

9 Nestles Avenue, Hayes, London  
Biodiversity Enhancement Plan  
Report for Charles Edward Ltd

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# Executive Summary

Temple was commissioned in March 2022 by Charles Edward Ltd to write a Biodiversity Enhancement Plan for the land at 9 Nestles Avenue, Hayes, London (henceforth referred to as 'the Site'). The BEP is required to assist in releasing Planning Conditions 8 and 9 (planning application no. 51175/APP/2020/2543). This plan should be read alongside the Bird Hazard Management Plan (Temple, 2022). The enhancement measures outlined in the plan are as follows:

- Tree and hedge planting
- Provision of habitat piles
- Provision of bird nesting opportunities for house sparrow
- Green roofing.

# 1 Introduction

## BACKGROUND TO COMMISSION

- 1.1 Temple was commissioned by Charles Edward Ltd in March 2022 to develop a Biodiversity Enhancement Plan (BEP) for the development at 9 Nestles Avenue, Hayes, London (henceforth referred to as 'the Site'). The BEP is required to assist with discharging Planning Conditions 8 and 9 (planning application no. 51175/APP/2020/2543) for site clearance and building of a mixed commercial and residential development.

- 1.2 Condition 8 of the Planning Permission States:

*Prior to above ground works, an ecological enhancement plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with HAL. The plan shall show dedicated areas for the management of wildlife. The plan shall also include a diverse range of planting through an updated landscaping plan that has been developed to improve biodiversity. Finally, the plan shall also show the inclusion of wildlife enhancement features (i.e. bat and bird boxes as well log piles) throughout the landscaped areas and within the fabric of the buildings. The development must proceed in accordance with the approved plan.*

## REASON

*To ensure the development incorporates measures to improve biodiversity whilst protecting the interests of aircraft safety in compliance with policies DMAV 1, EM7 of the Local Plan Part 1, Policy DME1 7 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policy G6.*

- 1.3 Condition 9 of the Planning Permission States:

*Prior to works above ground level, details of external lighting related to the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority for agreement by the Access and Landscaping Officers. Such details shall*

*include location, height, type and direction of light sources and intensity of illumination. The approved scheme shall be implemented prior to occupation and retained for the life of the development.*

## REASON

*In the interests of the protection of the biodiversity in accordance with Policy EM7 of the Local Plan Part 1, Policy DMEI 7 and DMEI 8 of the Hillingdon Local Plan Part 2 (2020) and London Plan (2021) Policy G6.*

- 1.4 Additionally, Temple were also commissioned to write a Bird Hazard Management Plan (BHMP) for the site to discharge planning condition 11. This report should therefore be read alongside this document (Temple, 2022).

## SCOPE OF THE REPORT

- 1.5 A plan showing the proposed ecological enhancements off site is provided in Appendix 1 and should be referred to when reading the supporting text in the body of the report.
- 1.6 National and local planning policy relating to biodiversity and the legislation afforded to protected species is provided in Appendix 2. Example photographs of enhancement measures are provided at Appendix 3.

## SITE CONTEXT AND STATUS

- 1.7 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.

## SUMMARY OF PREVIOUS ECOLOGICAL SURVEYS

- 1.8 The measures outlined in this Biodiversity Enhancement Plan are based on the findings of the Preliminary Ecological Appraisal report by Temple (then The Ecology

Consultancy) undertaken in 2018, with an updated report issued in 2020. The main findings of the PEA were:

- 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.

## 2 Enhancement Measures

### OVERVIEW

- 2.1 The enhancement measures outlined below have been proposed through liaison between Temple, Jefferson Sheard Architects Ltd, LT Studio Landscape Architects and Charles Edward Ltd. The objective of the enhancement measures are to provide a net gain in biodiversity as a result of the development at the Site.
- 2.2 Due to a Bird Hazard Management Plan being a mandatory requirement for the Site, there are limitations on tree and hedgerow species and the types of bird boxes that can be implemented as part of the BEP. It is necessary to minimise attracting large flocks or nesting colonies of certain bird species to the Site. Monitoring and management measures are required for the Site, see the Bird Hazard Management Plan (Temple, 2022) for further information.
- 2.3 Indicative locations of the enhancement measures are illustrated on the enhancements plan in Appendix 1.

### TREE PLANTING

- 2.4 The Preliminary Ecological Appraisal (Temple/The Ecology Consultancy, 2020) and Arboricultural Impact Assessment (Arbeco/Temple, 2020) found a total of 8 individual trees and a single group on site. All of these are scheduled for removal during the clearance stage, in addition to 4 hedgerows.
- 2.5 To mitigate for the loss of the 8 trees, a total of 18 new trees will be planted at ground level to supplement and enhance the trees that are to be retained within the development. The species used will be small fastigate trees, such as field maple *Acer campestre*. These species have narrow canopies of 2 - 3m and are not fruit or berry bearing, and therefore will be less attractive to flocks of birds which is a requirement of the bird hazard management plan. If other tree species are used, the tree canopies should be maintained to these parameters.
- 2.6 To maintain a planting regime which is unattractive to large flocks of birds, the species used for hedging will be required to be non-berry producing. As such the

hedgerows within the development will be comprised of European beech *Fagus sylvatica*.

### PROVISION OF BIRD NESTING OPPORTUNITIES

- 2.7 The Preliminary Ecological Appraisal outlined the recommendation for bird nesting opportunities to be installed as part of the new development, particularly for house sparrow *Passer domesticus*, and swift *Apus apus* both Species of Principle Importance included on the local Biodiversity Action Plan. However, as swift pose a potential bird strike risk they have been omitted from the enhancements and boxes for house sparrow will be used.
- 2.8 A total of four house sparrow terrace boxes will be placed on the walls of the new development, at least 3 metres high and on a north or eastern aspect to avoid heavy rainfall and excessive heat.
- 2.9 The recommended box type is the are Schwegler 1SP Sparrow Terrace, made from woodcrete. As such, they are long lasting and insulate occupants from extremes of temperature and condensation. The specification of equivalent boxes should be checked with a suitably qualified ecologist prior to purchase.
- 2.10 The following entrance hole sizes should be used to target a range of species:
- 32mm for the house sparrow terrace boxes.

### PROVISION OF HABITAT PILES

- 2.11 Single bug hotels or log piles of appropriate design should be placed within the green space around the building at ground level and on the green roof to provide additional habitat for a range of invertebrates.

### BIODIVERSE ROOFING

- 2.12 In line with recommendations made in the Preliminary Ecological Appraisal (The Ecology Consultancy, 2020), biodiverse roofing will be included as part of the new



structure design. The roofing should be designed with and installed by a company with a proven track record in delivering biodiverse roofing with long-term success. The following suggested species mix will ensure that there are species in flower between March and October to maximise the benefits to pollinators and comprises the following:

- Yarrow *Achillea millefolium*
- Sea thrift *Armeria maritima*
- Common daisy *Bellis perennis*
- Clustered bellflower *Campanula glomerata*
- Harebell *Campanula rotundifolia*
- Cornflower *Centaurea cyanus*
- Common centaury *Centaureum erythrea*
- Maiden pink *Dianthus deltoides*
- Viper's bugloss *Echium vulgare*
- Lady's bedstraw *Galium verum*
- Water avens *Geum rivale*
- Yellow toadflax *Linaria vulgaris*
- Bird's foot trefoil *Lotus corniculatus*
- Ragged robin *Lychnis flos-cuculi*
- Common poppy *Papaver rhoeas*
- Fox and cubs *Pilosella aurantiaca*
- Common self-heal *Prunella vulgaris*

- Yellow rattle *Rhianthos minor*
- Wild Sweet William *Saponaria officianalis*
- Small scabious *Scabiosa columbaria*
- Goldmoss stonecrop *Sedum acre*
- Sea campion *Silene uniflora*
- Bladder campion *Silene vulgaris*
- Mother-of-Thyme *Thymus polytricus*

# 3 Management Plan

## OVERVIEW

3.1 Details for the management of each enhancement measure are outlined below.

## TREE PLANTING

3.2 The following measures should be adhered to in the management of planted trees on site:

- Following planting, an area of 600mm around each tree should be kept vegetation free through hand-weeding, mulching, mulch mats, herbicide or a combination of methods.
- The trees should be provided with sufficient irrigation, especially in periods of drought.

3.3 Once the trees are suitably established, weeding at the bases can cease and an occasional cut of vegetation conducted if required, this should be done in early autumn.

## PROVISION OF BIRD NESTING OPPORTUNITIES

3.4 Nest boxes should be cleaned out annually as part of the management regime of the site. This should be done between October and February. Any nesting material should be removed and hot water only used to sterilise the box, before drying and placing back into position. During these checks, evidence of nesting should be noted.

## BIODIVERSE ROOFING

3.5 A specific management plan for any biodiverse roofing incorporated into the new building design should be provided by the contractor responsible for its installation.

## MONITORING

- 3.6 It is important to monitor the success of long-term management to ensure that the biodiversity enhancements outlined are delivering the desired results.
- 3.7 Annual monitoring will be undertaken by a suitably qualified ecologist. This should be in the form of walkover surveys in September to assess the condition of bird boxes, as well as noting any areas of habitat management which need addressing.

## REMIDIAL MEASURES

- 3.8 Failed trees will be replaced as and when required, during routine maintenance by the appointed contractor.
- 3.9 Damaged house sparrow terraces will be replaced as directed by a suitably qualified ecologist, as there may be timing restrictions depending on the extent of damage and if the boxes may be potentially occupied.

# References

Arbeco (2020) *9 Nestles Avenue, Hayes - Arboricultural Impact Assessment Report*.

British Standards Institution (2013) *Biodiversity. Code of practice for planning and development: 42020*. BSI, London.

British Standards Institution (BSI) (2012) BS 5837:2012- *Trees in relation to design, demolition and construction*. BSI, London.

Connolly, S. and Charles, P. (2005) *Environmental good practice pocket book*. CIRIA, London.

GRO (2014) *The GRO Green Roof Code: Green Roof Code of Best Practice for the UK 2014*. Groundwork Sheffield, Sheffield.

LT Studio Landscape Architects (2022) *9 Nestles Avenue, Hayes – Planting Plans*. Bath

Newton, J., Nicholson, B., Saunders, R., Willets, R. and Venables, R. (2011) *Working with wildlife: guidance for the construction industry* (2nd Ed.). CIRIA, London.

Temple (2022) *9 Nestles Avenue, Hayes – Bird Hazard Management Plan*

The Ecology Consultancy (2020) *9 Nestles Avenue, Hayes - Preliminary Ecological Appraisal Report*.

## Appendix 1: Biodiversity Enhancement Plan

Figure 1: Biodiversity Enhancement Plan



## Appendix 2: Legislation and Planning Policy



**Important Notice:** This section contains details of legislation applicable in England and Wales only (i.e. not including Scotland, 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 represent the current (at the time of writing) situation with respect to the UK's position outside of the EU and to ensure accuracy throughout, this section should not be relied upon as a definitive statement of the law.

Over the past few years, three important bills have been published which are intended to shape how growing pressures on the environment post-Brexit (post-transition period) are tackled. Both the Agriculture Bill and Fisheries Bill gained Royal Assent in November 2020 and are now the Agriculture Act 2020 and Fisheries Act 2020 respectively; and, more recently, the Environment Bill was passed into law in November 2021, becoming the Environment Act 2021. *N.B. as environment policy is a devolved matter, most of this Act applies to England only.*

## **A      LEGISLATION AFFORDED TO SPECIES**

The objective of the EC Habitats Directive<sup>1</sup> 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 (as amended)** and **The 'Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended)**.

Various amendments to the 2017 Regulations in England and Wales have been made through the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. These changes came into effect on the 1 January 2021 following the UK's departure from the EU and the end of the Transition Period. The changes are largely limited to 'operability changes' that will ensure the Regulations can continue to have the same working effect as before.

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<sup>1</sup> Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

**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](http://www.opsi.gov.uk). Key amendments have been made through the Countryside and Rights of Way (CROW) Act (2000).

As well as delivering long-term targets to reduce waste and improve resource efficiency and improve air and water quality targets, the **Environment Act 2021** aims to halt the decline of nature by 2030, mandates Biodiversity Net Gain for developments in England and amends the Wildlife and Countryside Act 1981 (as amended) to introduce an additional purpose for granting a protected species licence in relation to development which is 'for reasons of overriding public interest'. The Act also introduces the Office for Environmental Protection (OEP), which will be a new public body intended to hold government and public authorities to account, although the government will be able to issue guidance to the OEP on how it enforces policies and legislation.

Some of the key biodiversity elements in the Act that will have a bearing on species protection in the UK include:

- A strengthened biodiversity duty on Local Planning Authorities;
- Biodiversity net gain to ensure developments, including Nationally Significant Infrastructure Projects (NSIP), deliver at least 10% increase in biodiversity;
- Local Nature Recovery Strategies to support a Nature Recovery Network;
- Duty upon Local Authorities to consult on street tree felling;
- Strengthen woodland protection enforcement measures;
- Conservation Covenants;

- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature;
- Introduces the power for the Habitats Regulations to be amended or 'refocused' to 'to deliver creative public policy thinking that delivers results'.

This section does not provide further detail on the Environment Act 2021 as, at the time of writing (November 2021), the Act, in its final form, has not been published and it remains to be seen how and when the various elements will be enacted at a national and local level.

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

- Salmon and Freshwater Fisheries Act 1975;
- Deer Act 1991;
- Protection of Badgers Act 1992;
- Wild Mammals (Protection) Act 1996;
- Countryside and Rights of Way (CROW) Act 2000;
- Natural Environment & Rural Communities (NERC) Act 2006;
- The Eels (England and Wales) Regulations 2009; and
- Environment (Wales) Act 2016.

Species and species groups that are protected or otherwise regulated under the aforementioned legislation, and that are most likely to be affected by development activities, include herpetofauna (amphibians and reptiles), badger, bats, birds, dormouse, invasive 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 (as amended), which includes smooth snake, sand lizard, great crested newt, natterjack toad, all bat species, otter, dormouse and some plant, invertebrate and fish species, are given below. **These should be read in conjunction with the relevant species sections that follow.**

- In the Habitats 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 where relevant.
- In order to obtain a mitigation licence for species protected under the Conservation of Habitats and Species Regulations 2017 (as amended), 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.

## Birds

All wild birds, their nests and eggs are protected under Sections 1-8 of the Wildlife and Countryside Act 1981 (as amended). A wild bird is defined as any bird of a species that is resident in or is a visitor to the European Territory of any member state in a wild state. Among other things, the legislation 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; or
- 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 *Tyto alba*, black redstart *Phoenicurus ochruros*, hobby *Falco subbuteo*, bittern *Botaurus stellaris* and kingfisher *Alcedo atthis*

receive additional special protection under Schedule 1 of the Act. 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 is to undertake work outside the main bird nesting season which typically runs from March to August<sup>2</sup>. 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 also protected against disturbance during the nesting 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. It should be noted that there is no threshold under which disturbance is not an offence, that is to say that disturbance need not be 'significant' for an offence to be committed.

While it is possible to obtain a licence to permit some activities that would otherwise constitute an offence, these can only be issued for specific purposes set out in the Act. This includes damage to crops, to preserve public health or safety and to preserve air safety, but does not include development, some land management and recreational activities and damage to property.

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<sup>2</sup> It should be noted that this is the main breeding period. Breeding activity may occur outside this period (depending on the particular species, geographical location of the site and vagaries of the season in any particular year) and thus due care and attention should be given when undertaking potentially disturbing works at any time of year.

## Invasive Plant Species

Under Section 14 (2) of the Wildlife and Countryside Act 1981 (as amended), it is an offence to plant or otherwise cause to grow in the wild any species of plant listed on Part II of Schedule 9. Schedule 9 plant species include Japanese knotweed *Fallopia japonica*, giant hogweed *Heracleum mantegazzianum* and Himalayan balsam *Impatiens glandulifera*. In the main, Schedule 9 species are those that are already established in the wild, but which continue to pose a threat to the conservation of native biodiversity and habitats, such that further releases should be regulated.

## B EUROPEAN AND NATIONAL LEGISLATION AFFORDED TO SITES AND HABITATS

As for certain species described above, habitats and sites are also protected directly through the Wildlife & Countryside Act 1981 (as amended), The Conservation of Habitats and Species Regulations 2017 (as amended) and The 'Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) through the notification, classification or designation of various protected sites as detailed below.

In addition, The Environment Act 2021 and the Water Framework Directive indirectly afford protection to non-designated habitats through the duties placed on public and private bodies to promote nature conservation and biodiversity, for example, the creation of Local Nature Recovery Strategies (LNRS) and associated Species Conservation and Protected Site strategies, and to reduce or avoid harmful activities. Many of these duties and targets form the basis for national and local planning policy and wider conservation strategies and are not covered in detail here.

## The Hedgerow Regulations 1997

The Hedgerow Regulations 1997 are intended to protect 'important' countryside hedgerows from destruction or damage. Under the 'Wildlife and Landscape' criteria of the Regulations, a hedgerow is considered important if (a) it has existed for 30 years or more; and (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations.

Under the Regulations, it is against the law to remove or destroy important hedgerows without permission from the local planning authority. Hedgerows on or adjacent to common land, village greens, SSSIs (including all terrestrial SACs, NNRs and SPAs), LNRs, land used for agriculture or forestry and land used for the keeping or breeding of horses, ponies or donkeys are covered by these regulations. Hedgerows '*within or marking the boundary of the curtilage of a dwelling-house*' are not.

## C PLANNING POLICY

### National Planning Policy Framework

The National Planning Policy Framework replaced PPS9 and emphasises the need for sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and priority species (see Section D below). An emphasis is also made for the need for ecological networks via preservation, restoration and re-creation. The protection and recovery of priority species is also listed as a requirement of planning policy. In determining 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

Section 40 of The Natural Environment and Rural Communities (NERC) 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.' 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.

## Local Plans

### 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:

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

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.

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.



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.

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

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

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

### **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.

## Appendix 3: Example Photographs

**Photograph 1**  
Schwegler 1SP Sparrow  
Terrace  
[© WILDCARE]



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