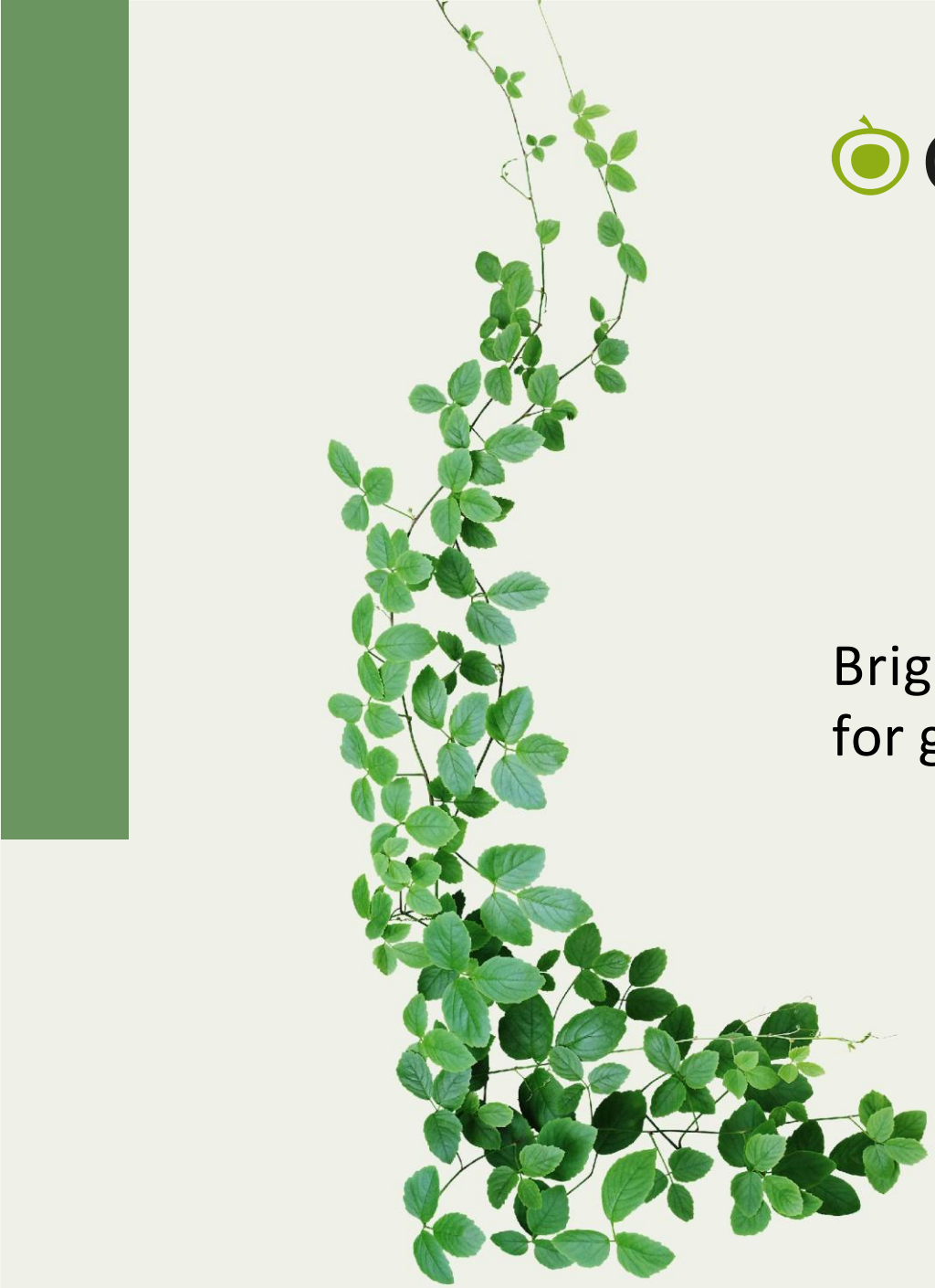
Greengage

Brighter strategies
for greener projects



Client: Shall Do Hayes Developments Limited

Project: Hayes Park South and West

Report: Ecological Management Plan

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	February 2026	May 2026
Comments:		
Prepared by:	Laura Thomas	Laura Thomas
Authorised by:	Abbie Case	Charlotte Hammond
File Reference:	553135lt13May26FV01_EMP.docx	553135lt13May26FV01_EMP.docx

CONTENTS

Tables

Figures

Plates

No table of figures entries found.

1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned in March 2025 by Shall Do Hayes Developments Limited ('the Applicant') to produce an Ecological Management Plan (EMP) to cover a period of five years for Hayes Park South and West, Hayes End Road, Hayes, UB4 8FE ('the site') in the London Borough of Hillingdon.

The granted planning application (12853/APP/2023/1492) for site includes the "*Change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.*"

This document has been produced to address Condition 14 of the granted planning application for the proposed development at the site. The condition states:

"Prior to the completion of works to the buildings, a scheme for the management and enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living walls and/or roofs) and the fabric of the new built form (i.e. bat and bird boxes). The scheme shall include a plan with the features annotated and the development must be built and operated in accordance with the approved scheme.

REASON: To ensure the development contributes positively to the ecological value of the area in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan: Parts 2 (2020) and Policies G6 and G7 of the London Plan (2021)."

A Preliminary Ecological Appraisal (PEA)[1] was undertaken by Greengage on the 8th April 2022 and identified a Site of Importance for Nature Conservation (SINC), which lies immediately off-site to the north-east, and the presence of Biodiversity Action Plan (BAP) priority deciduous woodland immediately off-site. As well as the site having low suitability/potential for foraging bats, foraging badger *Meles meles* and hedgehog *Erinaceus europaeus* as well as moderate potential for nesting birds and stag beetle *Lucanus cervus*. No further surveys were required however recommendations were made within the PEA to enhance the site for the above-mentioned ecological receptors. Additionally, potential invasive non-native species Cotoneaster sp. was identified during the PEA which was recommended for removal.

Targeted ecological enhancements have been specified in light of baseline conditions, contemporary best practice, local conservation targets (such as BAP priorities), relevant planning policy, and proposed development details. Enhancements have been incorporated into the landscaping proposals and will seek to create habitat suitable for supporting rare, protected and notable ecological receptor. The development secures Biodiversity Net Gain (BNG) with a 72.70% uplift in Habitat Units (HU) and a 10.27% uplift in Hedgerow Units (HeU) as demonstrated by the Biodiversity Net Gain Assessment (BNGA)[2] undertaken by Greengage in May 2023. Enhancements for the site include wildlife friendly planting in the form of wildflower meadows and tree planting, integrated bird and bat boxes on buildings, hanging bird and bat boxes in trees, reptile and invertebrate features and on-going wildlife sensitive management.

BNG will be delivered in the medium to longer terms as a result of the proposed ecological enhancements and site management. Monitoring of the recommended management of the site for bats, birds and invertebrates will take place annually within the first three years so that remedial actions can be performed accordingly.

2.0 INTRODUCTION

Greengage Environmental Ltd was commissioned in March 2025 by Shall Do Hayes Developments Limited ('the Applicant') to produce an Ecological Management Plan (EMP) for Hayes Park South and West, Hayes End Road, Hayes, UB4 8FE ('the site') in the London Borough of Hillingdon.

The production of an EMP was identified in order to discharge condition 14 of the planning consent (ref: 12853/APP/2023/1492) for the proposed development at the site. The condition states:

"Prior to the completion of works to the buildings, a scheme for the management and enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living walls and/or roofs) and the fabric of the new built form (i.e. bat and bird boxes). The scheme shall include a plan with the features annotated and the development must be built and operated in accordance with the approved scheme.

REASON: To ensure the development contributes positively to the ecological value of the area in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan: Parts 2 (2020) and Policies G6 and G7 of the London Plan (2021)."

1.1 AIMS AND OBJECTIVES

This document aims to collate the site-wide ecological design concepts and provide a future management regime at the site.

This plan details enhancement specifications to include creation of wildflower meadows and tree planting, bird and bat boxes in buildings, hanging bird and bat boxes in trees, reptile and invertebrate features to be incorporated into the scheme and on-going wildlife sensitive management.

Enhancements are targeted at specific ecological receptors of note, known to be in the area, reflecting contemporary best practice and objectives of local conservation groups, Biodiversity Action Plans (BAPs) and planning policy.

This plan also outlines a five year programme of management and three year programme of monitoring which will be undertaken by Suitably Qualified Ecologist (SQE) where required.

1.2 PROPOSED SCHEME

The granted planning application (12853/APP/2023/1492) for site includes the *"Change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works."*

1.3 SITE LOCATION AND DESCRIPTION

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

The site forms part of the Hayes Park Business Estate which encompasses three former office buildings, associated carparking and soft landscaping. This report supports the development associated with Hayes Park Central and Hayes Park South buildings, which includes two concrete

Grade II listed former office buildings associated carparking, access driveways and footpaths surrounded by low-cut well-maintained grassland, introduced shrub, scattered trees and species poor hedgerow.

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

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

3.0 ECOLOGICAL BACKGROUND

1.4 BASELINE CONDITIONS

A Preliminary Ecological Appraisal (PEA)[1] was undertaken by Greengage on the 8th April 2022 and comprised a detailed systematic survey of the site to identify the extent, distribution, type and categories of the different habitats on site and identify the potential value for legally protected or priority species at the site. The PEA identified value for a number of notable and protected species and habitats including:

- Confirmed presence of Hayes Shrub SINC which lies immediately off-site to the north-east;
- Confirmed presence of BAP priority habitat deciduous woodland associated with the SINC immediately off-site;
- Low potential for foraging badger onsite;
- Low suitability for foraging bats on site;
- Moderate potential for nesting birds associated within the woodland and scatted trees on site;
- Moderate potential for invertebrates such as stag beetle using the standing deadwood and invertebrate hotels on site; and
- Low potential for BAP species foraging, sheltering and hibernating hedgehog, associated with introduced shrub and modified grassland on site.

Whilst value for reptiles was negligible on-site, immediately off-site in the large expanse of rough grassland parkland habitat was considered to have moderate potential for reptiles. Recommendations were made within the PEA to enhance the site for the above-mentioned ecological receptors.

1.5 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[3] 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)[4].

Local BAPs (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.

London BAP

The London BAP[5] is subdivided into HAPs and Species Action Plans SAPs, which set out objectives and actions to be taken to support priority habitats and species in a Greater London context. The following are potentially of importance to the site:

- Parks and Urban Greenspaces HAP;
- Meadows and pastures (are listed as an important habitat);
- Built Structures (are listed as an important habitat);
- Bats SAP;
- House sparrow *Passer domesticus* SAP;
- Reptiles SAP;
- Stag beetle SAP; and
- Black redstart *Phoenicurus ochruros* (are listed as an important species).

3.2 COMPETENCIES

Laura Thomas 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 2 Class Licence and is an Associate member of CIEEM. Laura has over eight years' experience in the commercial sector.

Abbie Case, Senior Consultant, has a BSc (Hons) in Ecology and Conservation, an MSc in Conservation Biology and is an Associate member of CIEEM. Abbie has over seven years in ecological survey and assessment and holds a Natural England Great Crested Newt Licence, and is a Level 4 botanist as accredited by FISC.

Charlotte Hammond, Associate, has an undergraduate degree in Geography (BSc Hons), two postgraduate degrees in Environmental Bioscience in a Changing Climate (MSc) and Landscape Architecture (MA). Charlotte is an Associate member of both CIEEM and Landscape Institute and holds a Natural England bat and Great Crested Newt Licence. Charlotte has over 12 years' experience in ecological surveys and consultancy.

This report was written by Laura Thomas and reviewed by Abbie Case and verified by Charlotte Hammond who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

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

4.0 ECOLOGICAL ENHANCEMENTS

1.6 OVERVIEW

The proposed development provides the potential to enhance the biodiversity value of the site. This will primarily be achieved by the introduction of features within the landscaping proposals and actions within the long-term management regime for the site, targeting specific ecological receptors.

The creation of specific habitats and attraction of notable and protected ecological receptors will complement the targets of national and local policy and BAPs.

Specifically, the proposals will seek to enhance the on-site habitat for the following species:

- Foraging and roosting bats (UK and London BAP priority species);
- Birds known to favour the built environment (including swift *Apus apus* as well as London BAP and important species house sparrow and black redstart);
- Reptile habitat (as per London BAP); and
- Invertebrates (including London BAP species stag beetle as well as Lepidoptera species through the inclusion of stag beetle loggeries, larval and nectar plants, and solitary bees and wasps through provision of burrowing habitat).

As per Chapter 8 of the Design and Access Statement (DAS)[6] produced by Studio Egret West, the landscape strategy includes:

- Wildflower meadows in the form of pastoral meadows and perennial meadows embankment and arrival area to include herbaceous planting;
- Tree planting;
- Woodland understory planting (mapped as shrubs and herbaceous planting in Appendix A).

The following enhancements are to be included at the site:

- Provision of bird and bat boxes mounted on the buildings and surrounding trees;
- Provision of reptile features;
- Provision of invertebrate enhancement features log piles, invertebrate hotels; and
- Wildlife sensitive management.

Detail on these features and specifications are provided in the chapter below.

The site is located 5.6 km north of Heathrow Airport and therefore within the statutory radius (13 km) for aerodrome safeguarding consultation. Some bird species are identified as 'hazardous species' of birdstrike concern[7] by the Combined Aerodrome Safeguarding Team (CAST) and as such measures to increase the value of the site for these species should be avoided in line with the Bird Hazard Management Plan (BHMP) produced by Greengage in February 2026[8]. This has been taken into consideration when selecting appropriate species mixes and specifications within the landscaping.

1.7 WILDFLOWER MEADOW

Pastoral Meadow

The DAS does not describe the type of wildflower meadow mix that will be used. As the site is situated on London Clay as described in the Phase 2 Site Investigations Report undertaken by Lustre Consulting in May 2025[9], the British Native Meadow Wildflower Seed Mix For Clay Soil[10] would be suitable however should be confirmed by a landscape architect. The seed mix comprises the following native species:

- Autumn Hawksbit *Scorzoneroides autumnalis*;
- Betony *Stachys officinalis*;
- Birdsfoot Trefoil *Lotus corniculatus*;
- Corn Poppy *Papaver rhoeas*;
- Lady's Bedstraw *Galium verum*;
- Lesser Knapweed *Centaurea nigra*;
- Meadow Buttercup *Ranunculus acris*;
- Meadow Vetchling *Lathyrus pratensis*;
- Musk Mallow *Malva moschata*;
- Oxeye Daisy *Leucanthemum vulgare*;
- Ragged Robin *Silene flos-cuculi*;
- Ribwort Plantain *Plantago lanceolata*;
- Selfheal *Prunella vulgaris*;
- Sorrel *Rumex acetosa*;
- White Campion *Silene latifolia*;
- Wild Carrot *Daucus carota*;
- Yarrow *Achillea millefolium*;
- Yellow Rattle *Rhinanthus minor*;
- Browntop bent *Agrostis capillaris*;
- Crested dogstail *Cynosurus cristatus*;
- Strong creeping red fescue *Festuca rubra ssp. rubra*;
- Chewings fescue *Festuca rubra ssp. commutata*;
- Slender creeping red fescue *Festuca rubra ssp. littoralis*;
- Yellow oat grass *Trisetum flavescens*; and
- Sweet vernal grass *Anthoxanthum odoratum*.

Of the above, 15 of the herbaceous species are listed as Royal Horticultural Society (RHS) Plants for Pollinators[11] which will increase foraging resources for invertebrates and subsequently birds and bats.

Management

There will be an initial spring cut to 7.5cm in height no later than the end of April to create lighter, more open conditions at ground level, allowing wildflower seedlings to establish, access sunlight, and compete more effectively with the grasses as the growing season begins. There will be a late summer cut in between late June and the end of August, the arisings will be left for a few days to allow the seeds to drop and will be removed to be composted or baled to help reduce the soil fertility. There will also be one or two cuts between the end of August and late November. During the winter the grass will be kept mown so it is short throughout the winter, all arisings will be removed immediately.

The establishment of wildflowers may only begin after one year of establishment, so flexibility and expertise are required. If following the initial years of establishment the grasses outcompete the wildflowers then yellow rattle will be sown in August to help manage a potentially dominant grass meadow.

Invasive non-native species, and where feasible nuisance species such as creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved *dock Rumex obtusifolius*, common nettle *Urtica dioica,* creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*, will be removed.

Perennial meadow

There is a perennial meadow mixture proposed for the embankments at site as well as an area at the entrance of the site. The perennial meadow embankment will comprise a mix of native grasses such as

- Sheep's fescue *Festuca ovina*;
- Red fescue *Festuca rubra*;
- Crested hair-grass *Koeleria macrantha*;
- Common bent *Agrostis capillaris*;
- Brown bent *Agrostis vinealis*;
- Sweet vernal grass *Anthoxanthum odoratum*;
- Crested dogstail *Cynosurus cristatus*;

Intermixed with the following species those of which have been included in the RHS Plants for Pollinators Lists.

- Allium sp. (*Allium cernuum* and *Allium sphaerocephalon*);
- Crocus 'Cream Beauty' *Crocus chrysanthus*;
- Yarrow 'Terracotta' *Achillea* sp.;
- Michaelmas daisy *Aster amellus*;
- Aster 'Mönch' *Aster × frikartii*;
- Fleabane *Erigeron karvinskianus*;
- Alpine sea holly *Eryngium alpinum*;

- Field scabious *Knautia arvensis*;
- Sea lavender *Limonium platyphyllum*;
- Purple toadflax *Linaria purpurea*;
- Rose campion 'Alba' *Lychnis coronaria*;
- Oregano 'Herrenhausen' *Origanum laevigatum*;
- Russian sage 'Blue Spire' *Perovskia*;
- Pasqueflower *Pulsatilla vulgaris*;
- Balkan clary 'Caradonna' *Salvia nemorosa*;
- Stonecrop 'Jose Aubergine' *Sedum* sp.;
- Catchfly 'Stardust' *Silene* sp.

Of the above, 15 of the herbaceous species are listed as Royal Horticultural Society (RHS) Plants for Pollinators[12]. The above soft landscaping will make a small contribution to biodiversity at the site through provision of nectar and pollen resources for pollinators, nesting habitat and a food resource for birds and foraging habitat for bats that may be present in the area, among other taxa.

Management

The perennial meadow will be managed in a similar way to the pastoral meadow above. Herbaceous planting will be managed in line with landscape maintenance plan which is not yet available but will be produced to address Condition 13 of the planning permission. This will likely include manual watering during establishment, applying and maintaining a mulch layer, forking over beds to keep soil loose, removal and replacement of failing plants and pruning dead heads from flowering plants following the flowering period, to promote further flowering.

Invasive non-native species, and where feasible nuisance species will be removed.

1.8 WOODLAND UNDERSTORY PLANTING

There is understory woodland planting proposed for underneath the tree canopies of trees on site (mapped as shrubs and herbaceous planting on Appendix A). There is a parcel of woodland Hayes Shrub SINC adjacent to the site and the proposed understory planting will provide stepping-stone habitat, enhancing ecological connectivity between woodland areas. The species list includes, but is not restricted to, the following:

- Pheasant's tail grass *Anemanthele lessoniana*
- Tufted hair-grass *Deschampsia cespitosa,*
- Wood rush *Luzula sylvatica,*
- Crocus 'Ladykiller' *Crocus* sp.
- Downy woundwort *Cenolophium denudatum*
- Snowy wood rush *Luzula nivea*
- Purple moor grass 'Moorhexe' *Molinia caerulea*
- Wall polypody *Dryopteris wallichiana*

- Marsh spurge 'Walenburg's Glorie' *Euphorbia palustris*
- Soft shield fern *Polystichum setiferum*
- Common valerian 'Alba' *Valeriana officinalis*
- Ivy-leaved cyclamen *Cyclamen hederifolium*
- Wild strawberry *Fragaria vesca*
- Cranesbill 'Ingwersen's Variety' *Geranium macrorrhizum*
- Freckles violet *Viola sororia*
- Spring cyclamen *Cyclamen coum*
- Snake's head fritillary *Fritillaria meleagris*

Of the above, five of the 17 species are listed as RHS Plants for Pollinators[13] however this habitat will provide varied structure which will provide sheltering habitat for invertebrates and hedgehogs.

Management

The woodland understory will be managed in a similar way to the herbaceous planting within the perennial meadow above. The woodland understory will be managed in line with landscape maintenance plan which is not yet available but will be produced to address Condition 13 of the planning permission.

1.9 TREE PLANTING

There planting includes scattered trees. The species list includes, but is not restricted to, the following:

- Scots pine *Pinus sylvestris*
- Tulip tree *Liriodendron tulipifera*
- Ginkgo tree *Ginkgo biloba*
- Golden rain tree *Koelreuteria paniculata*
- Dawn redwood *Metasequoia glyptostroboides*
- Hop hornbeam *Ostrya carpinifolia*
- Black pine *Pinus nigra*
- Honey locust *Gleditsia triacanthos*
- Hornbeam *Carpinus betulus*

Of the above, two of the species have known value to UK wildlife and in addition will provide varied structure which will provide foraging habitat for invertebrates and sheltering habitat for nesting birds and the leaf litter will provide sheltering habitat for hedgehogs.

Management

Tree planting should be managed in line with a landscape maintenance plan which will be produced to address Condition 13 of the planning permission. This will likely include manual

watering during establishment, applying and maintaining a mulch layer, replacement of failing trees and crown pruning.

The mulch layer at the base of each tree will be maintained by annual topping-up to a depth of 50 millimetres (mm) to a diameter of 1.2 metres (m) around the trunks.

The crown of young trees will be pruned by removing dead branches and reducing selected side branches, ensuring development of a single strong leader. Any pruning will be carried out in accordance with BS 7370-4.

Large tree species may attract large hazardous bird species as specified by CAST[7], such as all Corvid and pigeon species (Columbidae sp), therefore such trees should be managed to avoid becoming attractive to significant numbers of roosting or nesting birds. This can be achieved through pruning regularly to reduce branching that provides ideal perching or nesting platforms (such as horizontal branches), limiting canopy density to make trees less hospitable for roosting or nesting birds and removing deadwood or cavities that could be used for nesting. Actions to limit canopy growth may include pollarding, coppicing and/or thinning out trees so they do not become dense enough to attract substantial numbers of hazardous species. There are no recommendations for maximum height recommendations made by CAST[7].

4.2 HORTICULTURAL BEST PRACTICE

Avoidance of Pesticides

The landscaped areas will require maintenance once established. The use of pesticides (herbicides, insecticides, fungicides and slug pellets) should be discouraged to prevent changes to habitat composition and from entering the food chain, particularly via invertebrates, birds and/or mammals. Plants should be sourced which have not been subjected to pesticides whilst growing in the nurseries. Biosecurity

Maintenance will follow appropriate biosecurity protocols to avoid introduction of invasive non-native species. This will involve sourcing of plants and materials from within the UK and checking for the presence of potential high-risk species if products have been in other water bodies prior to introduction to the site.

Invasive species within the landscaping on site will be controlled to maintain biodiversity value.

Removal of Litter

In areas where windblown or washed down litter is present, litter removal will occur.

Avoidance of Plastics

All products will avoid the use of plastic which may degrade to release microplastic particles.

Plastic waste and debris should be collected when encountered with a general site check for plastic litter at least once every two months.

4.3 BIRD BOXES

Generalist Bird Boxes

Four generalist bird boxes with 32mm entrance holes as well as open fronted boxes (Schwegler 2M or similar) will be mounted on existing trees, at a height of 2-5m from ground level, away from any lighting, facing north. These boxes would appeal to a multitude of bird species including robin *Erithacus rubecula* and blue tit *Cyanistes caeruleus*.

Suitable locations for these boxes can be found within Appendix A.

Whilst Greengage does not officially endorse any products, the products shown below are known to be effective and long lasting.

Figure 4.1 Example Nest Boxes: 1B Schwegler Nest Box10, (left to right) and Cedar Plus Open Front Wooden Robin Box11, Woodstone 32mm entrance hole box and open fronted box (right)




Black Redstart

One open fronted black redstart box will be provided, such as the Eco Robin (Open-Fronted) Nest Box and hung ~2m from the roof level overlooking the rooftop of one of the buildings. It should be a deep open fronted box, facing north or east.

Suitable locations for this box can be found within Appendix A.

As black redstart is a Wildlife and Countryside Act (1981) Schedule 1 species, it is illegal to disturb them and therefore care will need to be taken after they have been installed so as not to cause any disturbance once occupied.

Figure 4.2 Example black redstart boxes

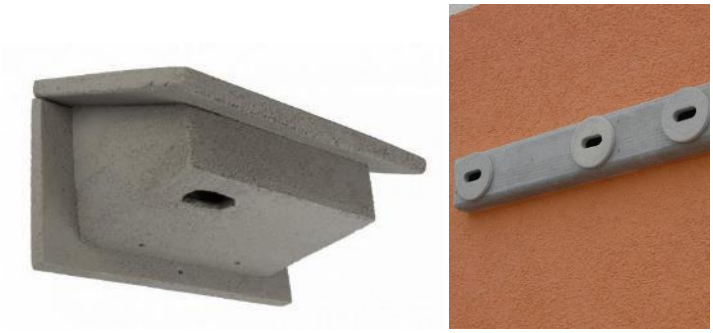

Swift boxes

Four façade bound swift nest boxes will be provided to create nesting opportunities for priority species within the UK BAP. These boxes will be installed at least 5m in height beneath the eaves on the northern and eastern elevations. Entrances should be free from clutter to provide a clear, unobstructed flight path available.

Suitable locations for these boxes can be found within Appendix A.

Whilst Greengage does not officially endorse any products, the products shown below are known to be effective and come in styles to be as unobtrusive as possible within the design.

Figure 4.3 Example of facade bound swift boxes including the Vivara Pro WoodStone Swift Nest Box[14] (left) No. 17A Schwegler Swift Nest Box (Triple Cavity)[15] (right)



House Sparrow Terraces

Four house sparrow nest boxes will be mounted onto the fabric of the building be at a minimum of 2m above ground level preferably close to the soffit or eaves facing north or east. These should be spaced at least 1 meter apart to reduce aggression between males.

An example of a house sparrow nest box is shown below. These should comprise terraces with at least 2 nesting chambers per unit. Boxes should be located away from balconies and windows, preferably overlooking foraging areas. Whilst Greengage does not officially endorse any products, the products shown below are known to be effective and come in styles to be as unobtrusive as possible within the design.

Suitable locations for these boxes can be found within Appendix A.

Figure 4.4 Example of facade bound house sparrow terraces including the Vivara Pro WoodStone House Sparrow Nest Box[16] (left), 1SP Schwegler Sparrow Terrace[17] (middle) and RSPB Sparrow Terrace Nest Box[18] (right)

Management

All bird boxes should be placed out of direct sunlight and the most powerful winds, with unobstructed access and not directly above or under windows, doors or balconies or artificial lighting.

Between October and February all mounted generalist bird boxes should be taken down, old nesting materials removed, and the box should be cleaned and rinsed with boiling water to kill any parasites. These should be reinstated ahead of the nesting season commences in March.

Swifts are known to leave few droppings at their nest sites[19] and as such swift boxes do not require maintenance.

4.4 BAT BOXES

Four bat boxes will be hung from suitably sized trees retained at site, with no uplighters installed, positioned south, south-east or south-west facing at least 3-4m high. All bat boxes should be placed out of direct sunlight and the most powerful winds, with unobstructed access.

Figure 4.5 Example bat boxes to be mounted on existing trees

At least four bat boxes will be incorporated into the building at around 2-7m in height, away from artificial light sources or direct illumination from streetlights or windows (to protect them from predation); and sheltered from strong winds and exposed to the sun for part of the day (usually south, south-east or south-west), ideally overlooking potential foraging areas.

Suitable locations for these boxes can be found within Appendix A.

Figure 4.6 Example bat boxes which can be mounted onto the building 2FE Schwegler Wall-Mounted Bat Shelter[20] (left) and 1FQ Schwegler Bat Roost[21] (right)

4.5 INVERTEBRATE FEATURES

The soft landscaping areas will include invertebrate habitat features, adding opportunities for nesting, shelter and additional forage resources.

Stag Beetle Loggery

The retention of the standing deadwood on site and the woodland understory planting will retain and increase the value of site for stag beetle. Additionally, a single stag beetle loggery will be provided in landscaped areas in semi-shaded conditions, under trees.

Stag beetle require deadwood for egg laying and support their larvae during their development, however, the loggery will benefit all saprophytic invertebrates. Stag beetle loggeries can be easily made using untreated native hard and soft woods, ideally oak *Quercus sp.* and beech *Fagus sylvatica*.

Figure 4.7 Example of a stag beetle loggery

Deciduous, untreated wood will be used, sourced from site or locally. Log sizes will range from ~100mm up to ~400mm in diameter and 500mm to 1000mm in length, with approximately one third of the logs buried in friable soils, an example is shown in Figure 4.7 above.

Plants such as ferns, bulbs and other woodland understorey plants can be planted amongst the loggeries in dappled sunshine.

Suitable location for this stag beetle loggery can be found within Appendix A.

Management

Loggeries will be left untouched as regular disturbance will limit the diversity of invertebrates using this feature.

4.6 INVERTEBRATE HOTELS

Three invertebrate hotels will be located in a sheltered area out of the wind at least 1.5 – 2.5 m off the ground. They should be south/south-east overlooking nectar rich plants within the landscaping, although vegetation should not cover the front of them. All can be on ground or mounted 1-2m up a tree and have a waterproofing roof.

Suitable locations for these features can be found within Appendix A. Examples have been provided below.

Figure 4.8 Four Floor Wooden Insect Hotel With Metal Roof [22]and RHS Insect hotel[23]

4.7 REPTILE FEATURES

While the site currently has negligible potential for reptiles, the adjacent grassland habitat is of moderate potential. As the site becomes more suitable following the creation and establishment of areas of wildflower meadow, three log piles will be incorporated within the wildflower meadow areas to provide additional refugia. Each log pile will be at least 1m x 1m, comprise a mixture of log sizes and shapes and be placed in a sunny location within existing suitable habitat. Suitable locations for these features can be found within Appendix A.

Figure 4.9 Reptile enhancement features log pile

Management

Grassland on and surrounding these features will be cut to 10cm ideally between November to February to prevent scrub encroachment onto the features.

4.8 GENERAL MANAGEMENT

Construction (Design and Management) Regulations

Any external features such as hanging bird boxes on trees and invertebrate features should be checked annually and after any period of high winds to ensure they are still securely in place.

All habitat features should be installed in accordance with the manufacturers instructions or those provided from the place of purchase.

4.9 ECOLOGICAL CONSTRAINTS TO MANAGEMENT

The habitats and features to be implemented will provide potential to support stag beetle, nesting birds, roosting bats, reptiles and hedgehogs. Relevant legislation relating to these species is detailed in Appendix B.

Birds

To avoid disturbing, harming or killing any nesting birds or their young, any maintenance and management of trees and shrubs and nest boxes will take place outside of the nesting bird season (taken to run from March - August inclusive). If this is not possible an inspection for nesting birds must take place, by an SQE prior to any works taking place.

Bat Boxes

The bat boxes are self-cleaning and require no maintenance. However, should any maintenance or management of boxes be required in the future, to avoid the disturbance of roosting bats, this will only be undertaken by a bat licenced ecologist or after a bat licenced ecologist has confirmed roosting bats to be absent.

Bat box maintenance will be undertaken in either April, September and October, outside of the maternity season (May to August inclusive) and avoiding the winter months (November to March) when bats may be in hibernation.

Stag Beetle

Management will avoid mowing close to loggery between May and August when adult stag beetles will be emerging.

Reptiles

Wildflower meadow hay and spring cuts should follow a precautionary staged management method, to mitigate against the risk of injuring or killing reptiles as follows:

- Vegetation will be cleared by cutting to 200-300mm in the first instance, followed by clearance to below ankle height a minimum of 24 hours later;
- The habitat clearance will be completed during the active reptile season (April -October) on dry days when the temperature is over 9°C. The vegetation will be strimmed in one direction only, and towards areas of suitable adjacent habitat (such as the log piles) so that any reptiles present can escape to safety without being exposed to predators.

In the unlikely event that any reptiles are discovered, works should be temporarily halted and the SQE will advise on further actions required.

Hedgehog

Whilst hedgehog is not a protected species in the UK and is not afforded the same levels of legislative protection as the other species discussed above, they are still protected from intentional injury or death under the Wild Mammal protection act (1996) (see Appendix B). Furthermore, hedgehog are listed under Appendix III of the Bern Convention and a priority species within the UK BAP.

The wildflower meadow vegetation and shrubs and herbaceous planting associated with the woodland understory will potential habitat to support hedgehogs. In order to minimise the potential for killing or injuring of hedgehog and other small mammals during management, the above a precautionary staged management method should also protect hedgehog. All arisings will be removed from site immediately to prevent creating brash piles which other species may subsequently utilise.

For management of shrubs, a hand search of the shrubs should be carried out prior to management.

The precautionary staged management at both phases will be undertaken using hand tools only. If any hedgehogs are found during management these should be moved to a pre-determined refuge area (to the south of the site boundary) not subject to clearance.

Hedgehog hibernate between November to March, therefore, the management will need to take outside of these months when hedgehog are active and can better escape from the path of management. The clearance or management should always be preceded by hand searches for hedgehogs.

5.0 MANAGEMENT AND MONITORING

This section provides an overview of the relevant management and monitoring features of the ecological enhancements at the site.

The EMP will follow a clearly defined 5-year timetable that will be used as a reference point for site maintenance, monitoring and any future planting and enhancement works that may be necessary. Some of the actions within the first 5 years will be dependent upon rate of growth or success of initial planting/sowing and enhancements. In general, where measures have not been stated it is due to a non-intervention policy once the features have been established.

This EMP will also be iterative in the medium to long-term, adapting in a staged process to the changing roof composition and in response to the feedback from monitoring exercises. Suggestions can be made to alter the enhancement measures or supplement the planting regime as necessary. Primarily, the EMP will include actions to maintain the ecological objectives for the habitat strategy, which are:

- Optimise biodiversity measured by the range of wildlife benefiting plant species, birds, bats, reptiles and invertebrate species using the landscaped areas, enhancement features;
- Encourage invertebrates through diverse range of floral species and suitable invertebrate niche habitats;
- Encourage species highlighted in the UK and London BAPs.

Further indicators of success will include the successful establishment of a wide variety of plant species, natural colonisation of floral species, evidence of invertebrates inhabiting the ecological features. A SQE will undertake the monitoring programme, observing the landscaped areas, the success of enhancements through the presence of bats, birds and invertebrates as key biodiversity indicators. The monitoring for bats, birds and invertebrates in particular will occur annually for the first three years and is recommended biennially thereafter. Monitoring will focus on the diversity and abundance of these species.

The management actions are summarised in Table 5.1 . The table outlines the necessary responsibilities and key objectives for the next 5 years with monitoring surveys conducted in the spring/summer informing any management actions necessary to be undertaken in the autumn.

Table 5.1 Summary of Management Actions for First 5 Years

Year after completion and season	Habitat Management Plan
Year 1-Year 5 (Spring/Summer)	Management Actions
	• Main summer 'hay' cut of wildflower meadow to 50mm carried out after the flowering season in July or August with a petrol strimmer or tractor mower. The 'hay' should be left to dry and shed seed for 1-7 days before removal from the site.
	• Manual watering of the habitats during long periods of drought or extreme heat
	• Pruning dead head flowering shrubs following the flowering period to promote further flowering.
	• Re-install invertebrate hotels following the winter
	Monitoring Actions
	• Annual monitoring programme to commence
	• Single site visit to be conducted between May and August and or setting up static acoustic monitoring for birds, bats and invertebrates
	• Check bird/bat/invertebrate hotels are intact and inspect for signs of occupancy
	• Full botanical inventory of wildflower meadow (pastoral and perennial meadow) areas
	Remedial actions
	• As identified by the SQE
	• Removal of invasive/non-native or nuisance species
	• Replacement of failing trees/shrubs reseeding of wildflower meadow (pastoral and perennial meadow) where sparse, seeding wildflower meadows with yellow rattle if grass composition too high (over 70%)
	• Litter removal
Years 1-5 (Autumn/Winter)	Management Actions
	• Wildflower meadow (pastoral and perennial meadow) re-growth will be mown to 50mm

Year after completion and season	Habitat Management Plan
	• Replacement of failing trees/shrubs reseeding of wildflower meadow where sparse, seeding wildflower meadow (pastoral and perennial meadow) with yellow rattle if grass composition too high (over 70%)
	• Bring invertebrate hotels inside to prevent deterioration.
	• Cleaning of invertebrate hotels and generalist bird boxes
	Reporting Procedure
	• Annual monitoring programme report produced
	• Review of the effectiveness and validity of monitoring programme
	Remedial Actions
	• As identified by annual report
	• Litter removal
	• Removal of invasive species/unwanted weeds
On going Management Actions	Management Actions over Spring/Summer (as required)
	• Manual watering of habitats in periods of extended drought
	• Litter removal
	• Main summer 'hay' cut of wildflower meadow (pastoral and perennial meadow) to 50mm carried out after the flowering season in July or August with a petrol strimmer or tractor mower. The 'hay' should be left to dry and shed seed for 1-7 days before removal from the site.
	• Manual watering of the habitats during long periods of drought or extreme heat
	• Removal of invasive/non-native or nuisance species
	• Replacement of failing trees/shrubs reseeding of wildflower meadow where sparse, seeding wildflower meadows with yellow rattle if grass composition too high (over 70%)
	Management Actions over Autumn/Winter (as required)
	• Wildflower meadow (pastoral and perennial meadow) re-growth will be mown to 50mm

Year after completion and season	Habitat Management Plan
	• Replacement of failing trees/shrubs reseeding of wildflower meadow where sparse
	• Bring invertebrate hotels inside to prevent deterioration.
	• As identified by annual report
	• Litter removal
	• Removal of invasive species/unwanted weeds prior to setting seed

5.1 TIMESCALES

The management plan will begin as soon as the final landscaping has been implemented and management will be ongoing for a minimum of 5 years to ensure that the targeted enhancements and will be reviewed after this period.

5.2 RESPONSIBILITY

It is the responsibility of the building owner to implement the actions associated with the EMP including responsibility for appointing a management team and an SQE to monitor the success of the ecological features and habitat enhancement measures. They will also keep a record of all ecological monitoring undertaken.

6.0 SUMMARY AND CONCLUSIONS

Greengage was commissioned by the Applicant in March 2025 to produce an EMP to cover a period of five years for the site in the London Borough of Hillingdon.

The granted planning application (12853/APP/2023/1492) for site includes the *"Change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works."*

This document has been produced to address Condition 14 of the planning consent for the proposed development at the site. The condition states:

"Prior to the completion of works to the buildings, a scheme for the management and enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living walls and/or roofs) and the fabric of the new built form (i.e. bat and bird boxes). The scheme shall include a plan with the features annotated and the development must be built and operated in accordance with the approved scheme.

REASON: To ensure the development contributes positively to the ecological value of the area in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan: Parts 2 (2020) and Policies G6 and G7 of the London Plan (2021)."

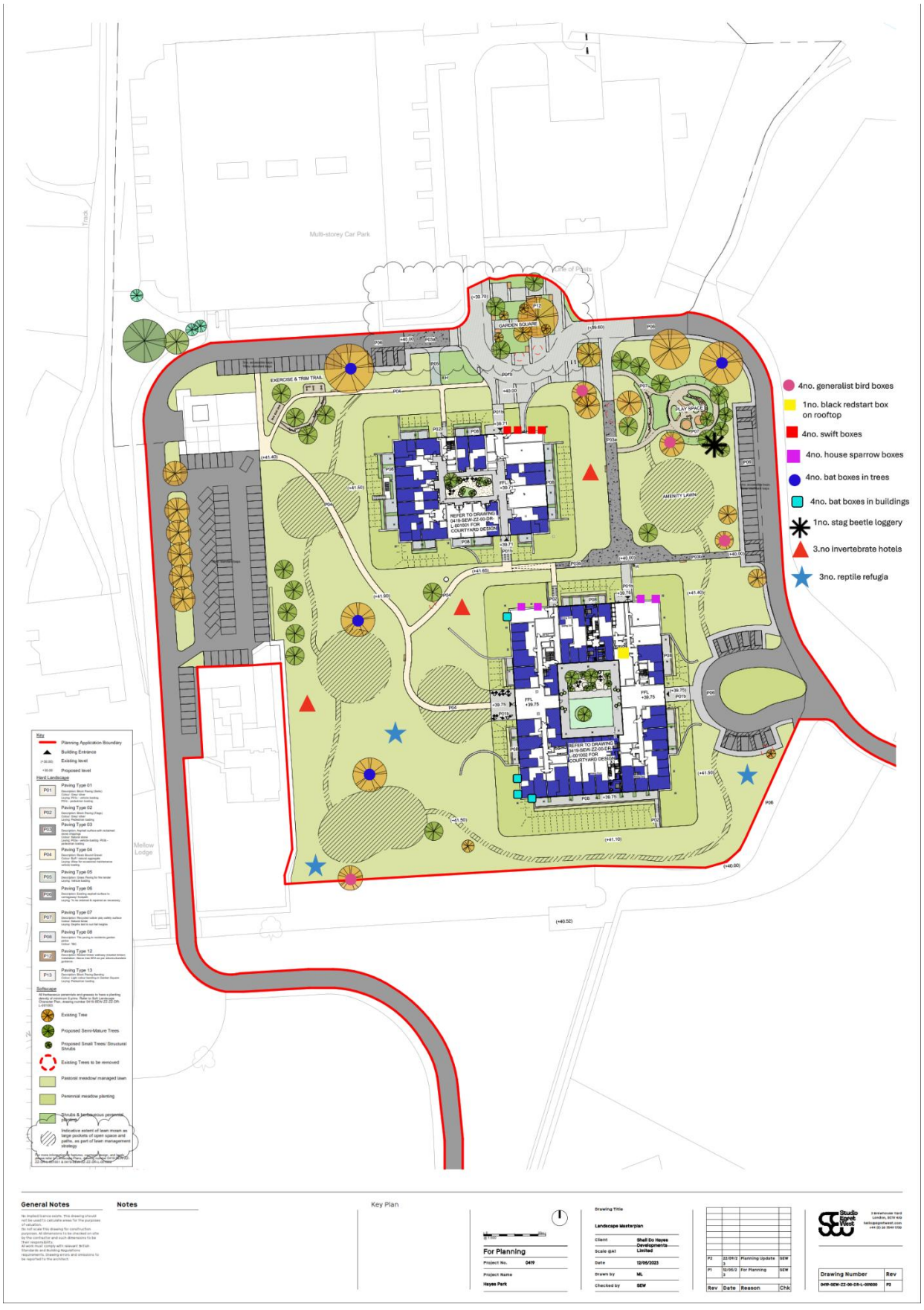
Targeted ecological enhancements have been specified in light of baseline conditions, contemporary best practice, local conservation targets (such as BAP priorities), relevant planning policy, and proposed development details. Enhancements have been incorporated into the landscaping proposals and will seek to create habitat suitable for supporting rare, protected and notable ecological receptor.

Enhancements for the site include wildlife friendly planting in the form of wildflower meadows and tree planting, bird and bat boxes in buildings, hanging bird and bat boxes in trees, reptile and invertebrate features and on-going wildlife sensitive management.

Net gains in biodiversity value will be delivered in the medium to longer terms as a result of the proposed ecological enhancements and site management. Monitoring of the recommended management of the site for bats, birds and invertebrates will take place annually within the first three years so that remedial actions can be performed accordingly.

APPENDIX A LANDSCAPE AND ENHANCEMENT PLAN

Figure A.1 Landscape and Enhancement Plan



APPENDIX B LEGISLATION AND POLICY

B.1 LEGISLATION

Current key legislation relating to ecology includes the Wildlife and Countryside Act 1981 (as amended)[24]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[25], The Countryside and Rights of Way Act 2000 (CRoW Act)[26], and The Natural Environment and Rural Communities Act, 2006[27].

The Environment Act, 2021

Under the Environment Act[28], 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)[29], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[30], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[31] 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[32] (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[33] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[34] (and Biodiversity 2020 strategy[35] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[36] and EU Biodiversity Strategy (EUBS)[37], 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 Nesting Birds

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 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 (Amendment) (EU Exit) 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.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

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 (Amendment) (EU Exit) 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.

B.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024[38] 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[39]

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[40]

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

Objective 5.1 Make more than half of London green by 2050

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

This policy states:

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

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

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

Objective 5.2 conserving and enhancement wildlife and natural habitats

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

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

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

Hillingdon Local Plan 2012-2026[41]

Strategic Objectives:

SO1: Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.

SO3: Improve the quality of and accessibility to, the heritage value of the borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest biodiversity, education, health and well being. In addition, address open space needs by providing new spaces identified in Hillingdon's Open Space Strategy.

SO4: Ensure that development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities.

SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.

SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.

SO11: Address the impacts of climate change, minimise emissions of carbon and local air quality pollutants from new development and transport.

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: Part2-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] *Greengage Environmental Ltd (2023) Preliminary Ecological Appraisal Hayes Park (ref: 552014ltMay23FV04_PEA)*
[2] *Greengage Environmental Ltd (2023) Biodiversity Net Gain Assessment Hayes Park (ref: 552014dpMay23FV02_BNGA)*
[3] *UNEP (2022). Kunming-Montreal Global Biodiversity Framework to 2030. Available at https:// Kunming-Montreal Global Biodiversity Framework | UNEP - UN Environment Programme*
[4] *HM Government, (2006). Natural Environment and Rural Communities Act 2006. HMSO*
[5] *Greenspace Information for Greater London (GiGL) London Biodiversity Action Plan available at: https://www.gigl.org.uk/about-gigl/planning-projects/londons-biodiversity-action-plan/*
[6] *Studio Egret West (2023) Design and Access Statement (ref: Hayes Park 0419)*
[7] *The Combined Aerodrome Safeguarding Team (CAST) (April 2024) Wildlife Hazards Around Aerodromes Advice Note*
[8] *Greengage Environmental Ltd (2026) Bird Hazard Management Plan - Hayes Park South and Central (ref: 553135lt17Feb26FV01_BHMP)*
[9] *Lustre Consulting (2025) Phase 2 Site Investigations Hayes Park (ref: R332-SI-02.0_5241)*
[10] *Available from: https://meadowmania.co.uk/products/wildflower-meadow-for-clay-soils*
[11] *Royal Horticultural Society (2016); Perfect for Pollinators: Wildflowers. RHS, London*
[12] *Royal Horticultural Society (2016); Perfect for Pollinators: Wildflowers. RHS, London*
[13] *Royal Horticultural Society (2016); Perfect for Pollinators: Wildflowers. RHS, London*
[14] *Vivara Pro WoodStone Swift Nest Box. Available from: http://www.vivarapro.co.uk/Vivara-Pro-WoodStone%C2%AE-Build-in-Swift-Nest-Box*
[15] *No. 17A Schwegler Swift Nest Box (Triple Cavity). Available from: https://www.nhbs.com/no-17a-schwegler-swift-nest-box-triple-cavity*
[16] *Vivara Pro WoodStone House Sparrow Nest Box. Available From: https://www.nhbs.com/vivara-pro-woodstone-house-sparrow-nest-box*
[17] *1SP Schwegler Sparrow Terrace. Available From: https://www.nhbs.com/search?q=house+sparrow+&qtview=174850*
[18] *RSBP Sparrow Terrace Nest Box. Available From: https://www.nhbs.com/search?q=house+sparrow&qtview=162118*
[19] *Wildcare Guide to Bird Boxes – Swifts https://www.wildcare.co.uk/blog/wildcare-guide-to-bird-boxes-swifts/#:~:text=Swifts%20leave%20very%20few%20droppings,unless%20used%20by%20another%20species.*
[20] *2FE Schwegler Wall-Mounted Bat Shelter Available from: https://www.nhbs.com/2fe-schwegler-wall-mounted-bat-shelter-pack-of-2*
[21] *1FQ Schwegler Bat Roost Available from: https://www.nhbs.com/1fq-schwegler-bat-roost-for-external-walls*
[22] *Extra Large Wooden Insect Bee Bug Hotel Available from: https://www.gardenstall.co.uk/products/extra-large-wooden-insect-bee-bug-hotel?srsltid=AfmBOorfywsVu5FKPJsi-yHZlYRrOd__uS898Xs2NdgdUj7eAtno6Em2*
[23] *RHS Insect Hotel Available from https://www.rhsplants.co.uk/product/_/insect-hotel/classid.2000037174/*
[24] *HM Government, (1981); Part I and Part II of Wildlife and Countryside Act (as amended). HMSO*
[25] *HM Government, (2019); The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Statutory Instrument 2019 no. 579*
[26] *HM Government, (2000); The Countryside and Rights of Way Act. HMSO*
[27] *HM Government, (2006); Natural Environment and Rural Communities Act 2006. HMSO*
[28] *GOV.UK. (2021). Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted*
[29] *HM Government, (1994); The Conservation (Natural Habitats, &c.) Regulations. HMSO*
[30] *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*
[31] *The European Parliament And Of The Council, (30 November 2009); Directive 2009/147/EC On The Conservation Of Wild Birds (Codified Version)*
[32] *CEC (Council of the European Communities), (1979); Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 19.IX.1979). EC*
[33] *UK Biodiversity Action Plan (2007). UKBAP Priority Species and Habitats. https://jncc.gov.uk/our-work/uk-bap-priority-species/*
[34] *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*

[35] *Defra (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem services*
[36] *Convention on Biological Diversity (CBD) (2010). Decision X/2 Strategic Plan for Biodiversity 2011-2020, including Aichi Biodiversity Targets. Available at https://www.cbd.int/decision/cop/?id=12268*
[37] *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))*
[38] *GOV.UK. (2024). National Planning Policy Framework. [online] Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Accessed 2nd February 2026].*
[39] *Greater London Authority, (2021). The London Plan: The Spatial Development Strategy for Greater London (GLA).*
[40] *Greater London Authority, (2018). London Environment Strategy 2018. London: Greater London Authority.*
[41] *Hillingdon Council (2012) Hillingdon Local Plan*