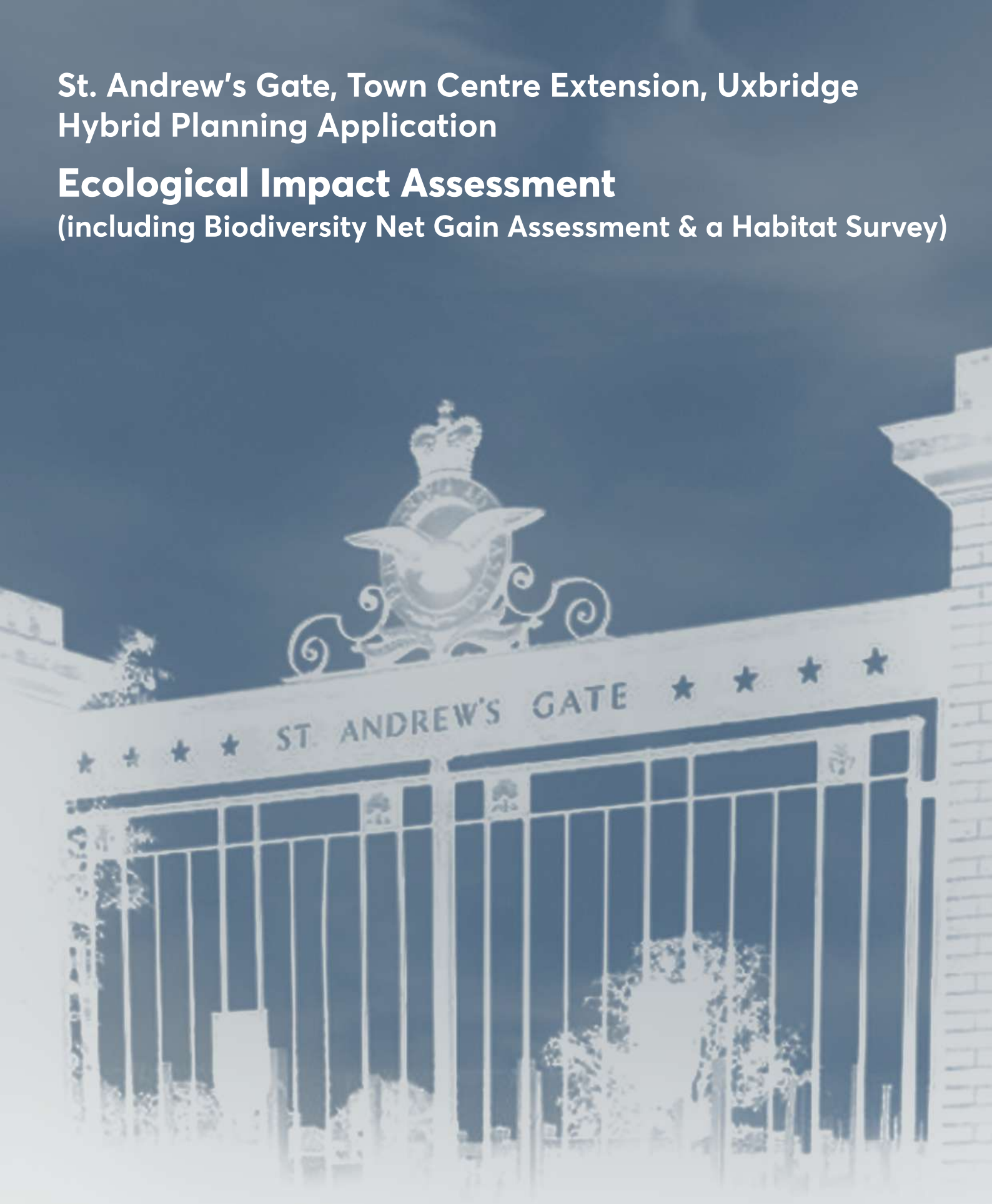
St. Andrew's Gate, Town Centre Extension, Uxbridge
Hybrid Planning Application

Ecological Impact Assessment

(including Biodiversity Net Gain Assessment & a Habitat Survey)



ST. ANDREW'S PARK
UXBRIDGE

VINCI PLC | ST. MODWEN

Ecological Impact Assessment

St Andrews Gate, Town Centre Extension, Uxbridge
25th June 2024

Tyler Grange

TG Report No. 15991_R01d_WW

Project No:	Report No.	Date	Revision
15991	R01d	25th June 2024	d

Admin QA	Author	Checked	Approved
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Summary

S.1. This report has been prepared by Tyler Grange Group Limited on behalf of Vinci St Modwen (VSM). It sets out the findings of an Ecological Impact Assessment at St Andrews Gate, Town Centre Extension, Uxbridge ('the TCE site'), UB8 1LE, hereinafter referred to as 'the site'. The proposed development is a hybrid application, with the Outline planning permission (with all matters reserved) for residential development and commercial uses, to be occupied flexibly within Use Classes E(a), E(b), E(c), E(e), E(g)(i), E(g)(ii) and a convenience store (Use ClassE9a)); plus car parking, hard and soft landscaping, and all other associated works. Full planning permission for reinstatement of gym use (Use Class E(d)) and change of use to provide a café (Use Class E(b)) within the former cinema building; and external alterations; and associated car parking, hard and soft landscaping and all other associated works.

S.2. The site is comprised of developed land, including a building and hardstanding, artificial unvegetated; unsealed surface, and modified grassland of negligible ecological importance. There are a few immature scattered trees of local ecological importance.

S.3. The site has limited potential for fauna. Some common bat species were recorded but no roosts. There is potential for common bird species, but little else.

S.4. In terms of protected sites, five non-statutory sites were assessed, and no impacts are anticipated as a result of development, as long as standard best practice is followed to control impacts via air, run-off, and other pollutants. These are to be incorporated into a Construction and Environmental Management Plan (CEMP) that can be secured by a suitably worded planning condition.

S.5. The proposed development retains most trees and whilst other habitats are lost, owing to their negligible importance, their loss does not require compensation. The proposed landscaping strategy includes habitats of greater importance (trees, grassland, shrubs, green roofs and SuDS) that will also benefit fauna as well as the end users of the development. Details of these will be provided in a Habitat Management and Monitoring Plan (HMMP) which is expected to be secured through a suitably worded planning condition. The biodiversity net gain assessment found that the proposals would result in a gain of 27.59% in habitat units, well in excess of the statutory 10% requirement. Features for birds and bats are also proposed.

S.6. In conclusion, the site is of low ecological importance currently and the proposals will result in new habitats in the public realm and also on buildings that will lead to an overall net gain for biodiversity (in excess of that required by recent legislation), as well as providing opportunities for fauna. Furthermore, this will create an attractive and valuable resource for the end users of the development.

S.7. The proposed mitigation and enhancement strategy, and management and monitoring post construction, could be controlled by planning conditions.

S.8. The proposed development is therefore in conformity with relevant planning policies such as the NPPF, policy G7 of the London Plan 2021, Policy EM7 of the London Borough of Hillingdon's Local Plan, Policy DMEI 7 of the Local Plan Part 2: Development Management Policies, as well as Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) with regard to ecology.

Section 1: Introduction and Context

Introduction

1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of Vinci St Modwen (VSM). It sets out the findings of an Ecological Impact Assessment (EcIA) at St Andrews Gate, Town Centre Extension, Uxbridge ('the TCE site'), UB8 1LE (OS Grid Reference TQ 06046 83762), hereafter referred to as 'the site'. See **Figure 1.1** for the indicative red line boundary.

Figure 1.1: Indicative red line boundary (© Google Aerial Imagery)

1.2. This assessment has been undertaken to inform a hybrid planning application for the redevelopment of the site. The Outline planning permission (with all matters reserved) for residential development and commercial uses, to be occupied flexibly within Use Classes E(a),

E(b), E(c), E(e), E(g)(i), E(g)(ii) and a convenience store (Use ClassE9a)); plus car parking, hard and soft landscaping, and all other associated works.

1.3. The Full planning permission for reinstatement of gym use (Use Class E(d)) and change of use to provide a café (Use Class E(b)) within the former cinema building; and external alterations; and associated car parking, hard and soft landscaping and all other associated works.

1.4. Masterplan to be delivered on a phased basis with Full proposals for the former cinema building to be delivered alongside Outline phases.

Site Context

1.5. The site is approximately 1.80 ha in size and comprises vacant brownfield land, the Grade II listed former cinema building and associated car park and the locally listed St Andrew's Gate. The site is currently enclosed by construction hoardings and not in active use, other than a temporary public right of way (PROW) across the site linking to Hillingdon Road and the underpass. The site is dominated by hardstanding and bare ground, with areas of modified grassland with associated scattered broadleaved trees present to the north, and along the western boundary, near the former cinema building.

1.6. The site is located to the east of Park Road and Hillingdon Road. It is bound to the north and north-east by St. Andrew's Road, to the east by the spine road, Town Centre West (TCW) phase of development and locally listed Mons building and to the south by Burton Road. Residential development which ranges in height from 3 to 8 storeys is located between the site and Dowding Park. Dowding Park provides a significant local amenity within a large area of urban green space, including sport pitches and play space. The John Locke Primary School is located within St. Andrew's Park, to the north of Dowding Park and is within walking distance of the site.

1.7. The site lies within the eastern section of the demarcated Town Centre boundary for Uxbridge, as defined in the Hillingdon Local Plan. It is located within the London Plan's Metropolitan Town Centre designation. Uxbridge Town Centre accommodates a range of retail, commercial and community uses, as well as sustainable transport options. Uxbridge Underground Station and Bus Station are located within walking distance of the site. St Andrew's Church is located on the opposite side of Hillingdon Road between the TCE site and town centre.

Purpose

1.8. This report:

- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"[1] [2] (ZoI) of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's development.
- Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 2**; and
- Can be used to inform a planning application for the site's development.

1.9. This assessment and the terminology used are consistent with published guidance[3] [4]. A full methodology is set out in **Appendix 3**.

Methodology

1.10. The habitat survey comprised of an extended Phase 1[5] and UK Hab[6] survey conducted on the 7th of August 2023 by James Sweetman, and subsequently updated on the 9th of January 2024 by Will Wells.

1.11. The data search was based on records purchased from Greenspace Information for Greater London CIC (GIGL), as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC)[7].

1.12. The methodologies for the protected species survey is set out in **Appendix 4**.

Quality Control

1.13. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and

[1] CIEEM (2018*) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.
[2] Defined as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries.
[3] CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.
[4] CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.
[5] JNCC. (2010) *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. Joint Nature Conservation Committee, Peterborough.
[6] UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at https://www.ukhab.org)
[7] https://magic.defra.gov.uk/magicmap.aspx [Accessed 21/08/2023]

act under the direction of members and abide by the Institute's Code of Professional Conduct[8].

Limitations and Assumptions

1.14. The first site visit was undertaken on the 7th of August 2023 during the optimal botanical window by James Sweetman. This data was then updated on the 9th of January, which is considered to be a sub-optimal time to conduct botanical surveys. However, due to the low habitat diversity and simple nature of the habitats present on site, this is not considered to be a limitation on the assessments carried out as part of this report. The second survey confirmed the results of the first and as such this is not considered to be a limitation.

[8] CIEEM (2022) *Code of Professional Conduct*. CIEEM, Winchester.

Section 2: Ecological Features and Evaluation

Designated Sites

2.1. The data search returned two Natura 2000 sites within 10 km of the site, one statutory and five non-statutory designated sites within 2 km of the site. These are detailed in **Table 2.1** and **Table 2.2** below.

2.2. Note, in London, non-statutory sites designated for their biodiversity importance are known as Sites of Importance for Nature Conservation (SINCs). SINCs are recognised by the Greater London Authority and London Borough Councils as important wildlife sites. SINCs are broken down into three tiers dependent on the geographic scale at which they are of importance, and these are, from most to least important:

- Sites of Metropolitan Importance;
- Sites of Borough Importance (Borough grade I and Borough grade II); and
- Sites of Local Importance.

Table 2.1. Designated Sites

Designated site	Distance and direction from site	Citation	Ecological Importance
South West London Waterbodies Ramsar and Special Protection Area (SPA)	8.6 km south	Comprises a number of reservoirs and former gravel pits in the Thames Valley adjacent to Heathrow Airport between Windsor and Hampton Court which support internationally important numbers of Gadwall *Anas strepera* and Shoveler *Anas clypeata*.	International
Fray's Farm Meadows Site of Special Scientific Importance (SSSI) and Local Nature Reserve (LNR)	1.6km north	One of the last remaining examples of relatively unimproved wet alluvial grassland in Greater London and the Colne Valley.	National

Table 2.2. Non-Statutory Designated Sites

Designated site	Distance and direction from site	Citation	Ecological Importance
Frays River at Uxbridge Moor Borough Grade I SINC	0.8 km southwest	River flows through urban Uxbridge and Cowley; parts adjacent to open spaces such hold a reasonable diversity of wetland plants and waterfowl.	County
Uxbridge Ponds Borough Grade I SINC	1.1 km north	Designated for supporting important populations of amphibians, including the specially protected great crested newt *Triturus cristatus* in two of the ponds.	County
Uxbridge Common Meadows Borough Grade II SINC	1.2 km northeast	Designated for plant species and diversity of species.	County
Hillingdon Court Park Local SINC	1.2 km east	The site is designated for plant and tree species present.	County
Uxbridge and Hillingdon Cemeteries Borough Grade II SINC	1.4 km southeast	This site is designated for plant and tree species.	County

Habitats and Flora

2.3. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The location of habitats are shown on the Habitats Features and Preliminary Bat Roost Assessment Plan **15991/P01**.

Table 2.3. Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
Primary code: Artificial Unvegetated; Unsealed Surface u1c	This habitat dominates the eastern boundary of the outline application boundary, and consists primarily of bare earth, with small areas of annual meadow grass *Poa annua* and buddleia spp. present.	This habitat is of limited ecological value and due the current site traffic using this area, it is determined to be of **negligible ecological importance**.	
Primary code: Developed Land; Sealed Surface u1b5	This habitat includes the former cinema building (B1) contained within the full planning permission area.	Buildings are of no inherent ecological value and as such is of **negligible ecological importance**.	
Primary code: Developed Land; Sealed Surface u1b	Roads, footpaths, and carparks located throughout the hybrid application boundary.	This habitat is of no inherent ecological value and as such is of **negligible ecological importance**.	

<u>Primary code:</u> Modified Grassland g4	Areas of grassland to the north of the outline planning application boundary and along the eastern boundary extending into the full planning application boundary. This habitat consists of species such as annual meadow grass *Poa annua*, yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata*, bristly oxtongue *Helminthotheca echioides*, cleavers *Galium aparine*, and common nettle *Urtica dioica*.	As this is a common and widespread habitat, it is determined to be of **negligible ecological importance**.	
<u>Primary code:</u> Modified Grassland g4 <u>Secondary code:</u> Scattered Trees 32	Five scattered trees associated with modified grassland on site. They are a mixture of mature and early mature trees and comprised of whitebeam *Sorbus aria*, cherry *Prunus avium*, cedar *Cedrus libani;* and horse chestnut *Aesculus hippocastanum*. Some have ivy *Hedera helix* cover and deadwood present within the crowns.	While they are not mature, there are few trees locally. They are therefore considered to be of **local ecological importance**.	

Protected and Notable Species

2.4. The below section sets out the potential for protected species on site. Species which are considered likely absent from the site based on professional judgement, following consideration the of habitats within the site, signs of species presence at the time of survey and data search records, are not discussed.

Bats

2.5. The data search returned 16 records of three bat species within 2 km of the site. The species included common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, and noctule *Nyctalus noctula*. The nearest of these was a record of common pipistrelle 0.3 km northeast of the site in 2020. There were no granted EPS licences for bats returned within 1 km radius of the site.

Potential for Roosts

2.6. A Preliminary Roost Assessment (PRA) was conducted on the 7th of August 2023. This assessment was carried out on the buildings and trees which may be impacted by the development and was conducted in line with best practice guidance at the time of the survey[9]. See **Appendix 2** for methodology, **Table 2.4** below for results, and the Habitat Features and Preliminary Bat Roost Assessment Plan **15991/P01** for locations. Note, no potential roosting features were identified in any of trees present on site.

[9] Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition*. The Bat Conservation Trust, London.

Table 2.4. PRA Results

Structure/tree and Suitability	Potential Roost Feature (PRF)	Photograph
Building B1 – Former Cinema Building High suitability	It is understood that B1 was previously surveyed for bats in 2022 and no bats were recorded roosting, though common and soprano pipistrelle, noctule and an unidentified Myotis species were recorded in low numbers during the surveys[10]. This was after re-roofing works were undertaken (*pers. comm.*) in which a number of bat tiles were installed. During the present survey, the building was found to have multiple potential bat egress points identified within the roof structure, soffits, boarded up broken windows, and bat tiles. In addition, a large loft void is present within the building. The interior of building B1 was observed during the PRA and a single (likely Myotis) bat dropping was recorded within one of the 1st floor rooms; this dropping appeared to be relatively fresh (deposited during 2023). No droppings were found within the loft void, however a full inspection wasn't carried out due to safety concerns. Due to the combination of these findings the building is considered to have **high suitability** to support roosting bats.	 

[10] SLR (October 2022) St Andrews Square, Uxbridge: Bat Survey Report

Emergence Bat Surveys

2.7. Following the PRA, three bat emergence surveys of building B1 were undertaken on the 10th of August, 28th of August, and 7th of September 2023 in accordance with best practice guidance at the time[9]. As in the 2022 survey referred to above, no roosts were recorded.

2.8. The site lies within an urban context, with light pollution within and adjacent to site, and habitats of limited suitability for commuting and foraging bats. As might be expected in such an urban context, only low levels of bat activity of common and soprano pipistrelle were recorded incidentally during the surveys around the site and the areas adjacent to the site (full results and data from the survey can be found in **Appendix 4**).

Birds

2.9. The data search returned a number of records of protected and notable birds species within 1 km of the site. Of these, some species noted adjacent to the site include swift *Apus apus*, grasshopper warbler *Locustella naevia*, and starling *Sturnus vulgaris*.

2.10. Habitats on site, such as the building and urban trees have the potential to support common and widespread nesting birds, though overall, opportunities are extremely limited.

2.11. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.

Invertebrates

2.12. Owing to the nature of the habitats present, the site is not considered to be of importance for invertebrates species and is likely to support common and widespread invertebrate species.

Reptiles

2.13. The site is not considered to support reptiles population due to being isolated from suitable habitats and due to the high level of disturbance on site.

Invasive species

2.14. Areas of *Buddleia spp*. were found scattered throughout the site. This species is listed under London Invasive Species Initiative (LISI)[11], and as such is recommended to be removed through the redevelopment of the site.

[11] London Biodiversity Partnership (available at: https://www.lbp.org.uk/LISI.html), accessed 03/05/2024

Section 3: Ecological Impacts, Mitigation and Enhancement

Proposed Development

3.1. The proposals are for a hybrid planning application with the outline planning element seeking planning consent for:

- Creation of up to no. 356 residential dwellings (Class C3) within three new build blocks, of up to 10 storeys;
- Up to 660sqm GIA of flexible commercial space (Use Classes E(a), E(b), E(c), E(e), E(g)(i) and E(g)(ii)) at ground floor level in Building Zones B and C, and up to 440sqm fixed as a convenience store (Use Class E(a)) (GIA) located in Building Zone C; and
- Associated car parking and hard and soft landscaping.

3.2. The full planning element is seeking to obtain planning consent for: -

- Change of use of the former cinema building to reinstate a gym (E(d)) in the Main Hall and change of use of former squash courts to a café (E(b));
- Associated car parking and hard and soft landscaping and access alterations;
- External alterations to the building;
- With the details of the refurbishment of the building to be secured by Listed Building Consent.

3.3. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy.

Design Evolution

3.4. The design of the Development has been iterative, and in accordance with policy and best practice guidance, follow the 'mitigation hierarchy'. As such, the Development has been designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this is not possible, new habitats have been proposed to compensate for habitat losses with the aim of maximising the overall ecological value of the habitats proposed on site. A summary of how the design follows the mitigation hierarchy, and reflects local policies (such as Policy G5 and G7 of the London Plan, and Policy EM1 of Local Plan), is set out below, with the landscape plan show in **Appendix 1**:

- Features of higher ecological value (namely the scattered trees of local ecological importance) have been retained where possible;
- The creation of additional grassland (other neutral grassland with wildflowers and modified grassland), the planting of additional native trees, introduced shrub areas,

sedum green roofs, as well as sustainable urban drainage features (SuDS) would more than compensate for the loss of habitats.

Designated Sites

Statutory Sites

3.5. Given the nature of the site proposals and the distances involved between the site and South-West London Waterbodies Ramsar and SPA, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

3.6. Given the distance between the site and Fray's Farm Meadows SSSI and LNR, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

3.7. The site is within the SSSI Impact Risk Zone for Fray's Farm Meadows SSSI. However, the development does not fall into any of the criteria set out by Natural England requiring further assessment, such as the development of a quarry or the creation of pipelines and underground cables. As such, an impact is not likely.

Non-statutory Sites

3.8. Frays River at Uxbridge Moor lies 0.8 km southwest of the site. Whilst the outline element of the hybrid planning application seeks consent for the creation of 356 residential dwellings, potential for impacts as a result of increased recreational pressure are anticipated to be negligible as Frays River at Uxbridge Moor lies next to Rockingham Recreation Ground which is managed for public access and as such is anticipated to be able to cope with recreational use.

3.9. During the construction phase, potential impacts via chemical/fuel run-off, noise/visual/vibration impacts, dust, etc are not anticipated due to the distance between the site and Frays River and the lack of hydrological connectivity.

Habitats and Flora

3.10. All of the habitats onsite to be impacted by the proposals are of negligible ecological importance, namely building, hardstanding modified grassland, scattered urban trees, and artificial unvegetated; unsealed surface and as such no specific mitigation is required.

3.11. The trees to be retained through the proposed works will be protected from impacts during the construction phase of the development, with the details of these protection measures included within the CEMP.

3.12. Two of the scattered trees (namely the whitebeam T2, and a wild cherry T4), which are of local ecological importance, will be lost through the proposed development following recommendations from the arboricultural report. The planting of 91 native species trees (see **Appendix 1**) would more than mitigate for the loss of this trees.

3.13. Overall, the native planting of trees, shrubs, and grassland is expected to improve the site for biodiversity.

Protected and Notable Species

Bats

3.14. B1 was assessed as having high suitability to support roosting bats though no roosts were confirmed. Proposed works to B1 should therefore not affect roosting bats.

3.15. Trees T2 and T4, which are being lost as part of the proposals, were assessed as having negligible suitability to support roosting bats. In line with best practice guidance[12], no further surveys are required.

3.16. To provide additional opportunities for roosting bats, bat boxes are recommended to be incorporated within scheme by either using integrated bat boxes or externally erected bat boxes to be placed in unlit areas (expected to be secured via a suitably worded planning condition).

3.17. No lighting during construction is recommended. While the site is already subject to light pollution from the adjacent road network, it is anticipated that relatively darker parts of the site will be lighter at night post-construction. This is not likely to significantly affect bats. However, lighting could be designed so as to retain some darker areas close to suitable foraging habitat that is proposed (SuDS, grassland, trees, etc). This can be secured via a suitably worded planning condition.

Birds

3.18. All birds, their nests and eggs, are protected by law and as such it is 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; and intentionally take or destroy the egg of any wild bird.

3.19. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (the buildings, trees, and hedgerow) should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledge and the nest is no longer active.

3.20. Habitat creation such as native tree planting is expected to increase nesting opportunities on site. Additionally, bird boxes are recommended to be incorporated within scheme, targeting species of conservation concern such as house sparrow *Passer domesticus* (expected to be secured via a suitably worded planning condition).

[12] Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition*. The Bat Conservation Trust, London.

BNG Results Summary

3.21. Policy G6 of the London Plan 2021, as well as the NPPF, requires developments to demonstrate a net gain in biodiversity. In addition, policy EM7 of the London Borough of Hillingdon's Local Plan which asks for developments to achieve a gain in biodiversity where feasible, and Schedule 7A of the Town and Country Planning Act which has made a 10% net gain mandatory from February 2024 for all major developments.

3.22. A development achieves biodiversity net gain when the total biodiversity units present post-development is higher than that of the biodiversity units present on site prior to development. DEFRA's statutory metric has been used to calculate the biodiversity value of the site before and after development in terms of "biodiversity units" to calculate an overall biodiversity net gain or loss.

3.23. As described within The Statutory Biodiversity Metric **(Appendix 5)** and summarised below in **Figure 3.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a gain of 0.81 habitat units, a percentage gain of 27.59% in habitat units. A full breakdown of the habitats present is shown in **Appendix 3**, with justification for each criterion contained within the metric (**Appendix 5**), and the locations of all habitats shown on **15991/P01** and **15991/P02**.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.81
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	27.59%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Figure 3.1: Biodiversity Net Gain Assessment Results Summary, taken from The Statutory Biodiversity Metric.

Management

3.24. The results of The Statutory Biodiversity Metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by DEFRA.

3.25. Details of habitat establishment and long-term management will be provided through the production of a Habitat Management and Monitoring Plan (HMMP). The HMMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years.

3.26. The plan can also include how measures for fauna species will be installed and maintained, or else that could be controlled by a separate condition.

Section 4: Conclusions

4.1. In conclusion, the site is of low ecological importance currently. The more important features, namely trees, are mostly retained within the proposals and, in accordance with the requirements of local policy, new habitats are proposed in the public realm and also on buildings that will lead to an overall net gain for biodiversity (in excess of that required by recent legislation), as well as providing opportunities for fauna. Furthermore, this will create an attractive and valuable resource for the end users of the development.

4.2. The proposed mitigation and enhancement strategy, and management and monitoring post construction, could be controlled by planning conditions.

4.3. The proposed development is therefore in conformity with relevant planning policies such as the NPPF, policy G7 of the London Plan 2021, Policy EM7 of the London Borough of Hillingdon's Local Plan, Policy DMEI 7 of the Local Plan Part 2: Development Management Policies, as well as Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) with regard to ecology.

Appendix 1: Proposed Site Plan (P20331-00-001-GIL-0600-Illustrative Landscape Masterplan)

PROJECT TITLE	St Andrew's Gate, Town Centre Extension (TCE), Uxbridge		
DRAWING NUMBER	P20331-00-001-GIL-0600		
DRAWING TITLE	Illustrative Landscape Masterplan		
DATE	June 2024	**REV**	00
SCALE	1/500 @A1		
STATUS	FOR PLANNING		

Gillespies

Appendix 2: Legislation and Planning Policy

Legislation

A2.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Environment Act 2021;
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities Act (NERC) 2006;
- The Hedgerows Regulations 1997; and
- The Protection of Badgers Act 1992.

A2.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).

A2.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A2.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

A2.5. The Environment Act gained Royal Assent in November 2022. Whilst the premise of Biodiversity Net Gain (BNG) has been around prior to this, the commencement of Statutory BNG on the 12th February 2024 has made Biodiversity Net Gain a condition of planning (not a planning condition). The target 'gain' is currently set at 10% but the Secretary of State has the ability to change this.

National Planning Policy

National Planning Policy Framework (NPPF), December 2023

A2.6. The updated National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A2.7. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

Section 11 of the NPPF, paragraph 120, sub-section b states that planning policies and decisions should:

b) "encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;

c) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"

A2.8. Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

A2.9. Paragraph 180 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; and

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A2.10. Paragraph 181 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Paragraph 185 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally

designated sites of importance for biodiversity[13]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[14]; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A2.11. When determining planning applications, Paragraph 186 states that local planning authorities should apply the following principles:

a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[15] and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

A2.12. As stated in paragraph 187 the following should be given the same protection as habitats sites[16]:

a) "potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites[17]; and

[13] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

[14] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

[15] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

[16] The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

[17] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A2.13. Paragraph 182 states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Planning Policy

The London Plan, The Spatial Development Strategy for Greater London, March 2021

A2.14. Policies relating to ecology and nature conservation can be found in Chapter 8: Green Infrastructure and Natural Environment, which are summarised as follows:

A2.15. Policy G1: Green Infrastructure

London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

- *identify key green infrastructure assets, their function and their potential function*
- *identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.*

Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

A2.16. Policy G5: Urban Greening

Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in

Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

A2.17. Policy G6: Biodiversity and Access to nature

Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- *use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.*
- *identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them.*
- *support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans.*
- *seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.*
- *ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- *avoid damaging the significant ecological features of the site*
- *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*
- *deliver off-site compensation of better biodiversity value.*

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

A2.18. Policy G7: Trees and woodlands

London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

In their Development Plans, boroughs should:

- *protect 'veteran' trees and ancient woodland where these are not already part of a protected site*
- *identify opportunities for tree planting in strategic locations.*

Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Local Plans, Supplementary Planning Documents, Core Strategies

Hillingdon Local Plan: A Vision For 2026 Local Plan: Part 1 Strategic Policies[18]

Strategic Objectives

A2.19. SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.

A2.20. SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.

A2.21. SO11: Address the impacts of climate change and minimise emissions of carbon and local air quality pollutants from new development and transport.

A2.22. SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans. Related Policies: EM1, EM7, EM8, BE1, T1

Policy EM1: Climate Change Adaptation and Mitigation

A2.23. The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.

[18] London Borough of Hillingdon (2012), A vision for 2026 Local Plan: Part 1 Strategic Policies (adopted November 2012), (available at: https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal_Plan_Part_1_Strategic_Policies_15_feb_2013_a_1_1.pdf?m=1598370401647, [accessed 04/05/2024]

2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.

3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.

4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.

5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.

6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.

7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.

8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity, and a greater use of waste as a resource.

9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

10. The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

11. Locating and designing development to minimise the probability and impacts of flooding.

12. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.

13. Giving preference to development of previously developed land to avoid the loss of further green areas.

14. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.

15. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

Implementation of Policy EM1- how we will achieve this

- The Council will implement Policy EM1 through the topic policies in the Hillingdon Local Plan: Part 1- Strategic Policies. The above criteria are essential to ensure that this Hillingdon Local Plan: Part 1-

Strategic Policies and future Local Plan plans and programmes can help the borough respond positively to climate change. The implementation of the criteria is embedded within most of the Hillingdon Local Plan: Part 1- Strategic Policies.

- In addition to the above, there will be a requirement to include the criteria in the development of the Hillingdon Local Plan: Part 2- Heathrow Area Policies Local Development Document. This will ensure that this highly important growth area is fully considerate of the environmental challenges alongside the social and economic matters.

- All the above criteria will be fed into the preparation of the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). This LDD will provide further details which development proposals must follow.

- A separate Heat Mapping Exercise will be undertaken by the Council in accordance with the London Plan requirements. This will build on the work in the London Heat Mapping exercise which has revealed possible opportunities for district heat networking to provide a more efficient approach to community heating needs. Policies in the Hillingdon Local Plan: Part 2- Development Management Policies LDD will require developers to investigate and link into identified networks.

Monitoring of Policy EM1- how we will measure success

A2.24. Monitoring of the Policy EM1 will be through the Annual Monitoring Report with specific links to:

- E1 (Core) Indicator: Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. Target: No planning permission will be granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality (or any other targets set by Government).

- E2 (Core) Indicator: Change in areas of biodiversity importance. Target: i) Preserve the area of wildlife habitats; and ii) Minimise loss of designated areas to development (or any other targets set by Government).

- E3 (Core) Indicator: Renewable energy generation. Target: 20%of energy needs from renewable sources for larger applications (or any other targets set by Government).

- LO16 (Local) Indicator: The average standard assessment procedure (SAP) rating of local authority owned dwellings. Target: BV63 Increase energy efficiency of local authority owned dwellings. Target for 2006/07 was 71.5. Targets for, 2007/08, 2008/09 and 2009/10 are 67.5, 68 and 68.5 respectively.

- LO17 (Local) Indicator: Annual average concentrations of nitrogen dioxide (NO2) in specific parts of the borough. Target: 40 µg/.m^3.

"Policy EM7: Biodiversity and Geological Conservation – page 116-117

A2.25. 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.

A2.26. 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.

Implementation of Policy EM7 - how we will achieve this

A2.27. The Council will implement Policy EM7 by:

- Raising the profile of the biodiversity and geological interests both locally, regionally and nationally.
- Supporting, improving and managing biodiversity interests and local geological sites through the planning process.
- Protecting and where feasible extend habitat and improve ecosystems throughout the borough and to areas beyond, by maintaining existing trees, native vegetation (adaptable to climate change) and open space and provide new areas of such vegetation (including the linking of existing fragmented areas) for the benefit of wildlife in accordance with the local Biodiversity Action Plan.

- Seeking and pooling contributions in accordance with the Planning Obligations Supplementary Planning Document towards the implementation of actions contained within Hillingdon's Biodiversity Action Plan.

- Working with partners, private landowners and other utility providers to achieve multi-functional use of land use that promotes and enhances biodiversity, adds to the green grid or achieves other open space outcomes, including improved accessibility.

- Working with local community groups/ partners when reviewing the Biodiversity Action Plan.

Monitoring of Policy EM7 - how we will measure success

A2.28. Monitoring of Policy EM7 will be through the Annual Monitoring Report with a specific link to:

- E2 (Core) Indicator: Change in areas of biodiversity importance including; change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance. Target: i) Preserve the area of wildlife habitats ii) Minimise loss of designated areas to development (or any other target set by Government).

- Number of biodiversity and geological conservation sites lost to development.

- Number of applications refused on biodiversity or geological interest grounds.

- Number of local sites actively managed.

- Number of additional nature conservation sites designated.

- Implementation of Hillingdon's Biodiversity Action Plan.

Local Plan Part 2: Development Management Policies Document (adopted January 2020)[19]

A2.29. Policy DMEI 7: Biodiversity Protection and Enhancement

A) The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.

B) If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate

[19] London Borough of Hillingdon (2020), Local Plan Part 2: Development Management Policies Document (available at https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2_Development_Management_Policies_-_ADOPTED_VERSION_JAN_2020_1.pdf?m=1598370641570),[accessed 03/06/2024]

that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

C) All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements. D) Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

RAF Uxbridge Supplementary Planning Document[20]

A2.30. The high amenity and environmental values of the landscaping, Green Belt and the River Pinn corridor are recognised on this site as well as the objective to preserve and enhance them. The potential to utilise the Green Belt as public open space was also a strong aspiration raised through the public consultation.

A2.31. There are a number of considerations, which will affect open space provision on the site and the strategy for this. These are:

- The provisions of the Green Chain designation for land in the north of the site, and potential for extension of the green chain
- The need to protect the openness of the Green Belt and the requirement that this be delivered as a District Park
- The need to protect the settings of the Listed Buildings and the aspiration to restore the historic landscape around Hillingdon House
- The protection of areas of significant wildlife habitat, mainly adjacent to the River Pinn
- The protection and enhancement of the biodiversity values of the River Pinn corridor
- The inclusion of sustainable urban drainage systems SUDS across the site, and flood management features as part of the green network
- The provision of recreational needs for the new residential population.

[20] London Borough of Hillingdon (2009), RAF Uxbridge Supplementary Planning Document (available at: https://www.hillingdon.gov.uk/media/6641/RAF-Uxbridge---supplementary-planning-document/pdf/esRAF_Uxbridge_SPD.pdf?m=1625574527463), [accessed 04/05/2024]

Appendix 3: Methodology and Detailed Results

Data Search

A3.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

A3.2. The following resources were consulted/contacted:

- Multi-Agency Geographic Information for the countryside (MAGIC) website[21];
- Greenspace Information for Greater London CIC (GIGL)[22] (Data ordered on 6th August 2023 and received on 7th August 2023);
- London Borough of Hillingdon Council website[23];
- Joint Nature Conservation Committee (JNCC) website[24];
- Natural England (NE) designated sites website[25];
- Ordnance Survey mapping; and
- Google Maps, including aerial photography.

A3.3. The following areas of search around the boundary of the site boundary were applied:

- 1 km for protected and priority species, national statutory designated and non-statutory sites; and
- 10 km for European statutory sites.

'Extended' Phase I Habitat Survey and UKHabs

A3.4. An 'extended' Phase 1 survey was carried out on the 9th January 2024 by Will Wells BSc , a suitably experienced ecologist and qualifying member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey[26] and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group[27].

[21] https://magic.defra.gov.uk/ [Accessed 21/08/2023]
[22] https://www.gigl.org.uk/ [accessed 07/08/2023]
[23] https://www.hillingdon.gov.uk/ https://www.hillingdon.gov.uk/local-plan-and-review [Accessed 04/05/2023]
[24] http://jncc.defra.gov.uk/ProtectedSites/ [Accessed 21/08/2023]
[25] https://designatedsites.naturalengland.org.uk/ [Accessed 21/08/2023]
[26] Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.
[27] Butcher, B., Carey, P., Edmons, R., Norton, L. and Treweek, J. (2020). UK Habitat Classification – Habitat Definitions V1.1

A3.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

A3.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the Statutory Metric ", which included confirming 'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Preliminary Bat Surveys

A3.7. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines[28], the Bat Workers Manual[29] and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition[30] and comprised:

- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats;
- Ground Level Tree Assessment (GLTA) – Ground level inspection of trees to assess potential of trees on site to support roosting bats; and
- Day-time Bat Walkover (DBW) – Walkover of the sites to assess potential bat activity including foraging areas and potential commuting routes.

Preliminary Bat Roost Assessment (PBRA)

A3.8. A PBRA was undertaken on all buildings within the Site boundary. The assessment was undertaken on the 7th August 2023 by James Sweetman BSc MSc following best practice guidance at the time[9]. This survey was then updated by Will Wells BSc on the 9th January 2024 to follow newly released best practice guidance[34].

A3.9. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the buildings and trees at the Site are shown on 15991/P01. All buildings were inspected from the ground using binoculars, high powered torch, digital camera and endoscope for accessible features. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.

A3.10. The potential of the buildings and trees to support roosting bats was assessed using the criteria shown in Table 3.1 below: -

[28] Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.
[29] Mitchell-Jones, A.J, & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8
[30] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

Table A3.2: Building / Structure Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[b] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats[c]).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[b] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed)
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[b] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

[a] Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

[b] For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

[c] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments. Common pipistrelle swarming has been observed in the UK and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland. This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.

Ground Level Tree Assessment (GLTA)

A3.11. A GLTA was undertaken on all trees within the Site boundary. The assessment was undertaken on the 7th August 2023 by James Sweetman BSc MSc following best practice guidance at the

time[9]. This survey was then updated by Will Wells BSc on the 9th January 2024 to follow newly released best practice guidance[34].

A3.12. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the trees at the Site are shown on 15991/P01. All trees were inspected from the ground using binoculars, high powered torch, digital camera, and endoscope for accessible features. Potential Roosting Features (PRFs) of interest include at detailed in Table A3.2 below.

Table A3.2: PRF Types hat can be Exploited by Bats and How they Form - adapted from Collins, 2023.

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
woodpecker holes squirrel holes knot holes pruning cuts tear outs wounds cankers compression forks butt rots	lightning strikes hazard beams subsidence cracks shearing cracks transverse snaps welds lifting bark desiccation fissures frost cracks	fluting ivy

A3.13. The potential of trees to support roosting bats was assessed using the criteria shown in Table A3.3 below.

Table A3.3: Assessment of Tree Suitability Criteria - adapted from Collins, 2023.

Roost Suitability	Description of Roosting Habitat
NONE	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Day-time Bat Walkover (DBW)

A3.14. A DBW was undertaken on all habitats within the Site boundary. The assessment was undertaken on the 7th August 2023 by James Sweetman BSc MSc following best practice guidance at the time[9]. This survey was then updated by Will Wells BSc on the 9th January 2024 to follow newly released best practice guidance[34].

A3.15. All surveys were daytime inspections and the conditions for all surveys were considered optimal. The DBW assessed habitats on-site for the likelihood to be used by foraging and commuting bats as detailed in Table A3.4 below. This combined with desk study records of local bats and bat roosts, and potential for roosting bats on-site is used to determine suitability of the site for bat activity.

Table A3.4: Flight Path and Foraging Habits Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Biodiversity Net Gain

A3.16. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the 'unit' value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and

- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

A3.17. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the 'unit' value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

A3.18. A calculation has been undertaken using the baseline habitats identified during habitat condition assessment survey, which was carried out on the 9th January 2024, alongside the 'extended' Phase 1 survey above. All surveys were carried out by Will Wells BSc, a suitably experienced ecologist and qualifying member of CIEEM.

A3.19. The UK Habitat Classification was used to identify habitat types. Note that the calculation is completed separately for non-linear and linear habitats. Habitat areas entered into The Statutory Biodiversity Metric in hectares were rounded to two decimal places.

Evaluation

A3.20. The evaluation of habitats and species is defined in accordance with published guidance[31]. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.

A3.21. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.

A3.22. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Impact Assessment

A3.23. The assessment of impacts identifies impacts and their effects as a result of the proposed development on important ecological features. This includes consideration of impacts at all relevant stages of the development, including construction and operation/occupation [include decommissioning and restoration, if relevant – it won't be for most projects]. The assessment

[31] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

includes reference to legislation and policy, and supplementary planning guidance where relevant.

Application of Mitigation Hierarchy

A3.24. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:

- Avoidance – measures to avoid harm to ecological features (set out in 'Design Evolution', Section 3);
- Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;
- Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and
- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.

Existing Habitats

A3.25. The following habitats are present within the red line boundary of the site and are shown on Habitat Features and Bat Roost Assessment Plan **15991/P01**. No watercourses or linear habitats were present. The rationale for condition assessments is detailed within the metric **(Appendix 5)**.

Table 2.5. Baseline Habitats and Areas Retained and Enhanced

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Urban	Developed land; sealed surface	0.63	V.Low	N/A - Other	0.00	0.00	0.63
Urban	Developed land; sealed surface	0.09	V.Low	N/A - Other	0.09	0.00	0.00
Grassland	Modified grassland	0.68	Low	Poor	0.00	0.00	0.68
Urban	Artificial unvegetated, unsealed surface	0.38	V.Low	N/A - Other	0.00	0.00	0.38
Individual trees	Urban tree	0.13	Medium	Good	0.13	0.00	0.00
Individual trees	Urban tree	0.004	Medium	Moderate	0.00	0.00	0.004

Proposed Habitats

A3.26. The proposals, as shown within **Appendix 1** and the Post-development Habitat Plan **15991/P02**, have been used to calculate the proposed habitat areas. The rationale for target condition assessments is detailed within the metric **(Appendix 5)**.

Created Habitats

Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Target condition	Units Provided
Urban	Developed land; sealed surface	0.38	V.Low	N/A - Other	0.00

Urban	Developed land; sealed surface	0.7	V.Low	N/A - Other	0.00
Urban	Sustainable drainage system	0.01	Low	Moderate	0.02
Urban	Introduced shrub	0.13	Low	Condition Assessment N/A	0.25
Grassland	Modified grassland	0.25	Low	Poor	0.48
Grassland	Other neutral grassland	0.03	Medium	Moderate	0.20
Individual trees	Urban tree	0.37	Medium	Moderate	1.13
Urban	Other green roof	0.18	Low	Condition Assessment N/A	0.31
A net gain of 0.81 units, a percentage gain of 27.59%					

Appendix 4: Bat Legislation, Methodology and Survey Results

Legislation and Conservation Status

A4.1. All U.K bat species are listed on Appendix II of the Bern Convention and on Annexes II and IV of the EU Natural Habitats Directive. In England and Wales bats are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 and under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). It is an offence, with certain exceptions, to:

- Intentionally or deliberately capture, kill, or injure a bat;
- Intentionally or recklessly damage, destroy, and disturb bats in a place used for shelter or protection, or obstruct access to such areas;
- Damage or destroy a bat breeding site or resting place;
- Possess a bat, or any part of it, unless acquired lawfully; and
- Sell, barter, exchange, transport, or offer for sale a bat or parts of them.

A4.2. Actions that are prohibited can be made lawful by a licence issued by the appropriate Statutory Nature Conservation Organisation.

A4.3. Several species of bats barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, brown long-eared *Plecotus auritus*, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, noctule *Nyctalus noctula* and soprano pipistrelle *Pipistrellus pygmaeus* are listed as Priority Species under the 'UK Post-2010 Biodiversity Framework which provides a statutory list of priority species in England, Scotland, Wales and Northern Ireland, as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (England), Section 7 of the Environment (Wales) Act 2016, Section 2(4) of the Nature Conservation (Scotland) Act 2004, and Section 3(1) of the Wildlife and Natural Environment Act (Northern Ireland) 2011. Decision-makers such as Local Planning Authorities must have regard for Priority species in all their activities, including when making decisions on planning applications.

Survey Methodologies

A4.4. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines[32], the Bat Workers Manual[33] and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition[34] and comprised:

- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats;

[32] Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.
[33] Mitchell-Jones, A.J, & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8
[34] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

- Ground Level Tree Assessment (GLTA) – Ground level inspection of trees to assess potential of trees on site to support roosting bats;
- Day-time Bat Walkover (DBW) – Walkover of the sites to assess potential bat activity including foraging areas and potential commuting routes;
- Emergence presence / absence surveys - to determine presence or likely absence or roosting bats within trees;

Building Preliminary Roost Assessment (PRA)

A4.5. A PRA was undertaken on all buildings within the site boundary. The assessment was undertaken the 7th August 2023 by James Sweetman BSc MSc following best practice guidance at the time[9]. This survey was then updated by Will Wells BSc on the 9th January 2024 to follow newly released best practice guidance[34]. All surveys were daytime inspections and the conditions for all surveys were considered optimal. The location of the building at the site is shown on **15991/P01**.

A4.6. All buildings were inspected from the ground using binoculars, high powered torch, and digital camera for accessible features. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.

A4.7. The potential of the buildings to support roosting bats was assessed using the criteria shown in **Table A4.1** below.

Table A4.1 Building / Structure Assessment Criteria

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain Potential Roost Features (PRFs) but with none seen from the ground or features seen with only very limited potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time.

A4.8. Consideration of the structures suitability to be utilised as a hibernation roost was also considered in line with published guidance[35][36].

Tree PRA

A4.9. A ground-level tree assessment was undertaken on the 7th August 2023 by James Sweetman BSc MSc following best practice guidance at the time[9]. This survey was then updated by Will Wells BSc on the 9th January 2024 to follow newly released best practice guidance[34]. All trees within and adjacent to the site to determine the level of potential of these features to support roosting bats, including hibernation roosts. During this survey, Potential Roost Features (PRFs) that may be used by bats, as identified within published guidance[37] [38], were looked for. These PRFs include:

- Woodpecker holes;
- Rot holes;
- Hazard beams;
- Other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached platey bark;
- Knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
- Man-made holes (e.g. cavities that have developed from flush cuts) or cavities created by branches tearing out from the parent stems;
- Cankers (caused by localised bark death) in which cavities have developed;
- Other hollows or cavities, including butt-rots;
- Double-leaders forming compression forks with included bark and potential cavities;
- Gaps between overlapping stems or branches;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bird, bat or dormouse boxes.

A4.10. Signs of a bat roost, as identified by the BCT, besides the actual presence of bats themselves, were also looked for. These signs include:

- Bat droppings in, around or below a PRF;
- Odour emanating from a PRF;
- Audible squeaking at dusk or in warm weather; and
- Staining below the PRF.

A4.11. The potential of the trees to support roosting bats was assessed using the criteria shown in **Table A4.1** above.

[35] Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.
[36] Middleton, N. (2019) Assessing Sites for Hibernation Potential. A Practical Approach, including a Proposed Method & Supporting Notes. Author: Neil Middleton (BatAbility Courses & Tuition) Version: Draft/V2.2019 Dated: 08.10.2019 Assessing-Sites-for-Hibernation-Potential-BatAbility-10.2019.pdf
[37] Collins, J. (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd edition. Bat Conservation Trust, London.
[38] Bat Tree Habitat Key (2018) *Bat Roosts in Trees: a guide for identification and assessment for tree-care and ecology professionals*. Pelagic Publishing, Exeter.

Emergence Surveys

A4.12. All bat surveys undertaken by Tyler Grange were completed with reference to published guidance[39] [40] [41] [42].

A4.13. The emergence surveys was/ere undertaken in accordance with best practice survey guidance, starting 15 minutes before sunset and finishing an hour and a half after sunset.

A4.14. During the visit, four surveyors were positioned so as to best observe any bats emerging from B1 or flying in close proximity to B1.

A4.15. Batlogger M2s and Echometer Touch 2s were used to identify bats during the surveys, and BatExplorer software was used to analyse bat calls for species identification. Analysts of the sound files had all completed BatAbility's Certificate of Bat Acoustic Analysis (COBAA)[43] assessment course.

A4.16. The surveys were completed during optimum weather conditions, and these are detailed in below **Table A4.2** along with the date and sunrise time.

Table A4.2 Dusk Emergence Survey Meta Data

Date: 10/08/23	**Start Time: 20:19**	**End Time: 22:04**
Sunset:	**Weather at Start:**	**Weather at End:**
Cloud Cover (%):	70	10
Wind (Beaufort):	1	1
Temperature (°C):	23	21
Precipitation:	None	None
Date:	**Start Time: 19:52**	**End Time: 21:37**
Sunset:	**Weather at Start:**	**Weather at End:**
Cloud Cover (%):	80	20
Wind (Beaufort):	1	0
Temperature (°C):	21	19
Precipitation:	None	None
Date:	**Start Time: 19:23**	**End Time: 21:08**
Sunset:	**Weather at Start:**	**Weather at End:**

[39] Collins, J. (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd edition. Bat Conservation Trust, London.
[40] Natural England (2022) Bats: advice for making planning decisions, Available at: https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions [Accessed 07/08/2023]
[41] Mitchell-Jones, A.J. (2004) *Bat Mitigation Guidelines*. English Nature, Peterborough.
[42] Mitchell-Jones, A.J. & McLeish, A.P. (2012) *The Bat Workers' Manual*. Pelagic Publishing, Exeter.
[43] https://batability.co.uk/cobaa/

Cloud Cover (%):	50	30
Wind (Beaufort):	1	1
Temperature (°C):	27	24
Precipitation:	None	None

Survey Results

A4.17. The survey recorded low numbers of common pipistrelle and soprano pipistrelle activity around the site, with no emergences recorded.

Limitations

A4.18. Access to the north of the building was not possible at the time of the surveys and as such this aspect of the building was not observed during the surveys.

Results

Building Preliminary Roost Assessment (PRA)

A4.19. One building was assessed for bat roost potential during the survey. **Table 2.1** summarises the results of these surveys, highlighting the building requires further survey effort, and the location of the building is shown on Plan **15991/P01**.

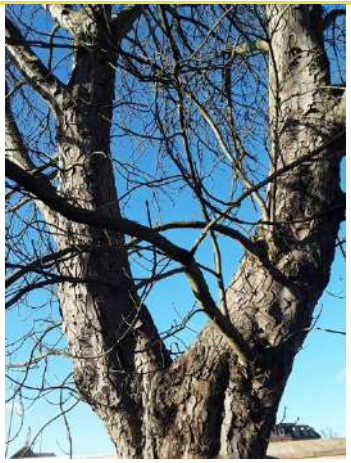
Ground level Tree Assessment

A4.20. A total of five trees or groups of trees were assessed for bat roost potential during the survey. **Table A4.4** below summarises the results of these surveys, highlighting no trees require further survey effort, and locations of these trees are shown on **15991/P01**.

Discussion and Evaluation of Results

A4.21. The emergence survey recorded low levels of bat activity both on site and directly adjacent to the site, with species such as common pipistrelle, soprano pipistrelle, and brown long eared bats *Plecotus auritus* recorded. No roosts were recorded and as such roosting bats are considered likely absent from site.

Table A4.4 Ground Level Tree Assessment Results

Tree No	Location (OS Grid reference)	Species (Common name)	Overall Tree Potential (BCT, 2016)	Tree PRF Features as per BTHK 2018				
			Neg, L, M, H,C	Prf type as per BTHK	Aspect	Hibernation Potential	Inspected ground level or ladder/aerial	Photo
1	TQ 06031 83802	Horse Chestnut	Neg	N/A	N/A	N/A	Ground Level	

2	TQ 06069 83722	Swedish Whitebeam	Neg	N/A	N/A	N/A	Ground Level	
3	TQ 06063 83722	Wild Cherry	Neg	N/A	N/A	N/A	Ground Level	

4	TQ 06057 83718	Wild Cherry	Neg	N/A	N/A	N/A	Ground Level	
5	TQ 06054 83715	Atlantic Cedar	Neg	N/A	N/A	N/A	Ground Level	

Appendix 5: Statutory Biodiversity Metric

The Statutory Biodiversity Metric
Start page

Project details			
Planning authority:	London Borough of Hillingdon		
Project name:	St Andrew's Gate, Town Centre Expansion, Uxbridge		
Applicant:	Vinci St Modwen		
Application type:	Hybrid		
Planning application reference:			
Completed by:	Will Wells BSc (Hons)		
Date of metric completion:	20 June 2024		
Reviewer:	Julian Arthur MCIEEM CEcol CEnv		
Calculation iteration:	-		
Planning authority reviewer:			
Date of planning authority review:			
Target % net gain:	10%		
Irreplaceable habitat present at baseline:	No ✓		
Total site area - including irreplaceable habitat area (hectares):	1.78	Irreplaceable habitat site area (hectares):	0.00
Total off-site area - including irreplaceable habitat area (hectares):	N/A	Irreplaceable habitat area off-site (hectares):	N/A

Main menu

Results

Cell style conventions	
⚠	Attention required
▲	Input error/rules and principles not met
	Use of this cell is not appropriate
	Enter data
	Automatic lookup
	Result

View all

Reset view

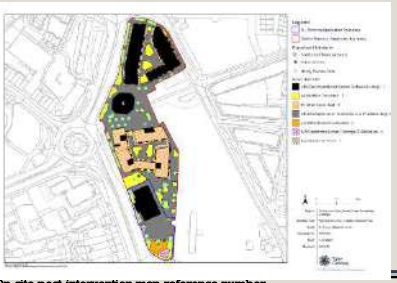
On-site baseline map

Insert

On-site baseline map reference number	15991/P01

On-site post intervention map

Insert



On-site post-intervention map reference number	15991/P02

Off-site baseline map

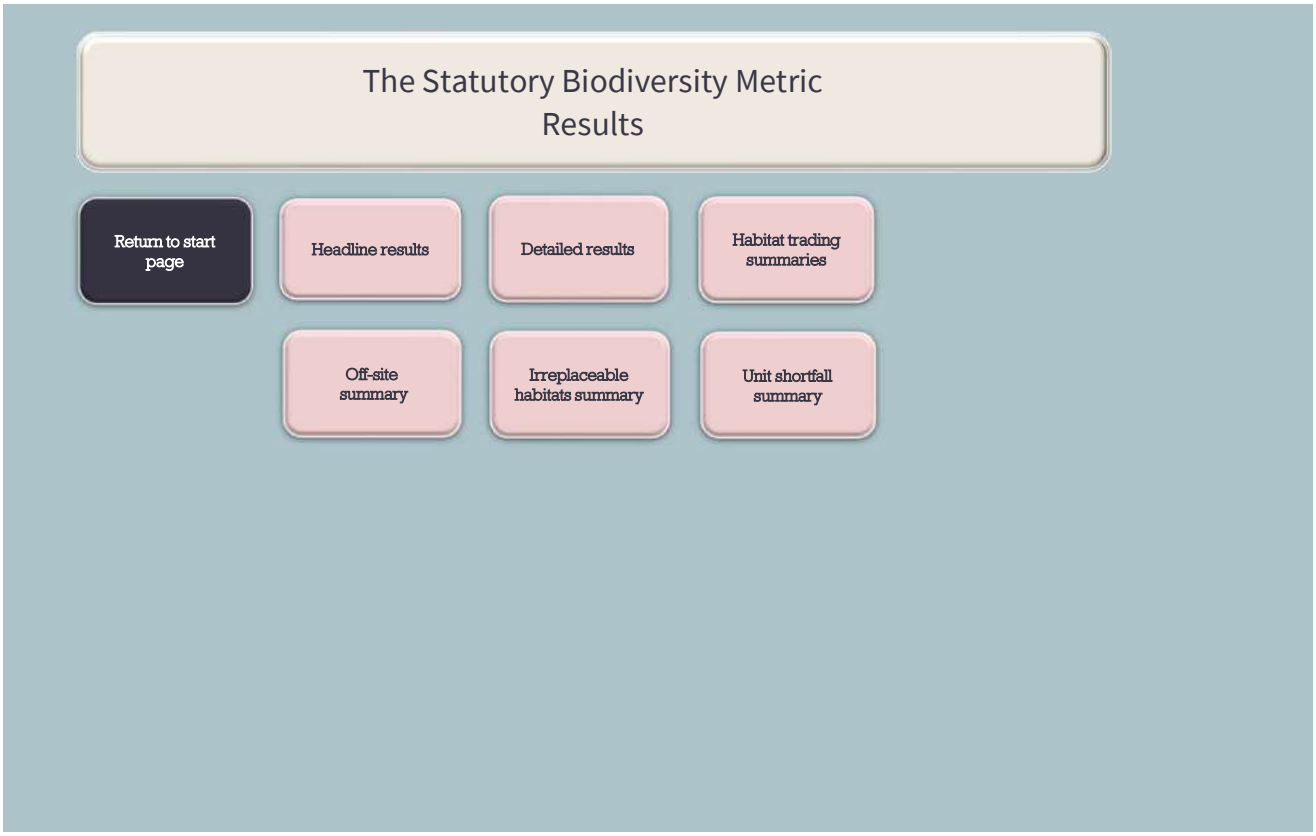
Insert

Off-site baseline map reference number	

Off-site post intervention map

Insert

Off-site post-intervention reference number	


The Statutory Biodiversity Metric
Results
Return to start page
Headline results
Detailed results
Habitat trading summaries
Off-site summary
Irreplaceable habitats summary
Unit shortfall summary

St Andrew's Gate, Town Centre Expansion, Uxbridge

Headline Results

Scroll down for final results ⚠

Return to results menu

On-site baseline	*Habitat units*	2.95	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	3.77	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	0.81	27.59%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	*Habitat units*	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.81	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.81	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	27.59%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	2.95	3.25	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Project Name: St Andrew's Gate, Town Centre Expansion, Uxbridge Map Reference:

A-1 On-Site Habitat Baseline

Condense / Show Columns | Condense / Show Rows

Main Menu

Area habitat summary	
Total Net Unit Change	0.81
Total Net % Change	27.89%
Trading Rules Satisfied	Yes ✓

	Existing area habitats				Distinctiveness		Condition		Strategic significance				Ecological baseline						Bespoke compensation agreed for losses of VHDH or irreplaceable habitat	Comments		
Ref	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic significance multiplier	Required Action to Meet Trading Rules	Total habitat units	Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost		User comments	Planning authority comments	Habitat reference number
1	Urban	Developed land; sealed surface	No	0.63	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00			0.00	0.00	0.63	0.00		Areas of paths and roads throughout the site which can achieve no other condition within the metric.		1
2	Urban	Developed land; sealed surface	No	0.09	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00	0.09		0.00	0.00	0.00	0.00		The former cinema building to the south of the site, due to be retained and reinstated through the proposals. Can achieve no other condition within the metric.		B1
3	Grassland	Modified grassland	No	0.68	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required ≥	1.36			0.00	0.00	0.68	1.36		Achieves a poor condition as it fails essential criteria A with less than 6 species per m2. The areas of grassland to the south of the site fail criteria B, D, and E as the sward height is uniform, with more than 5% of the areas showing damaging levels of access, with the cover of bare ground higher than 10%. They pass criteria C, F, and G as scrub and bracken accounts for less than 20% of the total area, with no schedule 9 invasive species present in this area. The grassland to the north passes all criteria apart from essential criteria A and as such achieves a poor condition.		2
4	Urban	Artificial unvegetated, unsealed surface	No	0.38	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00			0.00	0.00	0.38	0.00		Areas of artificial unvegetated unsealed surface with areas of buddleia present. Can achieve no other condition within the metric.		3
5	Individual trees	Urban tree	No	0.13	Medium	4	Good	3	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required (2)	1.56	0.11		1.32	0.00	0.02	0.24		T1, T3, T4, and T5 achieve a good condition, with T1 being very large and the rest are medium in size. T1, T3, and T4 achieves a good condition by passing all criteria. This is because the tree is a native individual mature tree, with little evidence of adverse impacts due to human activities, with deadwood or ivy present, with more than 20% of the canopy oversailing vegetation, it reaches a good condition. T5 reaches a good condition as it passes all criteria apart from criteria C as the tree is not mature. Achieves a good condition as the tree is a native individual tree with little evidence of human impact. There are ecological niches present in the form of ivy, with more than 20% of the canopy oversailing vegetation.		T1, T3, T4, and T5
6	Individual trees	Urban tree	No	0.004	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required (2)	0.03			0.00	0.00	0.00	0.03		T2 achieves a moderate condition as the tree does not pass criteria A, C, and E as the tree is not native, mature, or have ecological niches present. It passes criteria B, D, and F as it is an individual tree, with little evidence of adverse impacts due to human activities, with more than 20% of the canopy area oversailing vegetation.		T2
7																							
8																							
9																							
10																							
11																							
		Total habitat area		1.91									2.96	0.20	0.00	1.32	0.00	1.71	1.63				
		Site Area (Excluding area of individual trees, green walls, intertidal hard structures)		1.78																			

Total area lost (excluding area of individual trees, green walls and intertidal hard structures)	1.69

M² to hectares conversion tool:	Select a unit	Hectares	M²

ject Name: St Andrew's Gate, Town Centre Expansion, Uxbridge Map Reference: 15991/P0

A-2 On-Site Habitat Creation

Condense / Show Columns | Condense / Show Rows | Main Menu

Area habitat summary	
Total Net Unit Change	0.81
Total Net % Change	27.59%
Trading Rules Satisfied	Yes ✓
Area Check	Area Acceptable ✓

	Post intervention habitats										
				Distinctiveness	Condition	Strategic significance	Temporal multiplier		Difficulty		Comments		
Ref	Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation	Habitat units delivered	User comments	Planning authority comments	Habitat reference number
1	Urban	Developed land; sealed surface	0.38	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Low	0.00	Areas of buildings in the proposed development. Can achieve no other condition.		1
2	Urban	Developed land; sealed surface	0.7	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Low	0.00	Areas of paths, roads, and carparking in the proposed development. Can achieve no other condition.		4
3	Urban	Sustainable drainage system	0.01	Low	Good	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	5	Medium	0.03	Sustainable Urban Drainage feature, anticipated to reach a Good condition by passing criteria all criteria. The vegetation will be varied and consist of mostly native species that are suited to wetland or riparian habitats. No one vegetation type will account for more than 80% of the habitat area, with species that flower at different times of year. Invasive species (as defined on schedule 9 of the WCA) will account for less than 5% of the total vegetated area.		6
4	Urban	Introduced shrub	0.13	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.25	Areas of introduced shrub planting, can achieve no other condition within the metric.		7
5	Grassland	Modified grassland	0.25	Low	Poor	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.48	Areas of public amenity grassland which is expected to achieve a poor condition as it is expected to fail essential criteria A, B, and D with less than 6 species per m2 present, a uniform sward height, and evidence of a damaging level of access present in more than 5% of the total area. Expected to pass criteria C, E, F, and G with areas of scrub and bracken accounting for less than 20% of the total area. The cover of bare ground will be between 1-10%, with an absence of invasive non-native species.		2
6	Grassland	Other neutral grassland	0.03	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	5	Low	0.20	Area of other neutral grassland planting. Expected to achieve a moderate condition by passing essential criteria A, C, and D with the habitat being a good example of this habitat type as described within the UK Habitats Classification guide, with the cover of bare ground between 1-10% and the cover of bracken less than 20% and scrub cover of less than 5%. Expected to fail criteria B, E, and F as the sward heigh is anticipated to be uniform in height, with damaging levels of access present in more than 5% of the area, with less than 10 species present per m2.		5
7	Individual trees	Urban tree	0.37	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	27	Low	1.13	New tree planting. Expected to achieve a moderate condition by passing criteria A, B, D, and F. The trees are expected to pass these criteria as they will be native individual trees which will show little evidence of an adverse impact due to human activities, and will oversail vegetation for more than 20% of the tree canopy. Expected to fail criteria B and E as the trees will not be native, and there will be no natural ecological niches present.		
8	Urban	Other green roof	0.18	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.35	Areas of sedum green roof planting which can achieve no other condition within the metric.		3
9													
10													
11													
12													
13													
		Total habitat area	2.05							2.45			

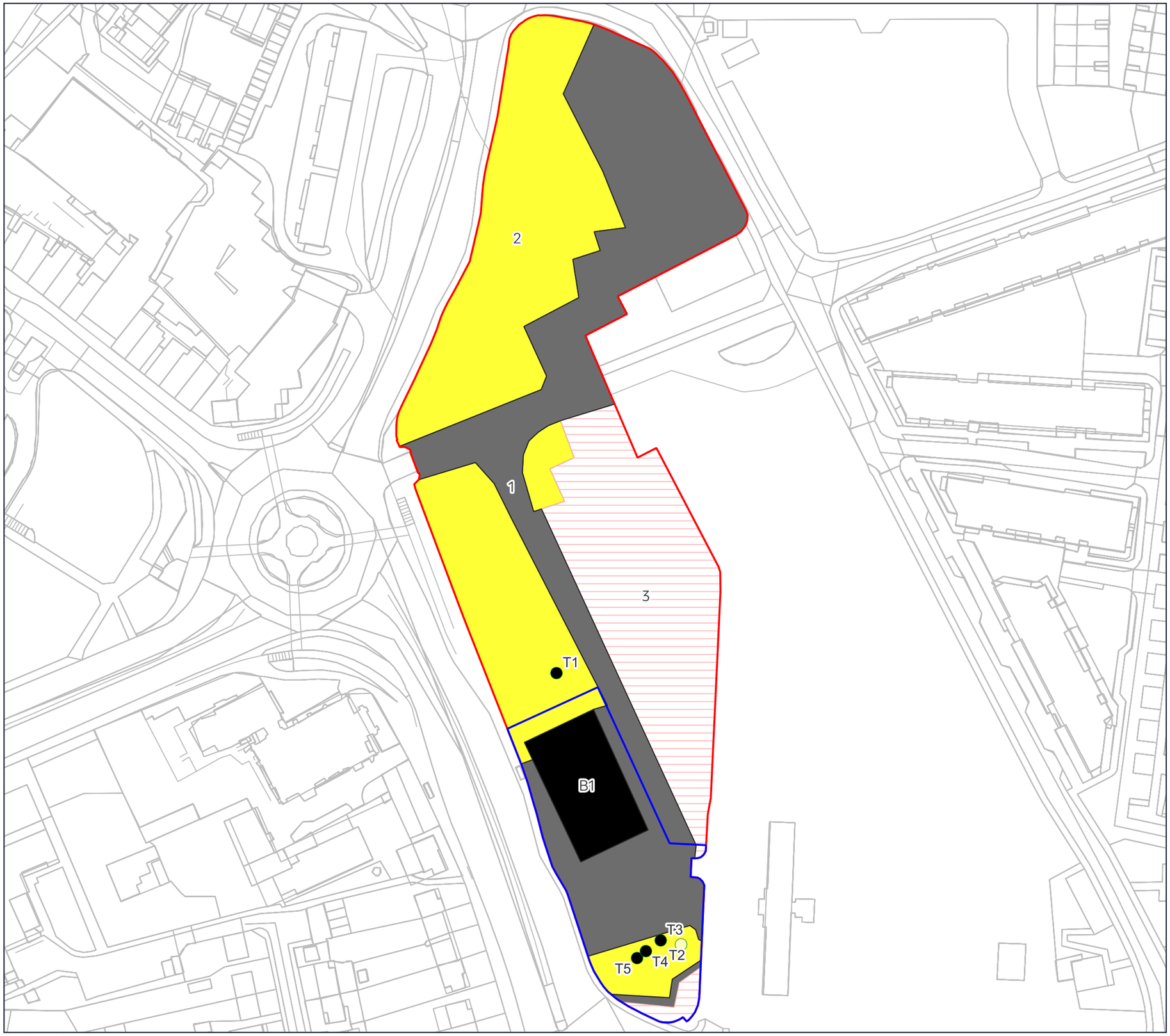
Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	1.88

M² to hectares conversion tool:	M²	Hectares	M²
	1600	0.16	1600

Plans:

Plan 1: Habitat Features and Preliminary Bat Roost Assessment (15991/P01)

Plan 2: Post-Development Habitat Features Plan (15991/P02)



Legend

- Full Planning Application Boundary
- Outline Planning Application Boundary

Baseline Habitats

32 - Scattered Trees (Urban)

- Good Condition
- Moderate Condition

Area Habitats

- u1b5 Developed Land; Sealed Surface (Building) - B1
- u1b Developed Land; Sealed Surface (Hardstanding) - 1
- g4 Modified Grassland - 2
- u1c Artifical Unvegetated; Unsealed Surface - 3

N

0 25 50 m

Project	St Andrews Gate, Town Centre Expansion, Uxbridge
Drawing Title	Habitat Features and Preliminary Bat Roost Assessment Plan
Scale	As Shown (Approximate)
Drawing No.	15991/P01
Date	June 2024
Checked	WW/JA

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Legend

Full Planning Application Boundary

Outline Planning Application Boundary

Baseline Habitats

32 - Scattered Trees (Urban)

Retained Trees

Newly Planted Trees

Area Habitats

u1b5 Developed Land; Sealed Surface (Building) - 1

g4 Modified Grassland - 2

89 Other Green Roof - 3

u1b Developed Land; Sealed Surface (Hardstanding) 4

g3c Other Neutral Grassland - 5

848 Sustainable Urban Drainage (SuD) feature - 6

847 Introduced Shrub - 7

N

0 25 50 m

Project	St Andrews Gate, Town Centre Expansion, Uxbridge
Drawing Title	Post-Development Habitat Features Plan
Scale	As Shown (Approximate)
Drawing No.	15991/P01
Date	June 2024
Checked	WW/JA

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