



---

**CLIENT:** INDURENT MANAGEMENT LIMITED  
**SITE:** HEATHROW 360, UNIT 2 MILLINGTON ROAD  
**DATE:** MARCH 2025  
**DOCUMENT:** BIODIVERSITY IMPACT ASSESSMENT

---

### **Associated Figures and Appendices:**

JN00748/DW02 – BNG Baseline Plan

JN00748/DW03 – BNG Proposed Plan

Appendix 1 – Condition Sheets

### **Defra Metric spreadsheet (supplied electronically alongside the BIA):**

JN00748/BNG – Heathrow BNG

### **Executive Summary**

- 1.1 SK Environmental Solutions Limited (SKE) was commissioned by Indurent Management Limited to undertake a detailed Biodiversity Impact Assessment (BIA) to support a planning application for the construction of a new pathway and revised landscaping associated with the existing building of Unit 2, Millington Road, Hayes.
- 1.2 The BIA has been carried out for the development using the Statutory Defra Metric. The Metric *'provides a way to measure biodiversity loss and gain in a consistent and robust way'*. It calculates a biodiversity value (measured in biodiversity units) for a site both before development commences and after development is completed, allowing the difference (positive or negative) to be measured.
- 1.3 Baseline habitat survey work was undertaken by SKE in February 2025. No irreplaceable habitats were identified on the site and, as a result, no impacts upon such habitats will occur as a result of the proposed development.
- 1.4 Post development habitats within the site have been based on the Landscape Concept Plans produced by BCA Design.
- 1.5 The BIA indicates that the proposal will result in a Biodiversity Net Gain (BNG) **of 0.07 habitat units (11.39%)**.

## Background

- 1.6 This BIA has been prepared in support of a planning application for a new pathway, along with revised landscaping, on an existing industrial site known as Heathrow 360, at Unit 2, Millington Road, Hayes, undertaken by Inudrent Management Limited. The application boundary extends to approximately 0.34 hectares (ha), while the wider ownership boundary approximately covers a further 1.93 ha.
- 1.7 This BIA has taken into account the baseline and post development habitats and hedgerows for the site (as informed by the Landscape Concept Plans).
- 1.8 The application boundary currently comprises existing areas of car parking and footways, along with landscaping in the form of amenity grassland (including an accessible amenity area), ornamental shrub and individual trees. An area of older landscaping has become overgrown with bramble *Rubus fruticosus* agg. and now comprises bramble scrub.
- 1.9 The project proposal is for the removal of areas of amenity grassland for the construction of a new footway, along with other minor changes to existing landscaping.

## Planning Policy

- 1.10 Under the Environment Act 2021, as of the 12<sup>th</sup> February 2024, all planning permissions granted in England (with a few exemptions) except for small sites must deliver at least 10% biodiversity net gain. The net gain must be demonstrated using the Statutory Defra Metric.
- 1.11 Chapter 2 of the National Planning Policy Framework (NPPF, 2023) describes the Government's objectives on achieving sustainable development. The environmental objective is "*– to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*"
- 1.12 Chapter 15 of the National Planning Policy Framework (NPPF) sets out the Government's objectives for planning in regard to the protection of habitats and biodiversity. The planning objectives in relation to biodiversity and the natural environment are laid out in paragraph 187 as follows:

*"Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*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; ...*

*f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."*
- 1.13 The National Planning Practice Guidance (PPG) provides further guidance to local authorities in relation to biodiversity planning. The PPG explains that planning applications should be informed by appropriate ecological survey work and that developments should be encouraged to protect and enhance biodiversity by following the 'mitigation hierarchy' to avoid, mitigate, or compensate for significant adverse effects to biodiversity.

- 1.14 The PPG also sets out and explains that plans should encourage a 'net gain' in biodiversity, whereby development leaves the natural environment in a measurably better state than it was beforehand.
- 1.15 The local policies of Hillingdon Council do not require a net gain higher than the 10% mandated by the Environment Act 2021.

## Methodology

### ***Statutory Defra Metric***

- 1.16 There are a number of equations undertaken as part of the metric, but simply put, the metric calculates the change in biodiversity resulting from a development by subtracting the number of pre-intervention or 'baseline' biodiversity units (those generated by existing habitats) from the number of post-intervention units (those anticipated to be provided after the development).
- 1.17 The calculation includes three separate categories: 'Habitat', 'Hedgerows and Lines of Trees' and 'Rivers and Streams'. Each category is considered separately and generates individual loss/gain results.
- 1.18 In order to populate the metric baseline, each land parcel (defined as contiguous habitats of the same type) and linear feature is measured and then assigned the following:
- Habitat Type - which carries with it a pre-assigned 'distinctiveness' classification, from 'very low' to 'very high'. This is a measure of habitat rarity and/or importance;
  - Condition – this is a measure of habitat quality as an example of the given habitat type (as per criteria set out in Statutory Biodiversity Metric User Guide) and can be 'poor', 'moderate', or 'good'. In exceptional circumstances, when justified, certain habitats can be assigned the intermediate condition classifications of 'fairly poor' and 'fairly good';
  - Strategic Significance – this is determined by whether the location of an existing/proposed habitat parcel is considered to be significant for nature. Such areas are typically identified in relevant published local strategies and objectives, such as an allocation for nature conservation purposes within a Local Plan or designated as a statutory site under the relevant legislation etc.
- 1.19 The metric then multiplies the area or linear length of a land parcel by the assigned distinctiveness, condition and strategic significance 'multipliers' to provide a baseline score in habitat or hedgerow units.
- 1.20 The same process is followed for post development land parcels which will have either been retained (no change), enhanced (either through an increase in condition or to habitat type which is of a higher distinctiveness) or lost and replaced with a different habitat type. There are also a number of additional factors involved in calculating the post-intervention scores such as:
- How long it would take for newly created habitats to reach the target condition;
  - Whether there will be a delay in habitat creation, or indeed whether habitats have been created/enhanced in advance of impacts; and

- How difficult it is to create a particular habitat type. Generally, the higher the distinctiveness the more difficult it is to create. For this reason, the metric also includes a number of 'trading rules' which must be satisfied when habitats are lost. For example, habitats of 'very high' distinctiveness, such as ancient woodland, are classed as 'irreplaceable' and therefore cannot be compensated for within the metric and habitats that are of 'high' distinctiveness must be replaced by the same habitat as that which was lost.

1.21 The Statutory Biodiversity Metric is a tool designed to aid the enhancement of the ecological value of sites. The biodiversity units calculated by the metric, used to give the net gain score, are designed as a best fit proxy for biodiversity and should be treated as relative values, as per the User Guide. Consequently, the metric should be used in conjunction with, rather than instead of, other relevant evidence, professional expertise and guidance.

### **Baseline Survey Work**

- 1.22 A habitat and protected species survey was undertaken by a suitably experienced ecologist on 5<sup>th</sup> February 2025. Although this is a suboptimal time of year at which to have completed such a survey, it is not considered that an appropriate assessment of the habitats present and their conditions was prevented by this, given the highly urbanised nature of the habitats present. This survey is summarised in JN00748\_TN01 Heathrow Ecological Constraints Summary.
- 1.23 This survey informed the completion, where required, of the relevant Condition Assessment Sheets for the habitats recorded on site (see Appendix 1).
- 1.24 There are no existing hedgerows within the site, nor any watercourse on site, or within 10m of the application boundary. Therefore, the hedgerow and watercourse elements of the metric are not relevant to this scheme, and are not referenced further in this report.
- 1.25 Seasonal trends and inherent variations in ecosystem dynamics mean that some species of flora may not have been recorded. However, the purpose of the survey was to record habitat types and therefore this is not considered to be a significant limitation.
- 1.26 No other limitations were encountered during the site survey.
- 1.27 All field work and desk work was undertaken in line with the British Standard set out in BS 8683: Process for designing and implementing biodiversity net gain – specification, as well as other relevant good practice guidelines.

## **Baseline**

### **Baseline Habitats**

- 1.28 The site comprises a mix of impermeable developed surfaces (roads, paths and parking) and amenity planting in the form of ornamental shrubs and highly modified grassland (achieving poor condition).
- 1.29 An area of ornamental planting has been overgrown by bramble and now comprises bramble scrub. A total of ten individual trees are also present within the landscaped areas, all of which achieve moderate condition.

- 1.30 All baseline habitats and conditions have been informed by the site survey undertaken on 5<sup>th</sup> February 2025. These are displayed on JN00748\_DW02 BNG Baseline Plan with Condition Sheets included as Appendix 1.
- 1.31 None of the habitats within the site are of 'very high' or 'high' distinctiveness and no 'irreplaceable habitats' were recorded.
- 1.32 The overall 'habitats' baseline score for the site is **0.66 Habitat Units**. Table 1 below, sets out the baseline habitats and how they contribute to the baseline score.

**Table 1 – Baseline Habitats**

Habitat Type	Area (Ha)	Distinctiveness	Condition	Habitat Units
Modified grassland	0.07	Low	Poor	0.13
Bramble scrub	0.03	Medium	Condition Assessment N/A	0.11
Developed land; sealed surface	0.21	Very low	N/A - Other	0.00
Introduced shrub	0.04	Low	Condition Assessment N/A	0.09
Urban tree	10 no.	Medium	Moderate	0.33
<b>TOTAL</b>	<b>0.34</b>	<b>n/a</b>	<b>n/a</b>	<b>0.66</b>
* Totals are taken from the Statutory Defra Metric. Due to rounding, totals may differ slightly to the sum of the columns.				

## Impact Assessment - Loss

### Habitats

- 1.33 The project is for the construction of a new footway within the site. This involves the loss of some areas of modified grassland. An existing area of grassland will also be replaced with new amenity grassland as part of these works.
- 1.34 Some further areas of modified grassland are to be lost, in order to facilitate new areas of ornamental shrub planting.
- 1.35 All remaining habitats are to be retained in their existing condition. No habitat enhancements are proposed.
- 1.36 Table 2, below, summarises the number of habitat units that will be lost prior to any habitat enhancement or creation.

**Table 2 - Baseline Habitat Units Lost to Proposals**

Habitat Type	Area Retained (Ha)	Area Enhanced (Ha)	Area Lost (Ha)	Habitat Units Lost
Modified grassland	0.02	0.00	0.04	0.09
Bramble scrub	0.03	0.00	0.00	0.00
Developed land; sealed surface	0.21	0.00	0.00	0.00
Introduced shrub	0.04	0.00	0.00	0.00
Urban tree	10 no.	0.00	0.00	0.00
<b>TOTAL</b>	<b>0.30</b>	<b>0.00</b>	<b>0.04</b>	<b>0.09</b>

## Habitat Proposals – Creation and Enhancement

### Habitats

- 1.37 Table 3, below, details the habitat creation measures that are proposed as part of the proposed development. There is no habitat enhancement proposed.

**Table 3 – Habitat Creation Proposals**

Habitat Creation				
Habitat Type	Area (Ha)	Distinctiveness	Condition	Habitat Units Delivered
Modified grassland	0.01	Low	Poor	0.02
Introduced shrub	0.01	Low	Condition Assessment N/A	0.03
Developed land; sealed surface	0.02	V. Low	N/A - Other	0.00
Urban tree	10 no.	Medium	Condition Assessment N/A	0.11
<b>TOTAL</b>				<b>0.16</b>

- 1.38 The new path is mapped as developed land; sealed surface and the replacement modified grassland recorded like-for-like in poor condition.

1.39 New ornamental shrub planting is recorded as introduced shrub. The ten new urban trees are only expected to achieve poor condition as they are cultivars, adapted to an urbanised environment, rather than true, native specimens.

1.40 Post development habitats are shown on JN00748\_DW03 BNG Proposals Plan.

### Post Development Score – Net Change

1.41 Following development of the proposed site, a Biodiversity Net Gain of **0.07 habitat units (11.39%)** can be achieved. See Plate 1, below.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.07
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	11.39%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	



Plate 1 – Headline Biodiversity Net Gain Assessment Results from the Statutory Defra Metric

# DRAWINGS




**DRAWING TITLE: BNG Baseline Plan**





**KEY:**

-  Application Boundary
-  Ownership Boundary

**INDIVIDUAL TREES**

-  Existing Small Urban Tree

**HABITATS**



-  Bramble scrub
-  Developed land; sealed surface
-  Introduced shrub
-  Modified grassland

SITE: Heathrow 360  
CLIENT: Indurent Management Limited  
JOB NUMBER: JN00748  
DRAWING NUMBER: JN00748\_DW02  
DATE: March 2025  
DRAWN/CHECKED: JW / MK  
SCALE: NTS











**KEY:**

-  Application Boundary
-  Ownership Boundary

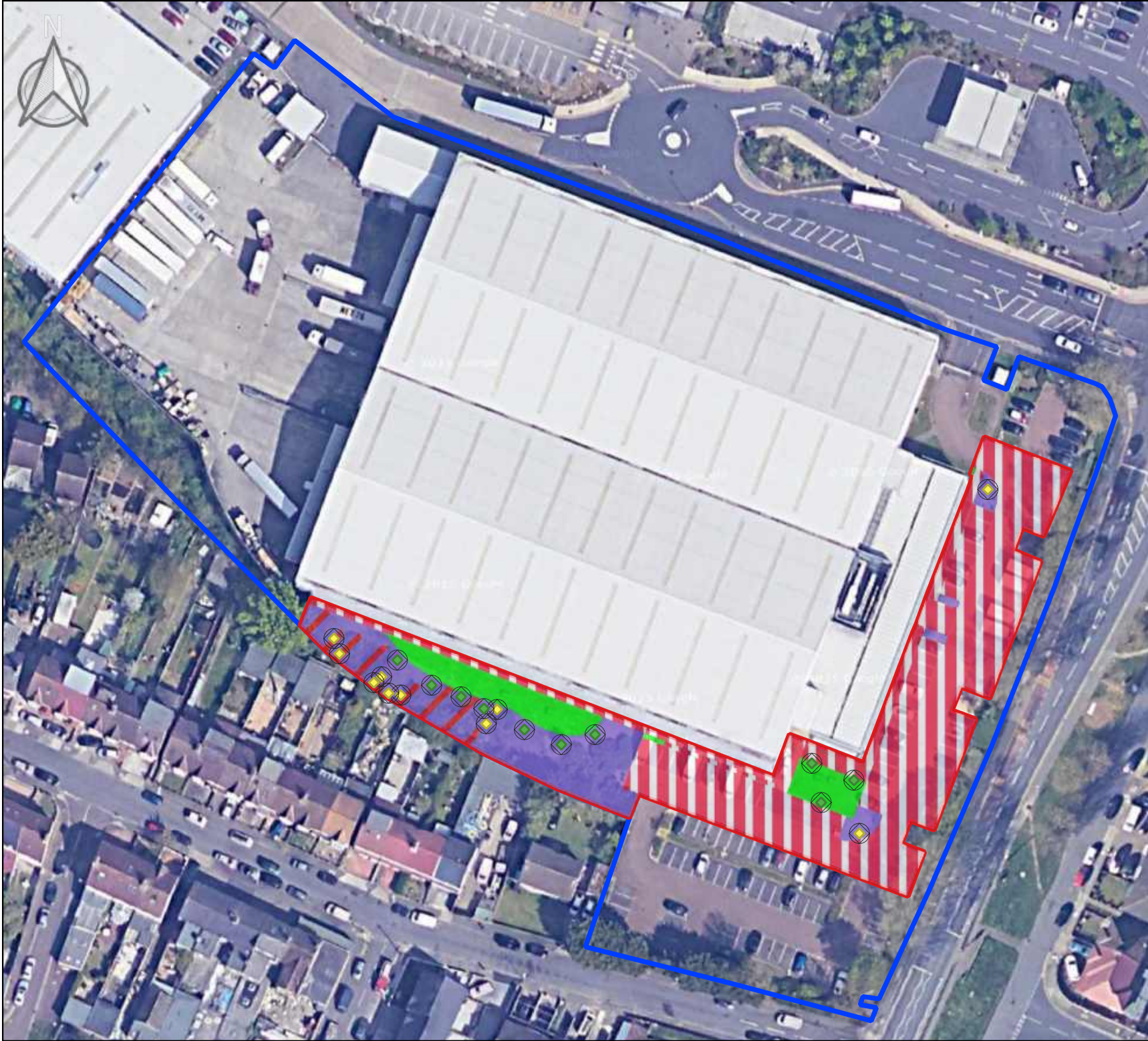
**INDIVIDUAL TREES**

-  Proposed Small Urban Tree
-  Retained Small Urban Tree

**HABITATS**

-  Bramble scrub
-  Developed land; sealed surface
-  Introduced shrub
-  Modified grassland

SITE: Heathrow 360  
CLIENT: Indurent Management Limited  
JOB NUMBER: JN00748  
DRAWING NUMBER: JN00748\_DW03  
DATE: March 2025  
DRAWN/CHECKED: JW / MK  
SCALE: NTS



# APPENDIX 1

[illegible]

Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	X											
Suggested enhancement interventions to improve condition score													
Footnotes													
<b>Footnote 1</b> – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> .													
<b>Footnote 2</b> – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.													
<b>Footnote 3</b> – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.													
<b>Footnote 4</b> – Wildlife and Countryside Act 1981 (as amended).													

Condition Sheet: INDIVIDUAL TREES Habitat Type														
Habitat Types														
<div>Individual trees – Urban trees</div> <div>Individual trees – Rural trees</div> <div>Complete a condition sheet for each tree or block of trees.</div> <div>Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.</div>														
Habitat Description														
All on site urban trees														
<div>Individual trees (description applied to the urban or rural environment):</div> <div>Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.</div> <div>Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):</div> <div>Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.</div>														
On-site or off-site, site name and location	On Site, Heathrow 360				Survey date and Surveyor name		5th February 2025, Molly Dailide							
					Survey reference (if relating to a wider survey)									
Limitations (if applicable)					Habitat parcel reference									
					<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>		<div></div>
					Grid reference									
Condition Assessment Criteria					<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>		
					Criterion passed (Yes or No)								Notes (such as justification)	
A	The tree is a native species (or at least 70% within the block are native species).				N									
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).				Y									
C	The tree is mature (or more than 50% within the block are mature) <sup>1</sup> .				N									
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.				Y									
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.				N									
F	More than 20% of the tree canopy area is oversailing vegetation beneath.				Y									
Number of criteria passed					3									

Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved x/√									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)	X									
Passes 2 or fewer criteria	Poor (1)										
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											
Suggested enhancement interventions to improve condition score <sup>2</sup>											