



CLIENT: INDURENT MANAGEMENT LIMITED
SITE: HEATHROW 360, UNIT 2 MILLINGTON ROAD
DATE: JULY 2025
DOCUMENT: HABITAT MANAGEMENT AND MONITORING PLAN

Associated Documents:

JN00748 Heathrow Biodiversity Impact Assessment

Background

- 1.1 SK Environmental Solutions Limited (SKE) was commissioned by Indurent Management Limited to produce a Habitat Management and Monitoring Plan (HMMP) to discharge Condition 4 of the planning permission granted in relation to a proposed construction of a new pathway and revised landscaping associated with the existing building of Unit 2, Millington Road, Hayes (ref: 62644/APP/2025/1092).
- 1.2 The land, hereafter known as the 'site' extends to approximately 0.34 hectares (ha), while the wider ownership boundary approximately covers a further 1.93 ha. These are respectively shown by the red line boundary and blue line boundary on Figure 1, below. It is located at an approximate central grid reference of TQ 09311 78953 and nearest postcode of UB3 4AU.



Figure 1 – Site Boundary Plan

1.3 A full Biodiversity Net Gain (BNG) assessment of the proposed development was completed as part of the original submission by SKE and is detailed in JN00748 Heathrow Biodiversity Impact Assessment.

1.4 The purpose of the HMMP is to set out the management practices and monitoring requirements necessary for habitats to achieve their targeted conditions, as described in the BNG report, ensuring the claimed gain of 0.07 habitat units (11.39%) is delivered. This will cover the full 30-year period over which BNG applies. The habitat improvement works detailed in this report will commence upon its approval by the LPA and the discharge of Condition 4.

1.5 Indurent Management Limited will take responsibility for discharging the conditions set out in the HMMP. They will employ a maintenance contractor who is suitably qualified to understand the provisions of this plan and they will be instructed to undertake the inspection maintenance to adhere to the HMMP as per the condition within the Decision Notice.

1.6 It is expected that SK Environmental Solutions Limited, or another suitably qualified ecological organisation, will be appointed by Indurent Management Limited to undertake the required monitoring of the post-development habitats.

Planning History

1.7 Hillingdon Council granted conditional planning permission to the client on 4th June 2025 (ref: 62644/APP/2025/1092). Included within the Decision Notice is Condition 4, which states:

1.8 “No works shall take place until a written 30-year Habitat Management Plan (HMP) for the site has been submitted to and approved in writing by the Local Planning Authority. The approved HMP shall be strictly adhered to and development commenced and operated in accordance with it. The HMP should, as a minimum, include:

- a) *Description and evaluation of the features to be managed;*
- b) *Aims, objectives and targets for management*
- c) *Description of the management operations necessary to achieving aims and objectives;*
- d) *Prescriptions for management actions;*
- e) *Preparation of a works schedule, including annual works schedule;*
- f) *Details of the monitoring needed to measure the effectiveness of management;*
- g) *Details of the timetable for each element of the monitoring programme; and*
- h) *Details of the persons responsible for the implementation and monitoring;*
- i) *Reporting to the Council routinely as to the state of the Biodiversity Net Gain requirements of the development on years 1 (post completion), 3, 5, 10, 20 and 30, with biodiversity reconciliation calculations at each stage.”*

Habitat Proposals – Management and Monitoring

1.9 Proposed habitats described in the sections below align with JN00748 Biodiversity Impact Assessment while the management prescriptions are in line with, and are to be read in conjunction with, those given in the 2431-25-01A Concept Landscape Plan produced by BCA Design.

Modified grassland

1.10 The site will contain areas of retained and newly created modified grassland. All areas of modified grassland are amenity areas and will be managed as such, maintaining a short, close-mown sward year-round to maintain accessibility to these areas. Consequently, they are all classified as being in poor condition.

1.11 As these areas are not being managed for biodiversity and no specific condition criteria are being targeted, this report does not require any specific management be adopted in order to deliver the calculated biodiversity uplift. As long as the grassland exists, it complies with what is stated within the BNG calculation.

Introduced shrub

1.12 The site will contain areas of retained and newly created introduced shrub. These areas are ornamental and are created and maintained for their visual appeal and not directly for their biodiversity value. As only a single, universal condition exists for this habitat, there are no such criteria that need to be met in order for this habitat to deliver its assessed biodiversity value.

1.13 As these areas are not being managed for biodiversity and no specific condition criteria are being targeted, this report does not require any specific management be adopted in order to deliver the calculated biodiversity uplift. As long as the areas of shrub exist, they comply with what is stated within the BNG calculation.

1.14 While not strictly a BNG requirement, ongoing management of areas of introduced shrub should consider the potential presence of nesting birds within this habitat, with maintenance works such as pruning undertaken outside of the nesting bird season (March to August inclusive).

Bramble scrub

1.15 Existing areas of bramble scrub adjacent to the southern boundary fence are to be fully retained, in line with the Biodiversity Impact Assessment.

1.16 Once again, a single condition exists for this habitat, meaning that the biodiversity units delivered by this habitat, as quantified in the Biodiversity Impact Assessment, will be maintained in full as long as this habitat continues to exist.

1.17 Therefore, it is considered that management of this area need only comprise the targeted removal of any woody scrub species which may start to grow through the existing bramble scrub.

1.18 Given the requirements for amenity value from the adjacent areas of introduced shrub, it is expected that management be undertaken to prevent encroachment of the bramble scrub into these areas.

Individual trees

1.19 Ten existing individual trees are to be retained in their existing condition. All are small-sized (<30cm DBH) and while they will grow over the 30-year BNG period, in line with metric guidelines, they stay recorded as small in the calculation. It is considered that continuing existing management practices will maintain these trees in their existing condition of moderate, passing criteria B, D and F of the relevant condition assessment sheet.

1.20 Ten new individual trees are also to be planted post-development. These have been selected for their appearance and suitability for an urbanised, highly landscaped environment. However, this being the case, it has not been considered appropriate for anything other than poor condition to be assigned to these trees. No specific condition criteria are therefore targeted; however, it is considered that criteria B and F will be passed for all trees.

Ongoing Management

1.21 Given that no specific management interventions are recommended above, it is considered that standard, general good practice management of typical urbanised habitats (which the above comprise) is sufficient to deliver the biodiversity uplift detailed in the Biodiversity Impact Assessment. These include, but are not limited to, practices such as:

- Litter removal;
- Regular and/or responsive watering;

- Treatment and / or removal of diseased vegetation;
- Weeding amenity areas;
- Pruning; and
- Replacement of failed shrubs or trees.

Monitoring

1.22 Ecological monitoring visits will be conducted on all habitats annually in years 1, 3, 5, 10, 20 and 30 with summary reports submitted to the council in each of these years, as stipulated by Condition 4 of the Decision Notice, alongside a metric calculation confirming the continued delivery of >10% net gain as required.

1.23 Given that the uplift calculated in the Biodiversity Impact Assessment is fully delivered simply by the existence of the retained and created habitats, it is considered that monitoring visits can be robustly undertaken at any time of year, to verify the maintenance of these habitats.

1.24 Should the findings of monitoring visits indicate the potential for the ongoing existence of the stated habitats to be compromised, then new management prescriptions for that parcel may be stipulated, in order to best avert the risk of that habitat failing.

1.25 Any alterations that have been made to the management of any habitat parcel in light of the results of the monitoring survey will also be detailed in the report submitted to the council. Updates on the efficacy of such management changes or interventions will be included in subsequent monitoring reports.

Risk Register and Remedial Measures

1.26 Table 1 below details potential risks to the created and retained habitats as outlined in the above report, along with proposed remedial actions, to ensure habitats are delivered and maintained.

Table 1 – Risk Register

Risk	Habitat Type	Remedial Action
Newly planted trees failing to establish	Individual trees	Replacement like-for-like planting should any individual tree fail to establish.
Encroachment of non-native species (e.g. Himalayan balsam)	All	Adopt removal measures as appropriate, should INNS (e.g. giant hogweed, Japanese knotweed, Himalayan balsam) colonise.
Bramble encroachment	Introduced shrub	While bramble encroachment into these areas will not diminish their biodiversity value, as assessed by the Statutory metric, the ornamental value of this habitat will be reduced. Cutting and removal of bramble from these areas using hand

		tools, outside of the breeding bird season, will be undertaken should bramble encroachment occur.
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Biodiversity Unit Score – Net Change

1.27 The proposals detailed above yield a total gain of **0.07 habitat units (11.39%)**, as required by Condition 4 of the Decision Notice (ref: 62644/APP/2025/1092).