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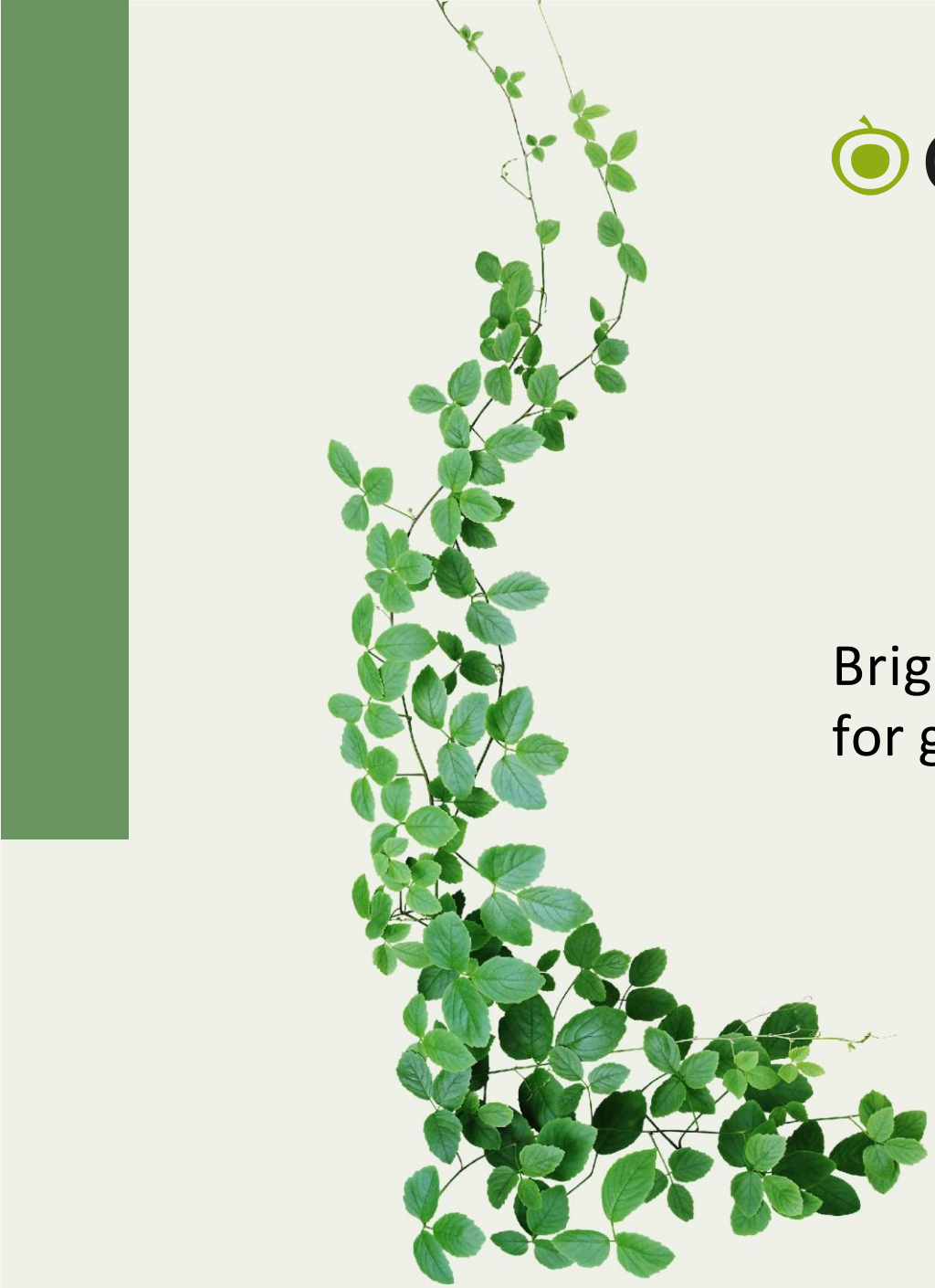

Client: Shall Do Hayes Developments Limited

Project: Hayes Park South and West

Report: Bird Hazard Management Plan

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	February 2026	February 2026
Comments:		
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File Reference:	553135lt17Feb26FV01_BHMP.docx	553135lt17Feb26FV01_BHMP.docx

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Limited (Greengage) was commissioned in March 2025 by Shall Do Hayes Developments Limited to undertake a Bird Hazard Management Plan (BHMP) to discharge Condition 15 of the planning permission (planning ref: 12853/APP/2023/1492) for the land at Hayes Park South and West in the London Borough of Hillingdon, hereafter referred to as 'the site'.

The granted planning permission (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.*"

The granted planning permission is subject to several of planning conditions. This BHMP has also been produced to address requirements of Condition 15 as detailed below which states that:

" Prior to commencement of development above ground level, a Bird Hazard Management Plan (BHMP) shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence (MOD). The Bird Hazard Management Plan should contain, but not be limited to:

a. An assessment of the various bird species found in the vicinity of the site, to include species data and numbers.

b. Details of layout of the solar panels, and roof proofing measures designed to prevent access to, and successful breeding by, large gulls, Feral Pigeons and any other identified problematic species on the roof spaces and on, under or around the PV panels; and

c. Schedule for inspection of the roof spaces by a suitably qualified individual (to include details of roof access), details of the methods used to disturb/disperse birds, and a method statement for recording the results of the disturbance/dispersal activity.

The development shall be carried out and managed strictly in accordance with the details agreed and there shall be no variation without the express written consent of the Local Planning Authority in consultation with MOD.

REASON: To limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020)."

The site is located 5.6 kilometres (km) north of Heathrow Airport and therefore within the statutory 13km for aerodrome safeguarding consultation[1].

Landscaping proposals include tree and shrub planting, woodland understory planting and wildflower meadows in the form of pastoral meadows and perennial meadows embankment and arrival area to include herbaceous planting.

Based on the most common hazardous birds in the United Kingdom (UK)[2] and the suitability of the site post-development, species that are considered relevant to potentially cause bird strike hazard at the site include: red kites *Milvus milvus*, rooks *Corvus frugilegus*, jackdaw *Coloeus monedula*, carrion crow *Corvus corone*, starling *Sturnus vulgaris*, herring gull *Larus argentatus*, lesser black-backed gull *Larus fuscus*, great black-backed gull *Larus marinus*, mallard *Anas platyrhynchos,* and wood pigeon *Columba palumbus*.

Hazardous species or accumulation of birds could be encouraged by large canopy trees which may encourage hazardous numbers or species on site. Therefore, remediations regarding large canopy

trees is recommended and regular bird hazard inspections, is required to inform use of bird deterrents.

Additional design considerations include waste management practices, monitoring and management to mitigate hazardous populations of bird species.

This BHMP has been prepared as guidance for the management and prevention of birds during both the development and operational phases of the site due to its proximity to Heathrow Airport. The BHMP will be implemented as approved unless otherwise agreed by the London Borough of Hillingdon Council.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by Shall Do Hayes Developments Limited in March 2025 to undertake a Bird Hazard Management Plan (BHMP) to discharge Condition 15 of the planning permission (planning ref: 12853/APP/2023/1492) for the land at Hayes Park South and West in the London Borough of Hillingdon, hereafter referred to as 'the site'.

The application seeks 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."*

Condition 15 states:

" Prior to commencement of development above ground level, a Bird Hazard Management Plan (BHMP) shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Ministry of Defence (MOD). The Bird Hazard Management Plan should contain, but not be limited to:

a. An assessment of the various bird species found in the vicinity of the site, to include species data and numbers.

b. Details of layout of the solar panels, and roof proofing measures designed to prevent access to, and successful breeding by, large gulls, Feral Pigeons and any other identified problematic species on the roof spaces and on, under or around the PV panels; and

c. Schedule for inspection of the roof spaces by a suitably qualified individual (to include details of roof access), details of the methods used to disturb/disperse birds, and a method statement for recording the results of the disturbance/dispersal activity.

The development shall be carried out and managed strictly in accordance with the details agreed and there shall be no variation without the express written consent of the Local Planning Authority in consultation with MOD.

REASON: To limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020)."

The site is location approximately 5.6km away from Heathrow Airport and therefore within the statutory 13km radius for aerodrome safeguarding consultation[1]. This BHMP therefore considers the best design and management strategies for enhancements, in order to discourage bird loafing, roosting or nesting behaviour on site that could adversely affect the safety of operations at Heathrow Airport.

The BHMP therefore includes the following elements:

- An assessment of attractiveness to birds during the construction and operational phases of development at the site;
- Design considerations to be incorporated into the scheme to minimise bird activity;
- Recommendations for a management and monitoring regime to identify any problems that might arise and measures to address these if they do;
- Details of site maintenance to reduce the value of the site for birds, notably hazardous species, including waste collection, storage and removal; and,

- Deterrent techniques to reduce the attractiveness of the development to birds.

The Airport Operators Association Safeguarding of Aerodromes Advice Note 3: Wildlife Hazards Around Aerodromes[1] and the Civil Aviation Authorities (CAA) Wildlife Hazard Management at Aerodromes[3] document were used to inform this BHMP.

2.1 SITE DESCRIPTION

The site extends to approximately 3.73 hectares (ha) 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 is also mapped as Biodiversity Action Plan (BAP) deciduous woodland. 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.

2.2 RATIONALE

International Civil Aviation Organisation (ICAO) and CAA detail that the statutory radius for aerodrome safeguarding consultation is 13km, as this is generally where approaching aeroplanes descend below 2000ft elevation, and the vast majority of wildlife collisions occur[1]. Heathrow Airport is located approximately 5.6km south of the site.

The most common hazardous birds found in the UK, with large birds and flocking species presenting the greatest hazard, as detailed in the Combined Aerodrome Safeguarding Team (CAST) Aerodrome Safeguarding Advice Note 3[1] include the following:

- All wildfowl (ducks, geese, swans *Anatidae spp*.);
- All large waterfowl *Anseriformes spp*.;
- Herons *Ardeidae spp*.;
- Egrets *Ardeidae spp*;
- Cormorants *Phalacrocoridae spp*.;
- Gamebirds (pheasants and partridges *Phasianidae spp*.);
- Birds of prey *Accipitres spp*.;

- Large waders (lapwing *Charadriiae spp*., curlew *Numenius spp*. and golden plover *Pluvialis apricaria*);
- All gull species *Laridae spp*.;
- All pigeon species *Columbidae spp*.;
- All corvid species *Corvidae spp.;* and,
- Starlings *Sturnus vulgaris*.

The site's location and habitats of value to nesting birds such as individual trees, introduced shrubs and surrounding BAP deciduous woodland, means there is an increased risk of flocks of larger foraging birds such as crows, pigeons, starlings and gull species. Coupled with the site's location within the statutory radius for consultation for Heathrow Airport, this BHMP includes the following elements:

- An assessment of attractiveness to birds during the construction and operational phases of development at the site;
- Design considerations to be incorporated into the scheme to minimise bird activity;
- Recommendations for a management and monitoring regime to identify any problems that might arise and measures to address these if they do;
- Details of site maintenance to reduce the value of the site for birds, notably hazardous species, including waste collection, storage and removal; and,
- Deterrent techniques to reduce the attractiveness of the development to birds.

2.3 ECOLOGICAL CONTEXT

A Preliminary Ecological Appraisal (PEA)[4] was undertaken by Greengage on the 8th April 2022. Features within the site boundary were evaluated for their potential for birds to be present and identify opportunities for nesting. The PEA identified value for a number of notable and protected species and habitats including:

- Confirmed presence of Hayes Shrub Site of Importance for Nature Conservation (SINC) which lies immediately off-site to the north-east;
- Confirmed presence of BAP priority habitat deciduous woodland immediately off-site;
- Moderate potential for nesting birds associated within the woodland and scatted trees on site.

No further breeding bird surveys were recommended as the majority of suitable habitat will be retained and impacts to nesting birds can be fully avoided through timing of works.

2.4 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 the 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 BHMP was prepared by Laura Thomas reviewed by Abbie Case and authorised by Charlotte Hammond, 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; and,
- Avoids invalid, biased and exaggerated statements.

3.0 BIRD HAZARD MANAGEMENT PLAN

To understand the potential for bird strike hazards at the site, using baseline information for the wider site, a view has to be taken on the likelihood of the proposed development at the site increasing the concentration of birds on the site/in the local area during the operational phases of the development by:

- Enhancing the ecological value of the site so as to encourage/support birds; and,
- Increasing the potential for foraging, e.g. on discarded food waste or through poorly maintained refuge/waste management areas.

An increase in bird activity of such a nature, near airports, has been associated with a perceived increased risk in potential bird strikes although the nature of bird activity, the species and the time of the year are all key aspects in determining the likelihood of strike events. Concern is given to any development or proposal that may have the potential to significantly increase bird activity within the statutory radius for aerodrome safeguarding consultation (13km, as per the ICAO and CAA[3]).

3.1 DESKTOP ASSESSMENT

Greengage undertook a data consultation for the PEA submitted with the planning submission in May 2023. However, in June 2025, Greengage undertook a more recent data consultation to support another phase of the Hayes Park development immediately adjacent to the site, the data of which has been reviewed for this BHMP. Data was provided by the Local Environmental Records Centre (LERC), Greenspace Information for Greater London (GiGL), for a 2km search radius around the site which included bird records.

In accordance with point a). of Condition 15, to assess the suitability for the various bird species found within 2km of the site including species data from the past 10 years and numbers, Greengage re-evaluated the data for the presence of hazardous birds as named in Section 2.2, their numbers are presented in Table 3.1 below.

Table 3.1 Records of hazardous birds in 2km

Species	Total number of records (peak count) within 2km within the past 10 years	Year of most recent record
Ruddy Shelduck *Tadorna ferruginea*	16 (5)	2018
Lesser Redpoll *Acanthis cabaret*	33 (12)	2021
Common Redpoll *Acanthis flammea*	2 (2)	2017
Barnacle Goose *Branta leucopsis*	9 (5)	2018
Hen Harrier *Circus cyaneus*	1 (1)	2020
Whooper Swan *Cygnus cygnus*	2 (3)	2018
Little Egret *Egretta garzetta*	116 (6)	2021

Species	Total number of records (peak count) within 2km within the past 10 years	Year of most recent record
Merlin *Falco columbarius*	2 (1)	2017
Herring Gull *Larus argentatus*	46 (204)	2021
Lesser Black-backed *Gull Larus fuscus*	29 (14)	2015
Baltic Gull *Larus fuscus fuscus*	8 (3)	2021
Linnet *Linaria cannabina*	290 (80)	2021
Reed Bunting *Emberiza schoeniclus*	301 (31)	2021
Smew *Mergellus albellus*	8 (15)	2018
Red Kite *Milvus milvus*	150 (6)	2021
Sand Martin *Riparia riparia*	16 (50)	2020
Starling *Sturnus vulgaris*	45 (1100)	2021
Green Sandpiper *Tringa ochropus*	45 (3)	2021
Redwing *Turdus iliacus*	228 (260)	2021
Fieldfare *Turdus pilaris*	161 (285)	2021
Mistle Thrush *Turdus viscivorus*	49 (22)	2021
Lapwing *Vanellus vanellus*	223 (130)	2021

The site has currently has large mature trees and introduced shrubs suitable foraging and nesting habitat for an array of larger birds such as corvid species, red kites, pigeon species. This site has areas of flat roof space on both buildings which could provide nesting habitat for gull species and pigeons. Smaller trees provide foraging and nesting habitat for smaller passerine species.

The scheme will retain the majority of the trees on site however the PEA recommended any clearance of suitable nesting habitats such as trees and introduced shrubs should take place outside of the nesting season, which is taken to run March and August (inclusive), unless a Suitably Qualified Ecologist (SQE) confirmed absence prior to works.

Compensatory native tree and shrub planting was also recommended in the PEA report to mitigate the loss of nesting bird habitat.

3.2 DESIGN CONSIDERATIONS

The habitats present at baseline consisted of arable farmland, hedgerows and trees. As a result of the development, all the arable farmland will be lost, existing hedgerows and trees surrounding the site will be retained where possible. These habitats will be replaced by a new landscaping strategy.

The development proposals include:

- Wildflower meadows in the form of pastoral meadows and perennial meadows embankment and arrival area to include herbaceous planting;

- Tree and shrub planting;
- Woodland understory planting (mapped as shrubs and herbaceous planting in Appendix A).

The details of the planting within these areas has been taken from and should be read in conjunction with the relevant landscape drawings:

- Chapter 8 of the Design and Access Statement (DAS)[5];
- Studio Egret West's Landscape Master Plan[6] (Appendix A).

Species selection

Tree and shrub planting

A total of 28 small newly planted trees consisting of native and non-native species are included in the landscaping design alongside retained trees on site (see Appendix A). Proposed species currently consist of:

- 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*;
- Sea buckthorn *Hippophae salicifolia 'Robert'*;
- Hornbeam *Carpinus betulus*;
- Downy birch *Betula pubescens*; and
- Hazel *Corylus avellana.*

Sea buckthorn produces abundant berries that could attract thrushes and other flocking birds, hazel produces nuts and a dense canopy that could produce nesting and flocking opportunities, hornbeam produces seeds and dense canopy can provide loafing, roosting or nesting opportunities for flocking species and downy birch produces catkins and seeds attract finches and other birds, which in turn may attract predators. Scots pine and black pine provide loafing, roosting or nesting opportunities, particularly for larger birds such as crows, jackdaws and rooks that can present a bird strike hazard/risk, particularly when roosting in social groups at high numbers.

Trees that could cause loafing, roosting or nesting opportunities for larger species will be managed to avoid becoming attractive to significant numbers of loafing, 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 loafing, roosting or nesting opportunities 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.

However, it is recommended that species such as sea buckthorn, hazel, hornbeam and downy birch are omitted from the tree planting schedule as they could provide attractive foraging resources for flocking species.

Solar Panel Roof

The current flat roof has suitability to attract gull and pigeon species which may present a risk to aircraft. As per point b.) of Condition 15, the solar panels roof designs limit the areas of flat roof spaces available for loafing, roosting or nesting by birds. See Appendix B for the solar panel roof plans.

3.3 POTENTIAL ATTRACTION OF THE SITE TO BIRDS

The site at baseline is considered to have moderate suitability to nesting birds with the trees and surrounding woodland providing suitable nesting opportunities in and around the site. The solar panel roofs will reduce the availability of flat roof space for loafing, roosting or nesting gull and pigeon species which may present a risk to aircraft. Due to the suitability of the site and the habitats within the surrounding to a variety of hazardous bird species it is expected these will be present on site during and after development.

However, the change in land use from office spaces to a housing estate is unlikely to create an increase in foraging habitat and therefore bird activity from baseline. Landscaping designs focus more on grassland to attract small passerine species which are not considered a hazard to aircraft. However, implementing large canopy trees such as pine trees could increase areas of suitable nesting habitat for hazardous species.

Should monitoring by the appointed member of staff on site identify dangerous populations of hazardous species utilising the solar panel roofs or trees, further deterrents will be implemented. This should be included in a management and monitoring regime, conducted by the owners/operators of the site and enforceable by London Heathrow Airport, Hillingdon Council, the UK CAA or any successor to these bodies throughout the existence of the site.

Waste management

Greengage reviewed the Waste and Recycling Strategy produced by Waterman Infrastructure & Environment Limited [7]. Once operational, the residential housing will implement waste management strategies to reduce the amount of food waste available for foraging/scavenging corvids pigeons and gulls.

The waste from the new development will be stored in communal bins with fitted lids within covered service areas to ensure that putrescible waste is not available for urban gulls, corvids or other opportunistic/ scavenger bird species.

All waste will be collected weekly. Site management staff will monitor the usage of the bin stores to ensure the provision of bins are meeting the waste generation demand in terms of quantity and type of waste, this is covered within the Delivery and Servicing Management Plan (DSP)[8] monitoring regime also produced by Waterman Infrastructure & Environment Limited.

Restricting foraging opportunities through the measures described above will strongly deter birds who will seek locations where there is greater potential for food to be available.

3.4 MONITORING AND MANAGEMENT

Bird Hazard Inspections

As per point c) of the Condition wording, bird hazard inspections will be carried out by an appointed member of the facilities management team or site maintenance staff for the lifetime of the development to identify any unexpected bird activity, such as the solar panel roof, trees or shrubs on site.

These bird hazard inspections will be weekly (during the peak bird breeding season March to August, inclusive) and at regular intervals (i.e. fortnightly) when outside of the bird breeding season, dictated by levels of bird activity which may require more frequent/additional Bird Hazard Inspections where activity is considered to be higher/different to normal. These inspections will inform the level of deterrents needed to reduce hazardous species from using the site.

Management

Where Bird Hazard Inspections highlight unexpected bird activity (i.e. greater activity than normal or presence of hazardous species) then suitable deterrent techniques will be implemented, as described below in Section 3.5. This BHMP will remain enforceable by London Heathrow Airport, staff from other airfield/airstrip staff within a 13 km radius of the site, the Hillingdon Council, the UK CAA or any successor to these bodies throughout the existence of the site. These obligations will be passed to any subsequent owners/operators of the site.

Any hazardous birds found loafing, roosting or nesting in the trees will be dispersed when detected and/or when requested by London Heathrow Airport staff or staff from other airfield/airstrip staff within a 13 km radius of the site, only if this complies with wildlife legislation (see Section 3.6 on legal considerations). It is particularly important that gulls are dispersed when spotted during the inspections to ensure that they do not become habituated to the area.

A log of any bird activity recorded will be kept from these inspections, an example of which is contained at Appendix C. The name of the person undertaking the survey will be included with ultimate responsibility for the log resting with the building manager (or another suitable person).

Review of Management Plan

The BHMP shall be subject to review to reflect changes in habitat or populations of bird species. Should the aerodrome deem it necessary, a meeting between Heathrow Airport, the applicant and/or the Hillingdon Council will be convened at the earliest opportunity to discuss and agree any changes which may be necessary. Any changes to this BHMP should also be discussed with the SQE.

Inspection and Site Access

Heathrow Airport or their nominated representatives, and/or staff from other airfield/airstrip staff within a 13 km radius of the site will be allowed access to the site by prior arrangement by a nominated person, to evaluate the success of this BHMP and to review any remaining bird strike hazard.

Long Term Management

This BHMP will remain enforceable by London Heathrow Airport, staff from other airfield/airstrip staff within a 13 km radius of the site, Hillingdon Council, the UK CAA or any successor to these bodies throughout the existence of the site. These obligations will be passed to any subsequent owners/operators of the site.

3.5 DETERRENTS AND ANTI-PERCHING DEVICES

Deterrents, such as mounted bird scarers, would be used to deter hazardous bird species while bird spikes and trip wires are designed to physically prevent a bird from landing on the solar panel roofs, ledges, guttering and other architectural features. Bird exclusion products like nylon bird netting or floating deterrent balls, are usually installed to physically prevent a bird from gaining access to an area.

All bird control products have problems associated with their use and installation and one of the biggest disadvantages associated with bird control products is that they fail to deal with the source of the problem.

However, in the instances where monitoring has identified an area within the site where issues have arisen, then the basic bird deterrent measures are to be considered. For the site these will include:

- Bird trip wire;
- Mounted bird scarers;
- Bird spikes; and
- Bird netting.

If all deterrents have been trialled and all considered ineffective, the BHMP should be reviewed by an SQE and discussion with London Heathrow Airport Staff, or staff from other airfield/airstrip staff within a 13 km radius of the site, Hillingdon Council and the UK CAA undertaken.

Bird Trip Wire

Bird wire is a discreet, low-profile anti-perching deterrent currently available. It is designed for ledges and areas where large birds have been temporarily 'resting', and where a low visibility product is essential. Bird wire typically consists of a nylon-coated wire tensioned by springs between stainless steel posts, which when mounted, offers an unstable landing area for large pest birds (see Plate 3.1 as an example).

Plate 3.1 Bird Spike Control: bird trip wire

Mounted Bird Scarers

These are less intensive deterrents that consist of large balls mounted on poles with large eyes and with flashing strobe light effects that induce predatory responses in birds and deter them from using the site. These can be placed around the solar panel roofs to deter birds from using the area (see Plate 3.2 as an example).

Plate 3.2 Tuckwells: Hawkeyes wind driven mounted bird scarers

Bird Spikes

Whilst spikes are not aesthetically pleasing, consideration will be given to their use if necessary and these will be retrofitted at a suitable density or at suitable distances from each other to exclude the relevant species should the initial deterrent measures and inbuilt design be ineffective. (see Plate 3.3 as an example).

Plate 3.3 Defender® Solar Panel Bird Excluders

Bird netting/metal mesh

In extreme circumstances, bird netting/metal meshcan be placed over the solar panels to deter bird landing. The netting will be of a suitable gauge and weight to exclude the target hazardous bird species. It will be suspended at a suitable tension to ensure that birds landing on the netting will not cause sagging onto the roof but not be too taut as this will allow birds to land. The netting must also be inspected on a regular basis (i.e. as part of regular Bird Hazard Inspections of the site) to ensure it is in full working order and not in such a condition to allow bird entanglement. (see Plate 3.4 as an example).

Plate 3.4 Hawkeye bird netting

3.6 LEGAL CONSIDERATIONS

The Wildlife and Countryside Act 1981 (WCA) (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. Under the WCA 1981 (as amended), all wild birds, their nests and eggs are protected while a nest is in use or occupied. The nesting bird season is typically considered to fall between March and August (inclusive). There are exceptions regarding nuisance birds (such as feral pigeons) where bird control through nest or egg removal may be possible under certain licence conditions obtained from Natural England for preserving air safety. Licensing options would be considered as part of the BHMP where necessary and, where required, this should be discussed with an SQE.

4.0 CONCLUSION

Greengage was commissioned by Shall Do Hayes Developments Limited in March 2025 to undertake a BHMP to discharge Condition 15 of the planning permission (planning ref: 12853/APP/2023/1492) for the land at Hayes Park South and West in the London Borough of Hillingdon, hereafter referred to as 'the site'.

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 BHMP seeks to minimise the potential bird strike risk to aircraft operating into and out of London Heathrow Airport, which could arise from the operational phase of the construction of residential dwellings.

This BHMP includes an assessment of the baseline conditions for nesting and foraging birds and attraction of the site post development through the associated landscaping scheme.

Design considerations have been made for soft landscaping at the site as well as for waste management practices, and management and monitoring for hazardous bird species.

The site has large mature trees suitable foraging and nesting habitat for an array of larger birds such as corvid species, red kites, pigeon species. This site has areas of flat roof space on both buildings which could provide nesting habitat for gull species and pigeons. While smaller trees provide nesting and foraging and nesting habitat for smaller passerine species. Therefore, the site current has an existing risk of loafing, roosting or nesting.

It has been determined that the landscaping proposals are not considered likely to increase the site's current value for high-risk birds compared to baseline habitats. Actions have been recommended to limit canopy growth which include pollarding, coppicing and/or thinning out trees so they do not become dense enough to attract substantial numbers of hazardous species. It is recommended that species such as sea buckthorn, hazel, hornbeam and downy birch are omitted from the tree planting schedule as they could provide attractive foraging resources for flocking species.

APPENDIX A LANDSCAPING

Figure A.1 UBU Design LTD landscape masterplan and planting strategy

Key

- Planning Application Boundary
- Building Entrance
- (+30.00) Existing level
- +30.00 Proposed level

Hard Landscape

P01 Paving Type 01
Description: Block Paving (Setts)
Colour: Grey/ silver
Laying: P01a - vehicle loading.
P01b - pedestrian loading

P02 Paving Type 02
Description: Block Paving (Flags)
Colour: Grey/ silver
Laying: Pedestrian loading

P03 Paving Type 03
Description: Asphalt surface with reclaimed stone chippings
Colour: Natural stone
Laying: P03a - vehicle loading. P03b - pedestrian loading

P04 Paving Type 04
Description: Resin Bound Gravel
Colour: Buff / natural aggregate
Laying: Allow for occasional maintenance vehicle loading

P05 Paving Type 05
Description: Grass Paving for fire tender
Laying: Vehicle loading

P06 Paving Type 06
Description: Existing asphalt surface to carriageway/ footpath
Laying: To be retained & repaired as necessary.

P07 Paving Type 07
Description: Recycled rubber play safety surface
Colour: Natural tones
Laying: Depths laid to suit fall heights

P08 Paving Type 08
Description: Tile paving to residents garden patios
Colour: TBC

P12 Paving Type 12
Description: Raised timber walkway (treated timber)
Installation: Above tree RPA as per arboriculturalists guidance.

P13 Paving Type 13
Description: Block Paving Banding
Colour: Light colour banding in Garden Square
Laying: Pedestrian loading.

Softscape

All herbaceous perennials and grasses to have a planting density of minimum 9 p/ms. Refer to Soft Landscape Character Plan, drawing number 0419-SEW-ZZ-ZZ-DR-L-001003

- Existing Tree
- Proposed Semi-Mature Trees
- Proposed Small Trees/ Structural Shrubs
- Existing Trees to be removed
- Pastoral meadow/ managed lawn
- Perennial meadow planting
- Shrubs & herbaceous perennial planting
- Indicative extent of lawn mown as large pockets of open space and paths, as part of lawn management strategy

For more information on features, courtyard design, and levels please refer to Landscape Plans, drawing number 0419-SEW-ZZ-ZZ-DR-L-001001 & 0419-SEW-ZZ-ZZ-DR-L-001002

General Notes

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation.
Do not scale this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.
All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

Notes

Key Plan

0 20m
@ 1:500

For Planning

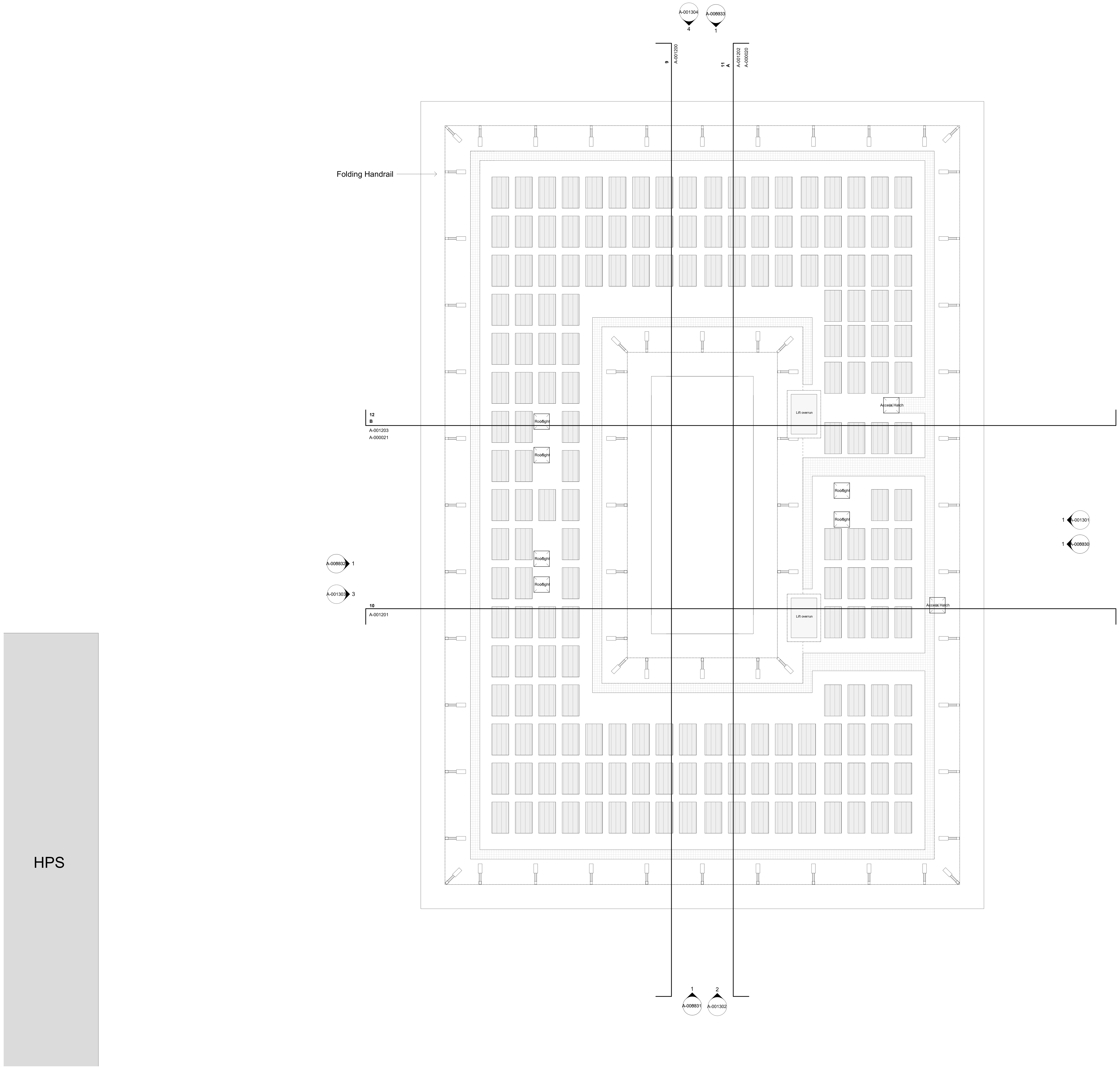
Project No.	0419
Project Name	Hayes Park
Drawing Title	Landscape Masterplan
Client	Shall Do Hayes Developments Limited
Scale @A1	
Date	12/05/2023
Drawn by	ML
Checked by	SEW

Rev	Date	Reason	Chk
P2	22/09/23	Planning Update	SEW
P1	12/05/23	For Planning	SEW

Studio Egret West
3 Brewhouse Yard
London, EC1V 4JQ
hello@egretwest.com
+44 (0) 20 7549 1730

Drawing Number	Rev
0419-SEW-ZZ-00-DR-L-001000	P2

APPENDIX B SOLAR ROOF PLANS



General Notes

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Do not scale this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.
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Notes

For the purpose of this application, the existing building has been modeled in 3D, taken from 2D survey information provided by CSL Surveys (Stevenage) LTD and a structural model, designed by Whitby Wood. Due to the complexities of an existing building, the 3D model has been simplified to suit the scale of drawings required for the planning submission and design work stage. Please refer to the detailed drawings for the setting-out.

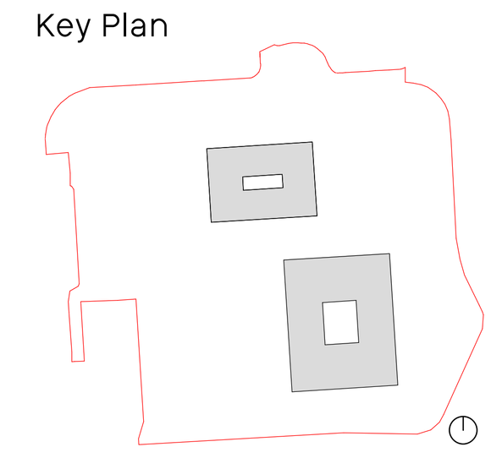
Residential Typologies

- 1B1P
- 1B2P
- 2B3P
- 2B4P
- 3B5P
- 3B6P
- 4B
- 5B
- 6B

Other residential uses

- Plant / cycle store / bin store
- Communal room
- Proposed amenity - garden
- Proposed amenity - balcony
- Proposed indicative sloped/stepped ground floor light wells
- Existing basement/tunnel location
- Existing HPC lower ground location
- Proposed amenity - garden
- Paving for roof maintenance access
- PV panels

Key Plan



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3 Brewhouse Yard
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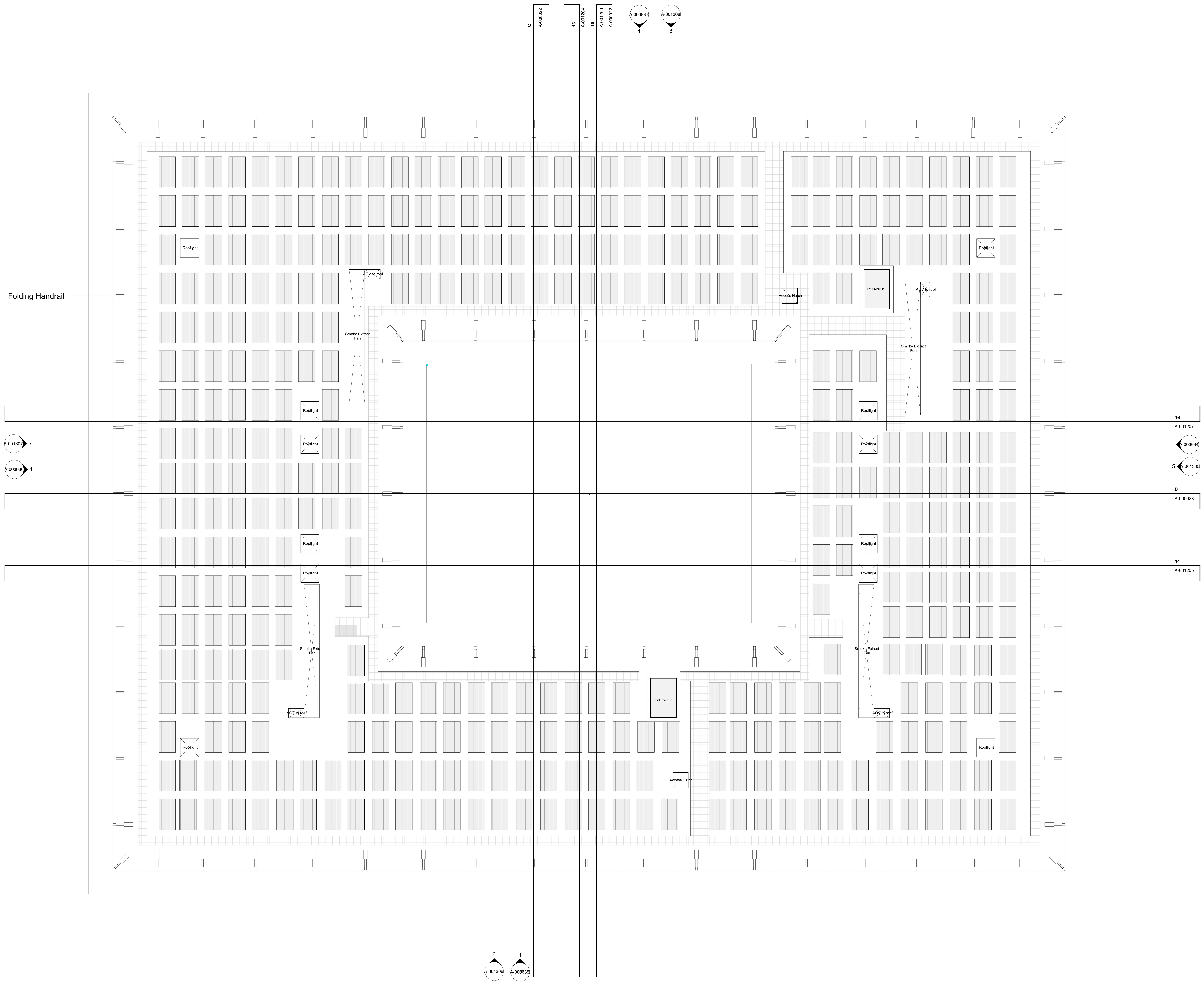
For Planning

Project No.	0419
Project Name	Hayes Park
Drawing Title	Proposed Roof Plan - HPC
Client	Shall Do Hayes Developments Limited
Scale @A0	1 : 100
Date	12/05/2023
Drawn by	PJ
Checked by	CS

Rev	Date	Reason	Chk
P1	12/05/23	For Planning	SEW

Drawing Number	Rev
0419-SEW-HC-RF-DR-A-001114	P1



General Notes

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Residential Typologies

- 1B1P
- 1B2P
- 2B3P
- 2B4P
- 3B5P
- 3B6P
- 4B
- 5B
- 6B

Other residential uses

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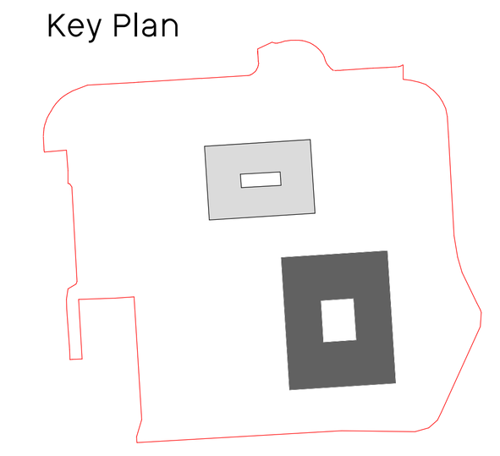
- Existing basement/tunnel location
- Existing HPC lower ground location
- Proposed amenity - garden
- Paving for roof maintenance access
- PV panels

Key Plan



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For Planning

Project No. 0419

Project Name
Hayes Park

Drawing Title
Proposed Roof Plan - HPS

Client Shall Do Hayes Developments Limited

Scale @A0 1 : 100

Date 12/05/2023

Drawn by CS

Checked by GN

Rev	Date	Reason	Chk
P1	12/05/23	For Planning	SEW

Drawing Number	Rev
0419-SEW-HS-RF-DR-A-001119	P1

APPENDIX C INSPECTION/ACTIVITY LOG TABLE

Table C.1 Inspection and Activity Log Table

Inspection undertaken by	Date/Time	On-site pressure*	Off-site pressure*	Action(s) taken	Outcome	Comments

*Notes on species present, pressure level (High = >30 pigeons, gulls, corvids, starlings; Medium = 5-30 birds; Low = <5 birds; None = 0 birds), distance from site and behaviour (Sc = scavenging; P = prospecting, L = Loafing, N = Nesting). NB include details of inspections where no hazardous birds were recorded.

Comments on monitoring	Remedial recommendations

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

Current key legislation relating to ecology includes the Environment Act 2021[9], Wildlife and Countryside Act 1981 (as amended)[10]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[11], The Countryside and Rights of Way Act 2000 (CRoW Act)[12], and The Natural Environment and Rural Communities Act, 2006[13].

The Environment Act, 2021

Under the Environment Act[14], 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)[15], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[16], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[17] 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[18] (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[19] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[20] (and Biodiversity 2020 strategy[21] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020 and EU Biodiversity Strategy (EUBS)[22], 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 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.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024[23] 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[24]

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

5. 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.
6. 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).
7. 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

8. Sites of Importance for Nature Conservation (SINCs) should be protected.
9. 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.
10. 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.
11. 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.
12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

13. 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.
14. 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
15. 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[25]

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[26]

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

3. The conservation and enhancement of the natural state of:
   - Harefield Gravel Pits
   - Colne Valley Regional Park
   - Fray's Farm Meadows

- Harefield Pit

4. 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.
5. 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.
6. 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.
7. The provision of biodiversity improvements from all development, where feasible.
8. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
9. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

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[3] *Civil Aviation Authority, (2017); Wildlife Hazard Management at Aerodromes. CAA*
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[8] *Waterman Infrastructure & Environment Limited (2023) Hayes Park, Hayes End Road, Hayes, UB4 8FE Delivery and Servicing Plan (ref: WIE19060.103.R.1.2.3.DSP)*
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