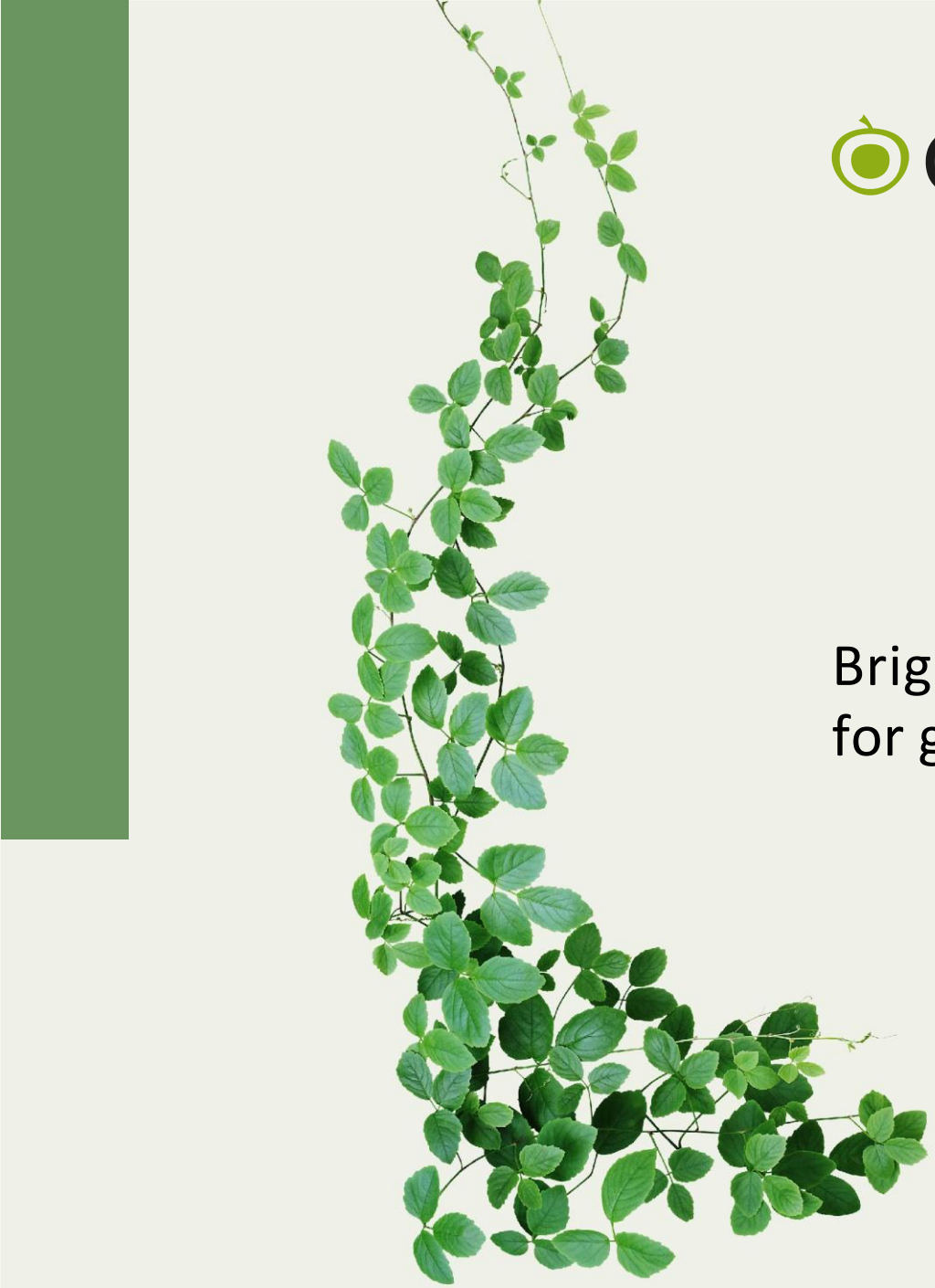
Greengage

Brighter strategies
for greener projects



Client: Shall Do Hayes Development Ltd

Project: Hayes Park West

Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	September 2025	September 2025
Comments:		
Prepared by:	Ben Newbery / Kane Powell	Ben Newbery
Authorised by:	Laura Thomas	Alexandra Wadia-Knowles
File Reference:	553349bnkp25Sept25FV01_PEA.docx	553349bnkp25Sept25FV01_PEA.docx

CONTENTS

1.0 EXECUTIVE SUMMARY 1
2.0 INTRODUCTION 7
2.1 SITE DESCRIPTION 7
3.0 METHODOLOGY 8
3.1 DESK STUDY 8
3.2 SITE WALKOVER 9
3.3 SURVEYORS/COMPETENCIES 13
3.4 CONSTRAINTS 14
4.0 RESULTS 15
4.1 DESK STUDY 15
4.2 SITE WALKOVER 25
5.0 EVALUATION 33
5.1 PROPOSALS 33
5.2 DISCUSSION AND RECOMMENDATIONS 33
6.0 CONCLUSION 42
APPENDIX A UKHAB MAP
APPENDIX B TARGET NOTES
APPENDIX C SITE PHOTOGRAPHS
APPENDIX D DESK STUDY RECORDS
APPENDIX E RELEVANT LEGISLATION AND POLICY
REFERENCES

Tables

Table 1.1 Ecological Constraints and Recommendations 1
Table 1.2 Ecological Enhancement Recommendations 5
Table 4.1 Statutory and Non-Statutory Designated Sites identified within 2km Search Radius 15
Table 4.2 Summary of most relevant great crested newt records within 2km of the site 20
Table 4.3 Great Crested Newt EPS Licences within 2km 21
Table 4.4 Summary of most relevant native amphibians within 2km of the site 21
Table 4.5 Summary of most relevant bat records within 2km of the site 21
Table 4.6 Summary of most relevant bird species recorded within 2km of the Site. 22
Table 4.7 Summary of most relevant invertebrate records within 2km of the site 23
Table 4.8 Summary of most relevant reptile records within 2km of the site 24
Table 4.9 Summary of most relevant invasive non-native species records within 2km of the site 24

Table 4.10 Summary of most relevant other priority/notable species records within 2km of the site 25
Table D.1 Full list of bird species returned during GiGL data review, and protective status of each species.

Figures

Figure A.1 UKHAB Survey Results

Plates

Plate C.1 Upper floor of the on-site car park.
Plate C.2 Pedestrian access bridge connecting the road to the upper level of the car park.
Plate C.3 Material storage and artificial lighting within the lower level of the car park.
Plate C.4 Newly created rooms within the lower car park level, functioning as contractor office space and welfare facilities.
Plate C.5 Raised planting beds
Plate C.6 Buddleia shrubs within the open-air section of the lower ground car park.
Plate C.7 Modified grassland towards the southern extent of the site.
Plate C.8 Other native hedgerow, located adjacent to the road at the southern extent of the site.
Plate C.9 Snowberry scrub, located between the car park and hedgerow.
Plate C.10 Woodland located north of the car park.
Plate C.11 Linear ceiling gap viewed from the lower car park level.
Plate C.12 Bird nest locating between adjoining roof sections of the car park.

1.0 EXECUTIVE SUMMARY

Greengage Environmental Limited (Greengage) was commissioned by Shall Do Hayes Development Ltd to undertake a Preliminary Ecological Appraisal (PEA) of an area of land known as Hayes Park West, Hayes Park, Uxbridge, UB4 8FE, hereafter referred to as 'the site'.

This document is a report of the PEA and has been produced to inform a planning application for the site which seeks the "*partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works*."

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the Zone of Influence (ZoI) i.e. the ecological constraints, assess likely impacts based on design stage proposals/assumptions and subsequently to provide recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided.

The site extends to 0.9 hectares (ha) and comprised one building (car park), green roofs (i.e. planters on the car park upper level), other developed land, introduced shrub, modified grassland, ruderal or ephemeral vegetation, scattered trees, native hedgerow with trees, mixed scrub and woodland.

Ecological Constraints and Additional Surveys/Mitigation Recommendations

The below designated sites/habitats/species have been confirmed to be present or have potential to be present due to suitable habitats on the site and/or habitat connectivity with the wider landscape. Sections 4.0 and 5.0 of the PEA report should be referred to for full details.

Table 1.1 Ecological Constraints and Recommendations

Ecological Constraint	Level of Suitability/ Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
Internationally designated sites	Confirmed presence	There is one Special Protection Area (SPA) located within 10 kilometres (km) of the site: South West London Waterbodies SPA (9.09km southwest). The proposed development is not considered to be a high risk with regards to this SPA, particularly given the distance between them and intervening urban barriers (e.g. residential developments in Greater London). As such a Habitat Regulations Assessment (HRA) is not considered necessary for the development. This conclusion should be agreed with the competent authority (i.e. the Local Planning Authority).
Statutory designated sites	Confirmed presence	Three Local Nature Reserves (LNRs) are located within 2km of the site, the closest is Yeading Brook Meadows LNR located 1.18km east. Given the distance of this LNR from the proposed development construction phase impacts are considered unlikely. Operational phase impacts to the LNR, such as increased recreational pressures and dog walking, are possible

Ecological Constraint	Level of Suitability/ Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
		due to an increase in local population as a result of the development. The provision of communal greenspace is recommended, to reduce the chance of increased footfall at the LNRs.
Non-statutory designated sites	Confirmed presence	10 Sites of Importance for Nature Conservation (SINCs) are located within 2km of the site, the closest being the 'Hayes Shrub' SINC (a site of Borough grade II importance) located 0.4km southwest of the site. Construction phase impacts, such as dust deposition and pollution, could negatively impact such sites. A Construction Environmental Management Plan (CEMP) should be produced for the site, incorporating appropriate mitigation measures which could be secured through condition.
Habitats (on-site)	Confirmed presence	A native hedgerow, a habitat of principal importance listed on the Section 41 of the Natural Environment and Rural Communities (NERC) Act, is located on-site. In the absence of mitigation these may be subject to direct and indirect impacts during the construction phase, including damage from construction machinery, pollution or poor materials storage practices. It is recommended that mitigation measures are secured through the CEMP.
Local priority habitat	Confirmed presence	Lowland mixed deciduous woodland (also a habitat of principal importance) was identified to be present 80 meters (m) east of the site. This habitat could be subject to indirect impacts (e.g. dust pollution) during the construction phase. It is recommended that mitigation measures are secured through the CEMP.
Species		
Common amphibians	Low	No ponds or waterbodies are present on-site, however one pond is located 335m east of the site. A Habitat Suitability Index (HSI) was conducted on this pond by Greengage in 2023[18] which concluded poor suitability for Great Crested Newts (GCN). Common amphibians may forage and commute within suitable terrestrial areas of habitat on-site (ruderal vegetation, hedgerow, woodland understorey), the majority of which are expected to be retained under the proposed development. These could be killed or injured during the construction phase without suitable mitigations. It is recommended that mitigation measures are secured through the CEMP.

Ecological Constraint	Level of Suitability/ Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
Badger	Low	No evidence of badgers or their setts were identified on-site or within influencing distance (30m radius, where accessible) and no further surveys are therefore required. However, the site offers opportunities for future sett excavation (e.g. within woodland and sloping terrain) therefore a pre-commencement inspection for new bat activity should be conducted three months prior to the commencement of works by a Suitably Qualified Ecologist (SQE) to check for any new badger activity/setts. Furthermore, transient badgers which may foraging on or commute across the site may be at risk from injury or death as a result of construction works. It is recommended that mitigation measures are secured through the CEMP.
Bats (foraging/ commuting)	Moderate	One tree (T112) is to be felled under the proposed development. This loss is unlikely to significantly impact foraging and commuting resources for bats given presence of more extensive habitat locally. Indirect impacts on foraging and commuting bats may occur during construction and operational phases due to lighting, as additional light spill can deter bats from their commuting routes/foraging resources. Through implementation of mitigation, these impacts will be minimised. Best practice measures during the construction phase and a sensitive lighting strategy should be implemented for the operational phase.
Bats (roosting - summer/ transitional - buildings/structures)	Negligible	No suitable potential roosting features (PRFs) were identified on or within the car park and no further surveys or mitigations are therefore required for the purposes of demolition. Enhancements which stand to benefit roosting bats are detailed below.
Bats (roosting - summer/ transitional - trees)	FAR	T112 is planned to be felled under the proposed development however as this tree did not contain any PRFs there are not anticipated to be any negative impacts to roosting bats. All tree within the woodland parcel were categorised as Further Assessment Required (FAR) during the site walkover. If any trees within the woodland are later identified to either require felling or significant pruning, a Ground Level Tree Assessment should be conducted of any impacted trees to

Ecological Constraint	Level of Suitability/ Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
		assess for the presence of PRFs, in line with best practice[13]. This survey is best conducted in the winter months.
Birds - nesting	Confirmed presence	One bird nest, constructed from grass and leaves, was identified with the roof structure of the car park, demonstrating the buildings suitability as a nesting site. Furthermore, the trees around the site provide further nesting opportunities, although no arboreal bird nests were observed during the survey. It is understood that the majority of trees within the site are to be retained during the development, with the exception of T112. In the first instance its felling should be avoided, however if this is not possible then felling should take place outside of the bird nesting period (March to August inclusive). If this timeframe cannot be avoided, a Nesting Bird Check of the tree should be undertaken by a SQE no more than 48 hours prior to vegetation clearance. In the instance of identification of an active nest, an exclusion zone is to be agreed and adhered to until an ecologist has monitored and confirmed that chicks have fledged/the nest is no longer in use. The above process should also be followed for the demolition of the car park, where demolition works cannot be scheduled outside of the nesting season.
Invertebrates	Moderate	The site provides a variety of habitats suitable for invertebrates, including deadwood, hedgerow and trees. Given the presence stag beetle records locally (0.35km southwest), it is recommended that deadwood present within the woodland is retained, preferably in situ. This will continue to provide a foraging resource for the larvae of this species, as well as other saproxylic species which may be present on-site. Suitable invertebrate enhancement opportunities are detailed below.
Reptiles (widespread species)	Low	No evidence of reptiles was observed on-site, however there is suitable habitat for foraging and sheltering (i.e. ruderal vegetation, hedgerow, woodland understorey). The majority of this habitat is expected to be retained under the proposed development, however small areas will require clearing. Common reptile species could therefore be killed or injured during the construction phase without suitable mitigations. It is recommended that mitigation measures are secured through the CEMP.

Ecological Constraint	Level of Suitability/ Confirmed Presence	Additional Surveys/Mitigation Recommendations (Summary)
Hedgehog	Moderate	Suitable hedgehog habitat (i.e. ruderal vegetation, hedgerow, woodland understorey) is present on-site within connectivity to the wider landscape. The majority of this habitat is expected to be retained under the proposed development, however small areas will require clearing. Hedgehogs could therefore be killed or injured during the construction phase without suitable mitigations. It is recommended that mitigation measures are secured through the CEMP.
Invasive non-native species	Confirmed presence	No species listed on the Wildlife and Countryside Act 1981 (as amended) Schedule 9 were identified, however four species listed on the London Invasive Species Index (LISI) were confirmed to be present. These included buddleia *Buddleja davidii*, cherry laurel *Prunus laurocerasus* and snowberry *Symphoricarpos album.* Mitigation measures, including the removal of these species, should be outlined in a CEMP to prevent unnecessary spread.

Ecological Enhancements

Table 1.2 below table includes details of ecological enhancements recommended for the site.

Table 1.2 Ecological Enhancement Recommendations

Ecological Feature	Recommendations
Grassland enhancement	• Enhancement of existing areas of species-poor, modified grassland which will be retained in the wider site with a variety of native wildflowers and grassland species.
Tree/shrub planting	• Planting of native tree and shrub species, such as beech *Fagus sylvatica*, field maple *Acer campestre*, hazel *Corylus avellana*, hornbeam *Carpinus betulus* and rowan *Sorbus aucuparia* in appropriate locations and buffering existing, similar habitat where feasible.
Bat boxes	• Integration of 15 bat boxes into the brick courses of new buildings to provide additional roosting habitat for these BAP species. Specifications are as follows: ○ Boxes should comprise woodcrete or insulating concrete for long lasting durability, with suggested integrated box models including the Habibat Bat Box[22] or Ibstock Enclosed Bat Box[23]; ○ Specific siting could be set out within a Landscape and Ecological Management Plan (LEMP).
Bird boxes	• Integrate ten swift *Apus apus* boxes, six sparrow *Passer domesticus* terraces and four open-fronted nest boxes into the brick courses of new buildings at the site to provide additional nesting habitat for BAP bird species, in line with the measures outlined in the British Standard "*Integral*

Ecological Feature	Recommendations
	nest boxes. Selection and installation for new developments. Specification" (BS 42021:2022). • Specific siting could be set out within a LEMP.
Invertebrate features	• Installation of invertebrate features as part of soft and hard landscaping, post-development to provide further sheltering and foraging habitat. This could include bee bricks, bee posts, pollinator friendly planting and log piles/stag beetle loggeries.

General Recommendations

In accordance with the Environment Act, 2021[1], National Planning Policy Framework[2] (NPPF) 2024, and local policy drivers, unless a site is exempt, development proposals are required to provide a measurable net gain in biodiversity. The development must deliver a minimum of 10% BNG, which should be evidenced through a Biodiversity Net Gain Assessment (BNGA) using the Statutory Biodiversity Metric (SBM)[3]. Please refer to the separate BNGA, when available.

A Construction and Environment Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) providing greater detail on the above mitigation recommendations and in accordance with British Standard 42020: 2013 Biodiversity[4], should be produced and implemented for the site and secured through planning condition.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'[5] should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report has been undertaken in September 2025.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by Shall Do Hayes Development Ltd to undertake a Preliminary Ecological Appraisal (PEA) of an area of land known as Hayes Park West, Hayes Park, Uxbridge, UB4 8FE, hereafter referred to as 'the site'.

This document is a report of the PEA and has been produced to inform a planning application for the site which seeks the "*partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works*."

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the zone of influence (i.e. the ecological constraints), assess likely impacts based on design stage proposals/assumptions and subsequently to provide recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided.

2.1 SITE DESCRIPTION

The site extends to approximately 0.9 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 08804 82571, OS Co-ordinates 508804, 182571.

The site predominantly consists of a two-tier, multi-storey car park. This sits within semi-natural, boundary landscaping, including areas of amenity grassland, mixed scrub, native hedgerows, woodland and scattered trees. Additionally, three sizeable roof-top planters on the upper car park level create green roofing elements.

The site comprises the northwest section of a former business park, known as Hayes Park, north of the town of Hayes in the London Borough of Hillingdon. The business park comprises several former office blocks, outbuildings and access roads, as well as significant areas of grassland, scrub and woodland which create a semi-natural, localised setting. The business park is currently undergoing a phased development with land immediately east of the site (referred to as 'Hayes Park North') currently an active construction site, pursuant to a separate planning application (reference: 12853/APP/2025/1587). Furthermore, land immediately south of the site (known as 'Hayes Park South and Central') also has planning permission for redevelopment (planning reference: 12853/APP/2023/1492) however it did not appear that works had begun at the time of the survey.

Beyond the business park boundaries, the landscape generally takes on a more urban character with extensive residential housing, public amenities (e.g. schools, retail outlets, etc.) and associated infrastructure. There are also scattered parks/recreation grounds (closest is Hayes End Recreation Ground, located 0.66 kilometres (km) southwest), nature reserves (closest is 'Hayes Shrub' Site of Importance for Nature Conservation (SINC) located 0.4km southwest) and allotments creating occasional vegetative landscape features. Immediately northwest of the site is an area of private parkland, as well as hedgerows and areas of woodland. These vegetative features provide additional, connected habitat beyond the site boundary.

3.0 METHODOLOGY

The PEA was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)[6] Version 2 and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[7], in accordance with British Standard (BS) 2020:2013: Biodiversity. The overall assessment consisted of:

- A desk study to collate site specific biological information gained from statutory and non-statutory consultation; and,
- A site walkover (15th July 2025) comprising a UKHab survey and scoping assessment to record and assess protected/priority habitats and species.

3.1 DESK STUDY

Environmental Databases

A review of readily available ecological information and other relevant environmental databases (including the Multi-Agency Geographic Information for the Countryside (MAGIC) website[8]) was undertaken for the site and a radius of 2km from the site boundary, to search for statutory designated sites at the local to national level. Furthermore, a review of all sites within a 10km radius was completed to assess for the presence of statutory designated sites of international importance.

A review of the MAGIC website was also undertaken to check for records of European Protected Species (EPS) licences for Great Crested Newt (GCN) *Triturus cristatus* and bat species within 2km of the site. EPS licences dated within the past 10 years are considered to be the most relevant.

Where the site is identified to be located within the Impact Risk Zone (IRZ) for a statutory designated site (e.g. Special Protection Area (SPA)/Special Area of Conservation (SAC)/Ramsar or Site of Special Scientific Interest (SSSI)) the features for which the designated site is notified and the types of proposed development which could potentially have adverse impacts (and trigger the requirement for further assessment, e.g. Habitat Regulations Assessment (HRA) or SSSI Impact Assessment have also been reviewed.

Biodiversity Action Plans/Priority Habitats and Species

UK Biodiversity Action Plans (BAPs) set priorities for nationally important habitats and species. To support the BAPs, Habitat/Species Statements (otherwise known as Habitat Action Plans (HAPs) and Species Action Plans (SAPs)) were produced to provide an overview of the status of the habitats/species and set out the broad policies that can be developed to conserve them. A list of priority habitats and species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity. Subsequently, this has been replaced by the Kunming-Montreal Global Biodiversity Framework[9] to 2030.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principal Importance list (as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006)[10].

Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

The desk study reviewed UKBAP and LBAP habitats and species with consideration as to which habitats/species are of relevance to the site and/or proposed development.

Local Environmental Records Centre

A data consultation with the Local Environmental Records Centre (LERC), Greenspace Information for Greater London (GiGL), for a 2km search radius around the site was undertaken and the data received was reviewed to identify the location and citations of any local non-statutory designated sites and the presence of any protected/priority species.

A summary of the records received from GiGL is discussed under 'Species Records' in Section 4.1. The records discussed under each relevant subheading have been included based on their relevance to the site e.g. there are suitable habitat types present on-site to support the species, there is habitat connectivity between the site and record location and/or the record is in proximity of the site. Records dated within the past 10 years have also been favoured. Accurate locations in relation to badger sett records have not been included to avoid potential persecution.

The combination of actions described above provided the overall ecological context for the site, to better inform the site walkover and the subsequent assessment.

3.2 SITE WALKOVER

Habitats

The extent, distribution, type and categories of the different habitats on-site were identified and mapped according to the standard UKHab methodology, using the UKHab primary codes, and UKHab secondary codes in square brackets to provide supplementary information where appropriate. Mandatory codes for habitat mosaics, priority and Annex 1 habitats that occur in multiple primary habitats have also been applied where appropriate. Photographs of habitats and notable features are included within Appendix C. Any features of interest were recorded using Target Notes (TN). Any protected plant species and/or invasive non-native species (INNS) present were also noted.

The relative abundance of plant species in each habitat parcel was recorded and classified according to the DAFOR rating scale. The standardised terms are: D – Dominant, A – Abundant, F – Frequent, O – Occasional and R – Rare. The relative abundance of each species is clarified in brackets alongside the species name in Section 3.2.

Where required, trees are labelled in accordance with the Tree Survey Plan[11] for the site, conducted by TMA, 2025.

Hedgerow Assessment

A hedgerow is defined as "...any boundary line of trees or shrubs over 20 metres (m) long and less than 5m wide, and where any gaps between the trees and shrub species are less than 20m wide"[12]. Any bank, wall, ditch or tree within 2m of the centre of the hedgerow is considered to be part of the hedgerow habitat, as is the herbaceous vegetation within 2m of the centre of the hedgerow.

For hedgerows of 30m in length or less, the entire hedgerow is surveyed. Hedgerows greater than 30m in length are split in to 100m sections and the central 30m of each 100m section is surveyed. The number of woody species present is recorded within each length along with the presence of any of the features listed in Sub-paragraph 4 of the Regulations, namely the presence of a bank, wall, or ditch, less than 10% gaps, at least one standard tree per 50m, at least three woodland plant species, at least four points achieved from connections to other hedgerows, woods or ponds, and/or a parallel hedge within 15m.

A hedgerow is considered important under the Regulations where:

- It has an average of seven or more woody species in the surveyed section(s);
- It has an average of six woody species in the surveyed section(s) and three or more features from Sub-paragraph 4;
- It has six woody species and one of the following rare trees – black poplar *Populus nigra*, large-leaved lime *Tilia platyphyllos*, small-leaved lime *Tilia cordata*, wild service tree *Sorbus torminalis*;
- It has an average of five woody species on average in the survey section(s) and has four or more features from Sub-paragraph 4; or,
- It has four woody species on average in surveyed section(s), is adjacent to a footpath, bridleway or byway open to all traffic (BOAT) and has two or more features from Sub-paragraph 4.

A hedgerow also qualifies as a habitat of principal importance under Section 41 of the NERC Act 2006 if it comprises greater than 80% of one or more native species. The hedgerows on the site were therefore also assessed to determine whether they qualify as a NERC Act 2006 habitat of principal importance.

Species

The site walkover included assessments to identify the potential value for legally protected or priority species at the site. This involved identifying potential habitats which support opportunities for refuge, breeding and foraging in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from the desk study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;

- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and,
- Present - Presence confirmed from the site walkover itself or recent, confirmed records from information gathered through the desk study.

The species considered potentially relevant to the site and therefore taken into consideration included:

Amphibians

Great Crested Newt

The site walkover assessed the habitats on-site for their suitability to support GCN and/or other native amphibians, e.g. common toad *Bufo bufo*, common frog *Rana temporaria*. The aquatic and terrestrial habitats required generally include still waterbodies suitable for breeding and woodland, scrub or grassland habitat where there is optimal invertebrate prey potential and/or shelter.

Badger

The potential for badger *Meles meles* to inhabit or forage/commute within the site was assessed during the site walkover. Evidence of badger activity includes the identification of setts (a system of underground tunnels and nest chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines/dung pits and paw prints.

Land up to 30m from the site was also observed and assessed for signs of activity, where access was permitted/available.

Bats

The PEA considers foraging/commuting bats and roosting bats (summer/transitional and winter hibernation).

Habitats such as woodland, meadows and waterbodies can provide important foraging resources and linear features such as tree lines, hedgerows, railway and river corridors are often considered valuable for commuting bats. The site walkover included recording the presence/assessing the suitability of the habitats and features present on the site, in combination with habitat connectivity associated with the wider landscape.

The site walkover included an external, ground-level visual assessment to identify and record Potential Roosting Features (PRFs) on buildings/structures, a Ground Level Tree Assessment (GLTA) and evaluation of habitats for foraging and commuting bat species *Chiroptera* spp. Consideration was given to the presence of features and habitats both within and adjacent the site.

In accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines[13] and methods given in the CIEEM Bat Mitigation Guidelines[14] consideration was given to:

- The presence, location, type and suitability of PRFs; and
- Signs of bat activity or presence including bat sightings, audible bat chattering, droppings, stains (including grease marks and urine spatter), scratch marks, and moth/butterfly wings.

Guidance from BCT ranks bat roosting and foraging suitability on a scale through None, Negligible, Low, Moderate and High. The parameters for each of these are as follows:

- None - Relates to a site with 'no habitat features suitable for bats';
- Negligible - Relates to a site with no 'obvious habitat features likely to be used by bats';
- Low - Relates to a site with only a few roost sites that could be used by individual bats 'opportunistically', and foraging and commuting habitat which is 'not very well connected' and only suitable to support small numbers of bats;
- Moderate - Relates to a site with potential roosting features that could be used regularly by bats but not for roosts of high conservation status, and foraging and commuting habitat which is 'continuous' and 'connected to the wider landscape'; and,
- High - Relates to a site with one or more potential roost sites that could support 'larger numbers of bats on a more regular basis' and also have suitability to support high conservation status roosts, e.g. maternity roosts. High suitability foraging and commuting habitat is well connected and likely to be used regularly by bats for flight paths e.g. rivers, valleys etc and could even be connected to a roost site(s).
- PRFs can include buildings, bridges, tunnels and caves with cracks or gaps leading into voids or crevices, or trees with holes, crevices or splits of sufficient size and depth. Based on the number, location and type of PRF(s) the buildings/structures were categorised based on the categorisations provided above.

Trees were categorised either individually or as a group using the following BCT grading system; None (same as above), Further Assessment Required (FAR), PRF-I (where PRFs are only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats), or PRF-M (where PRFs are suitable for multiple bats and may therefore be used by a maternity colony).

Birds

During the site walkover, the potential for the site to support breeding and/or non-breeding bird species was assessed. This included recording the presence/absence of areas of trees, scrub, heathland, arable and wetland habitat that could support nests or provide foraging resources for common or notable species. Consideration was also given to the presence/absence of features on-site that may support Wildlife and Countryside Act 1981 (as amended) Schedule 1 species, e.g. barn owl *Tyto alba*, black redstart *Phoenicurus ochruros*, and kingfisher *Althedo atthis*.

Dormouse

During the site walkover the potential for dormouse *Muscarduinus avellanarius* to be present on-site was assessed. This included observations for suitable habitat such as well-layered woodland, scrub and linking hedgerows, particularly those comprised of species offering suitable food sources such as honeysuckle *Lonicera periclymenum* and hazel *Corylus avellana*, in addition to direct evidence such as nests or characteristically gnawed hazelnuts, chewed ash keys and honeysuckle flowers.

Invertebrates

As part of the site walkover the quality of invertebrate habitat and the potential for the site to support notable terrestrial and aquatic invertebrate species was considered. There is a wide variety of habitats that are suitable for invertebrates including wetland, heathland, areas of bare

sandy soil, ephemeral brownfield vegetation and meadows. The diversity of the habitat structures and features present is important along with food sources for supporting specific needs/life stages/population numbers.

Species of particular interest included, but were not limited to, stag beetle *Lucanus cervus*, roman snail *Helix pomatia*, glow worm *Lampyris noctiluca* and notable butterfly species for the region.

Reptiles

The potential for widespread reptile species to use the site was assessed during the site walkover. Possible species include adder *Vipera berus*, grass snake *Natrix helvetica*, slow worm *Anguis fragilis* and common lizard *Lacerta vivipara*. These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained areas and frost-free features for hibernation are needed to survive the winter.

Other Priority/Notable Species

Where desk study data indicates the potential for presence of BAP priority species or other notable/rare species not protected by statute, effort was made to establish the potential for the site habitats to support these species during the site walkover.

Hedgehogs *Erinaceus europaeus* were of particular consideration, given the context of the surrounding landscape, however other species were also taken into account during the site visit.

Protected/Priority Plant Species

During the site walkover, presence of plant species protected under the Wildlife and Countryside Act 1981 (as amended) Schedule 8 or NERC Act 2006 Section 41 were searched for (seasonal timing allowing).

Invasive Non-native Species

During the site walkover, presence of plant and animal species listed as invasive under the Wildlife and Countryside Act 1981 (as amended) Schedule 9 were searched for. As and where appropriate to the site habitats present, these included but were not necessarily limited to, Japanese knotweed *Reynoutria japonica*, Himalayan balsam *Impatiens glandulifera*, wall cotoneaster *Cotoneaster horizontalis* and Japanese rose *Rosa rugosa*.

In addition, where species that are not Wildlife and Countryside Act 1981 (as amended) Schedule 9 listed species, i.e. INNS, but which are considered to have 'invasive tendencies' were encountered, these were also recorded e.g. buddleia *Buddleja davidii*, snowberry *Symphoricarpos alba*, common horsetail *Equisetum arvense* (list not exhaustive). Similarly, any species identified to be included on the London Invasive Species Initiative (LISI) were recorded, where seen.

3.3 SURVEYORS/COMPETENCIES

Ben Newbery, Consultant, has an undergraduate degree in Zoology (BSc Int.) and an MSc in Biodiversity and Conservation, with over three years' experience in ecological survey and assessment. Ben's experience spans PEAs, Biodiversity Net Gain (BNG) and bat-surveying, with botanical identification being a particular interest.

Laura Thomas, Senior Consultant, has an undergraduate degree in Biology (BSc Hons) and a Master's degree in Evolutionary and Behavioural Ecology, holds a Natural England Bat Survey Level

1 Class Licence and is a Qualifying member of CIEEM. Laura has over seven years' experience in the commercial sector.

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

This report was prepared by Ben Newbery, reviewed by Laura Thomas and authorised by Alexandra Wadia-Knowles, who confirms 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.

3.4 CONSTRAINTS

Due to the number of trees present in the area of woodland at the northern end of the sits it was not possible to complete a full GTLA of all trees within this habitat parcel. This constraint has been taken into consideration with regards to further survey and mitigation recommendations.

No significant constraints that would impact the conclusions drawn in this report were identified.

4.0 RESULTS

4.1 DESK STUDY

Environmental Databases

Designated Sites

The desk study has not identified any statutory designations associated with the site itself.

There is, however, one Special Protection Area (SPA) located within 10km, which is a statutory site of international importance; South West London Waterbodies SPA is located 9.09km southwest from the site. Further details of this designated site are included within Table 4.1.

The desk study has identified three statutory designated sites within 2km of the site. All three of these are categorised as Local Nature Reserves (LNRs) which are of national importance. Details of each statutory designated site are included within Table 4.1.

The desk study has identified that the site is located within the Impact Risk Zone (IRZ) for Fray's Farm Meadows Site of Special Scientific Interest (SSSI) located 4.32km northwest and Syon Park SSSI located 10.36km southeast.

Records received from GiGL did not return any non-statutory designation relating to the site itself, but identified ten non-statutory designated sites within 2km of the site. Table 4.1 below gives the locations and descriptions of all non-statutory designated sites in order of their proximity to the site.

Table 4.1 Statutory and Non-Statutory Designated Sites identified within 2km Search Radius

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
Statutory (International Importance)		
South West London Waterbodies SPA	9.09km southwest	The South West London Waterbodies SPA is designated for its importance to non-breeding waterfowl populations, specifically the qualifying species gadwall *Mareca strepera* and shoveler *Spatula clypeata*, which occur in internationally significant numbers. The site comprises a network of reservoirs, former gravel pits, and associated habitats that provide essential foraging, roosting, and loafing areas during the winter period. In addition to the qualifying species, the SPA supports a range of other waterbirds including tufted duck *Aythya fuligula*, pochard *Aythya ferina* and great crested grebe *Podiceps cristatus*, as well as diverse aquatic invertebrate and macrophyte communities, contributing to its broader biodiversity value.
Statutory (National Importance)		
Yeading Brook Meadows LNR	1.18km east	Yeading Woods lie in the valley of the Yeading Brook and contains a range of habitats such as ancient seminatural

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
		woodland, pedunculate oak plantation, mesotrophic grassland, ponds, flooded tanks of a former sewage works and a system of ditches. Common frogs, common toads, great crested and smooth newts *Lissotriton vulgaris* and grass snakes have been recorded on the site. The brook also supports riparian species such as kingfisher *Alcedo atthis*, while the meadows provide habitat for invertebrates including Roesel's bush-cricket *Roeseliana roeselii*, long-winged conehead *Conocephalus fuscus* and a range of butterfly species.
Yeading Meadows LNR	1.29km east	Yeading Meadows LNR forms part of Ten Acre Wood, a late 19th century oak *Quercus robur* plantation over hazel coppice, adjoining the species-rich grasslands of Yeading Brook Meadows. The woodland canopy is dominated by oak with an understorey primarily of hawthorn Crataegus monogyna and hazel. The meadows provide habitat for a variety of invertebrate species.
Yeading Woods LNR	1.51km northeast	The reserve comprises a small meadow, riverbank, and areas of coppiced woodland. Notable flora include bluebell *Hyacinthoides non-scripta* in spring and broad-leaved helleborine *Epipactis helleborine*. Hobby *Falco subbuteo* are known to nest within the woodland during summer months.
Non-statutory		
Hayes Shrub SINC (Borough II)	0.4km east	Mature and regenerating pedunculate oak is widespread, while hornbeam *Carpinus betulus* is more localised. Hairy brome *Bromopsis ramosa* and false oat-grass *Arrhenatherum elatius* are common on the woodland floor, where violets *Viola sp.* grow abundantly. The woodland incorporates a seasonal marshy pond (formerly ornamental, now naturalised) and various seasonal ditches. Flora of the damper areas includes locally abundant remote sedge *Carex remota*, water starwort *Callitriche stagnalis*, soft rush *Juncus effuses*, yellow flag *Iris pseudacorus* and common water plantain *Alisma plantago-aquatica*. Roe deer *Capreolus capreolus* have been reported from the site in recent years.
Uxbridge Road Scrub, Hayes SINC (Borough II)	0.8km south	An inaccessible area of impenetrable scrubland, likely to provide shelter for a range of birds and mammals, and a breeding site for shade loving insects such as certain craneflies and ground beetles. There are a number of ash trees *Fraxinus excelsior* and there a dense ivy Hedera helix

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
		ground-cover and on shaded tree-trunks. A number of hazels grow near the roadside, but otherwise the dense scrub is dominated by common hawthorn *Crataegus monogyna* and cherry laurel *Prunus laurocerasus*. There are many elm Ulmus procera suckers, and occasional oak saplings
Home Covert, Lowdham Field and Pole Hill Open Space SINC (Borough II)	0.93km northeast	Home Covert, a block of woodland in the north-west of the site, is dominated by pedunculate oak, including a number of large specimens. Hazel is abundant, and although there is extensive bramble *Rubus fruticosus agg.,* the woodland floor is generally bare due to high pedestrian usage. Soft rush *Juncus effusus* and great willowherb *Epilobium hirsutum* grow in seasonally wet ditches beside the paths. There are areas of rough grassland, the most diverse of which is around Old Abbotstonians Rugby Club. This has an exceptionally rich flora, including red bartsia *Odontites vernus*, grass vetchling *Lathyrus nissolia*, agrimony *Agrimonia eupatoria*, dove's-foot cranesbill *Geranium molle*, lesser hawkbit *Leontodon saxatilis* and tormentil *Potentilla erecta*, as well as species more typical of disturbed ground. On the east margin of the site a small pond and associated ditch are partly concealed in the hedgerow.
Yeading Brook Meadows SINC (Metropolitan)	1.4km northeast	The site comprises unimproved neutral and wet grasslands with diverse flora including sneezewort *Achillea ptarmica*, great burnet *Sanguisorba officinalis*, narrow-leaved water-dropwort *Oenanthe silaifolia*, and breeding birds like skylark *Alauda arvensis*, reed bunting *Emberiza schoeniclus* and broad-leaved helleborine
St Mary's, Wood End SINC (Local)	1.6km southeast	This complex of open spaces around St Mary's Church, the Beck Theatre and Grassy Meadows Day Centre provides valuable access to nature in an area lacking in accessible wildlife sites. A variety of habitats includes fields, amenity grassland, hedgerows, scrub, a botanic garden and an artificial pond. The rough edges of the amenity grassland to the east of Grassy Meadows Day Centre include a variety of plants such as wall lettuce *Mycelis muralis* and common knapweed *Centaurea nigra*, growing among tall perennial rye-grass *Lolium perenne*, barren brome *Anisantha sterilis* and false oat-grass *Arrhenatherum elatius*. A belt of dense scrub and trees north of the day centre contains a number of young aspen trees *Populus tremula*. A pond beside the Beck Theatre contains carp

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
		and many small fish. It is fed by an artificial waterfall, with wet stonework splash zones and mats of algae; both potentially important for invertebrates, and scarce habitats in London.
Down Way Park SINC (Local)	1.9km east	This small park is bordered on three sides by a native hedge of hawthorn, hornbeam and field maple *Acer campestre*. The hedge is regularly trimmed which allows it to maintain a dense growth providing ideal nesting habitat for birds. There is a particularly strong population of house sparrows *Passer domesticus* nesting here, a species which has greatly declined in London in recent years.
The West London Shooting Grounds and Down Manor SINC (Borough I)	2km northeast	The West London Shooting Grounds support a mosaic of habitats including several hedges, some patches of suckering English elm *Ulmus procera* and a small woodland of pedunculate oak which is unusual in having a wide age-range of trees. The site is bounded to the west, south and east by a large bank which supports varied semi-natural vegetation including tall herbs, ruderals and bare areas kept open by 4x4 vehicle activity. There is also a large pond in the centre with great reedmace *Typha latifolia* on the margins.
Lake Farm Country Park SINC (Borough I)	2km south	Semi-improved grassland with wildflowers such as red clover *Trifolium pratense*, dove's foot cranesbill and tansy *Tanacetum vulgare*. Scrub and hedgerows support kestrels and goldfinches. An area of scrub and trees to the south is dominated by common hawthorn, along with elder *Sambucus nigra*, growing beneath pedunculate oak, Norway maple *Acer platanoides*, crack willows *Salix fragilis* and other scattered trees. There is diverse herbage on the scrub margins including weld *Reseda luteola*, hemlock *Conium maculatum* and broad-buckler fern *Dryopteris dilatata*.
The Grove SINC (Borough II)	2km west	The smaller ponds and wet areas support a range of wetland plants including reed sweet-grass *Glyceria maxima*, yellow flag iris *Iris pseudacorus*, meadowsweet *Filipendula ulmaria*, water-plantain *Alisma plantago-aquatica* and water starwort Callitriche stagnalis. Sparse willows (*Salix caprea* and *S. cinerea*), ash and hawthorn grow around these ponds. The larger pond is heavily shaded in parts and has few wetland plants except for a covering of duckweed *Lemna minor*. The trees around it

Site Name and Designation	Approximate Location and Direction from the Site	Description/Citation
		include English elm and sycamore, with holly *Ilex aquifolium* and elder.
Hillingdon Court Park SINC (Local)	2km northwest	The park contains a good range of trees, from young to very old. Around the edges and scattered across the park are native trees and shrubs including beech *Fagus sylvatica*, silver birch *Betula pendula*, hornbeam and holly and non-native species including sycamore, Turkey oak *Quercus cerris*, red oak *Q. rubra* and rhododendron *Rhododendron ponticum***.** An open clump of trees in the park is dominated by large pedunculate oaks with a ground flora of bramble**,** Timothy grass *Phleum pratense*, cock's-foot *Dactylis glomerata* and broad-leaved dock *Rumex obtusifolius*. The mature trees in the park provide roosting sites for in excess of 100 starlings Sturnus vulgaris, a declining species.

Other notable species

The MAGIC website did not identify EPS licences for any other species within 2km of the site.

Biodiversity Action Plans/Priority Habitats and Species

The following UK BAP[15] priority habitats/species were of relevance to the site:

Habitats

- Native hedgerow (on-site);
- Deciduous woodland (80m east); and
- Traditional orchard (110m southwest).

Species

- Bats:
  - Brown long-eared bat *Plecotus auritus*;
  - Noctule *Nyctalus noctula*;
  - Soprano pipistrelle *Pipistrellus pygmaeus*;
- Birds:
  - Herring gull *Larus argentatus*;
  - House sparrow *Passer domesticus*;
  - Spotted flycatcher *Muscicapa striata*;
  - Starling *Sturnus vulgaris*;
- Invertebrates:

- Stag beetle *Lucanus cervus*; and

- Terrestrial mammals:
  - Hedgehog Erinaceus europaeus.

No standalone BAP is available for the London Borough of Hillingdon, however a review of the London BAP[16] HAPs and SAPs have identified the following additional receptors to be of relevance to the site:

Habitats

- Private gardens (150m south);
- Allotments (0.45km southeast); and
- Built structures (on-site) [N.B. This habitat does not have a specific SAP but is considered as an example of 'other important habitat' under the London BAP[16]].

Species

- Bats.

Local Environmental Records Centre

Species Records

The data consultation with GiGL returned records of relevance to the site relating to amphibians, bats, birds, badger, invertebrates, reptiles and protected flora within 2km of the site. Records of INNS were also returned.

Amphibians - Great Crested Newt

GiGL returned a total of 36 records for three amphibian species within 2km of the site, including five records of GCN. Furthermore, a review of the MAGIC website identified three European Protected Species (EPS) licences relating to GCN within 2km of the site.

Records of GCN, details of the identified EPS licences and records of relevant native amphibians within 2km of the site are included below in Table 4.2,

Table 4.3 and Table 4.4, respectively.

Table 4.2 Summary of most relevant great crested newt records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Great crested newt	*Triturus cristatus*	1.06km northeast	Five Records of GCN collected between with the most recent being in 2020, with a maximum count of two individuals.

Table 4.3 Great Crested Newt EPS Licences within 2km

Licence Reference	Approximate Location and Direction from the site	Actions Permitted under Licence
2014-696-EPS-MIT 2014-696-EPS-MIT-1	1.29km west	Damage and destruction of a resting place
EPSM2009-531	1.30km northeast	Destruction of a resting place
EPSM2013-6002	1.39km west	Destruction of a resting place

Amphibians - Native Amphibians

Table 4.4 Summary of most relevant native amphibians within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Common frog	*Rana temporaria*	1.06km northeast	28 records with a maximum occurrence of 40 individuals and a singular breeding occurrence. Data collected from 1999 to 2017.
Common toad	*Bufo bufo*	1.35km south	Three Records collected between 1999 and 2011 with a maximum occurrence of two.

Badger

GiGL returned a singular record for badger with 2km of the site, dating from 1980. The exact location of this record is not specified as the data is confidential to avoid persecution of this species.

Bats

GiGL returned a total of 30 records for four bat species within 2km of the site. Table 4.5 below provides the full list of species recorded within 2km of the site.

The MAGIC website did not identify EPS licences for bats within 2km of the site.

Table 4.5 Summary of most relevant bat records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Brown Long-eared	*Plecotus auritus*	0.09km east	A single record with a maximum count of one bat. The most recent record is from 2022.
Common pipistrelle	*Pipistrellus pipistrellus*	0.09km east	Seven records with a maximum count of a single bat. The most recent record is from 2022.

Common Name	Scientific Name	Distance/Direction From Site	Notes
Noctule	*Nyctalus noctula*	0.09km east	17 records with a maximum count of 100 individuals. The most recent record is from 2022.
Soprano Pipistrelle	*Pipistrellus pygmaeus*	0.09km east	5 records with a maximum count of 1 individual. The most recent record is from 2022.

Birds

GiGL returned a total of 3538 records for 57 species within 2km of the site. Of these, 14 Wildlife and Countryside Act 1981 (as amended) Schedule 1 bird species were included within the records. The records also comprised 29 BoCC[17] Red listed species, 16 were BoCC Amber listed species and the remaining five are of BoCC Green status or unlisted. Table 4.6 below provides the summary list of bird species of relevance to the site, based on the habitat types present. The full list of species recorded within 2km of the site is provided in Appendix D. Table 4.6 below does not include specific location and direction information.

Table 4.6 Summary of most relevant bird species recorded within 2km of the Site.

Common Name	Scientific Name	WCA/BoCC5 Status
Fieldfare	*Turdus pilaris*	WCA S1/Red
Black Redstart	*Phoenicurus ochruros*	WCA S1/Amber
Redwing	*Turdus iliacus*	WCA S1/Amber
Brambling	*Fringilla montifringilla*	WCA S1
Greenfinch	*Chloris chloris*	Red
Grey Partridge	*Perdix perdix*	Red
Herring Gull	*Larus argentatus*	Red
House Sparrow	*Passer domesticus*	Red
Lapwing	*Vanellus vanellus*	Red
Lesser Spotted Woodpecker	*Dryobates minor*	Red
Linnet	*Linaria cannabina*	Red
Mistle Thrush	*Turdus viscivorus*	Red
Spotted Flycatcher	*Muscicapa striata*	Red
Starling	*Sturnus vulgaris*	Red
Swift	*Apus apus*	Red
Dunnock	*Prunella modularis*	Amber
Lesser Black-backed Gull	*Larus fuscus*	Amber
Song Thrush	*Turdus philomelos*	Amber
Baltic Gull	*Larus fuscus*	Amber

Invertebrates

GiGL returned a total of 1040 records for 14 invertebrate species within 2km of the site. Table 4.7 below provides the full list of species recorded within 2km of the site.

Table 4.7 Summary of most relevant invertebrate records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Stag Beetle	*Lucanus cervus*	0.35km southwest	167 records with a maximum count of 10 individuals. The most recent record is from 2023.
Small Heath (butterfly)	*Coenonympha pamphilus*	0.461km northeast	95 records with a maximum count of 24 individuals. The most recent record is from 2024.
Large Skipper (Butterfly)	*Ochlodes sylvanus*	0.46km northeast	249 records with a maximum count of 27 individuals. The most recent record is from 2023.
Essex Skipper (Butterfly)	*Thymelicus lineola*	0.46km northeast	74 records with a maximum count of 49 individuals. The most recent record is from 2023.
A Butterfly	*Lycaena phlaeas eleus*	0.61km southeast	19 records with a maximum count of 5 individuals. The most recent record is from 2019.
Small Heath (butterfly, subspecies)	*Coenonympha pamphilus pamphilus*	0.77km west	14 records with a maximum count of 12 individuals. The most recent record is from 2019.
Small Skipper (Butterfly)	*Thymelicus sylvestris*	0.77km west	183 records with a maximum count of 39 individuals. The most recent record is from 2023.
Small Copper (Butterfly)	*Lycaena phlaeas*	1.11km northeast	126 records with a maximum count of eight individuals. The most recent record is from 2023.
Common Darter (Dragonfly)	*Sympetrum striolatum*	1.19km northeast	83 records with a maximum count of 20 individual. The most recent record is from 2023.
Brilliant Emerald Dragonfly	*Somatochlora metallica*	1.42km east	A single record with a maximum count of a singular dragonfly. The record is from 2019.
Brown Hairstreak (Butterfly)	*Thecla betulae*	1.44km north	Six records with a maximum count of a singular butterfly. The most recent record is from 2023.
Scarce Chaser (Dragonfly)	*Libellula fulva*	1.49km east	Two records with a maximum count of a singular dragonfly. The most recent record is from 2018.
White Admiral (butterfly)	*Limenitis camilla*	1.49km north	Nine records with a maximum count of two individuals. The most recent record is from 2018.
White-letter Hairstreak (Butterfly)	*Satyrium w-album*	1.70km northeast	12 records with a maximum count of six individuals. The most recent record is from 2019.

Reptiles

GiGL returned a total of 15 records for 1 reptile species within 2km of the site in the last 10 years. Table 4.8 below provides the full list of species recorded within 2km of the site.

Table 4.8 Summary of most relevant reptile records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Slow-worm	*Anguis fragilis*	1.00km northeast	15 records with a maximum count of 5 individuals. The most recent record is from 2021.

Invasive Non-native Species

GiGL returned a total of 428 records for 10 INNS within 2km of the site in the last 10 years, as listed on the LISI. A total of five Wildlife and Countryside Act 1981 (as amended) Schedule 9 species were also included within the records, including two plant species: Cotoneaster sp. And Himalayan balsam. Table 4.9 below provides the summary list of all INNS species of relevance to the site.

Table 4.9 Summary of most relevant invasive non-native species records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	WCA/LISI Status
Cotoneaster	*Cotoneaster sp.*	1.00km north	WCA S9 / LISI category 2
Cherry Laurel	*Prunus laurocerasus*	1.00km northwest	LISI category 3
Turkey Oak	*Quercus cerris*	1.00km northwest	LISI category 5
Tree-of-heaven	*Ailanthus altissima*	1.00km southwest	LISI category 3
False-acacia	*Robinia pseudoacacia*	1.00km southwest	LISI category 4
Himalayan Balsam	*Impatiens glandulifera*	1.10km east	WCA S9 / LISI category 3
Chinese Muntjac	*Muntiacus reevesi*	1.10km northeast	WCA S9 / LISI category 4
Evergreen Oak	*Quercus ilex*	1.25km southwest	LISI category 5
Ring-necked Parakeet	*Psittacula krameri*	1.20km south	WCA S9 / LISI category 4
Monk Parakeet	*Myiopsitta monachus*	1.92km northeast	WCA S9 / LISI category 2

Other Priority/Notable Species

45 records of other priority or notable species for which habitats in the site may be considered suitable to support were returned by GiGL.

Table 4.10 Summary of most relevant other priority/notable species records within 2km of the site

Common Name	Scientific Name	Distance/Direction From Site	Notes
Hedgehog	*Erinaceus europaeus*	0.33km south	45 records with a maximum count of 1 individuals. The most recent record is from 2023.

4.2 SITE WALKOVER

The site walkover was carried out on 15th July 2025 by Ben Newbery, Consultant, during dry and clear weather conditions (Temperature: 21°C, Humidity: 50%, Cloud cover: 5/8 okta, Precipitation: none).

The site extents and habitats are shown at Figure A.1 with site photographs presented at 0.

Habitats

The habitats present across the site consisted of the following UKHab categories, as mapped in Figure A.1, and described below:

- u1b5 - Buildings [804 - Car Park]
- u1b5 - Buildings [89 - Other green roof]
- u1b6 - Other developed land [804 - Car park]
- u1 - Built up areas and gardens [81 - Introduced shrub]
- g4 - Modified grassland
- g4 - Modified grassland [81 - Ruderal or ephemeral]
- g4 - Modified grassland [200 - tree]
- h2a6 - Other native hedgerow [11 - Hedgerow with trees]
- h3h - Mixed scrub
- w1h5 - Other woodland, mixed, mainly broadleaved

u1b5 - Buildings [804 - Car Park]

There was one building present on-site which historically functioned as a car park (Plate C.1). The building was largely open-sided and had two storeys, with open access into all parts of the building, and was constructed principally with concrete and tarmac. There were brick parapets to the upper level, which all appeared in good condition.

The landscaping was such that the lower level is sunken below street level, so that the upper floor was level with the adjacent road to the south and accessible to vehicles via a small bridge in the

southwest corner of the building. An additional pedestrian bridge was present in the southeast corner of the building (Plate C.2), also connecting the street to the upper car park storey.

At the time of the survey the lower car park level was primarily used for materials storage pertaining to a development (known as Hayes Park North) adjacent to the site (Plate C.3). As such, there were various contractors working around this area and temporary artificial lighting throughout.

Furthermore, there were several temporary wooden structures at the eastern side of the lower car park level (Plate C.4). These appeared to function as offices/welfare facilities for on-site contractors. The rooms were clad in timber boards, with UPVC windows and doors.

u1b5 – Buildings [89 - Other green roof]

There were three raised planting beds (approximately 2m high) on the upper floor of the car park (Plate C.5). These were classified as 'other green roof' as they do not meet the criteria for either 'intensive' or 'biodiverse' green roofs. All beds were vegetated with a mixture of introduced and native species, the latter of which had likely self-seeded. Furthermore, vegetation appeared desiccated, indicating that there is no active watering or irrigation of these beds.

The beds contained cherry laurel *Prunus laurocerasus* and hazel shrubs as the dominant species, surrounded by a variety of grasses and herbs including false oat grass *Arrhenatherum elatius* (F), perennial rye-grass *Lolium perenne* (F), mugwort *Artemisia vulgaris* (O), bristly oxtongue *Helminthotheca echioides* (R), common vetch *Vicia sativa* (R) and dandelion *Taraxacum officinale agg.* (R).

u1b6 - Other developed land [804 - Car park]

There was a tarmac road at the southern end of the site, with associated pavement. The roads were generally free of vegetation and were considered to be of no ecological value.

The lower level of the car park extended beyond the western boundary of the car park building by approximately 15m, which created additional, open-air parking spaces. The tarmac surface was cracked in places, which has allowed for colonisation by ruderal species. Most notable amongst these was buddleia *Buddleja davidii* (Plate C.6) which presented several sizeable specimens. Additional, ruderal grasses and herbs were also beginning to colonise the area.

u1 - Built up areas and gardens [847 - Introduced shrub]

Several areas of introduced shrub were present around the lower level, open-air car park. They were dominated by non-native honeysuckle *Lonicera sp.*, with some native, self-set willow *Salix sp.* (R) and bramble *Rubus fruticosus agg.* (R). These areas appeared to have undergone no recent management.

g4 - Modified grassland

Grassland in the form of amenity lawn areas was present towards the western extent of the site (Plate C.7). The sward length was maintained to a low level (~5cm), likely through regular mowing.

The sward was estimated to comprise 90% grasses and 10% herbaceous species, at the time of the survey with approximately four species per m^2. Perennial ryegrass *Lolium perenne* was abundant throughout the habitat parcel, with rare occurrences of Yorkshire fog *Holcus lanatus*. There was an accompanying variety of herbaceous flora, including bristly oxtongue *Helminthotheca echioides* (R), cat's ear *Hypochaeris radicata* (R), creeping thistle *Circium arvense* (R), fox-and-cubs *Pilosella*

aurantiaca (R), great lettuce *Lactuca virosa* (R), selfheal *Prunella vulgaris* (R) and sowthistle *Sonchus oleraceus* (R).

g4 - Modified grassland [81 - Ruderal or ephemeral]

The grassland extended northwards along the western site boundary, becoming noticeably dominated by ruderal/ephemeral species, up to 1m in height. Floral species present included nettles *Urtica dioica* (D) and bramble (O).

g4 - Modified grassland [200 - tree]

A total of 23 scattered trees were present on-site, not including those trees located within an area of woodland at the northern extent of the site. The trees were generally in good health with no identifiable decay features.

Tree species present included alder *Alnus glutinosa*, ash *Fraxinus excelsior*, common lime *Tilia x europaea*, field maple *Acer campestre*, hornbeam, pedunculate oak *Quercus robur*, tree cotoneaster *Cotoneaster frigidus*, turkey oak *Quercus cerris* and wild cherry *Prunus avium*.

h2a6 - Other native hedgerow [11 - Hedgerow with trees]

A beech *Fagus sylvatica* hedgerow was present towards the southern extent of the site, fringing the northern side of the road (Plate C.8). The hedgerow appeared to be semi-mature and subject to intensive management via regular pruning to maintain its shape. It stood at approximately 3m tall by 2m wide. The whole length of hedgerow (approximately 50m) is considered as a single unit, despite two notable gaps, including an 8m break for road access to the upper car park level and a 1m gap for a pedestrian footpath/bridge.

At the time of the survey, ground flora appeared scarce beneath the hedgerow. Species present within this layer included bramble (O), hedge bindweed *Calystegia sepium* (O), great lettuce (R), green alkanet *Pentaglottis sempervirens* (R) and nettle (R).

Various trees are located within close proximity to the hedgerow and are therefore considered a part of the habitat. Tree species here included alder and field maple.

The hedgerow does not comprise any features detailed in the Hedgerow Regulations 1997, and therefore was not considered to be an important hedgerow. However, as it contains only native species (i.e. dominated by beech) it is considered to be a habitat of principle importance under the NERC Act 2006.

h3h – Mixed scrub

An area of mixed scrub is present between the car park and hedgerow (Plate C.9). Snowberry *Symphoricarpos album* was the dominant species here. Notably, snowberry is listed as an invasive species under LISI (see 'Invasive Non-native Species' below).

w1h5 – Other woodland, mixed, mainly broadleaved

The northern extent of the site comprises broadleaved woodland (Plate C.10), with a vegetation structure comprising canopy trees, underlying shrub and saplings, and low-lying ground flora.

The woodland canopy layer comprised both broadleaved and deciduous tree species, including leyland cypress *Cupressus x leylandii* (O), ash (R), field maple (R), hornbeam (R), pedunculate oak (R) and tree cotoneaster (R).

The understorey shrub layer predominantly comprised cherry laurel *Prunus laurocerasus* (R) and elder *Sambucus nigra* (R). (N.B. cherry laurel is listed as an INNS under LISI [see 'Invasive Non-native Species' below]).

The ground flora comprised grey sedge *Carex divulsa* (F), wood avens *Geum urbanum* (O), bramble (R), broad-leaved dock *Rumex obtusifolius* (R), cow parsley *Anthriscus sylvestris* (R) and ribwort plantain *Plantago lanceolata* (R).

Species

The species referred to in Section 4.1 section are primarily those known to be in the area that may be impacted by any proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in Section 5.2.

Amphibians

Great Crested Newt

There were no ponds or suitable aquatic habitats within the site boundary to support breeding GCN, and no ponds within 250m. The nearest pond is located 335m east of the site, within the Hayes Shrub SINC. A Habitat Suitability Index (HSI) was previously conducted on this pond by Greengage in 2023[18] and concluded a suitability level of 'Poor' for GCN. There are no further ponds within 500m of this pond, and it is therefore considered to be isolated within the landscape. Furthermore, the habitats on-site largely consist of hardstanding or short-sward grassland, which are not suitable for GCN.

No ponds or ornamental water features were identified in any of the residential gardens located in close proximity to the site, following a review of aerial imagery. However, it should be noted that unidentified ponds / water features may exist in nearby gardens (within 250m of the site). However, such water features are relatively small in size and are more likely to be used by common amphibians (i.e. smooth newt, and/or palmate newt and/or common frog).

Based on the accepted terrestrial range of GCN (generally <250m, occasionally >500m, rarely >1 km from their breeding sites) and the presence of only a singular, isolated, poor suitability pond locally (335m east), it is considered unlikely that the area could sustain healthy populations of GCN.

The site is therefore assessed to have negligible suitability for GCN, and they are not discussed further in this report.

Native Amphibians

The presence of other native amphibians on-site (such as common frog and common toad), which are typically understood to disperse over greater distances from breeding ponds in comparison to GCN, cannot be ruled out due to the presence of a nearby pond (335m east). There are small areas of habitat on-site which could provide suitable foraging and sheltering habitat for these species, including the hedgerow, scrub and woodland understorey vegetation.

The site is assessed to have low suitability for other native amphibians.

Badger

The sloping topography in areas of the site (e.g. within the mixed scrub) and the small area of woodland provide suitable conditions for future sett excavation, with good connectivity to the surrounding landscape.

The combination of grassland, scrub and woodland habitats on or in close proximity to the site provide badgers with opportunities to forage and commute, therefore the presence of transient badgers cannot be ruled out.

However, no direct evidence of badgers (e.g. latrines, snuffle holes, hairs, etc.) or badger setts were identified on-site.

The site's influencing distance (30m radius) was also searched, insofar as possible. This included surveying land to the south and east, which mainly comprise buildings, sealed surfaces and modified grassland. Land to the north of the site was observed from the northern site boundary, covering an area of grassland. Land to the west of the site was obscured by boundary vegetation and therefore a thorough search for evidence of badgers was not possible here.

The site is assessed to provide low suitability for foraging badgers and a confirmed absence of badger setts on-site.

Bats

Foraging/Commuting

There are numerous scattered trees and an area of woodland located within the site (Plate C.10), which may contribute to both foraging and commuting opportunities for bats, in combination with tree cover provided across the wider Hayes Park site and nearby Hayes Shrub SINC. These habitats have good connectivity to further habitats in the wider landscape, allowing bats to commute across the site when dispersing from nearby roosts.

Therefore, the site is assessed to provide moderate suitability for foraging and commuting bats, although this is limited to habitats along the north and west site boundaries.

Roosting

Summer/Transitional (Buildings)

The surveyed car park is a two-storey, open-sided, precast concrete structure with brick and mortar parapets on the upper level. On the lower level, a linear gap measuring approximately 3 cm wide by 20 cm deep was identified between precast concrete ceiling sections (Plate C.11). This feature was fully inspected and no signs of bats (e.g. droppings, staining, feeding remains or scratch marks) were recorded. The gap is highly exposed to wind and fluctuating temperatures due to the open-sided nature of the building. Furthermore thick, undisturbed cobwebs along its length indicate a lack of recent use. The smooth concrete material offers no insulation or shelter, and the feature does not provide the enclosed, stable microclimate typically favoured by roosting bats[13]. In addition, artificial lighting and human activity, associated with the temporary adjacent developments works at Hayes Park North contribute further disturbance at this time.

No further PRFs were identified on B1 and consequently it is assessed to be of negligible suitability for roosting bats (summer/transitional).

Summer/Transitional (Trees)

Scattered trees within and adjacent to the site were subject to a GTLA during the site walkover. No PRFs were identified within the trees located within the site boundary. All trees could be suitably inspected from ground-level.

One tree (T118)[11] located 12m southeast of the site, was identified to provide bat roosting suitability). The tree contained numerous PRFs including:

- Butt rot (ground level facing south) and callus roll (2m facing south), both of which open up into large internal cavity extending upwards (PRF-M);
- Pruning wound (7m facing south) on southern branch (PRF-I);
- Knot hole (8m facing south) on Western branch (FAR);
- Knot hole (8m facing west) on Western branch (PRF-I);
- Pruning wound (4m facing west) on trunk (FAR);
- Pruning wound (7m facing north) on northern branch (PRF-I); and
- Additional upwards facing Knot holes and decaying branches (>8m above ground level) which may support additional PRFs not visible from ground level (FAR).

The trees within the area of woodland at the northern extent of the site were much more numerous and foliage limited views of higher branches, therefore these trees are assessed as FAR with regard to the bat roosting suitability.

Winter Hibernation

As above, there are no habitats or structures with PRFs suitable to provide winter hibernation roosts (i.e. thermally stable) present on-site. However, T118 which comprise numerous PRFs is assessed to have high hibernation suitability.

The site is assessed to provide a suitability level of 'none' for roosting bats (winter hibernation), with 'high' bat hibernation suitability within the ZoI due to the presence of T118.

Birds

One birds nest, constructed from grass and leaves (Plate C.12), was identified within the gap in the ceiling of the lower car park level between adjoining concrete sections (as described above). The nest did not appear active at the time of the survey and no active nesting behaviour was observed. No further evidence of nesting activity was identified.

No bird nests (active or inactive) were observed within the trees, hedgerow or introduced shrub on-site, however the habitat structure of these vegetative features offered nesting opportunities and nest-building resources for bird species.

There is a confirmed presence of nesting birds on-site.

Dormouse

No evidence of hazel dormice was identified during the site visit, such as gnawed hazel nuts or nesting structures.

The strips of woodland present on-site are narrow (approximately 15m wide) and of limited extent. Although these strips link eastwards to a larger (approximately 8.7 ha) woodland block (Hayes Shrub SINC), this area is isolated within dense residential development and does not form

part of a wider, connected woodland/hedgerow network required to support dormice populations. Furthermore, the site lacks the diverse shrub and understorey composition (including hazel and honeysuckle) necessary to provide year-round food resources.

A data search undertaken through GiGL (Greenspace Information for Greater London) returned no records of hazel dormouse in the local area, supporting the conclusion that the species is absent from this landscape. Hazel dormice are also considered rare within Greater London, with only a handful of isolated populations persisting regionally.

The site is therefore assessed to provide a suitability level of negligible for hazel dormice. This species is not discussed further within this report.

Invertebrates

Vegetated habitats suitable for foraging and sheltering invertebrates included ruderal vegetation, scrub, hedgerows, scattered trees and woodland.

Furthermore, deadwood found within the woodland may provide habitat for stag beetles (or their larvae). A review of biological records data from GiGL also indicated records of this species locally (closest 0.35km southwest).

The site is considered to have moderate suitability to support protected invertebrates and moderate suitability to support common/widespread species.

Reptiles

No reptiles or evidence thereof were identified during the site walkover. The majority of the site comprised hardstanding, which is not suitable for reptiles due to exposure and predation risks. Vegetated habitats on-site (i.e. ruderal vegetation, hedgerows and woodland understorey vegetation) provide some foraging and sheltering opportunities for reptiles, although these are limited in extent. Opportunities for basking are likely limited as much of the vegetation lacks a southern aspect, which is most ideal for basking.

The presence of the rarest UK reptiles sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca* are considered unlikely, as the site falls far outside of their known ranges.

Overall, the site is assessed to provide low suitability to support reptiles.

Invasive Non-native Species

No INNS listed under Schedule 9 (Wildlife and Countryside Act 1981) were identified on-site on the day of the site walkover.

One LISI category 2 species (snowberry) was identified on-site, growing within the scrub and woodland. Category 3 encompasses "Species of high impact or concern present at specific site that require attention (control, management, eradication, etc.)". The locations of established snowberry plants are indicated by target note 2 (TN2), in Appendix A with target note descriptions in Appendix B.

Two LISI category 3 species were also identified to be growing onsite; cherry laurel was identified in multiple parts of the woodland and buddleia within the open-air, ground floor car park. Category 3 encompasses "*species of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate*". The locations of cherry laurel and buddleia specimens are indicated by target note 3 and 4 (TN3, TN4) respectively, in Appendix A with target note descriptions in Appendix B.

Additionally, green alkanet was identified and is listed under Category 6 of LISI. This category encompasses "species that were not currently considered to pose a threat or have the potential to cause problems in London".

There is a confirmed presence of INNS on-site.

Other Protected Species

The survey also considered the suitability of the site for aquatic mammals such as water vole *Arvicola amphibius*, otter *Lutra lutra* and beaver *Castor fiber*, aquatic species such as fish and white-clawed crayfish *Austropotamobius pallipes* and protected plant species. There was no suitable habitat on or connected to the site, and no evidence or field signs for any of these protected species identified during the site visit. Therefore, it is considered the potential for the site to support other notable/BAP species is negligible. These species are not considered further in this report.

Other Priority/Notable Species

Hedgehog

No evidence of hedgehogs was identified on-site during the walkover, however the hedgerow, scrub and woodland understorey vegetation provide opportunities for hedgehogs to forage and shelter. Transient hedgehogs may commute across the site when moving between more optimal areas of habitat in the local area (e.g. scrub, long sward grassland). Deadwood and brash within the woodland understorey may also provide hibernation opportunities for hedgehogs.

Overall, the site is assessed to provide moderate suitability for hedgehog.

5.0 EVALUATION

5.1 PROPOSALS

The proposed development is expected to comprise the "partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works", as shown in the Landscape Masterplan drawing[19], produced by Studio Egret West, 2025.

5.2 DISCUSSION AND RECOMMENDATIONS

The discussion is provided below on the key ecological receptors that stand to be impacted by and/or could benefit through careful design of, the proposed development. High level commentary on the recommendation for additional targeted survey, appropriate mitigation, compensation and enhancement actions is provided.

Designated Sites

Statutory Sites of International Importance

South West London Waterbodies SPA is located within 10km of the site (9.09km southwest).

Given the considerable distance to the SPA, the absence of habitat connectivity (i.e. extensive urban and suburban development creating barriers), and the fact that the site does not support any of the qualifying habitat features for which the SPA is designated (i.e. large waterbodies), construction-phase impacts are considered unlikely.

Operational-phase impacts (such as habitat degradation from recreational use or dog walking pressures) are likewise unlikely, again due to the site's separation from the SPA.

Consequently, a Habitats Regulations Assessment (HRA) is not considered proportionate for this development. This conclusion should be agreed with the competent authority.

Site of Special Scientific Interest - Impact Risk Zones

The site is located within the IRZ of two SSSIs: Fray's Farm Meadows SSSI located 4.32km northwest and Syon Park SSSI located 10.36km southeast. As above the development is not considered a 'high-risk' development type and therefore no impacts to these SSSIs are anticipated during the construction or operational phases.

Statutory/Non-statutory

There are three LNRs and ten SINCs present within 2km of the site, the closest of these are Yeading Brook Meadows LNR (1.18km east) and Hayes Shrub' SINC (Borough II) (0.04km east), respectively. Given the proximity of Hayes Shrub SINC, this designated site could be subject to direct or indirect impacts during the construction phase of the development, including dust deposition, pollution and artificial lighting. To mitigate negative impacts a Construction Environmental Management Plan (CEMP) should be produced and implemented for the site, and could be secured through planning condition in accordance with BS 42020: 2013 Biodiversity. CEMP measures would likely include, wetting down of bare ground to prevent dust generation, storage of fuel/potentially hazardous chemicals in line with 'Control of Substances Hazardous to Health' (COSHH) regulations and limiting construction to daylight hours.

Significant impacts during the operational phase of the development are considered unlikely as the SINC is largely closed to the public, thereby limiting impacts such as increased recreational pressure and dog walking. The operational phase however may result in increased recreational impacts upon the identified LNRs due to an increase in local population as a result of the development. The provision of communal greenspace is recommended to be provided within the proposed development and for residents to be encouraged to make use of more suitable amenity space such as local parks, reducing the chance of increased footfall at the LNRs.

Habitats

Hedgerows

A native hedgerow, identified as a habitat of principal importance under the NERC Act 2006, is present along the southern site boundary. This hedgerow is understood to be retained within the development, however, it could be subject to negative direct impacts (e.g. damage from construction machinery) or indirect impacts (e.g. pollution or poor materials storage practices) during the construction phase.

Lowland Mixed Deciduous Woodland

Lowland mixed deciduous woodland (also a habitat of principal importance), is also located in close proximity to the site (80m east). Indirect impacts, as described above, could also be caused to this habitat.

To address these risks, the above-mentioned CEMP should incorporate specific measures to avoid both direct and indirect impacts on both the native hedgerow (on-site) and deciduous woodland (off-site). This would include abiding by the root protection areas recommended with the arboricultural report, particularly in relation to T113.

Biodiversity Net Gain

In accordance with the Environment Act, 2021, National Planning Policy Framework (NPPF) 2024, and local policy drivers, development proposals are required to provide a measurable net gain in biodiversity. Where a site is not exempt, the development must deliver a minimum of 10% BNG, which should be evidenced through a Biodiversity Net Gain Assessment (BNGA) using the Statutory Biodiversity Metric (SBM) as appropriate to the site and development. A separate BNGA report is underway for this project.

Species

Amphibians

Native Amphibians

The habitats present on-site (i.e. ruderal vegetation, hedgerow, woodland understorey, etc.) may provide some foraging and sheltering opportunities for common amphibians. No further surveys will be required to assess for the presence of other native amphibians on-site and it is understood that the development is seeking to retain much of its habitat of value. Where suitable habitats require clearance, a precautionary method of working (PMoW) should be implemented to minimize any residual risk to these species. Details of which should be incorporated in the above-mentioned CEMP and measures will include, but are not limited to:

- A phased method of vegetation clearance will be adopted, whereby mixed scrub vegetation (between the existing car park and road) is first hand searched for amphibians by an Ecological Clerk of Works (ECoW). Vegetation is then cut to an increasingly shorter sward on consecutive days (Day 1 - 30cm; Day 2 - 15cm; Day 3 - ground level) in the direction of suitable retained habitat allowing time for smaller species to disperse in between; and
- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations.

Badger

As no evidence of badgers or their setts were identified on-site or within influencing distance, no further surveys are required. However transient badgers may be at risk from injury or death as a result of development works. Therefore, best practice measures should implemented to minimize any residual risk to transient badgers which could forage on-site. Details on best practice measure will be incorporated in the above-mentioned CEMP and will include:

- A pre-commencement inspection of the site and surroundings (30m radius) to search for any new badger activity three months prior to the start of works on-site (N.B. if new setts are discovered further badger surveys may be required);
- Any excavations, ground works or trenches left overnight should be covered or have a ramp installed to allow trapped animals to escape;
- Excavations or trenches should be inspected each morning and evening to ensure no badger (or other animals e.g. hedgehog) have become trapped;
- Storage of construction materials on pallets or hardstanding, and checking for any sheltering animals prior to moving them;
- The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to habitats which badgers could use;
- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations;
- Use of plant and machinery should cease at least two hours prior to sunset and not commence until an hour after sunrise; and
- Alerting a Suitably Qualified Ecologist (SQE) in the event that a mammal burrow is identified on, or within 30m of the site, to advise on how to proceed.

Bats

Foraging/Commuting

As it is understood only a singular tree (T112) is to be felled within the scope of the proposed development. The loss of T112 is likely to be inconsequential for foraging and commuting bats given the presence of more extensive areas of foraging and commuting habitat in the locality. Furthermore, the loss of one tree will require compensatory planting of additional trees under BNG legislation (as above), which is likely to be beneficial to bats in the long-term.

Indirect impacts on foraging and commuting bats may occur during construction due to artificial lighting, however through implementation of mitigation, these impacts will be minimised. Works should be scheduled during day-time hours and, if task lighting is needed at any point, a sensitive

lighting strategy should be implemented. Best practice measures will be incorporated into the above-mentioned CEMP.

Sensitive lighting strategy

Whilst foraging and commuting resources for bats are not formally protected by law, their protection is a material consideration within the planning process. Alterations to lighting levels on-site during both the construction and operational phases of the proposed development may stand to negatively impact established bat flight paths and foraging grounds. Suitable best practice and mitigation detailed below, provide high level recommendations for the design of wildlife friendly lighting on-site. These are based on guidance provided by the Institute of Lighting Professionals (ILP) and BCT [20]:

- Do not increase lighting levels above the current level on-site and reduce where possible;
- Use of low-UV warm-white LED bulbs (< 2,700k) with directional, downward facing and shielded lights which point away from green features such as trees, hedgerows and areas of soft landscaping;
- External lights should be subject to curfew controls where possible with lights on movement sensors on short timers (~30 seconds) to reduce light pollution when not needed;
- Green infrastructure (including hedgerows, woodland and scattered trees) should remain unlit, particularly between April and October, inclusive; and,
- Use of buffer planting to block light spillage into valuable areas of foraging and commuting habitat (e.g. mature trees).

Roosting - Summer/Transitional (Buildings)

The car park is considered to provide negligible suitability for roosting bats and no further surveys or mitigations are therefore required.

Suitable enhancements for the provision of bat roosting, foraging and commuting habitat are provided below.

Roosting - Summer/Transitional (Trees)

T112 is planned to be felled under the proposed development. As this tree did not contain any PRFs there are not anticipated to be any impacts to roosting bats as a result of its felling.

T118, located within the ZoI contained several PRF-M features. As such, this tree should remain unlit during the works and any construction activities should maintain a reasonable distance to avoid disturbance.

If any trees within the woodland (i.e. those categorised as FAR) are later identified to either require felling or significant pruning, a GTLA should be conducted to assess for the presence of PRFs, in line with best practice[13]. A SQE would need to undertake a detailed inspection of the PRFs from ground level, using binoculars where necessary, to either rule out the need for further survey or advise of the appropriate survey/mitigation measures. There is no seasonal constraint to this survey, however it is best conducted during the winter months when foliage is absent and roosting PRFs associated with the trunk and branches are most visible. During the GTLA, if any trees are found to contain PRFs assessed as PRF-M and are proposed for felling or pruning as part of the development, further surveys will be required during the active bat season.

Birds

The trees (including those within the woodland), hedgerows and scrub on-site may provide nesting sites for a variety of bird species. Only one tree (T112) is planned to be felled under the development proposal, with additional scrub removal. These activities could result in the disturbance and subsequent abandonment of active nests, as well as the killing and injury of adult and young birds.

Furthermore, a singular bird nest was identified within the car park ceiling, between two adjoining concrete sections. As the building is demonstrated to provide nesting habitat, any demolition works should be undertaken outside of the bird nesting season, which is typically recognised as March to August, inclusive. If this timeframe cannot be avoided, a nesting bird check should be undertaken by a SQE, no more than 48 hours prior to the commencement of demolition works. All active nests will need to be retained until the young have fledged. Any active nests will need to be retained in-situ until the young have fledged, with a buffer zone implemented between any machinery and active nests until the young have fledged. The SQE is to monitor and advise when works can re-commence in that area.

Equally, timing for tree felling should be scheduled outside of the nesting season. A nesting bird check would also be required of T112, as described above, if this timeframe cannot be accommodated.

Enhancement opportunities for nesting birds are detailed in the subsequent section of this report.

Invertebrates

The site provides a variety of habitats suitable for invertebrates, including deadwood, hedgerow and trees. Given the numerous records for stag beetle locally (nearest located 0.35km southwest), it is recommended that deadwood present within the woodland is retained, preferably in situ. This will continue to provide a foraging resource for the larvae of this species, as well as other saproxylic species which may be present on-site.

Suitable invertebrate enhancement opportunities are detailed below.

Reptiles

The majority of suitable reptile habitat on-site is anticipated to be retained under the development proposals. Although small areas of grassland will be cleared during the construction phase, there remains a low risk that a small number of common reptile species could be present within these areas. Without appropriate mitigation, these individuals could be at risk of injury or mortality.

To address this risk, a PMoW for widespread reptiles will be implemented during construction. The precautionary measures detailed above for amphibians will also safeguard any transient reptiles during the construction phase. These will be incorporated into the above-mentioned CEMP.

Invasive Non-native Species

Four LISI plant species (buddleia, cherry laurel, snowberry and green alkanet) were identified on-site during the walkover. No further invasive species surveys are required, but measures should be adopted to responsibly remove them from the site and prevent further spread.

Measures to safely remove this species from the site should be incorporated into the above-mentioned CEMP. Methods are likely to include: pruning stems/trunks back as low to the ground as possible; excavation of the roots carefully using hand tools, keeping the root system as intact as

possible; and disposal of all plant material (pruned stems and excavated roots) responsibly of in line with local bio-secure waste control measures and DEFRA guidance[21].

Following disposal, the area should be monitored for any regrowth and any new growth should be promptly removed to prevent further spread or re-establishment. A specialist invasive species contractor could be contacted to aid with the correct removal process, if necessary.

Other Priority/Notable Species

Hedgehog

The on-site ruderal vegetation, scrub, hedgerow and woodland understorey habitats provide suitable foraging, sheltering and hibernation habitat for hedgehogs. The majority of these habitats are planned to be retained under the proposed development. However, small areas of these habitats is subsequently required during the construction phase, this could result in the disturbance, killing and injury of hedgehogs.

The clearance of this habitat should be managed through a precautionary staged clearance to minimise the risk of killing and/or injuring hedgehogs. Clearance works should be undertaken under ecological watching brief by an ECoW who will initially complete a hand search of suitable impacted habitats, moving any hedgehogs to a suitable area of habitat that is not subject to clearance. A phased clearance comprising a systematic cutting, as described above for amphibians, can then take place. This method will allow any hedgehogs present to disperse into adjacent suitable habitat. Additional details should be recorded in the above-mentioned CEMP.

To mitigate impacts on hibernating individuals, vegetation clearance should be avoided during the main hibernation period (October–March) where possible. If works must occur during this period, pre-clearance checks of likely hibernation features should be carried out by the ECoW, and any confirmed hibernating hedgehogs should be carefully relocated to purpose-built hibernation boxes or retained suitable habitat outside of the working area. Contractors should also be briefed on the potential presence of hibernating hedgehogs and instructed to exercise caution when working near piles of vegetation, timber or debris.

As there will be a loss of habitats with suitability to support hedgehogs, habitats of similar value should be included within the landscaping proposals to compensate for this loss.

Ecological Enhancements

Where feasible, it is recommended that the following ecological enhancements could and should be incorporated within the site design going forward (list is not exhaustive):

Habitats

- Enhancement of existing areas of species-poor, modified grassland which will be retained in the wider site with a variety of native wildflowers and grassland species; and
- Planting of native tree and shrub species, such as beech, field maple, hazel, hornbeam and rowan *Sorbus aucuparia* in appropriate locations and buffering existing, similar habitat where feasible.

Species

Bats

- Integration of 15 bat boxes into the brick courses of new buildings to provide additional roosting habitat for these BAP species. Specifications are as follows:
    - Boxes should comprise woodcrete or insulating concrete for long lasting durability, with suggested integrated box models including the Habibat Bat Box[22] or Ibstock Enclosed Bat Box[23];
    - Boxes should be integrated into southeast elevation of the new building approximately 5-7m above ground level with clear flight paths (i.e. no obstructing trees or vegetation) at least 5m in front of the box; and
    - Alternative box models and/or placements to be discussed and agreed with an ecologist prior to installation.

Birds

- Integrate ten swift boxes into the brick courses of new buildings at the site to provide additional nesting habitat for this UK BAP species in line with the measures outlined in the British Standard "Integral nest boxes. Selection and installation for new developments. Specification" (BS 42021:2022). (N.B. Swift bricks are considered a "universal nest brick" for small bird species, including red-listed species such as common swift, house sparrow, house martin, and starling). Recommended specifications are as follows:
    - Suitable boxes include the Ibstock Swift Eco Habitat[24], or similar alternative brand.
    - Swift bricks should be integrated into the fabric of the new buildings during construction. Boxes should be positioned close together (0.6-1.0m between bricks) as swifts prefer to nest gregariously.
    - The boxes should be placed at least 5m above ground level ideally under the eaves of the buildings, on north or east elevations, where they will be sheltered from prevailing wind, rain and strong sunlight. To be suitable for swifts, the bricks require an open aspect with no trees or large shrubs obstructing the birds' flight path up to 5m from the brick.
- Integrate six house sparrow terraces on the new buildings to target additional nesting provision towards this UK BAP species. Recommended specifications are as follows:
    - The box should comprise woodcrete or insulating concrete for long lasting durability and can be integrated into the brick course (e.g. Woodstone Estella House Sparrow Nest Box[25]);
    - The box should be integrated/installed at least 5m above ground level ideally under the eaves or building overhang, on north or east elevations, where they will be sheltered from prevailing wind, rain and strong sunlight;
    - Sparrow terraces should be installed in close proximity to one another or clustered, as they prefer to nest gregariously; and
    - Alternative box models and/or placements to be discussed and agreed with an ecologist prior to installation.

- Integrate four open-fronted nest boxes into the new buildings to target additional nesting provision for spotted flycatcher, a UK BAP species. Recommended specifications are as follows:
    - The box should be of woodcrete or insulating concrete construction to ensure long-lasting durability and low maintenance (e.g. Build-In Half Open WoodStone Nest Box[26]);
    - Boxes should be integrated or installed between 2–4m above ground level on sheltered north or east facing elevations, ideally positioned near open areas with scattered trees or shrubs to provide suitable foraging habitat;
    - Boxes should be sited singly and not in close clusters, as spotted flycatchers are solitary nesters; and
    - Alternative box models and/or placements should be discussed and agreed with an ecologist prior to installation.

Invertebrates

- Installation of invertebrate features as part of soft and hard landscaping, post development to provide further sheltering and foraging habitat. Recommendations are as follows:
    - Bee bricks can be incorporated into the brick course of the new building, such as Green&Blue Bee Brick[27]. It should be installed at least 1m high (no maximum limit) on a south-facing wall, with no obscuring vegetation;
    - Bee posts can be installed amongst soft landscaping, such as Green&Blue Bee Post[28]. These should be south facing and positioned in a sunny spot;
    - Creation of additional log piles and/or stag beetle loggeries, ideally using timber sourced from the felling of T112 to retain the wood on-site, and provide habitat for saproxylic invertebrate species; and
    - Landscaping should favour native shrub and tree species, as well as RHS Plants of Pollinators[29] species to provide a variety of foraging opportunities on-site.

General Recommendations

Construction Environmental Management Plan

It is recommended that a CEMP should be produced and implemented for the site, providing greater detail on the mitigation measures set out above, which should be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

Landscape Ecological Management Plan

It is recommended that a Landscape and Ecological Management Plan (LEMP) is produced and implemented for the site, providing greater detail on the long-term management and enhancement measures outlined above.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'[30] should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid

and will need to be updated (subject to an assessment by a professional ecologist). This report has been undertaken in September 2025.

6.0 CONCLUSION

Greengage was commissioned by Shall Do Hayes Development Ltd to undertake a PEA for the site known as Hayes Park West, Hayes Park, Uxbridge, UB4 8FE, in order to establish the ecological value of the site and its potential to support protected/priority habitats and species.

The PEA identified the following ecological constraints associated with the site:

- Presence of a European Site within 10km (South West London Waterbodies SPA is located 9.09km southwest of the site);
- The site is located within the IRZ of two SSSIs: Fray's Farm Meadows SSSI located 4.32km northwest and Syon Park SSSI located 10.36km southeast;
- Presence of three statutory LNRS and ten non-statutory SINCs within 2km, the closest of which is Hayes Shrub SINC (Borough II) (0.4km east);
- Low suitability for widespread amphibians;
- Low suitability for badgers;
- Low suitability for foraging and commuting bats;
- A confirmed presence of nesting birds within the car park;
- Moderate suitability for common invertebrates;
- Low suitability for reptiles;
- Moderate suitability for hedgehogs; and
- A confirmed presence of the invasive non-native species (buddleia, cherry laurel and snowberry) which are listed under LISI.

No further targeted survey have been recommended for any species, as impacts to ecological receptors can be suitably inferred from the data collected during the site survey.

Key mitigation, compensation and enhancement actions have been recommended to enable legislative and policy compliance (see context at Appendix E).

Key actions as mentioned above should be included within CEMP and LEMP documents for the site, which could be secured through planning condition.

A separate BNGA report for the site is underway, using the Statutory Biodiversity Metric (SBM) in accordance with the Environment Act, 2021, NPPF 2024, and local policy drivers.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys' should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report has been undertaken in September 2025.

APPENDIX A UKHAB MAP

Figure A.1 UKHAB Survey Results

HAYES PARK WEST

- Site Boundary
- Target Notes

Habitats

- g4 - Modified grassland
- h3h - Mixed scrub
- u1 - Built-up areas and gardens
- u1b5 - Buildings
- u1b6 - Other developed land
- w1h5 - Other woodland, mixed, mainly broadleaved

Secondary habitat codes

- 81 - Ruderal or ephemeral
- 89 - Other green roof
- 200 - Trees

Hedges

- h2a6 - Other native hedgerow

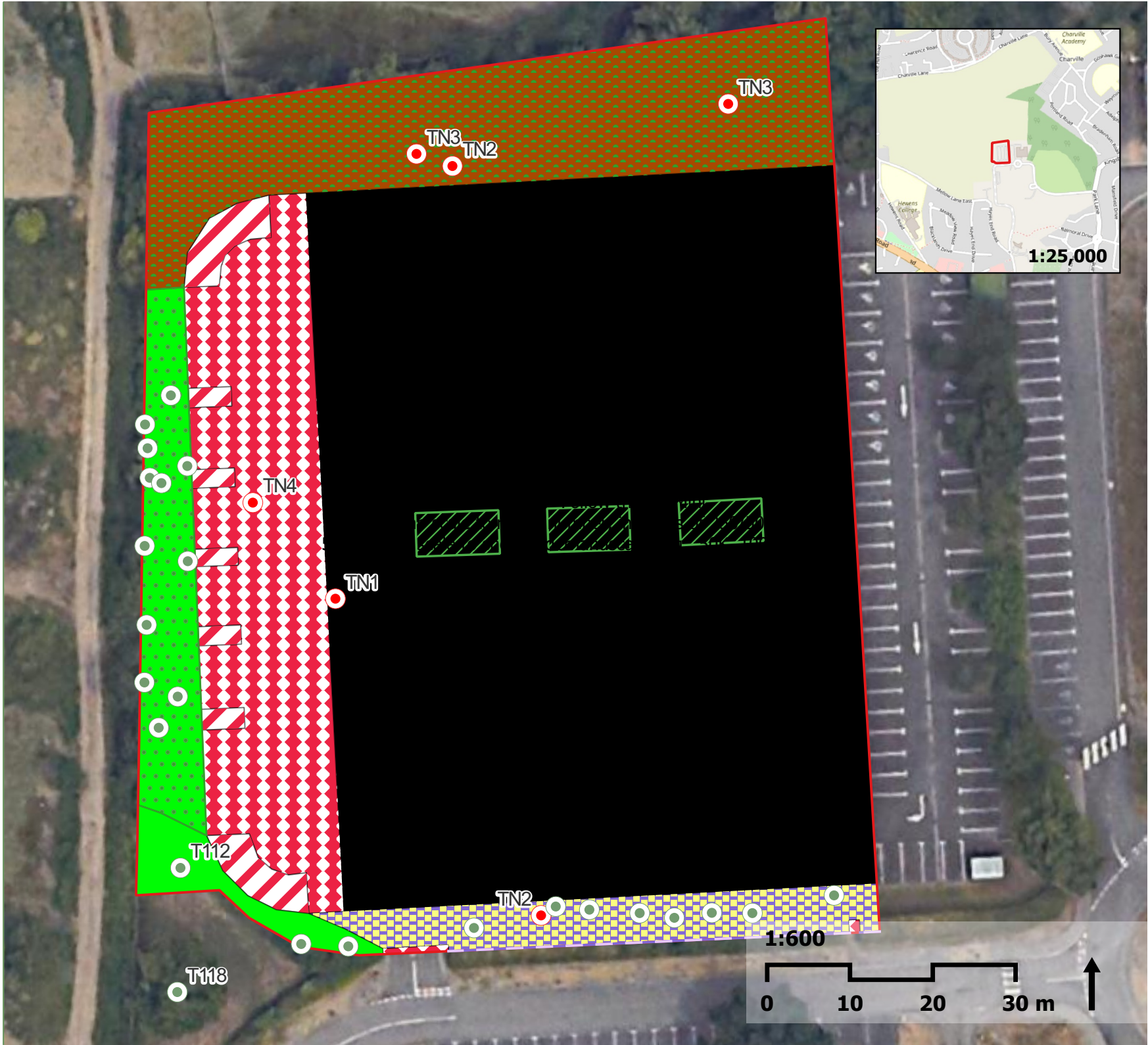
Title: Figure A.1 UKHab Survey Result

Drawn by: BN
Date: 15/09/2025

Reviewed by: LT
Date: 15/09/2025

Project number: 553349
Sources: Google Satellite Imagery, ESRI World Topo

Greengage



APPENDIX B TARGET NOTES

Target Note Reference	Description
TN1	Bird nest
TN2	Snowberry shrubs
TN3	Cherry laurel trees
TN4	Buddleia shrubs

APPENDIX C SITE PHOTOGRAPHS

Plate C.1 *Upper floor of the on-site car park.*

Plate C.2 *Pedestrian access bridge connecting the road to the upper level of the car park.*

Plate C.3 *Material storage and artificial lighting within the lower level of the car park.*

Plate C.4 *Newly created rooms within the lower car park level, functioning as contractor office space and welfare facilities.*

Plate C.5 *Raised planting beds*

Plate C.6 *Buddleia shrubs within the open-air section of the lower ground car park.*

Plate C.7 *Modified grassland towards the southern extent of the site.*

Plate C.8 *Other native hedgerow, located adjacent to the road at the southern extent of the site.*

Plate C.9 *Snowberry scrub, located between the car park and hedgerow.*

Plate C.10 *Woodland located north of the car park.*

Plate C.11 *Linear ceiling gap viewed from the lower car park level.*

Plate C.12 *Bird nest locating between adjoining roof sections of the car park.*

APPENDIX D DESK STUDY RECORDS

Table D.1 Full list of bird species returned during GiGL data review, and protective status of each species.

Common Name	Scientific Name	WCA/BoCC5 Status
Fieldfare	*Turdus pilaris*	WCA S1/Red
Hen Harrier	*Circus cyaneus*	WCA S1/Red
Merlin	*Falco columbarius*	WCA S1/Red
Whimbrel	*Numenius phaeopus*	WCA S1/Red
Black Redstart	*Phoenicurus ochruros*	WCA S1/Amber
Green Sandpiper	*Tringa ochropus*	WCA S1/Amber
Redwing	*Turdus iliacus*	WCA S1/Amber
Whooper Swan	*Cygnus cygnus*	WCA S1/Amber
Brambling	*Fringilla montifringilla*	WCA S1
Firecrest	*Regulus ignicapilla*	WCA S1
Kingfisher	*Alcedo atthis*	WCA S1
Little Ringed Plover	*Charadrius dubius*	WCA S1
Red Kite	*Milvus milvus*	WCA S1
Wryneck	*Jynx torquilla*	WCA S1
Cuckoo	*Cuculus canorus*	Red
Grasshopper Warbler	*Locustella naevia*	Red
Greenfinch	*Chloris chloris*	Red
Grey Partridge	*Perdix perdix*	Red
Herring Gull	*Larus argentatus*	Red
House Martin	*Delichon urbicum*	Red
House Sparrow	*Passer domesticus*	Red
Lapwing	*Vanellus vanellus*	Red
Lesser Spotted Woodpecker	*Dryobates minor*	Red
Linnet	*Linaria cannabina*	Red
Mistle Thrush	*Turdus viscivorus*	Red
Nightingale	*Luscinia megarhynchos*	Red
Ring Ouzel	*Turdus torquatus*	Red
Skylark	*Alauda arvensis*	Red
Smew	*Mergellus albellus*	Red
Spotted Flycatcher	*Muscicapa striata*	Red
Starling	*Sturnus vulgaris*	Red
Swift	*Apus apus*	Red
Tree Pipit	*Anthus trivialis*	Red
Whinchat	*Saxicola rubetra*	Red
White-fronted Goose	*Anser albifrons*	Red

Common Name	Scientific Name	WCA/BoCC5 Status
Woodcock	*Scolopax rusticola*	Red
Yellow Wagtail	*Motacilla flava*	Red
Yellowhammer	*Emberiza citrinella*	Red
Common Redpoll	*Acanthis flammea*	Red
Barnacle goose	*Branta leucopsis*	Amber
Common Tern	*Sterna hirundo*	Amber
Dunnock	*Prunella modularis*	Amber
Grey Wagtail	*Motacilla cinerea*	Amber
Lesser Black-backed Gull	*Larus fuscus*	Amber
Mediterranean Gull	*Ichthyaetus melanocephalus*	Amber
Pied Flycatcher	*Ficedula hypoleuca*	Amber
Reed Bunting	*Emberiza schoeniclus*	Amber
Short-eared Owl	*Asio flammeus*	Amber
Song Thrush	*Turdus philomelos*	Amber
Tawny Owl	*Strix aluco*	Amber
Baltic Gull	*Larus fuscus*	Amber
Ruddy Shelduck	*Tadorna ferruginea*	Green
Sand Martin	*Riparia riparia*	Green
Little Egret	*Egretta garzetta*	Green
Golden Plover	*Pluvialis apricaria*	Green
Lesser Whitethroat	*Sylvia curruca*	Green

APPENDIX E RELEVANT LEGISLATION AND POLICY

E.1 LEGISLATION

Current key legislation relating to ecology includes the Environment Act 2021[31], Wildlife and Countryside Act 1981 (as amended)[32]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[33], The Countryside and Rights of Way Act 2000 (CRoW Act)[34], and The Natural Environment and Rural Communities Act, 2006[35].

The Environment Act, 2021

Under the Environment Act[36], 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[37], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[38], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[39] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[40] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (Erinaceus europaeus), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[41] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[42] (and Biodiversity 2020 strategy[43] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[44] and EU Biodiversity Strategy (EUBS)[45], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2019 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

Legislation Relating to Badger

Badgers and their setts are protected under the Protection of Badgers Act 1992, an Act which consolidated and strengthened previous legislation, including the Badgers (Further Protection) Act 1991, the Badgers Act 1991 and the Badgers Act 1973. In England and Wales, it is an offence to:

- Wilfully kill, injure or take a badger;
- Attempt to kill, injure or take a badger;
- Cruelly ill-treat a badger;
- Dig for a badger;
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it;
- Cause a dog to enter a badger sett; or
- Disturb a badger when it is occupying a sett.

A licence may be obtained from the appropriate authority (Natural England or Natural Resources Wales) to carry out any activities prohibited by the Act, subject to the conditions of the licence being adhered to.

Legislation Relating to Bats

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.

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.

The Wildlife & Countryside Act 1981 (WCA) 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, 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 2019, 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.

Legislation Relating to Birds (Nesting)

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2019. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential

development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

Legislation Relating to Invasive Non-native Species

Section 14 of the Wildlife and Countryside Act 1981 (as amended) prevents the release into the wild of certain plants and animals which may cause ecological, environmental or socio-economic harm. It prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed on Schedule 9 of the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated. The Schedule also includes some native species (for example barn owl) in order to provide a level of control to ensure that releases, in particular reintroduction programs, are carried out in an appropriate manner and biodiversity is properly safeguarded.

E.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024**Error! Bookmark not defined.** 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.

Regional

The London Plan[46]

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[47]

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".

Local

Hillingdon Local Plan: Part 1[48]

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. 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

[1] *GOV.UK., (2021). Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted*
[2] *GOV.UK., (2023). National Planning Policy Framework. [online] Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2*
[3] *GOV.UK. (2023). Statutory Biodiversity Metric. Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides*
[4] *BSI, (2013). British Standard 42020:2013: Biodiversity — Code of practice for planning and development, BSI Standards Publication.*
[5] *CIEEM, (2019). Advice Note - On The Lifespan Of Ecological Reports and Surveys' April 2019.*
[6] *UKHab Ltd (2023); UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*
[7] *CIEEM, (2017). Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.*
[8] *MAGIC, (2019). Interactive Map. (Partnership project involving six government organisations: Defra (Department for Environment, Food and Rural Affairs); English Heritage; Natural England; Environment Agency; Forestry Commission; Department for Communities and Local Government). Available at: www.magic.gov.uk.*
[9] *UNEP (2022). Kunming-Montreal Global Biodiversity Framework to 2030. Available at https:// Kunming-Montreal Global Biodiversity Framework | UNEP - UN Environment Programme*
[10] *HM Government, (2006). Natural Environment and Rural Communities Act 2006. HMSO*
[11] *TMA (2025). BS 5837 Tree Survey Plan [Ref: 250569-TMA-XX-DR-AP-2100-P00 Tree Survey.pdf].*
[12] *Bickmore, C.J. (2002) Hedgerow survey handbook: a standard procedure for local surveys in the UK. London, DEFRA.*
[13] *Collins, J (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.*
[14] *Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.*
[15] *UK Biodiversity Partnership (1994). UK Biodiversity Action Plan (UK BAP [online]. Available at: https://jncc.gov.uk/our-work/uk-bap/*
[16] *London Biodiversity Partnership (1999). London's BAP priority habitats. Available at: https://www.lbp.org.uk/londonhabspp.html#parks*
[17] *Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021); The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747. Available online at https://britishbirds.co.uk/content/status-our-bird-population*
[18] *Greengage (2023). Preliminary Ecological Appraisal: Hayes Park [ref: 552014ltMay23FV04_PEA].*
[19] *Studio Egret West (2025). Landscape Masterplan [ref: 0489-SEW-HPW-00-DR-L-001001.pdf].*
[20] *Institute of Lighting Professionals (2023). Bats and artificial lighting at night. Available at: https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/*
[21] *Natural England, DEFRA and Environment Agency (2022). How to stop invasive non-native plants from spreading. [Online]. Available at: https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants#dispose-of-plant-material*
[22] *Habibat (2024). Habibat Bat Boxes and Access Tiles. Available at: https://www.habibat.co.uk/bat-boxes*
[23] *Natural History Book Service (2024). Ibstock Enclosed Bat Box 'C'. Available at: https://www.nhbs.com/ibstock-enclosed-bat-box-c*
[24] *Ibstock (2024). Swift box. Available at: https://www.ibstock.co.uk/product/ecohabitats/swift-box?page=1&*
[25] *Vivara Pro (2025). Woodstone Estella House Sparrow Nest Box [Online]. Available at: https://www.wildcare.co.uk/vivara-pro-woodstone-build-in-11265.html*
[26] *Wildcare (2025). Build-In Half Open WoodStone Nest Box [Online]. Available at: https://www.wildcare.co.uk/buildin-half-open-woodstone-nest-box.html*
[27] *Green&Blue (2025). Bee Brick [Online]. Available at: https://www.greenandblue.co.uk/products/bee-brick?srsltid=AfmBOopsKqaBSsor9H_yeXI8MWlE2a5dbe-OimR9IRttFkll_-05PfNE*
[28] *Green&Blue (2025). Beepost [Online]. Available at: https://www.greenandblue.co.uk/products/beepost?srsltid=AfmBOop4Pb4OlmGCGexw6aiVoa_PwULvFRnFfGhZxL3Z_DfSb1h2BecC*

[29] *Royal Horticultural Society (2025). RHS Plants for pollinators [Online]. Available at: https://www.rhs.org.uk/science/research/plants-for-pollinators*
[30] *CIEEM, (2019). Advice Note - On The Lifespan Of Ecological Reports and Surveys' April 2019.*
[31] *GOV.UK., (2021). Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted*
[32] *HM Government, (1981). Part I and Part II of Wildlife and Countryside Act (as amended). HMSO.*
[33] *HM Government, (2019). The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Statutory Instrument 2019 no. 579.*
[34] *HM Government, (2000). The Countryside and Rights of Way Act. HMSO.*
[35] *HM Government, (2006). Natural Environment and Rural Communities Act 2006. HMSO.*
[36] *GOV.UK. (2021). Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted*
[37] *HM Government, (1994). The Conservation (Natural Habitats, &c.) Regulations. HMSO.*
[38] *CEC (Council of the European Communities), (1992). Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.*
[39] *The European Parliament And Of The Council, (2009). Directive 2009/147/EC On The Conservation Of Wild Birds (Codified Version).*
[40] *CEC (Council of the European Communities), (1979). Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 19.IX.1979). EC.*
[41] *UK Biodiversity Action Plan, (2007). UKBAP Priority Species and Habitats. https://jncc.gov.uk/our-work/uk-bap-priority-species/*
[42] *JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), (2012). UK Post-2010 Biodiversity Framework. July 2012. Available from: http://jncc.defra.gov.uk/page-6189*
[43] *Defra, (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem services.*
[44] *UNEP (2022). Kunming-Montreal Global Biodiversity Framework to 2030. Available at https:// Kunming-Montreal Global Biodiversity Framework | UNEP - UN Environment Programme*
[45] *European Commission, (2012). Our life insurance, our natural capital: an EU biodiversity strategy to 2020 European Parliament resolution of 20 April 2012 on our life insurance, our natural capital: an EU biodiversity strategy to 2020 (2011/2307(INI)).*
[46] *Greater London Authority, (2021). The London Plan: The Spatial Development Strategy for Greater London (GLA).*
[47] *Greater London Authority, (2018). London Environment Strategy 2018. London: Greater London Authority.*
[48] *Hillingdon Council (2012). Hillingdon Local Plan: Part 1 [Online}. Available at: https://www.hillingdon.gov.uk/local-plan-and-review*