Biodiversity Enhancement & Mitigation Plan

Breakspear Road, Ickenham

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Report	Biodiversity Enhancement & Mitigation Plan (BEMP)
Site Name	Breakspear Road South, Harefield
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Client	Amery Construction
Date of Issue	3rd February 2025
Status	***Final – For Submission***

Table of Contents

1.0 INTRODUCTION

1.1 Brief

Planning permission has been granted for the retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary use, alongside hardstanding, widening of the vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works at Site off Breakspear Road South, Harefield, UB9 6LS (under planning application reference 72870/APP/2022/3126). This report is to address Condition 15 and Condition 25 from Hillingdon Council:

Condition 15: 'Prior to commencement of development (including demolition), full details of bat mitigation requirements shall be submitted to and approved in writing by the Local Planning Authority. These measures must be carried out in accordance with the bat licence issued by Natural England (to be issued subsequent to this planning permission) and submitted alongside the full details of bat mitigation. The development must be carried out in accordance with the approved details.

Reason: To ensure the protection of bats in accordance with Policy G6 and G7 of the London Plan (2021) and Policy EM7 and DMEI 7 of the Hillingdon Local Plan Parts 1 (2012) and 2 (2020).'

Condition 25: 'Prior to commencement of development above ground level (excluding demolition), a scheme for the enhancement of ecology shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall set out how the development will contribute positively to ecological value through the use of features and measures within the landscaping (i.e. nectar rich and diverse planting including living walls and/or roofs) and the fabric of the new built form (i.e. bat and bird boxes). The scheme shall include a plan with the features annotated and the development must be built and operated in accordance with the approved scheme.

Reason: To ensure the development contributes positively to the ecological value of the area in accordance with Policy EM7 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 7 of the Hillingdon Local Plan: Parts 2 (2020) and Policies G6 and G7 of the London Plan (2021).

This report should be read in conjunction with the Ecological Impact Assessment (Brindle & Green Ecological Consultants, 2022) and the Biodiversity Impact Assessment for Net Gain (Brindle & Green Ecological Consultants, 2022).

1.2 Aim

The aim of this report is to devise a site-wide Biodiversity Enhancement and Mitigation Plan (BEMP) to contribute towards a net gain for biodiversity post-development. This will ensure all features of ecological value and all legally protected species are protected, that their presence on site is retained in perpetuity, and to address the comments received from the council.

1.3 Site Description

The site is approximately 5.5 ha in extent and is situated within the northern outskirts of Ickenham, Uxbridge. The site comprises nineteen disused former office buildings, warehouses and laboratories, with amenity grassland, scattered trees and hardstanding access roads and pathways. The immediate surroundings comprised pastoral farmland to the north and scrubland and woodland parcels to the west. The active construction site for High Speed 2 is located immediately adjacent to the south boundary.

Figure 1. Redline location plan of the site (Campbell Architects, 2022. Drawing No 1381-DR-A-00-000).

1.4 Proposed Plans

The proposals involve the retention and demolition of existing buildings, construction of new buildings, all within Use Class B8 with ancillary uses, alongside hardstanding, widening of the vehicular access off Breakspear Road South, associated car and cycle parking, enhanced landscaping and ancillary works (**Fig 2**).

Figure 2. Proposed Site Layout (Drawing No 1381-DR-A00-015) (Campbell Architects, 2022).

2.0 ECOLOGICAL BASELINE SUMMARY

A walkover of the site was completed by Brindle & Green Ecological Consultants in February 2022 to note the habitats present on site and assess the site's suitability to support protected species. The results are outlined below.

2.1 Habitats

A Phase 1 habitat survey was undertaken following survey guidance (JNCC 2007) by Adrian Cox BSc (Hons) and Lucinda Sweet PhD MCIEEM, ecologists with Brindle & Greene in February 2022. The survey identified the following habitat types on site:

- Broadleaved woodland – semi-natural
- Broadleaved woodland – plantation
- Scrub – dense/continuous
- Poor semi-improved grassland
- Cultivated/disturbed land – amenity grassland
- Cultivated/disturbed land – ephemeral/short perennial
- Introduced shrub
- Buildings
- Hard Standing
- Wet ditch/dry ditch

2.2 Bats

Nineteen buildings were recorded within the application boundary (**Fig 3**). Of these, five buildings were considered to offer roosting features of moderate suitability (B1, B2, B6, B10, B15), and nine were considered to offer low suitability (B3, B5, B7, B8, B12, B13, B16, B17, B19).

A series of dusk emergence and dawn re-entry surveys were undertaken in July and August 2022. Surveys identified a Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Common Pipistrelle (*Pipistrellus pipistrellus*) day roost pertaining to single individuals of each species within lead flashing on Building B1 (**Fig 4**). No roosts were identified in any other buildings surveyed on site. Since the demolition of building B1 will result in the destruction of these roosts, the work will need to be completed under a European Protected Species (EPS) licence from Natural England, to allow works to proceed lawfully. A further single survey will be undertaken to Building B1 from 1st May 2025 to inform the EPSL licence application and thereafter the application for the EPS licence will be submitted.

Observations of bats made during presence/absence surveys undertaken throughout the site indicated that Common Pipistrelle and Soprano Pipistrelle were the dominant species recorded throughout the suite of surveys supporting a mixture of foraging and commuting behaviour across the site, with peak foraging associated with treelines located at the north-eastern boundaries and with darker sections of the site where light pollution was minimal (**Fig 3**). Infrequent commuting passes of Noctule (*Nyctalus noctula*), Brown Long-eared (*Plecotus auritus*) and *Myotis* sp. were also noted.

Figure 3. View of the buildings on site showing their potential and the dominant commuting and foraging activity (Brindle & Greene, 2022).

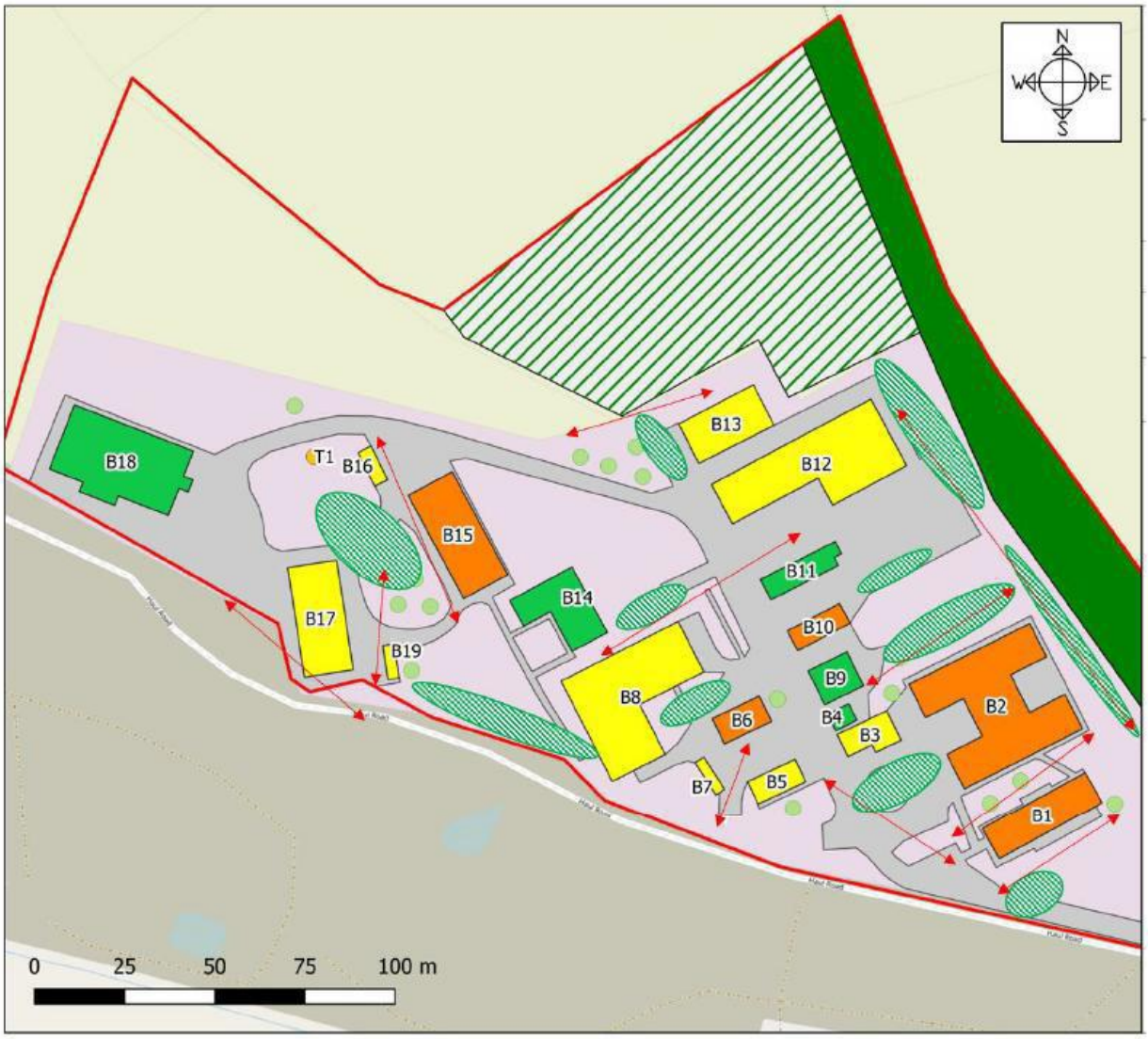


Figure B. Dominant commuting and foraging activity identified during the emergence / re-entry surveys.

Key:	
	Negligible Suitability Building
	Low Suitability Building
	Moderate Suitability Building
	Dominant Commuting Line
	Areas of dominant foraging behaviour

Figure 4. View of the activity and emergence location recorded at building B1 (Brindle & Greene, 2022).

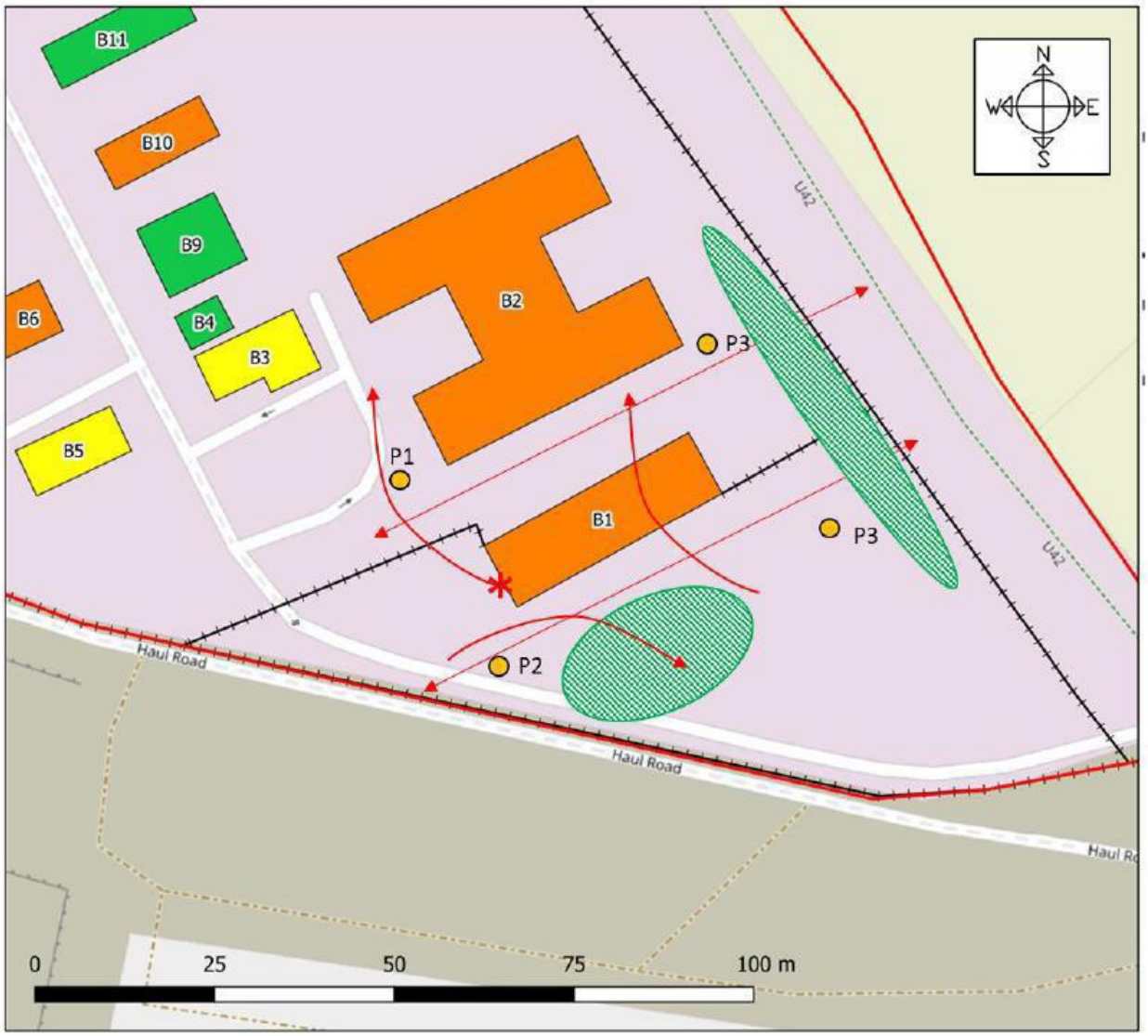


Figure A. Summary of Bat Activity recorded at Building B1

Key:	
●	Surveyor Position
*	Roost location – x1 common pipistrelle and x1 soprano pipistrelle
→	Commuting Line
▨	Areas of dominant foraging behaviour

2.3 Great Crested Newts

Sixteen ponds were identified within 500 metres of the site. Of these, six were separated from the site by significant barriers to dispersal, which includes Breakspear Road immediately to the east of the site, and the active construction site of the HS2 railway line immediately to the south of the site.

Some habitats within the application boundary, primarily semi-improved grassland and broadleaved woodland to the north-west, are considered suitable to support the terrestrial phase of the Great Crested Newt lifecycle. The remainder of the site is dominated by hardstanding and amenity grassland which are considered sub-optimal. Evidence indicates that a low population of GCN is present within a pond located 290m to the east of the site, however this is considered effectively barriered from the site and GCN are not expected to be present on site.

2.4 Breeding Birds

The areas of semi-improved grassland, scattered trees, broadleaved woodland, and buildings both within the application boundary and adjacent to the site supported suitable nesting and foraging habitat for a wide range of bird species. Buildings on site were particularly noted to support nesting feral pigeon (*Columba livia domestica*).

2.5 Reptiles

A small area of semi-improved grassland at the northwestern aspect of the site provided suitable basking and foraging habitat. The remainder of the site was dominated by hardstanding and short mown amenity grassland which was considered sub-optimal for this species. The site was well connected to the surrounding landscape by woodland to the north, particularly to rural areas to the west and the north. Following seven survey visits no reptiles were recorded within the suitable habitat onsite.

2.6 Badgers and Hedgehogs

No evidence of Hedgehogs or Badger setts, or activity such as mammal runs, snuffle holes and latrines were found during the ecological appraisal of the site and the zone of influence. The application site supported habitat features such as woodland and semi-improved grassland which provide suitable commuting habitat for this transient species. As a result of the site extent and the location within an agricultural dominated landscape to the north, it is considered that badgers and hedgehogs could use the site for foraging and commuting purposes on an episodic basis, but are not dependent on the site.

3.0 MITIGATION, COMPENSATION AND ENHANCEMENTS

This chapter deals with mitigation, compensation and enhancement. Mitigation refers to measures that can be undertaken to avoid or reduce ecological impacts. Compensation refers to measures taken in order to offset potential significant impacts and finally enhancements contribute towards a net gain for ecology.

3.1 Bats

3.1.1 During Construction Until such time as building removal has been completed

To avoid any disturbance to bats (and other potential nocturnal wildlife) construction works should be limited to normal working hours with no works to be undertaken in the evening. All lighting should be sensitive to the use of the site by nocturnal wildlife, for example by including low-level downward-facing / hooded lights that are sensor-operated where possible.

3.1.2 During Operation

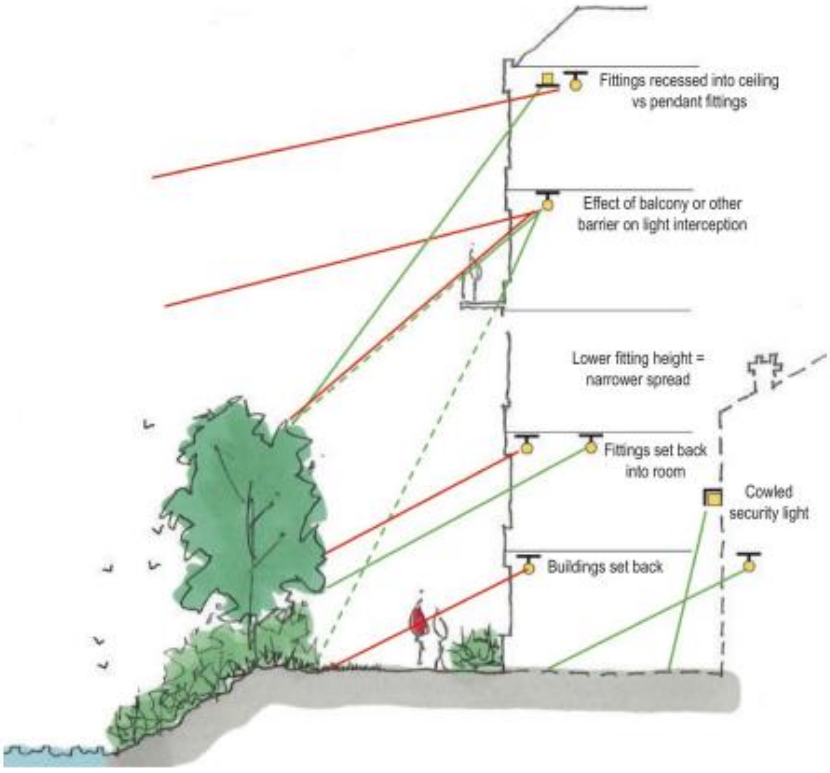
It is recommended that any lighting complies with the following the newly published *Guidance Note 08/23 Bats and Artificial Lighting at night* (ILP / BCT, 2023) produced via a collaboration between the Institute of Lighting Professionals (ILP) and the Bat Conservation Trust (BCT), which outlines the latest recommendations to minimise the impacts of increased artificial lighting on bats. The key recommendations within this document have been outlined below and will be implemented as far as is practicable:

'Light sources, lamps, LEDs and their fittings come in a myriad of different specifications which a lighting professional can help to select. However, the following should be considered when choosing luminaires and their potential impact on Key Habitats and features:

- *All luminaires will lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used*
- *LED luminaires will be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability*
- *A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component*
- *Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012)*
- *Internal luminaires can be recessed (as opposed to using a pendant fitting - See **Fig 5**) where installed in proximity to windows to reduce glare and light spill*
- *Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges (see Case Study 1)*
- *Column heights will be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards*
- *Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01*
- *Luminaires will always be mounted horizontally, with no light output above 90° and/or no upward tilt*

- *Where appropriate, external security lighting will be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate*
- *Use of a Central Management System (CMS) with additional web-enabled devices to light on demand Use of motion sensors for local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS*
- *The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues. See Case Study 6*
- *Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely'*

Figure 5. Internal lighting mitigation options (ILP 2023).



3.1.3 European Protected Species (EPS) Licence Application

All works that affect bat roosts carried out on the building B1 must take place under an EPSL obtained from Natural England and under the supervision of a Suitably Licenced Ecologist. Destruction of the roosts and capture of bats (if required) will need to be carried out under

the supervision of a licenced ecologist. All works would be detailed within the EPSL Method Statement required as part of the licence application.

3.1.4 Roofing / Destructive Works to Building 1

3.1.4.1 Timings and Weather Restrictions

Work in the hibernation period should not be carried out, as this is when the bats are the most vulnerable, therefore works will be restricted to between March-October (inclusive) and/or when temperatures are no lower than 8°C for at least an hour or two from dusk on 4 consecutive nights. Works can also not occur during adverse weather conditions (rain or strong wind), since under these conditions a bat could be harmed if flying away, following disturbance (Reason, P.F. and Wray, S. (2023).

3.1.4.2 Ecological Clerk of Works (ECoW)

The licensed bat worker must give a toolbox talk to all contractors before any work begins on building 1, mentioning the legal protection afforded to bats, bat biology, the contractor's responsibilities, measures of best practice and any conditions set out within the EPS bat licence and this report/any update report thereafter. Contractors will be aware of the bat roosts and the potential for bats to be found.

When work is to be carried out on the roof/eaves/overhanging tiles, a licensed bat worker will visit the site to carry out an endoscopic/internal survey prior to any work beginning. If a bat is found, the individual must be captured by the licensed worker whilst they are wearing gloves and the bat must be placed into the bat box. Work can only continue when the area has been deemed clear of bats.

Limited internal works to Building B1 can take place prior to obtaining the EPS Licence pursuant to the roof space remaining as is and bat access to the external roof/eaves remaining unfettered, aswell as all flight paths remaining clear with no obstructions ie scaffolding blocking the feature.

Once the licensed bat ecologist declares all potential bat roosting areas have been dismantled carefully, the remaining work can continue without their supervision. If a bat is to be found, work must be put on halt and the licensed ecologist contacted. Contractors are forbidden from handling bats.

Injured or underweight bats will be taken into care (as directed by the Batworker's Manual, s. 7. 3, pp 64 – 66; 3rd ed. 2004 and in accordance with the Bat Conservation Trust's (BCT) Bat Care Guidelines: A Guide to bat care for rehabilitators 2nd ed 2016).

3.1.4.3 Mitigation Bat Box / Compensation Roosts

Prior to the demolition of the building B1, two Schwegler 2F with double front panel Bat boxes (**Fig 6**) will be installed on nearby mature trees to act as bat roosts, whilst the works are being undertaken. The proposed location for the box is seen in **Appendix**, which is within the property ownership as seen in **Fig 1**.

The 2F bat boxes are manufactured from long-lasting Woodcrete, which is a blend of wood, concrete and clay which will not rot, leak, crack or warp, and will last for at least 20 - 25 years, making it suitable for long-term mitigation projects. Woodcrete is breathable and maintains a stable temperature inside the box and the 2F is painted black to absorb warmth. It also provides a rough surface for bats to cling to and climb up.

Alternative boxes may be used (as recommended by the licensed ecologist) if these boxes are unavailable. Following the completion of the works, these mitigation boxes will be left in situ to act as compensation roosts.

3.1.5 Enhancements

To act as biodiversity enhancement one Woodstone Beaumaris Bat Box (**Fig 6**) will be installed on the eastern elevation of the new Building 3, which will be in the similar location of the demolished building B1. Additionally, further 8 crevice bat boxes (e.g. Beaumaris Bat Box or Improved Crevice Bat Box) (**Fig 6**) should be positioned on suitable mature trees throughout the site (see **Appendix**) facing a south, south-easterly direction at a height of above 2 meters.

Figure 6. View of the Schwegler 2F with double front panel bat box on the left, the Beaumaris Bat Box in the middle and the Improved Crevice Bat Box on the right.

3.1.6 Compliance Check

As the bat roosts are considered to be of low conservation value due to being day roosts, no monitoring is required following completion of the works. However, following the completion of all works, a compliance check will be carried out to ensure the mitigation boxes remain in situ and the bat access tile has been installed.

3.2 Birds

3.2.1 Mitigation

To avoid disturbing nesting birds or damaging their nests, vegetation clearance will be undertaken outside of the bird nesting season (March – August, dependent on weather). If this is not possible, sections to be cleared should be thoroughly checked by an ecologist immediately prior to clearance. If any active nests are found, they should be left undisturbed with a suitable buffer of vegetation (5m), until the nestlings have fledged.

3.2.2 Enhancement

As a general enhancement, six No. 16S Schwegler swift boxes (**Fig 7**) or similar approved should be installed across the retained building (Building 18) and newly created units. Integrated boxes such as the woodstone build in swift box are preferable however boxes affixed to the exterior of buildings would also be considered suitable.

Figure 7. View of the 16S Schwegler Swift Box.

In addition, 5 Vivara Pro Seville 32mm boxes and 5 Vivara Pro Seville 28mm boxes (**Fig 8**) should be installed upon retained trees and within retained woodland on site (see **Appendix**). The Bird boxes should be positioned at a height of between 2 and 4 metres, with entrance holes directed towards the north and east to avoid strong sunlight and driving rain with an unobstructed flight line to and from the boxes during the Autumn.

Figure 8. View of the Vivara Pro Seville 32mm on the left and the Vivara Pro Seville 28mm on the right.

3.3 Reptiles

3.3.1 Destructive Search

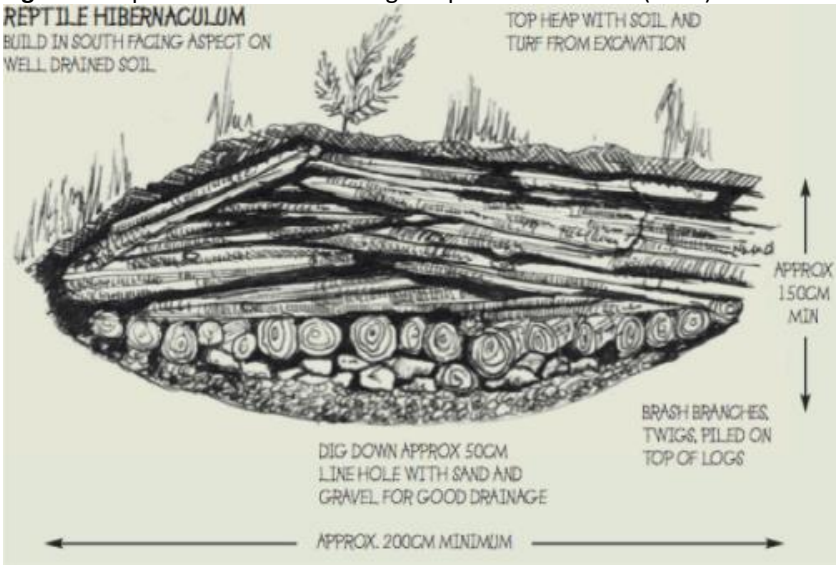
Due to the very small area of suitable habitat for reptiles in the context of the wider site and whilst no reptiles were recorded, it is considered that the most suitable form of mitigation would be a supervised destructive search. This would entail the sensitive stripping of vegetation on site using a toothed bucket where habitat is suitable for reptiles. Topsoil will be gently stripped to 100mm depth using a digger with a toothed bucket. The supervising ecologist will capture any reptiles found and relocate them outside of the working area in suitable habitat. Please note, any suitable habitat within the root protection zone will not have the topsoil stripped and will only be maintained cut at ground level.

These works will be done immediately before any ground works to prevent the habitats re growing and will be undertaken during the active reptile period (April – September) when temperatures are above 12°C with sunshine.

3.3.2 Habitat Enhancement

Based on the nature of the existing habitats within the boundary habitats (i.e. areas of scrub and woodland), the only potential enhancement anticipated would be the creation of 2 No wood-based hibernacula to provide reptiles with a suitable area to hibernate within (approximate locations shown in **Appendix**). This will be created following the specification outlined within Reptile Habitat Management: Guidelines for Landowners (HART, 2009) (**Fig 9**).

Figure 9. Reptile hibernaculum design as provided in HART (2009).



3.4 Badgers

Although no evidence of Badgers was recorded on site during the most recent walkover, the site does still provide potential for foraging and commuting.

Further to this, during the construction phase, any open excavations left overnight should either be covered to prevent commuting Badgers falling in or escape ladders should be used to prevent them from becoming trapped. Any open pipework should be checked and then capped nightly.

3.5 Hedgehogs

3.5.1 Mitigation

Habitat considered suitable for supporting west European Hedgehogs will be retained within the woodland on-site and vegetative connectivity through the site will be maintained at boundaries. If individuals are found during ground clearance works, works should cease until the individual has been moved into the open space within the south-western corner of the site. Once removed, the area should be searched, and works can recommence.

3.5.2 Enhancement

In order to enhance the site for hedgehogs, 2 Hedgehog homes (such as the Igloo Hedgehog home or Hogitat Hedgehog house) will be included on site (see **Appendix**). They will be

provided within or adjacent to areas of planted / retained trees / shrubs and will provide a rapidly declining species with a place to shelter / hibernate.

In addition to this, any fence present along the eastern and western boundary, will also ensure at least 2 gaps are present within the bases of each fence line to allow for movement of Hedgehogs between the site and into the wider area. The gaps should be at least 15 cm high by 15 cm wide with permeability for small mammals.

Small signage could be installed at these points to ensure they remain open upon completion of the development. The People's Trust for Endangered Species provide such signage, the purchase of which also supports conservation efforts (**Fig 10**).

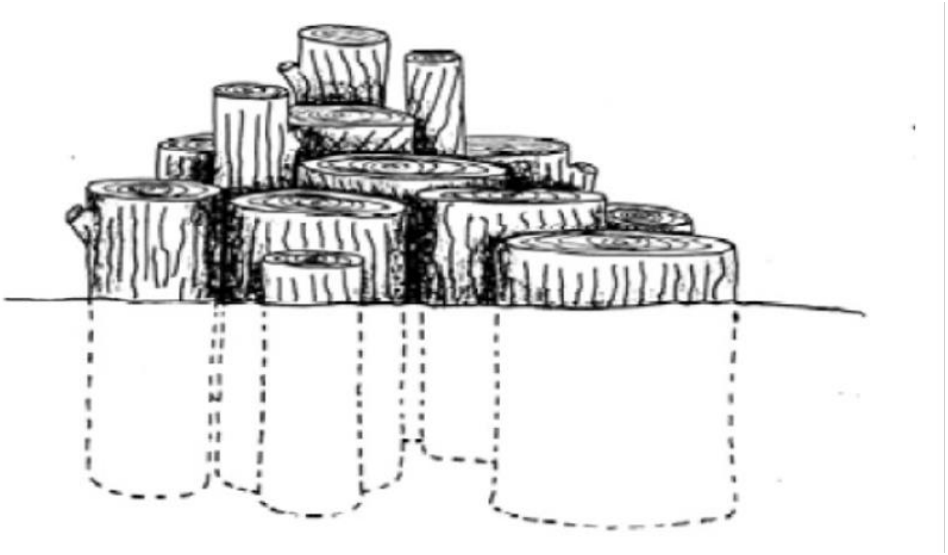
Figure 10. Example of Hedgehog Highway signage to be placed above fence gaps provided to allow movements between gardens.

3.6 Invertebrates

As a further ecological enhancement, two vertical log piles (**Fig 11**) will be created within the woodland. This will form an ideal place of shelter for important species such as Hedgehogs, and a significant habitat resource for invertebrates, which in turn will benefit local foraging bird and bat species.

The vertical pile will utilise logs of varying sizes and avoid using dead or decayed wood as this limits the food availability for invertebrates. Native wood should be used for the log pile.

Figure 11. Log pile of a vertical style.



3.7 Native Planting

As a general enhancement, in line with the Chartered Institute of Ecology and Environmental Management CIEEM guidance (2012), any proposed planting should aim for a 70:30 ratio in favour of native species over non-natives and ornamentals. Among the species to be planted, fruit bearing trees should be considered as they provide food sources for birds and small mammals during the autumn and winter, and nest sites during the spring and summer. Species that should be considered include:

- Hawthorn (*Crataegus monogyna*),
- Alder Buckthorn (*Frangula alnus*),
- Wild Cherry (*Prunus avium*),
- Crab Apple (*Malus sylvestris*),
- Elder (*Sambucus nigra*),
- Dogwood (*Cornus sanguinea*),
- Privet (*Ligustrum vulgare*),
- Dog Rose (*Rosa canina*).

Key tree species for enhancing the site for bats are Willow, Oak and Birch as they can support high numbers of insects. In addition, once matured they can eventually provide roosting opportunities for bats (see **Table 1** below).

Table 1. Tree species for foraging and roosting potential (Gunnel et al. 2012).

Native Tree species	Roosting potential	Supporting foraging
Oak	Very good	Very good
Willow	Minimal	Very good
Beech	Very good	Good
Ash	Good	Good
Elm	Good	Good
Birch	Minimal	Very good

4.0 CONCLUSION

This document has been prepared to bring together all the existing ecological information for Breakspear Road South with the aim of providing a method statement for carrying out the works without causing harm to protected species and providing opportunities for enhancement that are consistent with the aims of national and local planning policy.

Mitigation measures will include supervised demolition of the Building B1 under an EPSL Bat Licence and implementation of sensitive lighting, supervised clearance of vegetation to protect reptiles and birds, and avoidance of entrapment of Hedgehogs and Badgers.

Recommendations are also made within this document to provide compensation and enhancements for bats, birds, reptiles, hedgehogs and invertebrates.

It is considered that, should all aspects of this document be implemented, adequate mitigation can be achieved to minimise impacts on the existing population of protected and notable species on site and produce a net gain in the site's biodiversity value.

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5.0 REFERENCES

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Appendix – Enhancement Plan

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Legend

- Woodstone Beaumaris Bat Box - 1No
- Schwegler 2F with double front panel Bat Box - 2No
- Crevice Bat Boxes - 8No
- 16S Schwegler Swift Box - 6No
- Vivara Pro Seville Bird box
  - 28mm x 5No
  - 32mm x 5No
- Hedgehog fence gap - 4No
- Hedgehog Home - 2No
- Vertical log pile - 2No
- Reptile hibernacula - 2No

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Map	Enhancement Plan
Site	Land off Breakspear Road South
Client	Amery Construction
Date	03/02/2025