



Ecology Consultancy

9 Nestles Avenue, Hayes / Preliminary Ecological Appraisal / Healey Development Solutions (Hayes) Ltd



9 Nestles Avenue, Hayes

Preliminary Ecological Appraisal

Report for Healey Development Solutions (Hayes) Ltd

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Summary of key issues

The Ecology Consultancy was commissioned to carry out a Preliminary Ecological Appraisal (PEA) comprising a Phase 1 habitat survey, protected species assessment, and ecological evaluation of land at 9 Nestles Avenue, Hayes, Hillingdon. The main findings of the PEA are as follows:

- The site does not form part of any statutory or non-statutory nature conservation site;
- The site was comprised of a building, hard standing, introduced shrub, ephemeral/ short perennial vegetation, some scattered scrub and a few scattered trees. Habitats present were considered of value within the immediate vicinity of the site only;
- **Nesting birds** – scattered trees and introduced shrub on site had the potential to support nesting birds. Where these features are to be affected, they should be removed outside of the nesting bird season (February to September) or cleared following a nesting bird check by an ecologist up to 48 hours prior;
- **Invasive species**- some species of cotoneaster are invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and were recorded on site. Where these plants are to be affected by works, appropriate site management and waste disposal will be necessary to preclude the possibility of their spread in the wild.
- Recommendations to enhance the biodiversity value of the site in accordance with national and local planning policies comprise the inclusion of wildlife planting, biodiverse roofs, provision of bird nesting opportunities and good horticultural practice.

1 Introduction

BACKGROUND TO COMMISSION

- 1.1 The Ecology Consultancy was commissioned by Healey Development Solutions (Hayes) Ltd in November 2018 to carry out a Preliminary Ecological Appraisal (PEA) of the site known as 9 Nestles Avenue, Hayes, London Borough of Hillingdon. The appraisal was carried out in order to provide ecological information to inform an outline planning application for site clearance and construction of a new mixed residential and commercial building. This appraisal considers land within the planning application site boundary (hereon referred to as ‘the site’) as indicated on the Proposed First Floor Plan 1820-0473 revA (Brimelow McSweeny Architects, 2018).

SCOPE OF THE REPORT

- 1.2 The aim of this appraisal is to provide current baseline ecological information of the site. This will be used to identify any potential ecological constraints associated with the proposed development and/or to identify the need for additional survey work to further evaluate any impact that may risk contravention of legislation or policy relating to protected species and nature conservation. Where necessary, avoidance, mitigation/compensation and/or enhancement measures have been recommended to ensure compliance.
- 1.3 This appraisal is based on the following information sources:
- a desk study of the site and land within a 1 kilometre (km) surrounding radius;
 - a Phase 1 habitat survey (JNCC, 2010) of the site to identify and map the habitats present;
 - a protected species assessment of the site to identify features with potential to support legally protected species; and
 - an evaluation of the site’s importance for nature conservation.
- 1.4 This appraisal has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2017) and as detailed in British Standard 42020:2013 *Biodiversity - Code of Practice for Biodiversity and Development* (BSI, 2013).

- 1.5 The survey, assessment and report were conducted by Holly Harkness BSc (Hons) MSc Grad CIEEM, an ecologist with over two years' experience, who is competent in carrying out Phase 1 habitat surveys and protected species assessments.

SITE CONTEXT AND STATUS

- 1.6 The proposed development site is approximately 0.23 hectares (ha) and is centred on Ordnance Survey National Grid reference TQ 09851 79226. The site is situated in an urban setting and is bound by commercial properties to the north and west, Nestles Avenue to the south and a cleared site currently under development to the east.

DEVELOPMENT PROPOSALS

- 1.7 The proposals include the demolition of existing building and the redevelopment of a 11-storey residential building to provide 103 residential units with associated landscaping, access, car parking and cycle parking.

RELEVANT LEGISLATION AND PLANNING POLICY

- 1.8 The following key pieces of nature conservation legislation are relevant to this appraisal. A more detailed description of legislation is provided in Appendix 5:
- The Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitats Regulations);
 - Wildlife and Countryside Act 1981 (as amended);
 - Natural Environment and Rural Communities Act 2006;
 - Wild Mammals (Protection) Act 1996.
- 1.9 The National Planning Policy Framework (Department of Communities and Local Government, 2018) requires local authorities to avoid and minimise impacts on biodiversity and to provide net gains in biodiversity when taking planning decisions.
- 1.10 The London Plan: The Spatial Strategy for Greater London (GLA, 2016) deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the London Environment Strategy (GLA, 2018), and urban greening to mitigate the effects of climate change.
- 1.11 The new draft London Plan (Intend to Publish version, 2019) places greater emphasis on green infrastructure and proposes that developments incorporate green infrastructure. Local Boroughs are encouraged to develop their own 'Urban Greening

Factor' to identify the appropriate target for urban greening. This is based on the proportion of surface cover that contributes ecosystem services. In the interim the target score is 0.4 (housing) or 0.3 (commercial) increase. The new draft London Plan is subject to amendment prior to adoption.

- 1.12 Other planning policies at the local level which are of relevance to this development include the adopted Hillingdon Local Plan: Part 1 Strategic Policies (2012). Further information is provided in Appendix 5.

2 Methodology

DESK STUDY

2.1 The following data sources were reviewed to provide information on the location of statutory designated sites¹, non-statutory designated sites², legally protected species³, Species and Habitats of Principal Importance⁴ and other notable species⁵ and notable habitats⁶ that have been recorded within a 1km radius of the site:

- Greenspace Information for Greater London (GiGL) the local Biological Records Centre, principally for species records and information on non-statutory sites;
- MAGIC (<http://www.magic.gov.uk/>) - the Government's on-line mapping service; and,
- Ordnance Survey mapping and publicly available aerial photography.

HABITAT SURVEY

2.2 A habitat survey of the site was carried out on 27 November 2018 in cold, cloudy conditions. The survey covered all areas of the site and habitats were described and mapped following standard Phase 1 habitat survey methodology (JNCC, 2010). Habitats were marked on a paper base map and subsequently digitised using ESRI ArcGIS for Desktop software. Habitats were also assessed against descriptions of Habitat of Principal Importance as set out by the JNCC (BRIG, 2008)⁷.

2.3 Records for dominant and notable plants are provided, as are incidental records of birds and other fauna noted during the course of the habitat survey.

¹ Statutory designations include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR).

² Non-statutory sites are designated by local authorities (e.g. Sites of Importance for Nature Conservation or Local Wildlife Sites).

³ **Legally protected species** include those listed in Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981; Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended); or in the Protection of Badgers Act 1992 (as amended).

⁴ **Species of Principal Importance** are those listed on Section 41 of the Natural Environment and Rural Communities Act, 2006.

⁵ **Notable species** include Species of Principal Importance under the Natural Environment and Rural Communities Act 2006; Local Biodiversity Action Plan (LBAP) species; Birds of Conservation Concern (Eaton *et al.*, 2015); and/or Red Data Book/nationally notable species (JNCC, undated).

⁶ **Notable habitats** include Habitats of Principal Importance under the Natural Environment and Rural Communities Act, 2006; those included in an LBAP; Ancient Woodland Inventory sites; and Important Hedgerows as defined by the Hedgerow Regulations 1997.

⁷ Data required to confirm that certain habitats (including rivers and ponds) meet criteria for Habitats of Principle Importance is beyond that obtained during a Phase 1 habitat survey. In these cases the potential for such habitats to meet relevant criteria is noted but further surveys to confirm this assessment may be recommended

- 2.4 Common names are used where widely accepted for amphibians, birds, fish, mammals, reptiles and vascular plants. Scientific names are provided for other groups but at first mention only if there is also an accepted common name.
- 2.5 The site was also surveyed for the presence of invasive plant species as defined by Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). However, detailed mapping of such species is beyond the scope of this commission and the locations on the habitat plan are indicative only.
- 2.6 Target notes are used to provide information on specific features of ecological interest or habitat features that were too small to be mapped.

PROTECTED AND NOTABLE SPECIES ASSESSMENT

- 2.7 The suitability of the site for legally protected species was assessed on the basis of relevant desk study records⁸ combined with field observations from the habitat survey. The likely value of habitat for protected species occurrence was ranked on a scale from 'negligible' to 'present' as described in Table 2.1.
- 2.8 The assessment of habitat suitability for protected or notable species was based on professional judgement drawing on experience of carrying out surveys of a large number of urban and rural sites and best practice survey guidance on identifying field signs which includes that for the following species: badger (e.g. Roper, 2010); bats (Collins (ed.), 2016); hazel dormouse (English Nature, 2006); great crested newt (Langton *et al.* 2001); otter (Chanin, 2003); reptiles (Gent and Gibson, 2003); and water vole (Strachan *et al.* 2011).

Table 2.1: Protected species assessment categories

Category	Description
Present	Presence confirmed from the current survey or by recent, confirmed records.
High	Habitat present provides all of the known key requirements for a given species/species group. Local records are provided by desk study. The site is within or close to a national or regional stronghold for a particular species. Good quality surrounding habitat and good connectivity.
Moderate	Habitat present provides all of the known key requirements for a given species/species group. Several desk study records and/or site within national distribution and with suitable surrounding habitat. Factors limiting

⁸ Primarily dependent on the age of the records, distance from the site and types of habitats at the site.

	the likelihood of occurrence may include small habitat area, barriers to movement and disturbance.
Low	Habitat present is of relatively poor quality for a given species/species group. Few or no desk study records. However, presence cannot be discounted on the basis of national distribution, nature of surrounding habitats or habitat fragmentation.
Negligible	Habitat is either absent or of very poor quality for a particular species or species group. There were no desk study records. Surrounding habitat unlikely to support wider populations of a species/species group. The site may also be outside or peripheral to known national range for a species.

2.9 The findings of this assessment establish the need for protected species surveys that are required to achieve compliance with relevant legislation. Surveys are commonly required for widespread species such as bats, great crested newt, reptiles and badger, but may be necessary for other species if suitable habitat is present.

2.10 Surveys may be required where a site is judged to be of low suitability for a particular species/species group. However, in some cases there may be opportunities to comply with legislation, without further survey, through precautionary measures prior to and during construction.

SITE EVALUATION

2.11 The site's ecological value has been evaluated broadly following guidance issued by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2016) which ranks the nature conservation value of a site according to a geographic scale of reference: international, national, regional, county/metropolitan, district/borough, local/parish or of value at the site scale. In evaluating the nature conservation value of the site the following factors were considered: nature conservation designations; species/habitat rarity; naturalness; fragility and connectivity to other habitats.

DATA VALIDITY AND LIMITATIONS

2.12 Every effort has been made to provide a comprehensive description of the site; however, the following limitations apply to this assessment.

- The protected species assessment provides a preliminary view of the likelihood of protected species occurring on the site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if on the basis of the preliminary assessment or during subsequent surveys it is considered reasonably likely that protected species may be present.

- The ecological evaluation is preliminary and may change subject to the findings of further ecological surveys (should these be required).
- Even where data for a particular species group is provided in the desk study, a lack of records for a defined geographical area does not necessarily mean that there is a lack of ecological interest, the area may simply be under-recorded.
- Where only four figure grid references are provided for protected species by third parties, the precise location of species records can be difficult to determine and they could potentially be present anywhere within the given 1km x 1km square. Equally six figure grid references may be accurate to the nearest 100m only.
- The Phase 1 habitat survey does not constitute a full botanical survey or provide accurate mapping of invasive plant species.
- The survey was undertaken outside of the optimal season (April to September) however was sufficient to assess the habitats and their potential for protected species appropriately.
- Ecological survey data is typically valid for two years unless otherwise specified.

2.13 Despite these limitations, it is considered that this report accurately reflects the habitats present, their biodiversity values and the potential of the site to support protected and notable species.

3 Results

DESK STUDY

- 3.1 The following records regarding present and historical ecological interest at the site and within a 1km radius were supplied by GiGL and MAGIC. Records are summarised below.

Statutory Sites of Importance for Nature Conservation

- 3.2 The proposed development site is not subject to any statutory nature conservation designations, and no statutory designated sites are present within 1km of the site.

Non-statutory designated nature conservation sites

- 3.3 The proposed development site is not subject to any non-statutory nature conservation designations. Four non-statutory sites designated as a Sites of Importance for Nature Conservation (SINC) are present within 1km of the site comprising two Sites of Metropolitan Importance for Nature Conservation (SMINC) and two Sites of Borough Grade I Importance for Nature Conservation (SBINCs) (see Table 3.1).

Table 3.1: Non-statutory Designated Sites

Site Name	Distance from site and orientation	Reason for designation
London's Canals SMINC	245m north-east	London's canals support a wide range of aquatic flora, amongst which are found a number of locally uncommon species, important invertebrate fauna, a diverse fish community and breeding waterfowl.
Crane Corridor SMINC	675m east	This corridor of open space around the River Crane combines an excellent variety of wetland habitats, including ponds and lakes.
Yeading Brook, Minet Country Park and Hitherbroom Park SBINCs	900m north-east	A site centering on the reclaimed, derelict land of Minet Country Park. Habitats include amenity grassland, hedge, marsh/swamp, pond/lake, secondary woodland and unimproved neutral grassland.
Cranford Countryside Park and Open Space SBINCs	950m south	A country park with hay meadows, including St Dunstan's 16 th century churchyard. Habitats include amenity grassland, hedge, scattered trees, secondary woodland, tall herbs, unimproved neutral grassland and wet ditches

PHASE 1 HABITAT SURVEY

Overview

- 3.4 The survey area consisted of a building, hard-standing, introduced shrub, Ephemeral/short perennial, patches of scattered scrub and a few scattered trees. The areas in the immediate vicinity to south of the site were also included in the survey.
- 3.5 Phase 1 habitat types are mapped in Appendix 1, Figure 1, Target Notes are given in Appendix 4 and habitat areas are given in Table 3.2. A description of dominant and notable species and the composition of each habitat is provided below.

Table 3.2: Phase 1 Habitat Areas

Phase 1 Habitat	Extent (m ²)	%
Building/ Hardstanding	2464	97.2
Introduced shrub	12	0.5
Ephemeral/short perennial	50	2.0
Scattered scrub	8	0.3
TOTAL	2534	100.00

Habitat description

Building and hardstanding

- 3.6 Much of the site comprised a warehouse building, which is described below, in terms of its suitability for roosting bats.
- 3.7 The brick built front section of the building was a two-storeys high office block with a flat roof (see Photograph 1, Appendix 2). Some gaps in the brickwork were visible; however, they were not deemed suitable for bats. The back section of the building was a brick-built warehouse with an open pitched corrugated sheet and glass roof. A dense patch of ivy was present on north-western corner of the building (see Photograph 2, Appendix 2). There were some visible signs of disrepair such as broken window pane which led into the open, well-lit roof space, gaps in the brickwork and a gap between the barge board and wall (see Photographs 7,8 and 9, Appendix 2). The building was likely well-lit at night with security lighting present on the southern, western and northern elevation of the building as well as street lighting.

- 3.8 An area of hardstanding was present south of the building, which was used as a driveway, and along the eastern and western boundaries of the site (see Photograph 6, Appendix 2).

Introduced shrub

- 3.9 An area of introduced shrub was present at the front of the site (see Photograph 6, Appendix 2). Dominant species included cherry laurel.

Ephemeral/ short perennial

- 3.10 Around the perimeter of the building in the gaps of hardstanding were some small areas of Ephemeral/ short perennial vegetation (see Photograph 4, Appendix 2). Dominant species included groundsel and herb Robert.

Scattered scrub

- 3.11 Some scattered scrub was present around the perimeter of the building in the gaps of hardstanding (see Photograph 3, Appendix 2). Species consisted largely of Butterfly bush and occasional bramble.

Scattered trees

- 3.12 Several scattered trees were present on the south and south-eastern boundary of the site and included semi-mature hornbeam, common lime and pear. Various tree saplings were present along the perimeter of the building (see Photograph 5, Appendix 2).

PROTECTED AND INVASIVE SPECIES ASSESSMENT

- 3.13 The potential for the site to support protected species has been assessed using criteria provided in Table 2.1 based on the results of the desk study and observations made during the site survey of habitats at the site. Other legally protected species are not referred to as it is considered that the site does not contain habitats that would be suitable to support them. The following species/species groups are potentially present at the site:

- breeding birds;
- bats; and
- invasive species.

3.14 The table also summarises relevant legislation and policies relating to protected species. Key pieces of statute are summarised in Section 1 and set out in greater detail in Appendix 5.

Table 2.1: Protected Species Assessment

Habitat/ species	Status 9, 10	Likelihood of occurrence
Breeding birds	WCA S5 SPI LBAP BoCC	LOW: The desk study returned various records of bird species. These included Species of Principal Importance and London BAP species that could potentially utilise the site such as house sparrow which is a BoCC Red List species. The scattered trees, introduced shrub and ivy on site were considered to have potential to support nesting bird species. As habitat suitable for breeding birds will be removed as part of development they are considered further in Section 4 of this report.
Bats	HR WCA S5	NEGLECTIBLE: The building had a few signs of disrepair; there were some visible gaps located on the front, back and the west elevation of the building which were likely well-lit by security lighting as well as street lighting. Furthermore, the site is situated in an urbanised area with little connectivity to areas of suitable habitat and therefore unlikely to be found by bats. The site adjacent to the east had been cleared of vegetation and was under construction works. The trees within the site were all semi-mature or young with no features suitable to support bats. There were four desk study records of two species of bats, all the records were over 1km away. As there is a negligible likelihood of presence, bats are not considered further in this report.
Invasive species	WCA S9	PRESENT: Cotoneaster was present within the beds of introduced shrub (Target Note 1). It was unable to be identified to species level however some species of cotoneaster are invasive, non-native species and listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). As invasive species listed on Schedule 9 were potentially present on site, they are considered further in Section 4 of this report.

⁹ The following abbreviations have been used to signify the legislation regarding different species: HR = Conservation of Habitats and Species Regulations 2017 (as amended); WCA S1 = Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); WCA S5 = Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); WCA S9 = Schedule 9 of the Wildlife and Countryside Act 1981 (as amended); PBA = Protection of Badgers Act, 1992; WMA = Wild Mammals (Protection) Act, 1996.

¹⁰ The following abbreviations have been used to signify the policy of conservation assessments applying to notable species: SPI = Species of Principal Importance under the NERC Act 2006; LBAP = Local Biodiversity Action Plan species; BoCC = Birds of Conservation Concern - amber list / red list (Eaton *et al.*, 2015); and/or RD/NN = red data book/nationally notable species (JNCC, undated).

NATURE CONSERVATION EVALUATION

- 3.15 The proposed development site is not subject to any nature conservation designations. It is situated in an urban area surrounded by commercial premises and residential roads.
- 3.16 The site contains small areas of common and widespread habitats, none of which are Habitats of Principal Importance.
- 3.17 The scattered trees, introduced shrub and ivy had low potential to support birds including Species of Principal Importance, such as House Sparrow. The remaining habitats on site were not suitable for any other note-worthy species such as Species of Principal Importance or London BAP species.
- 3.18 If present, any populations of nesting birds are unlikely to exceed local value. Measures to mitigate potential impacts on them are recommended. It is considered unlikely that the site would support any other protected or rare species.
- 3.19 The habitats at the site are likely to be of value within the immediate vicinity of the site only and it is unlikely that the site would support rare species, or diverse assemblages or large populations of any noteworthy species.

4 Potential Impacts and Recommendations

- 4.1 This section summarises the potential impacts on habitats and protected and notable species that may be present at the site. The impact assessment is preliminary and further detailed assessment and surveys may be required to assess impacts and design suitable mitigation, where appropriate.
- 4.2 The following key ecological issues have been identified:
- habitat suitable for breeding birds is present – measures must be taken to avoid killing birds or destroying their nests;
 - invasive non-native plant species was present on-site and mitigation measures must be taken to ensure the proposals do not cause the spread of into the wild;
 - a range of measures should be undertaken to satisfy the requirement for ecological enhancement included in planning policy in order to achieve net gain.

CONSTRAINTS AND MITIGATION/COMPENSATION

Habitats

- 4.3 The majority of vegetation on site will be permanently lost. This includes the removal of introduced shrub, scattered trees, scattered scrub, and ephemeral/short perennial vegetation.
- 4.4 Working under the principle of ‘net-gain’ as supported by planning policy, any habitats to be permanently removed should be compensated for through soft landscaping within any future development proposals, including biodiverse roofs and planting schemes of recognised value to wildlife.

Breeding birds

- 4.5 All breeding birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended). The site has low potential to support small numbers of common species of nesting birds.
- 4.6 The proposed works require the removal of scattered trees, introduced shrub and ivy which could support breeding birds. As such, this should be carried out between September and February inclusive, to avoid any potential offences relating to breeding birds during their main bird breeding season (Newton et al., 2011).

- 4.7 Where this is not possible, a check for nesting birds up to 48 hours prior to vegetation clearance must be undertaken by an experienced ecologist and if any nests are found, the nests must be protected until such time as the young have left the nest, as confirmed by an ecologist. If any nesting birds are found at any time during clearance, works within the immediate surroundings of the nests must stop immediately and an ecologist consulted.

Other protected species

- 4.8 Works must stop immediately and advice sought from a suitably qualified ecologist in the unlikely event that any protected species are found during site clearance or construction.

Invasive species

- 4.9 Cotoneaster are species listed under as invasive under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and were present on-site (Target Note 1). Under this Act, it is an offence to plant or otherwise cause the spread of these species in the wild.
- 4.10 As the cotoneaster would be affected during the works appropriate site management and waste disposal will be required. Environmental management guidance to prevent the spread of invasive plant species is available on the Government website (Natural England, Defra & Environment Agency, 2016).

Environmental best practice

- 4.11 Best environmental practice measures which should be implemented where appropriate to include:
- Appropriate storage of fuels and chemicals to minimise the risk of accidental spillage. Sources of best construction practice and environmental management include CIRIA guidance (Connolly and Charles, 2005) and various DEFRA/Environment Agency guidelines (2016) environment agency pollution prevention guidelines (2007). This guidance relates various pieces of legislation including the environmental damage (prevention and remediation) regulations 2009.

FURTHER SURVEY REQUIREMENTS

- 4.12 Table 4.1 lists further survey requirements as recommended in the constraints section.

Table 4.1: Further survey requirements

Species/ Habitat	Survey Requirement	Number of surveys and seasonal considerations
Birds	Nesting bird check	If vegetation clearance is carried out between September and the end of February, no survey is required. Otherwise, individual surveys are required up to 48 hours prior to vegetation clearance works (Newton et al., 2011).

OPPORTUNITIES FOR ECOLOGICAL ENHANCEMENT

Native scrub and tree planting

- 4.13 It is recommended that native tree and scrub species are included within any future landscaping plans to enhance the site. Wildlife planting should be integral to any soft landscape plans and should include native species and/or species of recognised wildlife value¹¹. The use of nectar-rich and berry producing plants will attract a wider range of insects, birds and mammals and continue to accommodate those already utilising the site. Where possible, larger shrubs/trees should be under-planted to create greater structure and cover for wildlife.

Biodiverse Roof

- 4.14 It is recommended that areas of biodiverse roof are included in the newly constructed building. To demonstrate the highest feasible and viable sustainability standards in line with London Plan Policies (GLA, 2016) it is recommended that a specification for a biodiverse roof be drawn up by a company with a proven track record in delivering these features in London.
- 4.15 Biodiverse/biosolar roof designs are preferable to standard sedum mat roofs that deliver little in the way of biodiversity value and ecosystem services (storm water attenuation, urban cooling etc.), and are typically less species-rich and have a shallower substrate depth. The biodiverse roofs should follow UK standards (GRO, 2014) and include additional habitat features such as temporary pools, invertebrate boxes and varying substrate depths.
- 4.16 A biodiverse roof would also provide further benefits such as protecting and prolonging the life of the roof membrane, reducing building energy use by insulating the building in winter and keeping it cooler in summer, providing a Sustainable Drainage Systems

¹¹ For example The Royal Horticultural Society (RHS) Perfect for Pollinators Scheme <https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/encourage-wildlife-to-your-garden/plants-for-pollinators> and the joint RHS/Wildlife Trust's Gardening With Wildlife In Mind Database <http://www.joyofplants.com/wildlife/home.php>

(SuDS) function by reducing storm water run-off from the roof, reducing the urban heat island effect and local air/noise pollution.

- 4.17 It is recommended that advice is sought from a company experienced in the design and delivery of biodiverse roofs in London such as the Green Infrastructure Consultancy (<http://greeninfrastructureconsultancy.com>) in order to design the specification of the biodiverse roof in-line with the environmental goals of the development and best practice.

Sustainable Urban Drainage System (SuDS)

- 4.18 SuDS comprise a linked system of soft landscaping, green roofs, rain-water harvesting technologies including ponds, below ground drainage, swales and porous surfacing which can be designed into a development to intercept and attenuate surface water and prevent flooding. Design of a SuDS would be appropriate to this development including the use of rain gardens and should be considered as part of the site master plan. A SuDS would also increase biodiversity, for example by providing a series of habitats for wildlife to use, if appropriately planted¹² – see below.

Provision of nesting opportunities for birds

- 4.19 It is recommended that bird boxes suitable for declining species such as house sparrow (a London BAP and Species of Principal Importance) should be installed on site. The inclusion of woodcrete bird boxes are recommended as they are available in a range of designs, are long lasting compared to wooden boxes and insulate occupants from extremes of temperature and condensation. House sparrow boxes should be located at least 3m above ground level on new buildings out of direct sunlight but not obscured by dense vegetation. The boxes should be cleaned out yearly outside the breeding bird season (September-February) and old boxes should be replaced or repaired as necessary.
- 4.20 It is also recommended that integrated swift bricks such as the Manthorpe Swift Brick (See Appendix 2, Photograph 9) are installed within the new building where appropriate as they need to be placed at a height of at least 5 metres (m) above ground level and have unobstructed airspace in front of the box entrance to allow for uninterrupted ingress/egress. The boxes are placed to avoid being above windows or where they are easily overlooked/disturbed, in close proximity to mechanical outlet extractors or in locations likely to be subject to increased light levels.

¹² https://www.susdrain.org/files/resources/other-guidance/ecological_benefits_summary.pdf

- 4.21 Swifts are social birds that prefer to nest in colonies, therefore boxes that provide nesting opportunities for a number of boxes within close proximity of one another are recommended.

Good horticultural practice

- 4.22 Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants with local provenance and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

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Appendix 1: Habitat Map

Figure 1: Habitat Map



Appendix 2: Photographs

Photograph 1
Southern elevation of building.



Photograph 2
Northern elevation of building.



Photograph 3
Western elevation of building and
patches of scattered scrub.



Photograph 4

Eastern elevation of building looking south and hardstanding with patches of Ephemeral/ short perennial and various tree saplings.



Photograph 5

Eastern elevation of building and looking north and hardstanding with patches of scrub.



Photograph 6

Area of hardstanding with introduced shrub at the front, southern elevation of the building.



Photograph 7

Missing window pane and gaps in the brickwork.



Photograph 8

Gap between barge board and brickwork



Photograph 9

Gaps in the bricked-up window frame.



Appendix 3: Plant Species List

Plant Species List 9 Nestles Avenue, Hayes, London Borough of Hillingdon compiled from Phase 1 habitat survey carried out on 27 November 2018.

Scientific nomenclature and common names for vascular plants follow Stace (2010). Please note that this plant species list was generated as part of a Phase 1 habitat survey, does not constitute a full botanical survey and should be read in conjunction with the associated results section of this PEA.

Abundance was estimated using the DAFOR scale as follows:

D = dominant, A = abundant, F = frequent, O = occasional, R = rare, L = locally
c=clumped, e=edge only, g=garden origin, p=planted, y = young, s=seedling or sucker, t=tree, h=hedgerow, w=water

Common name	Latin Name	Abundance	Qualifiers
Ash	<i>Fraxinus excelsior</i>	R	s
Bramble	<i>Rubus fruticosus</i>	O	
Butterfly Bush	<i>Buddleja davidii</i>	F	
Cleavers	<i>Galium aparine</i>	F	
Common dandelion	<i>Taraxacum officinale</i>	O	
Common lime	<i>Tilia x europaea</i>	L	
Cotoneaster	<i>Cotoneaster spp.</i>	O	g
Field maple	<i>Acer pseudoplatanus</i>	R	s
Groundsel	<i>Senecio vulgaris</i>	F	
Hazel	<i>Corylus avellana</i>	R	s
Herb Robert	<i>Geranium robertianum</i>	F	
Holly	<i>Ilex aquifolium</i>	O	e
Hornbeam	<i>Carpinus betulus</i>	O	p, y
Ivy	<i>Hedera helix</i>	F	
Cherry Laurel	<i>Prunus laurocerasus</i>	F	h, g
Pedunculate Oak	<i>Quercus robur</i>	R	s
Pear	<i>Pyrus communis</i>	L	t
Perennial sowthistle	<i>Sonchus arvensis</i>	F	
Sycamore	<i>Acer pseudoplatanus</i>	O	s
Wild cherry	<i>Prunus avium</i>	L	y

Appendix 4: Target Notes

Target Notes List for 9 Nestles Avenue from the Phase 1 habitat survey and protected and notable species assessment carried out on the 27 November 2018.

Target Note (TN)	Description
TN	Cotoneaster spp.

Appendix 5: Legislation and Planning Policy

Important notice: This section contains details of legislation and planning policy applicable in Britain only (i.e. not including the Isle of Man, Northern Ireland, the Republic of Ireland or the Channel Islands) and is provided for general guidance only. While every effort has been made to ensure accuracy, this section should not be relied upon as a definitive statement of the law.

A NATIONAL LEGISLATION AFFORDED TO SPECIES

The objective of the EC Habitats Directive¹³ is to conserve the various species of plant and animal which are considered rare across Europe. The Directive is transposed into UK law by The Conservation of Habitats and Species Regulations 2017 (formerly The Conservation (Natural Habitats, &c.) Regulations 2010 (as amended) and The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended).

The Wildlife and Countryside Act 1981 (as amended) is a key piece of national legislation which implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and implements the species protection obligations of Council Directive 2009/147/EC (formerly 79/409/EEC) on the Conservation of Wild Birds (EC Birds Directive) in Great Britain.

Since the passing of the Wildlife & Countryside Act 1981, various amendments have been made, details of which can be found on www.opsi.gov.uk. Key amendments have been made through the Countryside and Rights of Way (CRoW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991;
- Countryside and Rights of Way (CRoW) Act 2000;
- Natural Environment & Rural Communities (NERC) Act 2006;
- Protection of Badgers Act 1992;
- Wild Mammals (Protection) Act 1996.

Species and species groups that are protected or otherwise regulated under the aforementioned domestic and European legislation, and that are most likely to be affected by development activities, include herpetofauna (amphibians and reptiles), badger, bats, birds,

¹³ Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

dormouse, invasive plant species, otter, plants, red squirrel, water vole and white clawed crayfish.

Explanatory notes relating to species protected under The Conservation of Habitats and Species Regulations 2017 (which includes smooth snake, sand lizard, great crested newt and natterjack toad), all bat species, otter, dormouse and some plant species) are given below.

These should be read in conjunction with the relevant species sections that follow.

- In the Directive, the term ‘deliberate’ is interpreted as being somewhat wider than intentional and may be thought of as including an element of recklessness.
- The Conservation of Habitats and Species Regulations 2017 (as amended) does not define the act of ‘migration’ and therefore, as a precaution, it is recommended that short distance movement of animals for e.g. foraging, breeding or dispersal purposes are also considered.
- In order to obtain a European Protected Species Mitigation (EPSM) licence, the application must demonstrate that it meets all of the following three ‘tests’: i) the action(s) are necessary for the purpose of preserving public health or safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequence of primary importance for the environment; ii) that there is no satisfactory alternative and iii) that the action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

Bats

All species of bat are fully protected under The Conservation of Habitats and Species Regulations 2017 (as amended) through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species (e.g. all bats)
- Deliberate disturbance of bat species as:
 - a) to impair their ability:
 - (i) to survive, breed, or reproduce, or to rear or nurture young;
 - (ii) to hibernate or migrate³
 - b) to affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place
- Keeping, transporting, selling, exchanging or offering for sale whether live or dead or of any part thereof.

Bats are also currently protected under the Wildlife and Countryside Act 1981 (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale.

How is the legislation pertaining to bats liable to affect development works?

A European Protected Species Mitigation (EPSM) Licence issued by the relevant countryside agency (e.g. Natural England) will be required for works liable to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored.

Though there is no case law to date, the legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded de facto protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost¹⁴.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the Wildlife and Countryside Act 1981 (as amended). Among other things, this makes it an offence to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built;
- Intentionally take or destroy an egg of any wild bird:
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.

Certain species of bird, for example the barn owl, black redstart, hobby, bittern and kingfisher receive additional special protection under Schedule 1 of the Act and Annex 1 of the European

¹⁴ Garland & Markham (2008) Is important bat foraging and commuting habitat legally protected? Mammal News, No. 150. The Mammal Society, Southampton.

Community Directive on the Conservation of Wild Birds (2009/147/EC). This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young;
- Intentional or reckless disturbance of dependent young of such a bird.

How is the legislation pertaining to birds liable to affect development works?

To avoid contravention of the Wildlife and Countryside Act 1981 (as amended), works should be planned to avoid the possibility of killing or injuring any wild bird, or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird breeding season which typically runs from March to August¹⁵. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Those species of bird listed on Schedule 1 are additionally protected against disturbance during the breeding season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

Invasive Plant Species

Certain species of plant, including Japanese knotweed *Fallopia japonica*, giant hogweed *Heracleum mantegazzianum* and Himalayan balsam *Impatiens glandulifera* are listed on Part II of Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) in respect to Section 14(2). Such species are generally non-natives whose establishment or spread in the wild may be detrimental to native wildlife. Inclusion on Part II of Schedule 9 therefore makes it an offence to plant or otherwise cause these species to grow in the wild.

How is the legislation pertaining to invasive plants liable to affect development works?

Although it is not an offence to have these plants on your land per se, it is an offence to cause these species to grow in the wild. Therefore, if they are present on site and development activities (for example movement of spoil, disposal of cut waste or vehicular movements) have the potential to cause the further spread of these species to new areas, it will be necessary to

¹⁵ It should be noted that this is the main breeding period. Breeding activity may occur outwith this period (depending on the particular species and geographical location of the site) and thus due care and attention should be given when undertaking potentially disturbing works at any time of year.

ensure appropriate measures are in place to prevent this happening prior to the commencement of works.

Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to:

- Mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

B NATIONAL AND EUROPEAN LEGISLATION AFFORDED TO HABITATS

Statutory Designations: National

Nationally important areas of special scientific interest, by reason of their flora, fauna, or geological or physiographical features, are notified by the countryside agencies as statutory **Sites of Special Scientific Interest** (SSSIs) under the National Sites and Access to the Countryside Act 1949 and latterly the Wildlife & Countryside Act 1981 (as amended). As well as underpinning other national designations (such as **National Nature Reserves** which are declared by the countryside agencies under the same legislation), the system also provides statutory protection for terrestrial and coastal sites which are important within a European context (Natura 2000 network) and globally (such as Wetlands of International Importance). See subsequent sections for details of these designations. Improved provisions for the protection and management of SSSIs have been introduced by the Countryside and Rights of Way Act 2000 (in England and Wales).

The Wildlife & Countryside Act 1981 (as amended) also provides for the making of **Limestone Pavement Orders**, which prohibit the disturbance and removal of limestone from such designated areas, and the designation of **Marine Nature Reserves**, for which byelaws must be made to protect them.

Statutory Designations: International

Special Protection Areas (SPAs), together with **Special Areas of Conservation** (SACs) form the **Natura 2000** network. The Government is obliged to identify and classify SPAs under

the EC Birds Directive (Council Directive 2009/147/EC (formerly 79/409/EEC)) on the Conservation of Wild Birds). SPAs are areas of the most important habitat for rare (listed on Annex I of the Directive) and migratory birds within the European Union. Protection afforded SPAs in terrestrial areas and territorial marine waters out to 12 nautical miles (nm) is given by The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SPAs in UK offshore waters (from 12-200 nm).

The Government is obliged to identify and designate SACs under the EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora). These are areas which have been identified as best representing the range and variety of habitats and (non-bird) species listed on Annexes I and II to the Directive within the European Union. SACs in terrestrial areas and territorial marine waters out to 12 nm are protected under The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SACs in UK offshore waters (from 12-200 nm).

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and wise use, in particular recognizing wetlands as ecosystems that are globally important for biodiversity conservation. Wetlands can include areas of marsh, fen, peatland or water and may be natural or artificial, permanent or temporary. Wetlands may also incorporate riparian and coastal zones adjacent to the wetlands. Ramsar sites are underpinned through prior notification as Sites of Special Scientific Interest (SSSIs) and as such receive statutory protection under the Wildlife & Countryside Act 1981 (as amended) with further protection provided by the Countryside and Rights of Way (CROW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. This effectively extends the level of protection to that afforded to sites which have been designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs).

Statutory Designations: Local

Under the National Sites and Access to the Countryside Act 1949 **Local Nature Reserves** (LNRs) may be declared by local authorities after consultation with the relevant countryside agency. LNRs are declared for sites holding special wildlife or geological interest at a local

level and are managed for nature conservation, and provide opportunities for research and education and enjoyment of nature.

Non-Statutory Designations

Areas considered to be of local conservation interest may be designated by local authorities as a **Wildlife Site**, under a variety of names such as **County Wildlife Sites** (CWS), **Listed Wildlife Sites** (LWS), **Local Nature Conservation Sites** (LNCS), **Sites of Biological Importance** (SBIs), **Sites of Importance for Nature Conservation** (SINCs), or **Sites of Nature Conservation Importance** (SNCIs). The criteria for designation may vary between counties.

Together with the statutory designations, these are defined in local and structure plans under the Town and Country Planning system and are a material consideration when planning applications are being determined. The level of protection afforded to these sites through local planning policies and development frameworks may vary between counties.

Regionally Important Geological and Geomorphological Sites (RIGS) are the most important places for geology and geomorphology outside land holding statutory designations such as SSSIs. Locally-developed criteria are used to select these sites, according to their value for education, scientific study, historical significance or aesthetic qualities. As with local Wildlife Sites, RIGS are a material consideration when planning applications are being determined.

C NATIONAL PLANNING POLICY

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) replaced Planning Policy Statement (PPS9) in April 2012 as the key national planning policy concerning nature conservation. The NPPF emphasises the need for suitable development. The Framework specifies the need for protection of designated sites and priority habitats and priority species. An emphasis is also made for the need for ecological networks via preservation, restoration and re-creation. The protection and recovery of priority species – that is those listed as UK Biodiversity Action Plan priority species – is also listed as a requirement of planning policy. In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from adverse harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and The Biodiversity Duty

The Natural Environment and Rural Communities (NERC) Act came into force on 1st October 2006. Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act (Section 42 in Wales) requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity.' They are referred to in this report as Species of Principal Importance and Habitats of Principal Importance. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

D REGIONAL PLANNING POLICY

The London Plan (2016): The Mayor's Spatial Strategy for Greater London

The 2016 London Plan includes all updates since its previous 2011 version and deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the Mayor's Biodiversity Strategy (GLA, 2002), and urban greening to mitigate the effects of climate change. Policies 5.10 – 'urban greening', and 7.19 – 'Biodiversity and access to nature', are relevant to the development proposal and are detailed below.

Climate change adaptation - Policy 5.10 Urban Greening

Strategic

A The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

B The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030, and a further five per cent by 2050.

Planning decisions

C Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can

contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

LDF preparation

D Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.

Climate change adaptation - Policy 5.11 Green roofs and development site environs

Planning decisions

A Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:

- a adaptation to climate change (ie aiding cooling)
- b sustainable urban drainage
- c mitigation of climate change (ie aiding energy efficiency)
- d enhancement of biodiversity
- e accessible roof space
- f improvements to appearance and resilience of the building
- g growing food.

LDF preparation

B Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.

Protecting London's open and natural environment - Policy 7.19 Biodiversity and access to nature

Strategic

A The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

B Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: [1.1](#), [2.1](#), [2.2](#), [2.3](#), [2.4](#), [2.5](#), [2.6](#), [2.7](#), [2.8](#), [2.9](#), [2.10](#), [2.11](#), [2.12](#), [2.13](#), [2.14](#), [2.15](#), [2.16](#) and [2.17](#), [3.1](#), [3.3](#), [3.7](#), [5.4A](#), [5.14](#), [5.15](#), [5.17](#), [5.20](#), [6.3](#), [6.9](#), [7.14](#), [7.15](#), [7.25](#), [7.26](#) and [7.27](#) and [8.1](#).

Planning decisions

C Development Proposals should:

- a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
- b. prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
- c. not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

D On Sites of Importance for Nature Conservation development proposals should:

- a. give the highest protection to sites with existing or proposed international designations[1] (SACs, SPAs, Ramsar sites) and national designations[2] (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations[3]
- b. give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
- d. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1 avoid adverse impact to the biodiversity interest

2 minimise impact and seek mitigation

3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

F In their LDFs, Boroughs should:

- a. use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.
- b. identify areas deficient in accessible wildlife sites and seek opportunities to address them
- c. include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets
- d. ensure sites of European or National Nature Conservation Importance are clearly identified.
- e. identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

Connecting with London's Nature: The Mayor's Biodiversity Strategy

Connecting with London's Nature: The Mayor's Biodiversity Strategy (GLA, 2002) includes a number of policies and proposals for protecting green spaces and important species that are relevant to the site.

Proposal 3: Conserving species through the planning system states that:

"The Mayor will and boroughs should resist development that would have a significant adverse impact on the population or conservation status of protected species or priority species"

Proposal 6: Greening new developments states that:

"The Mayor will and boroughs should ensure that new development capitalises on opportunities to create, manage and enhance wildlife habitat and natural landscape. Priority should be given to sites within or near to areas deficient in accessible wildlife sites, areas of regeneration, and adjacent to existing wildlife sites".

Living Roofs and Walls; Technical Report: Supporting London Plan Policy

A technical report (GLA, 2008) on living roofs and walls has been published to support The London Plan (GLA, 2016) and the new London BAP habitat – Built Structures. In outline, it includes the following key policies;

“The major will and boroughs should expect major developments to incorporate living roofs and walls where feasible and reflect this principle in LDF policies. It is expected that this will include roof and wall planting that delivers as many of these objectives as possible;

- Accessible roof space
- Adapting to and mitigating climate change
- Sustainable urban drainage
- Enhancing biodiversity
- Improved appearance

“Boroughs should also encourage the use of living in smaller developments and extensions where the opportunity arises”.

E LOCAL PLANNING POLICY

HILLINGDON LOCAL PLAN: PART 1 STRATEGIC POLICIES

Policy EM7 Biodiversity and Geological Conservation

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

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

1. 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.**

F REGIONAL AND LOCAL BAPS

Many local authorities in the UK have also produced a local Biodiversity Action Plan (LBAP) at the County or District level. The London BAP is based on the UK list of Species and Habitats of Principal Importance and contains 214 species and 15 habitats.

Specific Habitat Action Plans (HAPs) and Species Action Plans (SAPs) listed in the Hillingdon BAP which are of potential relevance to this site include House sparrow.



Ecology Consultancy

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