

The PEA walkover survey identified locations across the site that would enable all potential roosting features on the building and tree to be observed across two emergence surveys. On the first survey, this included one surveyor covering the damaged brickwork on the eastern façade of the main building, and one surveyor located to the east of the tree. On the second survey, one surveyor was located west of the tree, one surveyor north of the tree, and one Infrared Camera to the east of the tree as mapped in Appendix A.

Survey Type	Surveyor	Date	Sunset Time	Start/End Times	Weather Conditions	Temp °C
Emergence	Jordan McNulty & George Fuller	23rd August 2022	20:06	19:53 21:36	Dry, clear skies, no rain, Wind 9mph	22
Emergence	Jordan McNulty & George Fuller	7th September 2022	19:33	19:28	Partly cloudy, dry, no rain, Wind 9mph	19

The emergence surveys commenced 15 minutes before sunset and continued for 1.5 hours after sunset.

Each surveyor was equipped with an iPad and Echo Meter Touch bat detector to detect, visualise and record the calls of any bats present in the area.

3.2 SURVEYORS

Laura Thomas, who undertook the PEA site visit, has an undergraduate degree in Biology (BSc Hons) and a Master's degree in Evolutionary and Behavioural Ecology. Laura holds a Natural England Class 1 bat licence and has over 6 years' experience in the commercial sector.

Jordan McNulty, who undertook the PEA site visit, prepared this report and led the bat surveys, has an undergraduate degree in Marine Biology (BSc Hons) and a Master's degree in Ecology, Evolution & Behaviour. Jordan has had significant training and mentoring in bat surveying, and has 1 season of experience in ecological survey and assessment.

George Fuller, who undertook the bat surveys, has 3 years of experience undertaking a variety of ecological field surveys.

Stephanie Harper, who reviewed this report, has a degree in Environmental Biology, holds a Natural England bat licence and has 15 years' experience in ecological consultancy.

This report was written by Jordan McNulty and reviewed and verified by Stephanie Harper who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.3 LIMITATIONS AND COMMENTARY ON METHODOLOGY

There were no significant limitations to the bat surveys. The surveys were undertaken at a suitable time of year and in generally suitable weather conditions.

4.0 RESULTS

4.1 EMERGENCE/RE-ENTRY SURVEYS

There was no evidence of roosting observed during the emergence surveys. Roosting bats can therefore be confirmed as likely-absent from the site.

During the first emergence survey, moderate levels of commuting and foraging activity were recorded near the tree for common pipistrelle. Near the damaged brickwork, there were moderate levels of commuting and foraging recorded for common pipistrelle, and low levels recorded for noctule and soprano pipistrelle.

During the second emergence survey near the tree, moderate levels of foraging and commuting recorded for common pipistrelle and low levels recorded for brown long-eared bats and noctule.

5.0 RECOMMENDATIONS

The survey results confirmed the likely-absence of roosting bats within the building on site and tree located just off-site. There is therefore no requirement for mitigation with regards to roosting bats.

Moderate levels of bat foraging and commuting activity were observed during the emergence survey. Four species were recorded; common pipistrelle, soprano pipistrelle, noctule and brown long eared bats. No loss of habitats onsite will occur as a result of the development and therefore no mitigation measures are required.

It is recommended that the development proposals enhance the site's value for both roosting and foraging/commuting bats. The following enhancement measures should be implemented on site and are informed by both national and local planning policy, as well as good ecological practice.

Enhancements

Lighting

A bat sensitive lighting strategy in accordance with best practice guidance should be implemented. External light levels onto the two trees with features for bats and along the woodland edge immediately off-site should be reduced or as a minimum remain the same as current light levels, where possible.

The BCT and Institute of Lighting Professionals (2019)[4] and Stone (2013)[5] provide guidance on lighting designs to avoid impacts to bats, and this guidance should be used throughout the design process, where possible. Specifically:

- Consider avoidance of metal halide and fluorescent light sources;
- Warmth' of luminaires - any external areas should incorporate light at a <2700K where possible, with peak wavelengths higher than 550nm;
- Use of screens/hoods to make any external lighting as directional as possible, to avoid light spill on any natural features;
- Height of lighting column - where possible, external lights should be as low to the ground as possible; and
- Lighting controls - appropriate controls to minimise the duration lights are illuminated should be installed.

By reducing or minimising the impacts of external lighting, impacts upon foraging and commuting bats should be sufficiently minimised.

Wildlife Friendly Landscaping

To minimise impacts upon local bat populations identified at the site, valuable habitat should be retained within the scheme where possible. It is understood that trees are proposed for retention and 1.44 hectares of retained grassland is also to be enhanced to increase floral diversity and improve the site for invertebrates. Additional tree planting is also included within the landscaping proposals.

Bat Boxes

Bat boxes should be attached onto suitable retained trees around the site to enhance the roosting resources available. These should comprise a mixture of crevice and cavity bat box types, to cater to the assemblage of bats using the site.

The boxes should be positioned away from any direct lighting, so not to deter bats and entrance holes should remain uncluttered year-round.

6.0 SUMMARY

Greengage Environmental Ltd was commissioned to undertake bat emergence/re-entry surveys by Shall Do Hayes Developments Limited of a site known as Hayes Park, Hayes End Road, Hayes, UB4 8FE ('the site') in the London Borough of Hillingdon.

An external inspection undertaken on 8th April 2022 identified low potential for roosting bats within the main building on site and moderate potential within a tree located just off-site. Two emergence surveys were undertaken on 23rd August 2022 and 7th September 2022. No bat roosts were identified. Formal mitigation is therefore not required to avoid or minimise impacts upon roosting bats.

Moderate levels of bat foraging and commuting activity were observed during the emergence and activity survey. Four species were recorded; common pipistrelle, soprano pipistrelle, noctule, and brown long eared bats.

Any existing external lighting at the site should be revised as part of the proposals to ensure the current baseline level of lighting is improved, in order that impacts to foraging and commuting bats are minimised, in line with ILP and BCT guidance.

No loss of habitats onsite will occur as a result of the development and therefore no mitigation measures are required.

Enhancement measures have been recommended which include the provision of enhanced landscaping and additional roosting opportunities in the form of bat boxes.

Assuming recommendations are followed, the impact of the proposed development upon both local bat populations is expected to be negligible, and proposals will result in an overall increase in biodiversity value of the site.

APPENDIX A SURVEYOR AND ROOSTING FEATURE LOCATIONS

HAYES PARK

- surveyor location
- Moderate potential trees
- Low potential bat feature
- common pipistrelle pass
- Common pipistrelle flight path
- Soprano pipistrelle flight path
- Noctule
- Brown long eared

Drawn by: Laura Thomas
Date: [11/04/2023]

Reviewed by: Steph Harper
Date: [06/04/2023]

Project number: 552240
Sources: Google Satellite

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APPENDIX B LEGISLATION AND POLICY

B.1 LEGISLATION

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

The Wildlife & Countryside Act 1981 (WCA)[6] was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive[7], 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2017[8], which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England. Additionally, although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

B.2 PLANNING POLICY

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2021[9] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the

natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost..

The London Plan[10]

Policy G1 Green infrastructure

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
2. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
3. Development Plans and Opportunity Area Planning Frameworks should:
    1. identify key green infrastructure assets, their function and their potential function
    2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
4. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
3. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

1. Sites of Importance for Nature Conservation (SINCs) should be protected.
2. Boroughs, in developing Development Plans, should:
    a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
    b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
    c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
    d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
    e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
3. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
    a. avoid damaging the significant ecological features of the site
    b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
    c. deliver off-site compensation of better biodiversity value.
4. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
5. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

1. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
2. In their Development Plans, boroughs should:
    a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
    b. Identify opportunities for tree planting in strategic locations

3. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[11]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. [...] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

Hillingdon Local Plan[12]

Built Environment

Policy BE1: Built Environment

The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new developments should:

1. Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;

2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;

3. Be designed to include "Lifetime Homes" principles so that they can be readily adapted to meet the needs of those with disabilities and the elderly, 10% of these should be wheelchair accessible or easily adaptable to wheelchair accessibility encouraging places of work and leisure, streets, neighbourhoods, parks and open spaces to be designed to meet the needs of the community at all stages of people's lives;

4. In the case of 10 dwellings or over, achieve a satisfactory assessment rating in terms of the latest Building for Life standards (as amended or replaced from time to time);

5. Improve areas of poorer environmental quality, including within the areas of relative disadvantage of Hayes, Yiewsley and West Drayton. All regeneration schemes should ensure that they are appropriate to their historic context, make use of heritage assets and reinforce their significance;

6. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;

7. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;

8. Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;

9. Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;

10. Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the

required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;

11. In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.

Support will be given for proposals that are consistent with local strategies, guidelines, supplementary planning documents and Hillingdon Local Plan: Part 2- Development Management Policies.

Policy EM7: Biodiversity and Geological Conservation

The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

1. 1. The conservation and enhancement of the natural state of:

- Harefield Gravel Pits
- Colne Valley Regional Park
- Fray's Farm Meadows
- Harefield Pit

2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.

3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.

4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/assist in the delivery of actions within the Biodiversity Action Plan.

5. The provision of biodiversity improvements from all development, where feasible.

6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.

7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

REFERENCES

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