Hyde Park, Hayes
Preliminary Ecological Appraisal

Prepared for:

Columbia Threadneedle Investments

Date:
June 2025

CONTENTS

APPENDICES

INTRODUCTION

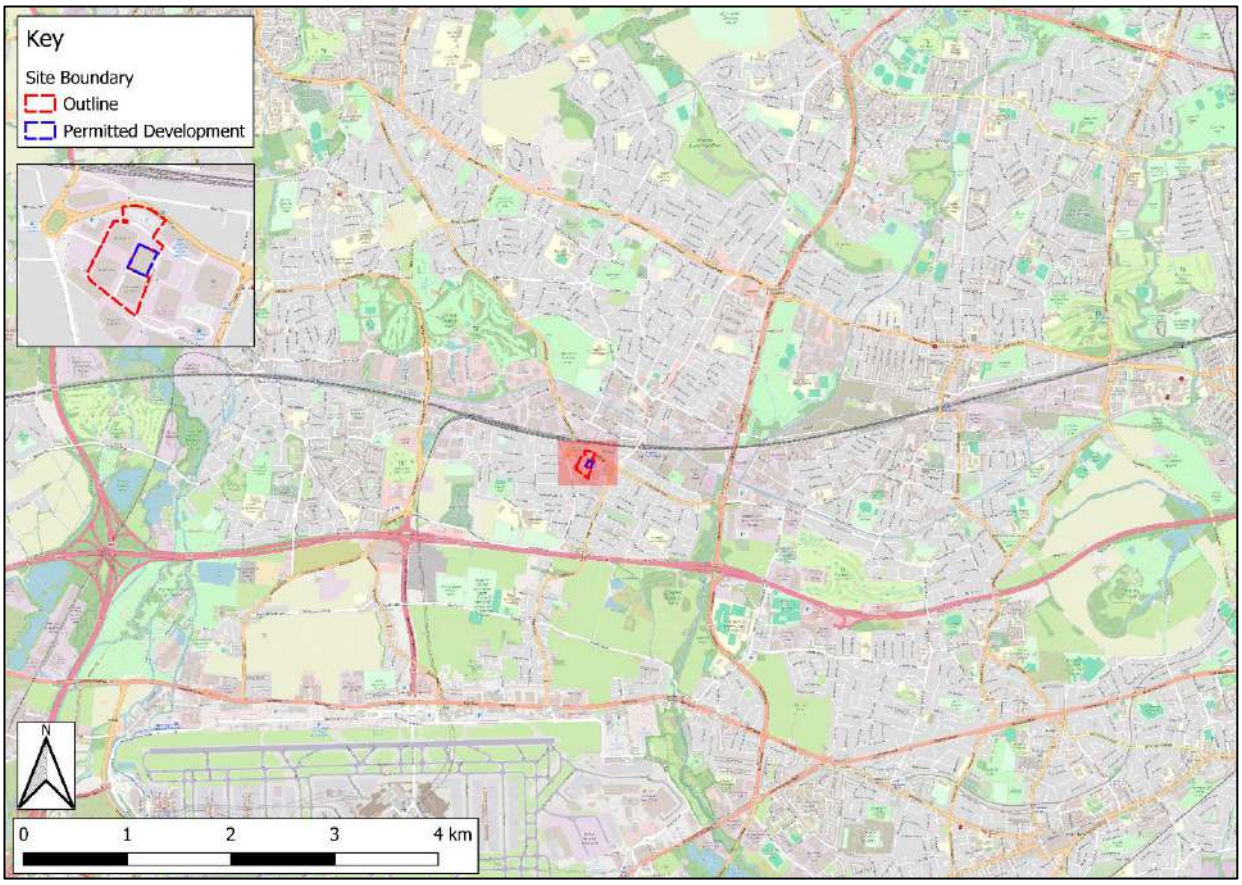
1.1 Columbia Threadneedle Investments (hereinafter referred to as the 'Applicant') is seeking outline planning permission for the proposed redevelopment of an area of land bounded by the A437 North Hyde Road to the north, Millington Road and the adjacent commercial properties to the east, south and west. The site covers a total area of 2.47 hectares (ha) and falls within the administrative boundary of the London Borough of Hillingdon (LBH).

1.2 Currently on site comprises three commercial properties with a multi-storey car park in the south-east part of the site, surface car park in the northern part and associated landscaping and access roads.

1.3 The outline application (with all matters reserved excluding access) is for the demolition of existing building (above basement level) and delivery of residential development (Class C3), flexible residential/commercial floorspace, new public realm, play space, car parking, cycle parking and associated works.

1.4 Figure 1.1 identifies the planning application boundary and site location plan.

Figure 1.1 **Site Location Plan** (Contains map data from OpenStreetMap)



Purpose

1.5 This Ecological Appraisal seeks to establish the effects of the Proposed Development upon valued biodiversity receptors, identify appropriate mitigation measures to ensure the protection of valued and legally protected features and establish enhancement opportunities within the design and through recommendations that deliver an enhancement for biodiversity. The report also provides the reporting requirements for biodiversity net gain at the planning application stage, setting out the baseline value and outlining the proposed strategy for delivering a policy and legally compliant net gain.

1.6 Initial versions of the Ecological Appraisal served to communicate the ecological constraints and opportunities to the design team for consideration in the development of proposals, and has been updated through the evolution of the design to reflect changes in the proposals and accompany the planning application for the development.

Scope

1.7 The Ecological Appraisal seeks to achieve its purpose through the following Scope of Works:

- Identify the presence of biodiversity features, including designated sites, notable habitats and legally protected and/or ecologically significant species, through a desk study of reliable web-based resources and data purchased from the local biodiversity centre;
- Map the habitats present within the site and immediately adjacent environs, following the UK Habitat Classification methodology, to establish the baseline environment, consider their importance and assess the potential supporting value for legally protected and/or ecologically significant species;
- Identify the requirement for and scope of further targeted surveys required to accompany a planning application;
- Appraise the effects of the proposed development upon valued biodiversity resources and identify mitigation measures required to negate or minimise adverse effects; and,
- Outline measures proposed to enhance the biodiversity value of the Proposed Development and strategy for compliance with the mandatory and policy requirements for biodiversity net gain.

Declaration of Conformity

1.8 The ecological appraisal has been led and carried out by Tom Hall MEnvSci CEnv MCIEEM, who holds over 19 years' professional consultancy experience. Tom holds an undergraduate master's degree in Environmental Science, full membership of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Chartered Environmentalist status.

1.9 I can confirm that the information and assessment provided in this Ecological Appraisal is an accurate and realistic assessment of site conditions and potential supporting value, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. Consideration has been given to best practice guidance in the completion of the appraisal, including British Standard 42020 and appropriate assessment guidance.

Tom Hall MEnvSci CEnv MCIEEM.

Period of Validity

1.10 In line with CIEEM guidelines[1], the reporting is considered to be valid for a period of 24 months from the completion of the survey on 22nd November 2024, although the licence associated with the desk study data identifies a period of 12 months for use of the associated data. Following on from this, any reliance on the information may need to be subject to an update, including survey to assess the findings and data search to consider any new species information available.

LEGISLATIVE AND POLICY CONTEXT

Legislation

1.11 Legislative protection for biodiversity, afforded to a range of sites, habitats and species, is principally derived from the following statute and regulations:

- Schedule 7A of the Town and Country Planning Act 1990 (as amended)[2];
- Conservation of Habitats and Species Regulations 2017 (as amended)[3];
- Wildlife and Countryside Act 1981 (as amended)[4];
- Countryside and Rights of Way (CRoW) Act 2000[5]; and,
- Natural Environment and Rural Communities (NERC) Act 2006[6].

1.12 Further details on the legislative protection afforded by these is provided in Appendix A, with the level of protection afforded to designated sites, habitats and/or species varying according to the sensitivity, rarity and scale at which they are considered valuable.

Planning Policy

1.13 National and local government provides guidance on the standards and expectations for development through adopted planning policy, with national policy and guidance typically cascading down to inform the shape of local planning policy. Planning policy will generally cover a wide variety of topics, including economic, social and environmental aspects, against which the merits of a development proposal can be considered. As a result, there are a number of planning policy documents that are relevant to the development proposal, which are identified below with key aspects of these in relation to biodiversity summarised in Appendix A:

- National Planning Policy Framework (NPPF)[7];
- Planning Practice Guidance[8];

1 *CIEEM (2019) Advice Note: On the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.*
2 *The Town and Country Planning Act 1990 (as amended). His Majesty's Stationary Office (HMSO).*
3 *The Conservation of Habitats and Species Regulations 2017 (as amended). His Majesty's Stationary Office (HMSO).*
4 *The Wildlife and Countryside Act 1981 (as amended). His Majesty's Stationary Office (HMSO).*
5 *The Countryside and Rights of Way (CRoW) Act 2000. His Majesty's Stationary Office (HMSO).*
6 *The Natural Environment and Rural Communities (NERC) Act 2006. His Majesty's Stationary Office (HMSO).*
7 *Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework. December 2024.*
8 *Department for Levelling Up, Housing and Communities (2016) Planning Practice Guidance. Last updated February 2024.*

- London Plan[9];
- London Borough of Hillingdon Local Plan, Part 1 – Strategic Policies[10]; and,
- London Borough of Hillingdon Local Plan, Part 2 – Development Management Policies[11].

Ecological Initiatives

1.14 There are a number of ecological initiatives potentially relevant to the application site and surrounding area, these are discussed in full in Appendix A and comprise:

- UK Biodiversity Framework and Environmental Improvement Plan 2023[12];
- London Biodiversity Action Plan[13];
- All London Green Grid Strategy, Green Grid Area 10[14]; and,
- London's Living Landscape Initiative[15].

METHODOLOGY

British Standard 42020: Biodiversity – Code of Practice for Planning and Development

1.15 British Standard (BS) 42020[16] on biodiversity provides an industry standard for biodiversity assessment, reporting and decision making, ensuring high-quality ecological information is available to enable effective decision-making, legal and policy compliance, successful implementation of mitigation and enhancement measures and the achievement of desired outcomes. To achieve this, BS 42020 sets out a framework that seeks to: promote transparency and consistency in the quality and appropriateness of information; provide greater confidence to planning authorities and other regulatory bodies in the information they receive with which to make decisions; and, encourage proportionality in requirements and promote a good environmental legacy through development.

1.16 Key aspects in the delivery of biodiversity consultancy include the following:

- collaborative approach between ecologists and landscape architects as part of an interdisciplinary team;
- proportionality, ensuring provision of adequate information appropriate to the environmental risk of the development and its location;
- objective professional judgement, clearly justified through documented reasoning; and,
- application of the mitigation hierarchy as a fundamental approach to decision making.

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9 *Greater London Authority (2021) The London Plan. The Spatial Development Strategy for Greater London, March 2021.*
10 *London Borough of Hillingdon (2012) Hillingdon Local Plan: Part 1 – Strategic Policies. Adopted November 2012.*
11 *London Borough of Hillingdon (2020) Hillingdon Local Plan: Part 2 – Development Management Policies. Adopted January 2020.*
12 *Department for Environment, Food and Rural Affairs (2023) Environmental Improvement Plan 2023. First Revision of the 25 Year Environment Plan.*
13 *London Biodiversity Partnership (2007) London Biodiversity Action Plan. Access through www.gigl.org.uk*
14 *Greater London Authority (2012) Green Infrastructure and Open Environments: The All London Green Grid. March 2012. Greater London Authority, London*
15 *London Wildlife Trust (2014) London's Living Landscapes. A recovery plan for nature. London Wildlife Trust, London*
16 *British Standards Institute (2013) British Standard 42020: Biodiversity – Code of Practice for Planning and Development. BSI, London.*

Zone of Influence

1.17 The Zone of Influence is defined by CIEEM guidance as '*the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities*'. As a result, the Zone of Influence will vary between projects and biodiversity features, and in most circumstances will extend beyond the project site boundary.

1.18 In order to capture potentially relevant biodiversity features within the assessment, an appropriate geographical scale has been set across which the desk study and field survey will be completed, comprising the study area and survey area respectively.

1.19 The study area comprises the area over which the presence of biodiversity information is gathered to identify potential constraints to and opportunities for the development and establish an ecological context for the site. As some designated sites, and their associated qualifying features, potentially hold greater sensitivity to impacts from development, the study area is considered across a varying geographic scale. All biodiversity features across a 2 km radius from the site are identified through the desk study, extending to 5 km for nationally designated sites and 10 km for internationally designated sites.

1.20 The survey area comprises the application site, identified by the red line boundary for planning, along with accessible land adjacent to the site where applicable. This area is subject to a walkover survey to map habitats present and identify the presence of biodiversity features potentially impacted by the development proposals.

Desk Study

1.21 The ecological context of the application site, based on the presence of ecological designations and local biodiversity records, has been established through an online search of information sources and geospatial data and a data request to the local biological records centre – Greenspace Information for Greater London (GiGL).

1.22 Information requested from the local biological records centre included statutory and non-statutory designated sites, notable habitats and legally protected and ecologically significant species. This has been supplemented by interrogation of the following publicly available data sources:

- Aerial imagery from Google Earth;
- Designated site and notable habitat geospatial information, published by Natural England;
- Biodiversity Hotspots for Planning geospatial information, published by GiGL; and,
- London Tree Map geospatial information, published by the Greater London Authority.

1.23 Due to the mobile nature of species, presence and distribution information will vary over time, and as a result information obtained through the desk study for species has been restricted to records from 2004 and onwards to ensure records are up-to-date and remain relevant. Any species without a record in the last 20 years are unlikely to remain present within the study area.

Field Survey

Habitat Survey

1.24 Habitats present within the survey area, comprising the site and immediately adjacent habitats, have been classified and mapped following the UK Habitat Classification methodology[17], a new comprehensive habitat classification system that was developed to provide greater consistency between applications and, through the combination of primary habitats and secondary codes enable clearer identification of habitat mosaics, management, origins and other environmental and species features associated with primary habitat types.

1.25 The methodology is suited to application through both remote-sensing observation and walkover survey mapping, or a combination of both, and is well suited to urban environments as the secondary codes allow for green infrastructure features to be identified and reflect their contribution to biodiversity potential.

1.26 The UK Habitat Classification system is hierarchical with the professional edition applied for the assessment requiring habitats to be identified to Level 4 where possible. Considering the scale of the development proposals and urban context of the site, where habitats are often present at limited extent and in contrast to often dominant artificial surfaces, the fine-scale Minimum Mapping Unit (MMU) has been applied, comprising habitats > 25 m^2 and 5 m length for linear features.

1.27 An initial appraisal of the site, using existing site drawings, aerial photography and site images, has been undertaken to establish the habitats present on the site in as much detail as possible. As the site is principally urban in nature, many of the habitats are relatively common and principally fall within the u- urban and u1-built-up areas and gardens categories. Whilst some habitats can only be identified at a high level following this approach and require a walkover survey to accurately identify to Level 4, within the urban categories the distinction between Level 4 habitats, and for developed land Level 5 habitats, is straightforward and achievable.

1.28 The initial remote sensing appraisal has been followed up with a walkover survey to ensure the accuracy of the mapping, identify all habitats to Level 4, establish floral species lists for the habitats present and assess the potential for the habitats and any notable features present to support legally protected or ecologically significant species. All habitats have also been attributed relevant secondary codes, based on the findings of the walkover survey, to provide additional information on the presence of features and management activities.

1.29 In addition to the habitat mapping, habitat condition assessments for those identified in Defra's Statutory Biodiversity Metric are requiring one have also been carried out in the walkover survey. For each habitat requiring a condition assessment, the criteria identified within the methodology[18] have been considered in turn with appropriate information recorded to confirm the status of each habitat parcel.

1.30 The walkover survey was carried out on 22nd November 2024 by Tom Hall MEnvSci CEnv MCIEEM, on an overcast yet cold day with gentle breeze and no rain. Vegetation present was identified in accordance with Blamey *et al*. (2003)[19].

[17] *UKHab Ltd (2023) UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*
[18] *Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology.*
[19] *Blamey, M., Fitter, R. and Fitter, A. (2003) Wild flowers of Britain and Ireland. Domino Books Ltd, Jersey.*

Daytime Bat Walkover

1.31 The potential for the site to support bats has been considered in the ecological appraisal through the completion of a Daytime Bat Walkover in line with the latest best practice guidance[20]. The assessment considers the suitability of the site to support bats, with structures and features assessed for their potential to support roosting bats and habitats assessed for their potential to provide commuting or foraging habitat. Habitat suitability is considered in line with the descriptions provided in Table 1.1.

Table 1.1 Guidelines for Assessing the Potential Suitability of the Site for Bats

Potential Suitability	Description for Roosting Habitats in Structures	Description for Potential Flight-Paths and Foraging 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).	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 by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	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	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 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).	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	A structure 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, such as maternity and hibernation – the categorisation described is made irrespective of species conservation status, which is established after presence is confirmed).	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	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 and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	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. Sute is close to and connected to known roosts.

1.32 As trees do not fit into the categorisation above, the BCT Guidance provides the following suitability categories to be applied to them:

- None – either no Potential Roost Features (PRFs) in the tree or highly unlikely to be any;
- FAR – Further Assessment Required to establish if PRFs are present in the tree; and,
- PRF – A tree with at least one PRF present.

[20] *Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.*

Assessment Methodology

1.33 An important aspect of ecological appraisal is establishing which ecological features are important and warrant consideration, with CIEEM guidance on both Preliminary Ecological Appraisal[21] and Ecological Impact Assessment (EcIA)[22] requiring the establishment of the likely importance of receptors present.

1.34 In determining importance, it is important to distinguish between the *biodiversity value* of a receptor and it's *legal status*. Features of high biodiversity value many not necessarily attract legal protection and vice versa, for example a viable area of ancient woodland is likely to be considered of high biodiversity value even if it does not receive any formal statutory designation affording legislative protection.

1.35 In accordance with CIEEM's EcIA guidance, each biodiversity feature has been assessed as important, or potentially important, within the following geographical frame of reference:

- International – e.g. existing or warranting designation as a Special Protection Area (SPA) and/or of significant conservation status for Europe;
- National – e.g. existing or warranting designation as a Site of Special Scientific Interest (SSSI) and/or of significant conservation status for England;
- Metropolitan – e.g. existing or warranting designation as a Site of Metropolitan Importance for Nature Conservation (SMINC) and/or of significant conservation status for Greater London;
- Borough – e.g. existing or warranting designation as a Site of Borough Importance for Nature Conservation (SBINC) and/or of significant conservation status for the London Borough of Hillingdon;
- Local – e.g. existing or warranting designation as a Site of Local Importance for Nature Conservation (SLINC) and/or of significant conservation status within a local context (e.g. within 1 km of the site);
- Within the immediate survey area only – e.g. habitats or species populations of significant conservation status within the site and immediate surrounding lands; and,
- Negligible – e.g. habitats or species whose presence does not contribute to the local biodiversity resource or has negative effects on local biodiversity (e.g. invasive species).

Biodiversity Net Gain Assessment

Principles of Biodiversity Net Gain

1.36 The application of the Mitigation Hierarchy is a fundamental element of delivering BNG, ensuring development proposals consider the baseline environment and opportunities to retain habitats where possible and not use the process to justify losses. This requirement is set out in British Standard (BS) 8683[23], which states that development should:

- '*first avoid impacts on biodiversity, by identifying all possible avoidance measures especially to avoid impacts on irreplaceable and vulnerable habitats, statutory and non-statutory designated sites and biodiversity of high conservation value*';

[21] *CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.*
[22] *CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester.*
[23] *BSI (2021) British Standard 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. British Standards Institute, London.*

- '*then be applied to minimise impacts, before restoring damaged habitats and other ecological features*';
- '*then, as a last resort, offsetting any residual impacts*'.

1.37 BS 8683 also establishes the 'like-for-like or better' principle as a fundamental element of BNG, whereby a net gain is achieved by 'restoring affected biodiversity or offsetting residual biodiversity loss with the same type of biodiversity (like-for-like) or with a type that is of higher conservation value'. This principle prevents replacement of high value habitat with a greater extent of habitat of lower conservation value.

1.38 The Construction Industry Research and Information Association (CIRIA), in partnership with the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA), have produced guidance on biodiversity net gain[24], setting out good practice principles for the delivery of BNG through development. These principles and how they have been addressed through the assessment are identified in Appendix B.

Ecological Significance

1.39 The Local Nature Recovery Strategy (LNRS) for London, a new system of spatial biodiversity strategies in England, is currently being prepared by the Greater London Authority with the aim for London's ecological network to be bigger, better and more joined up. The LNRS is not currently available, with the GLA aiming to complete the strategy by 2025. However, in the absence of the LNRS the GLA identify that the current London and Local Plans should be referenced to inform decision making.

1.40 The Hillingdon Local Plan does not identify the Site to be of particular significance in relation to green infrastructure links and does not appear to be part of the identified green chains forming part of Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains). Further to this, the Green Grid Area Framework covering the Site does not identify any specific project opportunities within the area that would suggest potential strategic significance for the Site.

Approach

1.41 The BNG assessment follows Defra's Statutory Biodiversity Metric, an auditing and accounting tool for biodiversity which comprises the assessment methodology required to demonstrate compliance with the mandatory BNG requirement through the Environment Act 2021. The BNG assessment has been completed using the Statutory Biodiversity Metric calculator[25], in line with the accompanying User Guide[26] and associated information within the Technical Annex[27].

1.42 In line with the PPG on Biodiversity Net Gain, outlined in Appendix A, as the mandatory requirement for BNG is a condition to planning the information required at the planning application stage is principally associated with the establishment of the baseline. However, in line with Paragraphs 013 and 014 of the PPG, additional information is provided to demonstrate how the proposals will deliver a policy and legally compliant net gain for biodiversity. As a result, the BNG assessment is split into two parts.

[24] *CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. Construction Industry Research and Information Association, London.*
[25] *Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. July 2024.*
[26] *Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. User Guide. July 2024.*
[27] *Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology.*

Pre-Development

1.43 The ecological value of the baseline habitats has been established from the findings of the walkover survey and habitat mapping, with the extent of habitat identified using GIS and, where required, the associated condition score identified in the walkover survey for each habitat or habitat parcel. The only exception for this is the extent of urban trees, for which the tree helper tool within the metric has been used to establish the associated habitat area. This is based on the size classification of the tree, using it's Diameter at Breast Height (DBH).

1.44 Each habitat/habitat parcel has been assigned a 'Strategic Significance', in line with the requirements identified in the User Guide and outlined in Table 1.1.

Table 1.2 Strategic Significance Criteria Considerations

Category	Criteria where LNRS is Published	Criteria where LNRS is not Published
High Strategic Significance	This category can be applied when: • The location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and, • The intervention is consistent with the potential measure proposed for that location. If the project delivers the mapped measure set out in the LNRS the assessment should: • record the strategic significance as low in the baseline; • record the strategic significance as high in post-intervention sheets; • record that you have applied the published LNRS.	The habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority. If the project delivers the mapped habitat creation, enhancement or actions set out within specified alternative documents, or enhances an existing habitat identified within specified alternative documents as locally ecologically important, strategic significance can be recorded as high in the post-intervention sheets. If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline. The assessment should record the name of the plan the relevant planning authority has specified in the Metric and record the specified document in the assessment.
Medium Strategic Significance	This category cannot be applied.	This category can be applied when the LPA has not identified a suitable document for assessing strategic significance. The assessment should: • explain how the habitat type is ecologically important within a specific location; • demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations; • use professional judgement. When the above criteria are met, strategic significance may be recorded as medium in the baseline and post-intervention sheets.
Low Strategic Significance	Where the definitions for high strategic significance are not met. Even if the project is in an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.	Where the definitions for high or medium strategic significance are not met.

1.45 The LNRS for London is not currently published, as outlined in Appendix A. As discussed, the Site is not identified within the Hounslow Local Plan or All London Green Grid as providing an important location for the introduction of strategic greening and, at present, the Site does not provide semi-natural habitat that is locally important nor supporting ecological linkage to strategically significant locations. As a result, the habitat is assessed as being of low strategic significance.

Post-Development

1.46 The post-development scenario, based on the proposed landscape strategy, has been provided as an indication to the strategy on how the Proposed Development can deliver a BNG thereby complying with the associated policy and legislative requirements.

1.47 The habitat types and extents have been identified based on the landscape information, applying the precautionary principle where uncertainty exists, with the extent measured from the associated areas on the drawings. Where a habitat condition is required, appropriate consideration has been given to the various criteria that apply and recommendations made to ensure the condition assessed can be achieved. In line with the assessment guidelines, trees proposed for installation have been included as small trees, unless appropriate information can be provided to justify the medium size class.

1.48 The Strategic Significance has been assessed in line with the information in Table 1.1. As indicated, the LNRS for London has not currently been published. Whilst the redevelopment of the Site provides an opportunity to introduce important green infrastructure within the existing Site that will complement the uses of the Site and provide a mix of amenity and biodiversity opportunities, the relatively suburban location means that semi-natural habitats in the form of parks and gardens are extensively present in the surrounding area that provide habitat opportunities. Consequently, whilst the inclusion of appropriate landscaping to enhance biodiversity is important to help strengthen habitat provision locally, the habitats included within the development are not considered to be ecologically significant in the local context nor provide notable habitat linkage. As a result, the habitats are assessed as being of low strategic significance.

Limitations

1.49 The Ecological Appraisal draws on a number of sources and methods on which the biodiversity value/ potential of the site is derived, following best practice guidance and utilising up-to-date information, and thus is not considered to give rise to any significant limitations as a result.

1.50 Ecological surveys inherently provide a snapshot in time, and conditions will change over time that will alter the conditions associated with the features/potential features present or introduce new features. The assessment has been completed at an appropriate time and within suitable timescales, and whilst some aspects may be missed, for example as a result of flowering periods, the information gathered is sufficient to assess the value and associated risks. The mitigation also takes into account the potential for the site to change, with recommendations made to address this potential and reference given to CIEEM guidance in relation to the period of validity for surveys.

BASELINE

Desk Study

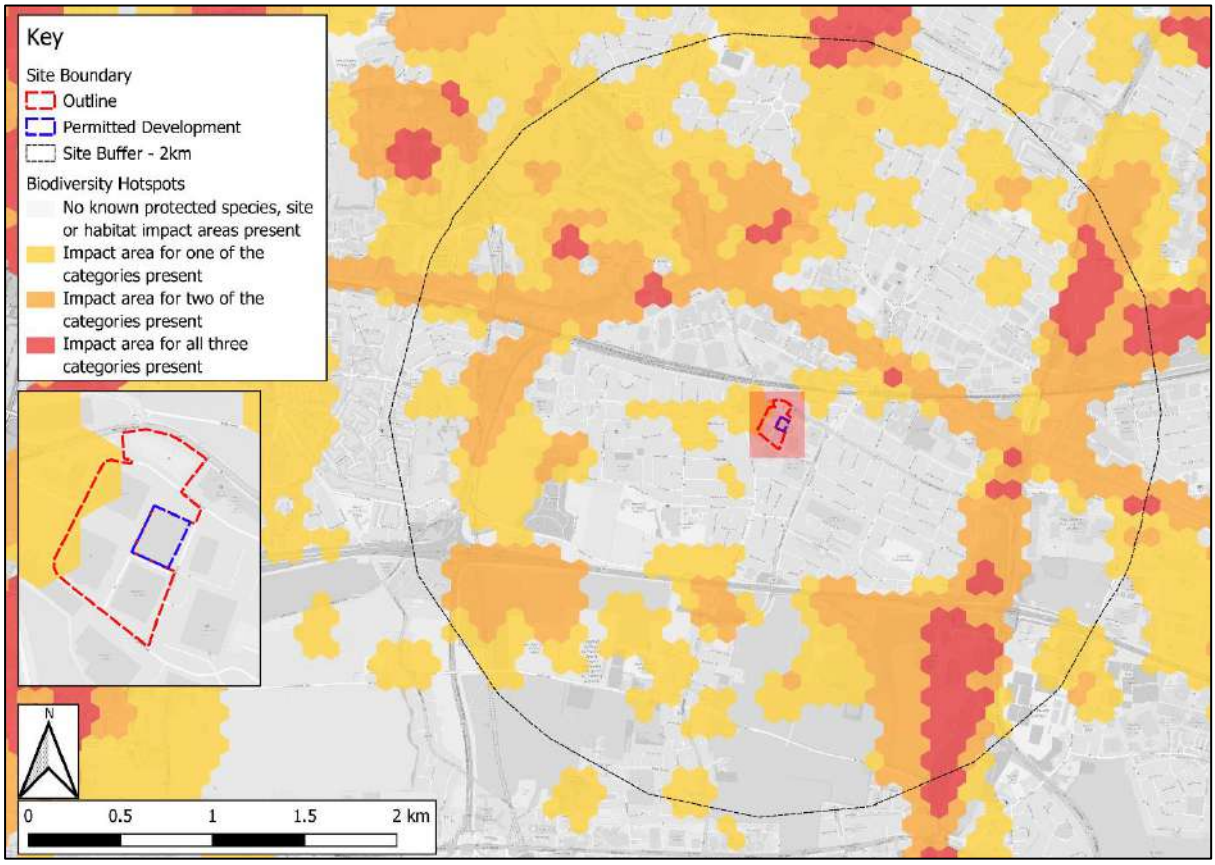
Biodiversity Hotspots

1.51 The Biodiversity Hotspots for Planning dataset[28], created by Greenspace Information for Greater London (GiGL), identifies areas, where data is available, that have potential for impacts on biodiversity and are likely to be relevant to local planning decisions. Hotspot areas indicate a detected presence of sensitive biodiversity that could potentially be affected by development.

[28] *Greenspace Information for Greater London (2019) Biodiversity Hotspots for Planning. November 2019.*

1.52 Most of the Proposed Development site falls within an area identified with a score of 0, identified in Figure 1.2, indicating that none of the impact categories of protected habitats, sites or species are present within the area. A small section of the site along the western boundary overlaps an area with a score of 1, indicating one of the impact categories to be present. Whilst this does not confirm the presence or absence of biodiversity within the Site, it provides context as to its biodiversity potential.

Figure 1.2 **Biodiversity Hotspots for Planning around the Application Site** (Map displays GiGL data (November 2019) and contains map data from OpenStreetMap)



Designated Sites

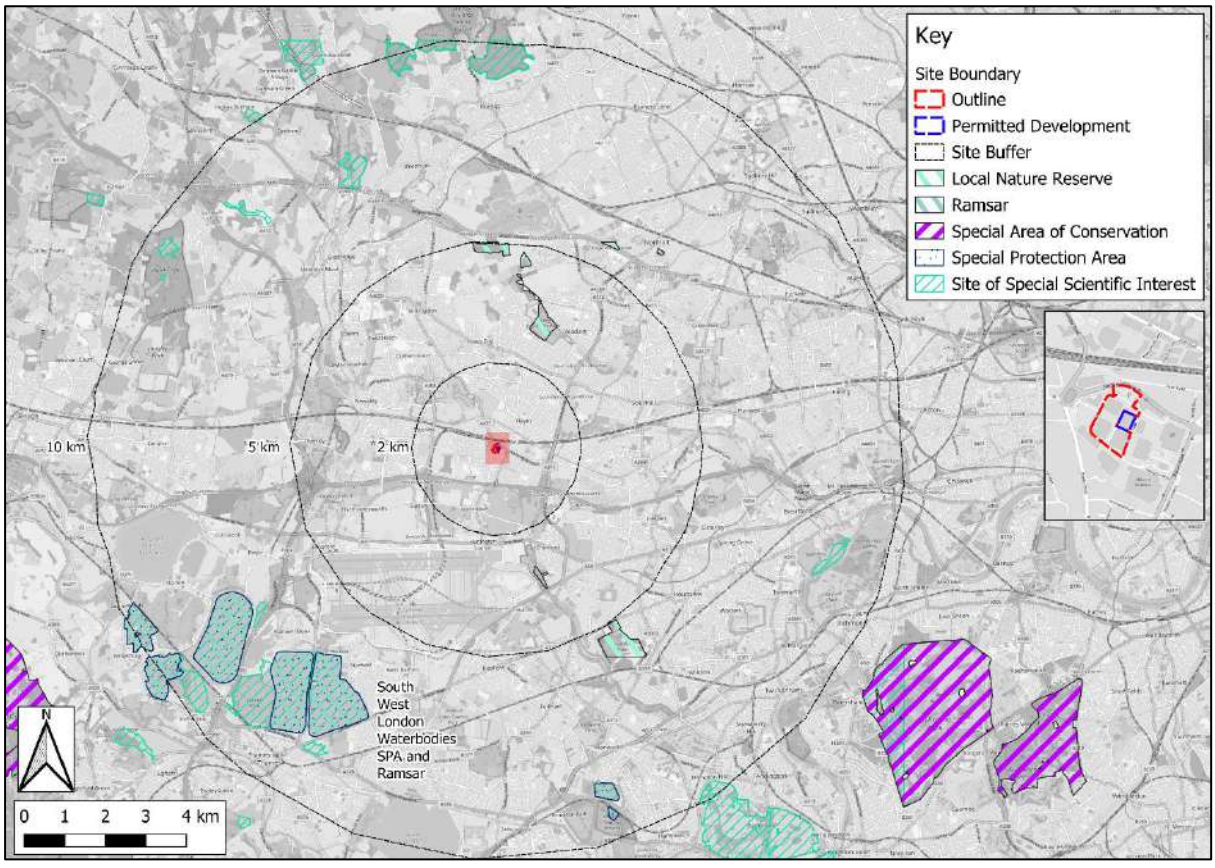
1.53 The study area includes two statutory designated sites, the South West London Waterbodies SPA and Ramsar, with 6 non-statutory designated sites also present. The designated sites present, and their proximity to the Proposed Development, are identified in Table 1.3 with the location of the designated sites identified in Figure 1.3. Those sites present in Figure 1.3 but not labelled do not fall within the relevant study area for that site.

Table 1.3 **Designated Sites in the Study Area**

Site	Area (ha)	Proximity to Site
Special Protection Area		
South West London Waterbodies	825.10	6.3 km south-west
Ramsar		
South West London Waterbodies	828.14	6.3 km south-west

Site	Area (ha)	Proximity to Site
Site of Metropolitan Importance for Nature Conservation		
London's Canals	187.50	460 m north
Crane Corridor	179.81	1.1 km south-east
Carp Ponds and Broads Dock	3.49	1.4 km west
Site of Borough Importance for Nature Conservation		
Lake Farm Country Park	24.24	630 m north
Cranford Countryside Park and Open Space	42.21	830 m south-east
Bolingbroke Way Sunken Pasture	2.29	880 m north-east
Craford Lane Gravel Workings	11.83	880 m south-east
Stockley Business Park Lakes & Meadows	6.59	885 m north-west
Wall Garden Farm Sand Heaps	13.11	1.3 km south-west
Iron Bridge Road Railsides (formerly The Piggeries)	1.02	1.6 km west
Yeading Brook, Minet Country Park and Hitherbroom Park	68.07	1.7 km north-west
Site of Local Importance for Nature Conservation		
Stockley Road Rough	1.75	1.6 km west
St Mary's, Wood End	6.82	1.7 km north
Hartlands Wood and Lower Park Farm	4.43	1.8 km south-east

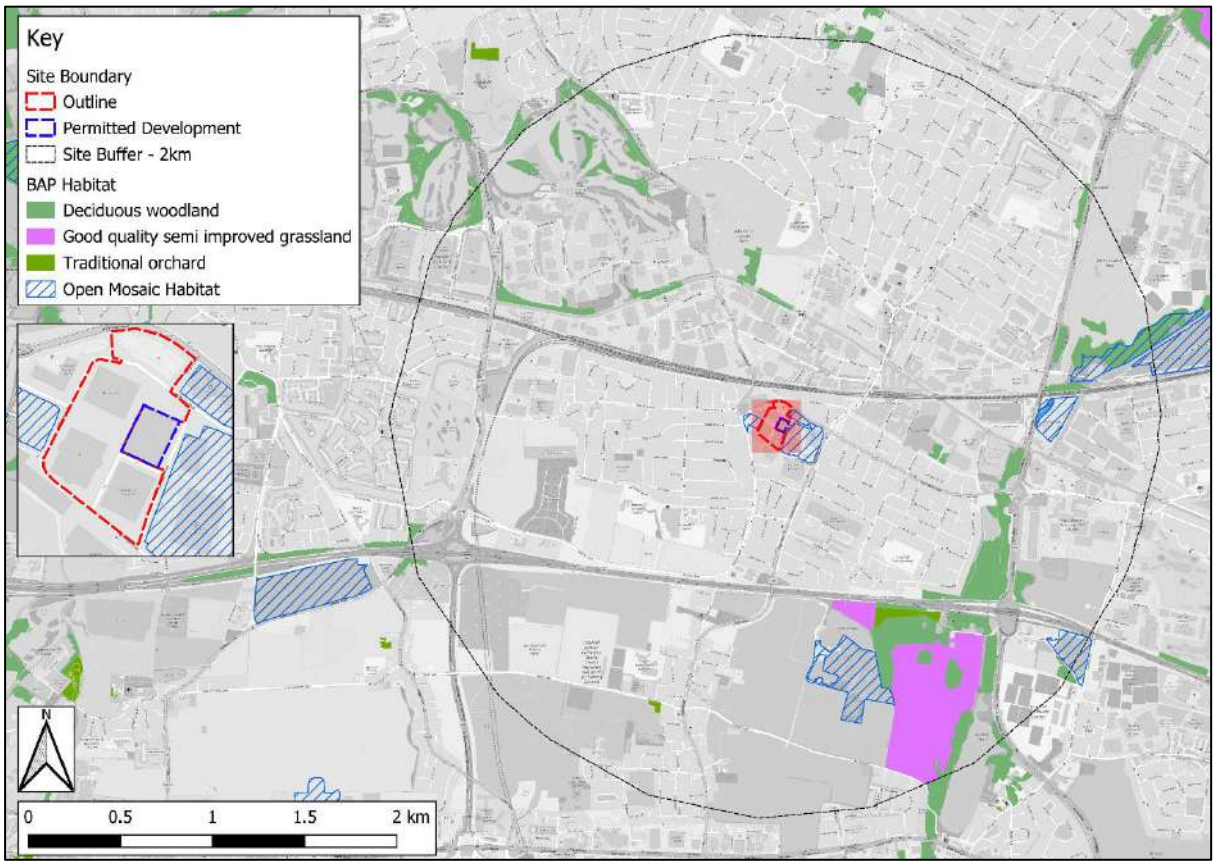
Figure 1.3 **Statutory Designated Sites within the Study Area** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



Notable Habitats

1.54 The study area does not include any areas of ancient woodland, however it does include four UK BAP Priority habitats, which are deciduous woodland, good quality semi-improved grassland, traditional orchard and open mosaic habitats present as identified in Figure 1.4.

Figure 1.4 **Notable Habitats present within Study Area** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



1.55 The information identifies the Site to border three areas of open mosaic habitat, however redevelopment within the local area have resulted in the loss of some of these areas for commercial premises and hardstanding. The area bordering the site to the west currently remains largely undeveloped, although parts of the site now comprise a car park alongside Millington Road and amenity landscaping as a verge to Dawley Road. Additional areas of Open Mosaic habitat are identified in the wider area to the south by Crane Meadows, south-east at Rectory Hartlands and east alongside the railway corridor.

1.56 Deciduous woodland is present in a number of locations, although principally associated with Stockley Country Park to the north-west Minet Country Park to the east and Cranford Country Park to the south-east. The closest area of the habitat is located approximately 495 m to the north at Lake Farm Country Park. Traditional orchard and good quality semi-improved grassland habitats are both primarily present approximately 1.0 km and 865m to the south-east of the Site at Cranford Country Park, with an additional area of traditional woodland to the south on Sipson Lane in Harlington.

1.57 A review of map information up to 500 m from the site boundary identified a single waterbody, the Grand Union Canal, approximately 460 m to the north. The waterbody is an artificial waterbody that provides a navigable waterway through Greater London and central London. The canal in this reach is largely artificial, with development along the southern bank extending to and including the bank. There are no ponds or lakes present in the surrounding area.

Legally Protected and Ecologically Significant Species

1.58 The desk study information returned by GiGL identified the presence of a number of ecologically significant and legally protected species within the study area. However, as the study area includes a wide variety of habitat types, including riverine, canal, woodland, agricultural, parks and gardens and cemeteries and graveyards alongside densely urbanised areas, the information has been reviewed to identify the species that have potential to be present within the development site and surrounding area to help focus the background context to the site.

1.59 The information identified a total of 66 species of bird that are identified as specially protected or ecologically significant, either as being of conservation concern (Red or Amber listed), local species of conservation concern or identified as a BAP priority species. The species of potential note for the Proposed Development, based on proximity to the site, most recent record and typical habitat requirements, are identified in Table 1.4.

Table 1.4 Bird Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Closest Record
Lesser redpoll	*Acanthis cabaret*	2021	975 m north
Common redpoll	*Acanthis flammea*	2010	-
Swift	*Apus apus*	2023	725 m south-east
Greenfinch	*Chloris chloris*	2021	975 m north
Lesser whitethroat	*Curruca curruca*	2021	975 m north
House martin	*Delichon urbicum*	2020	975 m north
Peregrine	*Falco peregrinnus*	2021	-
Pied flycatcher	*Ficedula hypoleuca*	2020	1.2 km north
Mediterranean gull	*Ichthyaetus melanocephalus*	2009	1.2 km north
Herring gull	*Larus argentatus*	2024	975 m north
Lesser black-backed gull	*Larus fuscus*	2016	975 m north
Red kite	*Milvus milvus*	2021	975 m north
Grey wagtail	*Motacilla cinerea*	2021	845 m north
Yellow wagtail	*Motacilla flava*	2020	975 m north
Spotted flycatcher	*Muscicapa striata*	2021	975 m north
House sparrow	*Passer domesticus*	2021	155 m west
Black redstart	*Phoenicurus ochruros*	2020	975 m north
Dunnock	*Prunella modularis*	2021	975 m north
Firecrest	*Regulus ignicapilla*	2018	1.2 km north
Turtle dove	*Streptopelia turtur*	2008	-
Starling	*Sturnus vulgaris*	2021	975 m north
Redwing	*Turdus iliacus*	2024	845 m north
Song thrush	*Turdus philomelos*	2021	975 m north

Species		Most Recent Record	Closest Record
Fieldfare	*Turdus pilaris*	2021	975 m north
Ring ouzel	*Turdus torquatus*	2019	975 m north
Mistle thrush	*Turdus viscivorus*	2021	975 m north

1.60 The information identified a total of 4 species of mammal that are identified as specially protected or ecologically significant, however as some of these are associated with freshwater environments they are not relevant to the Proposed Development. The species of potential note for the Proposed Development, based on proximity to the site, most recent record and typical habitat requirements, are identified in Table 1.5.

Table 1.5 Mammal Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Closest Record
Hedgehog	*Erinaceus europeaus*	2022	405 m west
Common pipistrelle	*Pipistrellus pipistrellus*	2015	275 m north
Soprano pipistrelle	*Pipistrellus pygmaeus*	2011	1.1 km south-east

1.61 The desk study data also identified the presence of two species of amphibian, three species of reptile, 17 species of higher plant, and 43 species of invertebrate. Species of note within these records are identified in Table 1.6.

Table 1.6 Additional Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Closest Record
Slow-worm	*Anguis fragilis*	2020	1.5 km north
Grass snake	*Natrix helvetica*	2005	2.0 km east
Adder	*Vipera berus*	2004	-
Bluebell	*Hyacinthoides non-scripta*	2018	1.3 km south-east
Dittander	*Lepidium latifolium*	2020	490 m north
Service tree	*Sorbus domestica*	2024	265 m east
Large-leaved lime	*Tilia platyphyllos*	2024	675 m north-east
Hoary mullein	*Verbascum pulverulentum*	2009	415 m north-east
Stag beetle	*Lucanus cervus*	2023	110 m north-west
Small heath	*Coenonympha pamphilus*	2023	845 m south
Small copper	*Lycaena phlaeas*	2023	360 m south-west
Large skipper	*Ochlodes sylvanus*	2022	220 m south-west
White-letter hairstreak	*Satyrium w-album*	2022	845 m south
Brown hairstreak	*Thecla betulae*	2023	-
Essex skipper	*Thymelicus lineola*	2022	220 m south-west
Small skipper	*Thymelicus sylvestris*	2022	220 m south-west

1.62 In addition to the legally protected and ecologically significant species identified in the GiGL data, the desk study identifies the presence of a number of species identified as invasive through national legislation or locally by the London Invasive Species Initiative (LISI). A total of 31 invasive species were identified, with those of potential relevance to the site identified in Table 1.7.

Table 1.7 Invasive Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	LISI Category[29]
Ring-necked parakeet	*Psittacula krameria*	2024	4
Tree of heaven	*Ailanthus altissima*	2024	3
Butterfly bush	*Buddleja davidii*	2023	3
Cotoneaster	*Cotoneaster*	2024	2
Wall cotoneaster	*Cotoneaster horizontalis*	2010	2
Entire-leaved cotoneaster	*Cotoneaster integrifolius*	2009	2
Montbretia	*Crocosmia x crocosmiiflora*	2010	2
Japanese knotweed	*Fallopia japonica*	2018	3
Bluebell	*Hyacinthoides x massartiana*	2017	4
Highclere holly	*Ilex x altaclerensis*	2011	5
Blue passionflower	*Passiflora caerulea*	2009	6
Green alkanet	*Pentaglottis sempervirens*	2012	6
Cherry laurel	*Prunus laurocerasus*	2024	3
Turkey oak	*Quercus cerris*	2024	5
Evergreen oak	*Quercus ilex*	2024	5
Rhododendron	*Rhododendron ponticum*	2004	2
False-acacia	*Robinia pseudoacacia*	2024	4
Snowberry	*Symphoricarpos albus*	2011	2

Field Survey

Habitats

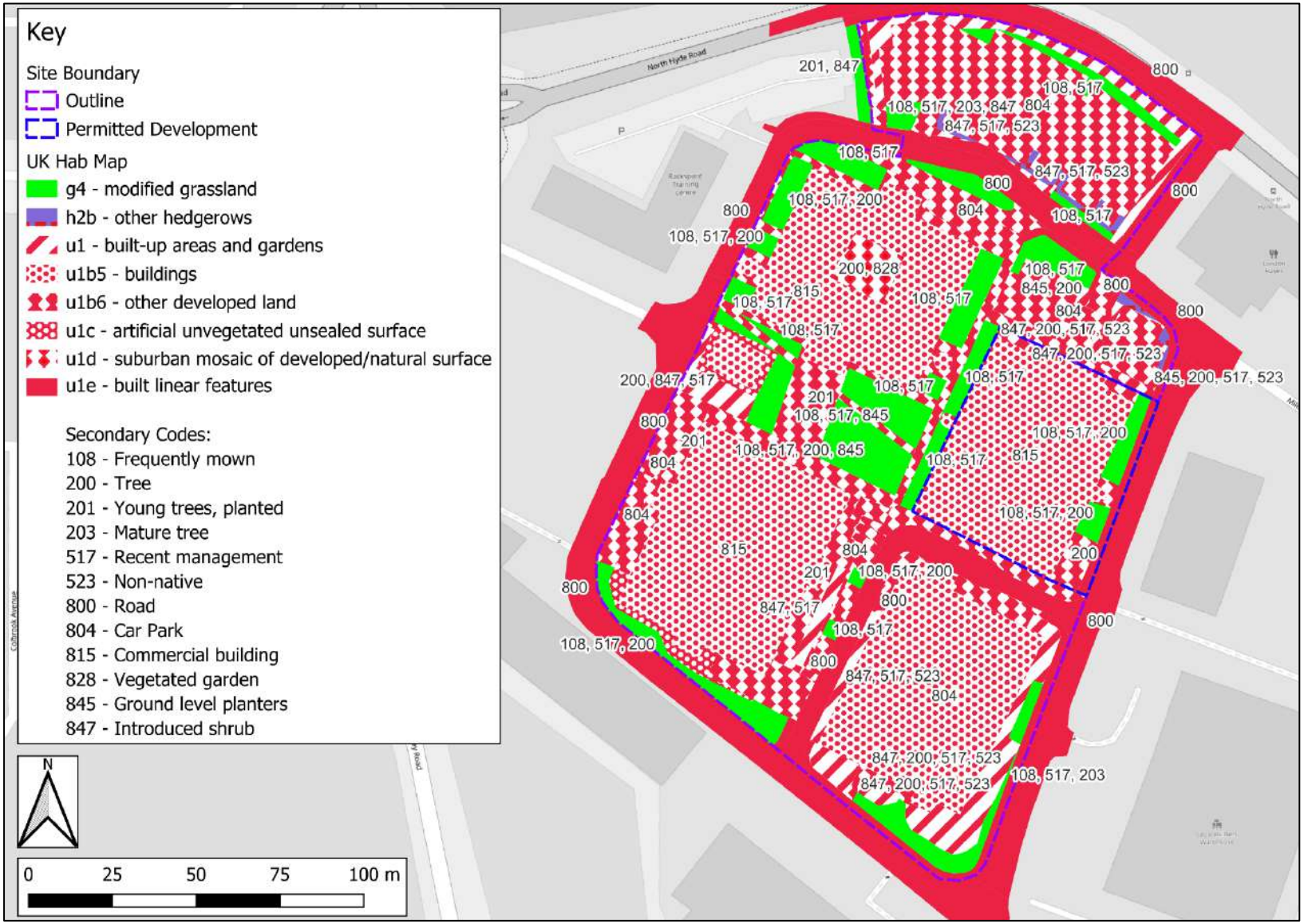
1.63 The following sections describe the habitat conditions that were identified in the field survey area according to the primary habitat type present in line with the UK Habitat Classification definitions and following CIEEM best practice guidance. The habitat descriptions should be read in conjunction with the UK Habitat Classification survey map, see Figure 1.5, and site photographs, see Appendix C.

U1 Built-up Areas and Gardens

1.64 A number of areas of the Site support introduced shrub, comprising principally non-native species planted and managed to provide amenity value as part of the soft landscaping of the Hyde Park Hayes estate.

[29] *LISI 2 - species of high impact or concern present at specific sites; LISI 3 - species of high impact or concern which are widespread in London, LISI 4 - Species which are widespread and eradication is not feasible; LISI 5 - species with insufficient data or evidence; LISI 6 - Species that were not currently considered to pose a threat or have the potential to cause problems in London.*

Figure 1.5 **UK Habitat Classification Map** (Contains map data from Open Street Map)



1.65 The main area of the habitat on Site extends along the eastern and southern sides of the MSCP, which is managed to a height of around 1 to 1.5 m and comprised principally non-native species with a couple of native species, including: cherry laurel (*Prunus laurocerasus*), ornamental viburnum (*Viburnum* sp.), Himalayan firethorn (*Pyracantha crenulata*), firethorn (*Pyracantha coccinea*), leatherleaf mahonia (*Mahonia bealei*), Franchet's cotoneaster (*Cotoneaster franchetii*), small-leaved cotoneaster (*Cotoneaster microphyllus*), meadowsweet (*Spirea* sp.), hazel (*Corylus avellana*), dogwood (*Cornus sanguinea*), blackthorn (*Prunus spinosa*), holly (*Ilex aquifolium*) and ivy (*Hedera helix*). The habitat in this location also supports a number of trees, classified as individual trees, which are all London plane (*Platanus x acerifolius*).

1.66 The introduced shrub is also present, but in smaller extent, along the western side of the MSCP but at a smaller height of 1 m and comprising cherry laurel, dogwood and ornamental viburnum and with no trees present.

1.67 The surface car park at the northern end of the Site supports a border of introduced shrub, with the habitat along the west and northern boundary of the car park comprising a mix of cherry laurel, ornamental viburnum, Indian cluster berry (*Lonicera ligustrina*), coralberry (*Symphoricarpos orbiculatus*), David viburnum, Japanese spindle (*Euonymus japonicus*), dogwood, bramble (*Rubus fruticosus*), ivy, Himalayan cotoneaster (*Cotoneaster simonsii*), leatherleaf viburnum (*Viburnum rhytidophyllum*) and Oregon grape (*Mahonia japonica*). On the eastern side alongside Millington Road, the shrub habitat is dominated by Japanese spindle, whilst introduced shrub along the southern boundary between the beech hedge and Millington Road is dominated by small-leaved cotoneaster. The introduced shrub habitat in this area also incorporates a number of individual trees along the western, northern and eastern boundaries of the car park, dominated by small-leaved lime (*Tilia cordata*) with silver maple (*Acer saccharinum*) and Norway maple (*Acer platanoides)*.

1.68 On the western boundary of the Site, introduced shrub is present to the west and south of the single-storey plant building with Indian cluster berry and ivy dominating the habitat with silver birch (*Betula pendula*) and Himalayan birch (*Betula jacquemontii*) present. Similar habitat is present on the eastern side of HPH5, where ivy dominates the habitat present with ornamental maple (*Acer* sp.) shrubs present.

1.69 The surface car park alongside One Hyde Park includes several small planters, classified as ground level planters but incorporating a range of small shrub species including Japanese skimmia (*Skimmia japonica*), elephant's ears (*Bergenia* sp.), ornamental viburnum, hebe (*Hebe* sp.) and broadleaf (*Griselinia* sp.). Several trees are also present within the planters, including a fastigiate beech (*Fagus sylvatica*), whitebeam (*Sorbus* sp.) and fastigiate Norway maple.

1.70 Although the habitat types covered by this do not require a condition to be identified, the trees are of sufficient size to be classified independently as individual trees and do require a condition assessment. The condition assessment for the trees associated with this habitat is provided in Table 1.8.

Table 1.8 Tree Habitat Condition Assessment for individual trees within the Built-up Areas and Gardens Habitat

Ref	Species	Size	Habitat Condition Criteria						
			A - Native	B – Canopy	C – Mature	D – No Adverse Impact	E – Natural Niches	F – Oversailing Vegetation	Condition
17-23	Silver birch (*Betula pendula*)	Small	Yes	Yes	No	Yes	No	Yes	Moderate
24	Himalayan birch (*Betula jacquemontii*)	Small	No	Yes	No	Yes	No	Yes	Moderate
25		Small	No	Yes	No	No	No	Yes	Poor
36-38, 43-46, 51, 52, 54, 55, 58,61, 63-65,	London plane (*Platanus x acerifolia*)	Small	No	Yes	No	No	No	Yes	Poor
39-42, 47-50, 56-57, 60, 62, 66	London plane (*Platanus x acerifolia*)	Medium	No	Yes	No	No	No	Yes	Poor
59, 67-69	London plane (*Platanus x acerifolia*)	Small	No	Yes	No	Yes	No	Yes	Moderate
77	Fastigiate beech (*Fagus sylvatica* var.)	Small	Yes	Yes	No	No	No	Yes	Moderate
78-79	Fastigiate Norway maple (*Acer platanoides*)	Small	No	Yes	No	No	No	Yes	Poor
80-81	Whitebeam (*Sorbus* sp.)	Small	Yes	Yes	No	Yes	No	Yes	Moderate
82-87	Small-leaved lime (*Tilia cordata*)	Small	Yes	Yes	No	No	No	Yes	Moderate
92	Silver maple (*Acer saccharinum*)	Medium	No	Yes	Yes	Yes	No	Yes	Moderate
93		Medium	No	Yes	Yes	Yes	Yes	Yes	Good
94-95	Norway maple (*Acer platanoides*)	Small	No	Yes	No	No	Yes	Yes	Moderate
96-104	Small-leaved lime (*Tilia cordata*)	Small	Yes	Yes	No	Yes	No	Yes	Moderate
105		Medium	Yes	Yes	No	Yes	No	Yes	Moderate
106-107		Small	Yes	Yes	No	Yes	No	Yes	Moderate

1.71 Introduced shrub habitat is common in the urban environment, and whilst it provides some foraging potential for faunal species the level of management reduces its potential to support sheltering opportunities. As a result, the habitat is considered to be of biodiversity value **within the immediate survey area only**. The trees present across the site do, however, increase the supporting value of the site for faunal species and provide connecting habitat that is important to the area and are, therefore, considered to be of **local** biodiversity value.

U1b5 Buildings

1.72 The Site is dominated by two main buildings on the western side of the Site, referred to as Hyde Park Hayes Building 2 (HPH2) and HPH5, along with a multi-storey car park (MSCP) in the south-east corner and a smaller plant building between HPH2 and HPH5.

1.73 HPH2 is an office building across 3 storeys, all above ground with no basement, and is of modern construction with curtain wall glazing and sheet material façade and a flat roof with bitumen felt. The roof includes building plant in the centre around a central atrium, which drops down to a central courtyard at ground level, which is netted across the top to restrict faunal access. The building provides office accommodation with a typical fitout comprising communal workspaces and breakout areas with supporting facilities, although only the 2nd floor is occupied at present. A small terrace is present at the southern end of the building at the 2nd floor level, which includes a couple of small planters with introduced shrub species that includes rosemary (*Salvia rosmarinus*), lavender (*Lavandula* sp.), David viburnum (*Viburnum davidii*), Japanese aucuba (*Aucuba japonica*) and blue fescue grass (*Festuca glauca*). The roof has previously included a small area of green roof on the southern side, which was retrofitted to the building, however this was removed due to continued issues with water ingress into the building from the habitat.

1.74 HPH5 is an office building across 5 storeys, 4 above ground and a single basement level, and is of modern construction with curtain wall glazing and sheet material façade and a flat roof of pebbles and pavers. The central area of the roof includes building plant in a series of areas and purpose built units, contained within louvred screens and netted above, and an atrium on the southern side of sheet metal materials with glazing and photovoltaic panels along the southern edge. The building provides office accommodation with a typical fitout, although all areas are currently vacant. The basement provides parking and storage facilities, accessed via a slope in the south-east corner which includes shutters that do not fully enclose the space. The internal area is typical of a basement, with fireboard across the ceiling and concrete or sheet pile walls. Landscaping was not present within the building, although butterfly bush (*Buddleja davidii*) and black nightshade (*Solanum nigrum*) had informally established at roof level.

1.75 The MSCP is a 5 storey building providing parking facilities for the Site across all floors and the roof deck, with two stairwells providing access on the northern and southern sides and ramps providing vehicular access between the floors at the northern and southern sides of the structure. The MSCP has a sheet material façade between floors with the eastern and western facades open across each floor, although including louvred screen across the ground floor and metal grill across the first floor to prevent unauthorised access to the car park. The stairwells and access ramps have a sheet material façade, with a part brick façade on the northern side and metal framed glazing for the stair cores. The northern façade has part brick façade. Each floor has a tarmacked surface with smooth concrete ceilings on the five floors below the roof deck, and access is via security controlled shutters with a security kiosk in the north-western corner which is of brick and upvc glazed façade.

1.76 On the western side of the site between HPH2 and HPH5 is a single-storey plant room of brick construction with a flat roof of gravel/pebble substrate. Three of the façades include wooden cladding and louvred access doors or vents, all of which include grills behind to prevent access.

1.77 The site is surrounded by several other buildings, including:

- One Hyde Park, on eastern boundary of the Site – a recently refurbished office building with 4 above ground floors of modern construction with a sheet metal and glazed curtain wall façade with louvres and flat roof that provides space for building plant and a central glazed atrium;
- Cavenham Court, opposite the Site to the west – a recently refurbished residential building across 7 above ground floors of modern construction with a sheet metal façade with metal framed glazing and brick and metal framed glazing stair core with a flat roof housing building plant;
- Premier Inn, opposite the Site to the east – a relatively modern hotel building across 4 above ground floors of modern construction with a mix of brick and sheet material façade with metal framed glazing and a flat roof. The western side of the building roof includes a small green roof area;

- HPH4 and HPH3, opposite the Site to the east – two 2 storey warehouse buildings providing commercial accommodation, with a corrugated sheet metal façade with metal framed glazing and a shallow pitched corrugated sheet metal roof.

1.78 Buildings are a common habitat in the urban environment and offer relatively limited biodiversity opportunities, and as a result are generally considered to be of **negligible** biodiversity value. Whilst there is some landscaping present on HPH2 and the Premier Inn building, the extent of these is very small and not sufficient in size and potential to warrant greater biodiversity value.

U1b6 Other Developed Land

1.79 Hardstanding is extensively present across the site, predominantly comprising pavers that provide access across the estate beyond the normal footpaths associated with roads. These areas are kept free of vegetation, with the exception of three areas in which trees are provided within planters. A group of 9 multi-stem Himalayan birch (*Betula jacquemontii*) are present on the habitat between HPH2 and HPH5, a further 3 multi-stem Himalayan birch are present on the western side of HPH5 and 5 olive (*Olea europaea*) are present on the eastern side of HPH5. These are, however, below the threshold for consideration as individual trees (i.e. <7.5 cm diameter stem).

1.80 The surface car park at the northern end of the site alongside additional surface car parking spaces alongside HPH2, HPH5 and One Hyde Park are also classified as hardstanding with a tarmac surface. The habitat is generally maintained to be free of vegetation, with the exception of three Norway maple (*Acer platanoides*) trees within the northern surface car park.

1.81 Although hardstanding habitat does not require a habitat condition to be identified, the trees not contained within planters are of sufficient size to be classified independently as individual trees and do require a condition assessment. The condition assessment for these is provided in Table 1.9. The trees present do not pass the no adverse impact criteria as they have been extensively cut back and show signs of anthropogenic damage, and therefore do not extend across the expected canopy area. One of the trees does, however, contain natural niches suitable for faunal species with a minor split in the bark.

Table 1.9 Tree Habitat Condition Assessment for individual trees within Other Developed Land Habitat

Ref	Species	Size	Habitat Condition Criteria						
			A - Native	B – Canopy	C – Mature	D – No Adverse Impact	E – Natural Niches	F – Oversailing Vegetation	Condition
88	Norway maple (*Acer platanoides*)	Small	No	Yes	No	No	No	No	Poor
89		Small	No	Yes	No	No	Yes	No	Poor
90		Small	No	Yes	No	No	No	No	Poor

1.82 Hardstanding habitat provides very little supporting potential for faunal species and as a result is considered to be of **negligible** biodiversity value. The individual trees do hold some biodiversity interest on the site, however the limited extent of these trees and highly managed nature of them limits their biodiversity potential and thus are considered to be of biodiversity value **within the immediate survey area only**.

U1c Artificial unvegetated undeveloped land

1.83 Two isolated areas of the site are classified as artificial unvegetated undeveloped land, comprising gravel substrate that are present around the central plant building between HPH2 and HPH5 and along the southern boundary of HPH5. The habitat is maintained to be free of vegetation, and therefore is considered to be of **negligible** biodiversity value.

U1d Suburban mosaic of developed/natural surface

1.84 The courtyard area within the atrium of HPH2 provides a garden-like area within the building that is best described as a suburban mosaic of natural/developed surfaces with artificial paths of gravel and paving slab materials navigating through ground level planters. The planting provides a mix of herbaceous and shrub species along with twelve relatively immature silver birch trees planted within the space. The planting includes Japanese pachysandra (*Pachysandra terminalis*), valerian (*Valeriana* sp), green alkanet (*Pentaglottis sempervirens*), pendulous sedge (*Carex pendula*), sweet box (*Sarcococca confusa*), blue lilyturf (*Liriope muscari*), elephant's ears, great willowherb (*Epilobium hirsutum*), Japanese anemone (*Anemone x hybrida*), herb robert (*Geranium robertianum*), male fern (*Dryopteris filix-mas*) and an ornamental viburnum.

1.85 Although the habitat type does not require a habitat condition to be identified, the trees present are of sufficient size to be classified independently as individual trees and do require a condition assessment. The condition assessment is provided in Table 1.10. The trees present do not pass the no adverse impact criteria as they have been managed to avoid encroachment on the building façade and do not, therefore, extend across the expected canopy area, and do not include any natural niches suitable for faunal species.

Table 1.10 Tree Habitat Condition Assessment for individual trees within Suburban Mosaic of Developed/Natural Surface Habitat

Ref	Species	Size	Habitat Condition Criteria						
			A - Native	B – Canopy	C – Mature	D – No Adverse Impact	E – Natural Niches	F – Oversailing Vegetation	Condition
1 to 12	Silver birch (*Betula pendula*)	Small	Yes	Yes	No	No	No	Yes	Moderate

1.86 The courtyard habitat has potential to provide some value for biodiversity, however the presence of netting above the atrium limits the access of the habitat and therefore limits its biodiversity potential. As a result, the habitat is considered to be of biodiversity value **within the immediate survey area only**.

U1e Built Linear Features

1.87 Hardstanding in the form of pavements and roads, identified as built linear features within the UK Habitat Classification, is present in small part within the Site and extensively surrounding the Site. Millington Road encircles the Site, providing access through the Hyde Park estate with access from the A437 North Hyde Road to the north, A437 North Hyde Road/Dawley Road roundabout to the west and Station Road to the east. A small part of Millington Road, between HPH2 and the surface car park to the north, falls within the Site boundary along with the access road that runs between the MSCP and HPH5 and One Hyde Park.

1.88 The roads and pavements are maintained to be clear of vegetation, commensurate to their purpose to provide access through the Hyde Park estate, with the surfaces comprising a mixture of tarmac, concrete and paving slabs.

1.89 Such habitat is common in the urban environment and does not provide any supporting potential for biodiversity, and thus is considered to hold **negligible** biodiversity value.

G4 Modified Grassland

1.90 Modified grassland is extensively present across the Hyde Park estate to provide amenity space for the office accommodation. The grassland habitat is regularly managed, being frequently mown to a short sward, and as a result of the management is dominated by grasses with very few herbaceous species present. Whilst of a short sward, the grassland was of the appearance of amenity turf, with perennial ryegrass (*Lolium perenne*) likely to be the principle constituent. Herbaceous species, where present, included daisy (*Bellis perennis*), dandelion (*Taraxacum officinale* agg), common chickweed (*Stellaria media*) and doves-foot cranesbill (*Geranium molle*). The grassland habitat is, therefore, classified as modified grassland as it is species-poor, with less than 9 species per square meter present and dominated by a few fast-growing species. In terms of condition, the grassland supports less than 6 species per square meter in all areas, and therefore cannot achieve more than a *poor* condition.

1.91 The grassland habitat supports additional areas, below the minimum mappable unit, which are assessed as secondary to the main habitat. The grassland to the north of HPH2 supports an area of introduced shrub (Secondary code 847), comprising blue blossom (*Ceonothus thyrsiflorus*), an ornamental viburnum and two ornamental crab apple (*Malus sp*) shrubs. Similarly the modified grassland habitat alongside the plant building between HPH2 and HPH5 supported introduced shrub with lavender and an ornamental cherry (*Prunus*) shrub present.

1.92 The central grassland area between HPH2 and HPH5 also included an area of ground level planting, of around 1m wide, that provides interest to the grassland. This is understood from the Site Management to have previously included pampas grass (*Cortaderia selloana*), but in the last couple of years been replanted with mixed wildflowers with species identified to be present including annual toadflax (*Linaria maroccana*), yarrow (*Achillea millefolium*), cornflower (*Centaurea cyanus*), cosmos (*Cosmos* sp.), California poppy (*Eschscholzia californica*), love-in-a-mist (*Nigella damascena*) and fiddleneck (*Phacelia tanacetifolia*). The planter has also seen a number of ephemeral/ruderal plants establish including shepherd's purse (*Capsella bursa-pastoris*), Canadian fleabane (*Erigeron canadensis*), ribwort plantain (*Plantago lanceolata*), smooth sow-thistle (*Sonchus oleraceus*), common ragwort (*Senecio jacobaea*), broadleaved dock (*Rumex obtusifolius*), common chickweed, black nightshade, common nettle (*Urtica dioica*) and wall lettuce (*Lactuca muralis*).

1.93 A number of the grassland areas also support individual trees, with a range of species present that are the result of planting during the formation of or subsequent management of the estate. The tree species and their associated condition are identified in Table 1.11. Many of the trees lack natural niches, with the exception of the two mature trees (T53 and T91) which provided various features associated with peeling bark and around pruning wounds and most were not assessed to show signs of adverse impact with the exception of T27-28 which had been pruned to remove the canopy from encroaching on the building.

Table 1.11 Tree Habitat Condition Assessment for individual trees within Modified Grassland Habitat

Ref	Species	Size	Habitat Condition Criteria						
			A - Native	B – Canopy	C – Mature	D – No Adverse Impact	E – Natural Niches	F – Oversailing Vegetation	Condition
13	Norway maple (*Acer platanoides*)	Medium	No	Yes	No	Yes	No	Yes	Moderate
14		Medium	No	Yes	No	Yes	No	Yes	Moderate
15	Ornamental birch (*Betula* sp.) (Multi-stem)	Small	No	Yes	No	Yes	No	Yes	Moderate
16		Small	No	Yes	No	Yes	No	Yes	Moderate
26	London plane (*Platanus x acerifolia*)	Small	No	Yes	No	Yes	No	Yes	Moderate
27		Small	No	Yes	No	No	No	Yes	Poor
28		Small	No	Yes	No	No	No	Yes	Poor
29 to 34		Small	No	Yes	No	Yes	No	Yes	Moderate
35	Silver birch (*Betula pendula*)	Small	Yes	Yes	No	No	No	Yes	Moderate
53		Medium	Yes	Yes	Yes	Yes	Yes	Yes	Good
91	Silver maple (*Acer saccharinum*)	Medium	No	Yes	Yes	Yes	Yes	Yes	Good

1.94 Modified grassland habitat typically holds limited supporting potential as a result of its management for amenity purposes, and the habitat present is not different with regular management limiting the structure and diversity of the grassland. As a result, the habitat is not sufficiently diverse to comprise a BAP priority grassland habitat and, despite some planting this is generally of limited extent and as a result its impact is limited. As a result, the modified grassland habitat is considered to be of biodiversity value **within the immediate survey area only**. However, the trees present across the site provide a number of opportunities for faunal species and provide linkage across the periphery of the site, which collectively is considered to be of biodiversity value at the **local** scale.

H2 Hedgerow

H2b Other Hedgerows

1.95 Ornamental beech (*Fagus sylvatica*) hedgerow is present in the northern part of the site, providing boundary planting to the surface car park for One Hyde Park and the car park at the northern end of the Site. The hedgerow is regularly managed to a relatively low height and width as an amenity resource to the site, with hardstanding, close mown grassland or introduced shrub habitats adjoining.

1.96 Ornamental hedgerows such as these do not require a condition to be identified, automatically being attributed a *poor* condition on account of their management. Whilst hedgerow habitat is a relatively uncommon habitat, the habitat present offers limited supporting potential for faunal species as a result of its management and is not considered to comprise part of the BAP priority habitat as a result of its amenity purpose, and as a result is considered to be of biodiversity value **within the immediate survey area only**.

Species

Flora

1.97 The presence of floral species on the Site is influenced by the presence of artificial habitats and maintenance thereof, with plants restricted to landscape areas as part of the amenity provision.

1.98 No plant species identified on Schedule 8 (protected plant species) were identified to be present, however two species listed on Schedule 9 (invasive plant species) of the Wildlife and Countryside Act 1981 (as amended) were identified – Himalayan cotoneaster and small-leaved cotoneaster. Further to these, four additional species are identified by LISI as locally invasive. Franchet's cotoneaster is part of the cotoneaster group that is identified as being of high impact or concern present at specific sites that requires attention, butterfly bush and cherry laurel are identified as being of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate, and green alkanet which is identified as not currently considered to pose a threat or have potential to cause problems in London.

1.99 As a result, the floral species present are considered to be of biodiversity value **within the immediate survey area only**. However, consideration is required regarding the presence of invasive species and mitigation required to ensure appropriate removal of the species.

Birds

1.100 Whilst the Site is largely dominated by artificial habitats, the significant presence of individual trees of semi-mature and mature size provides notable opportunities for nesting, with some old nests identified during the walkover survey, whilst the trees and introduced shrub provides some foraging resources. In addition, the buildings provide some opportunities for birds, particularly those that utilise the building fabric for nesting such as feral pigeon (*Columba livia domestica*) and gull species.

1.101 During the walkover survey, carrion crow (*Corvus corone*), magpie (*Pica pica*), herring gull (*Larus argentatus*), pied wagtail (*Motacilla alba*), robin (*Erithacus rubecula*), ring-necked parakeet (*Psittacula krameri*) and feral pigeon were observed. The Site Management team also indicated the presence of mistle thrush (*Turdus viscivorus*), red kite (*Milvus milvus*) and peregrine (*Falco peregrinus*) at times. The magpie are known to nest in a quiet part of the façade of One Hyde Park, whilst pied wagtail have previously been found nesting in the atrium of HPH2 (prior to it being netted) and the riser duct of HPH2.

1.102 The bird species present within the field survey area are relatively common urban species, and whilst species such as peregrine and red kite may be present at times the habitat is unlikely to be a significant part of their territory and the Site does not provide nesting opportunities for the species. As a result, the species and abundance present within the Site are unlikely to be significant and of biodiversity value **within the immediate survey area only**. Nevertheless, the presence of nesting birds would comprise a legal constraint to the development that requires mitigation.

Bats

1.103 The Site and immediate surrounding areas have relatively limited supporting potential for bats, whilst there are a number of semi-mature trees present around the Site they are in areas that are well lit by street lighting and as a result their value is significantly reduced. Furthermore, the Site is relatively isolated as a result of major roads to the north, east and west which are likely to reduce connectivity of the Site with habitats in the wider environment. Therefore, any foraging behaviour is likely to be opportunistic and associated with individual bats rather than regularly providing habitat for small numbers of bats. As a result, the Site is considered to be of *negligible* value for commuting and foraging.

1.104 The office buildings on Site are of types that are generally unsuitable for the presence of roosting bats. The buildings do not contain any roof voids and the building construction is not of a type that provides suitable opportunities in the façade. As a result, the buildings are considered to be of *negligible* suitability for roosting bats. Similarly, the MSCP is of a similar construction and does not contain any features that could be used by bats for roosting, and is of *negligible* suitability for roosting bats.

1.105 The one-storey plant building between HPH2 and HPH5 is of brick construction, but lacks any features in the brickwork that would provide crevices for roosting bats. The internal plant areas are well screened and the building does not contain a roof void with a flat roof across the entirety of the building. As a result, the building is considered to be of *negligible* value for roosting bats.

1.106 All of the trees were considered as to the potential for roosting bats, with all but one of the trees considered not to provide PRFs on account of their age or condition. The exception to this was T93, a silver maple on the western side of the surface car park at the northern part of the Site. The tree had a single rot hole on one of the branches approximately 2.5 m off the ground and facing in an easterly direction. The PRF was not, however, particularly extensive and therefore only likely to provide opportunities for individual bats and of *low* potential. Whilst the use of the site is unlikely, as discussed above, the PRF is retained as of *low* potential to ensure appropriate mitigation is employed in the construction phase.

1.107 Considering the value of the Site discussed above and findings of the desk study, which identified only two common species in the study area, the presence of bats on the Site are likely to be limited to individuals of common species on an opportunistic basis. The Site is unlikely to comprise a significant part of a bats territory, instead providing opportunistic or occasional opportunities as part of a wider network that are of relatively low conservation value. As a result, the Site is considered to be of biodiversity value **within the immediate survey area only**, although the presence of a significant roost would attract greater value. Nevertheless, the presence of PRF comprise a legal constraint to the development that requires mitigation.

Other Species

1.108 A number of other species were identified to be present in the wider area through the desk study, however conditions within the Site, either as a result of the habitat present or level of connectivity with suitable habitats, means the species are unlikely to be present.

1.109 Although reptile species were identified within the wider environment, the habitats present within the Site are largely unsuitable as the grassland is managed to a short sward and as a result offers no cover for the species to utilise the habitat. Furthermore, the Site is isolated from suitable habitat in the wider area that reduces the likelihood of reptiles being present, with the major roads to the north, east and west carrying large volumes of traffic and extensive hardstanding associated with the industrial land-uses to the south and east limiting connectivity between the Site and the wider area. Therefore, the species is considered likely to absent from the Site.

1.110 Whilst the semi-natural habitats present on the Site offer some opportunities for hedgehog, the presence of significant roads surrounding the Site and extensive hardstanding associated with the industrial land-uses to the south and east will limit the connectivity of the Site. Therefore, the species is considered likely to be absence from the Site.

Baseline Ecological Value

1.111 Several of the baseline habitats require a condition assessment as part of the BNG assessment, which is discussed in the habitat descriptions above and provided in Appendix D, with the remaining habitats assigned a default habitat condition for the assessment. The strategic significance for the baseline is discussed in Paragraph 1.45, with the site considered to be of low strategic significance as the habitats present are not of particular importance nor providing ecological connectivity with strategically significant locations.

1.112 The Proposed Development is assessed as having a baseline biodiversity value of 5.25 habitat units and 0.11 hedgerow units, as identified in Table 1.12. With an absence of watercourse habitat within the area of influence, this is excluded from the assessment. The full detail is provided in the Statutory Biodiversity Metric calculation which will accompany the planning application.

Table 1.12 Summary of the Baseline Habitat Value

Habitat	Area (ha)	Distinctiveness	Condition	Strategic Significance	Required Action	Baseline Unit Value
Area-Based Habitats						
Developed land; sealed surface	1.6653	Very Low	N/A	Low	Compensation Not Required	0.00
Built linear features	0.2157	Very Low	N/A			0.00
Artificial unvegetated, unsealed surface	0.0287	Very Low	N/A			0.00
Vegetated garden	0.0252	Low	N/A		Same distinctiveness or better habitat required ≥	0.05
Introduced shrub	0.1728	Low	N/A			0.35
Ground level planters	0.0038	Low	N/A			0.01
Modified grassland	0.3310	Low	Poor			0.66
Urban tree	0.3054	Medium	Poor		Same broad habitat or a higher distinctiveness habitat required (≥)	1.22
	0.2972		Moderate			2.38
	.0489		Good			0.59
Hedgerow Habitats						
Non-native and ornamental hedgerow	0.11	Very Low	Poor	Low	Same distinctiveness band or better	0.11

1.113 Irreplaceable habitat is defined in BS 8683:2021 as "*habitat that cannot be recreated within a specified time frame because it would be technically very difficult or impossible to recreate taking into account their age, uniqueness, species diversity, rarity and environmental or historical context*", with Schedule 1 of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 identifying those relevant. None of these habitats were identified to be present within the Proposed Development site.

1.114 Degradation of the biodiversity value of the Site has not occurred in respect to reducing the biodiversity value of the Site. The current conditions are representative of the Site since the 30th January 2020, representing the reference date for BNG when the Environment Bill was introduced to parliament, with habitats on the site remaining in current use with associated ongoing management. Whilst a green roof has previously been present on HPH2, this habitat was not fully viable as issues around water ingress into the building was not sustainable, therefore its removal was necessary as part of the functioning of the site rather than for derogation purposes.

ECOLOGICAL IMPACTS AND MITIGATION

1.115 A summary of the Ecological Features present within the zone of influence of the Proposed Development is provided in Table 1.13, with an assessment of their importance, or potential importance, based on the findings described above and their requirement for further consideration of impacts and mitigation.

Table 1.13 Summary of Ecological Features Present

Feature	Likely Biodiversity Importance	Discussion
Designated Sites		
South West London Waterbodies SPA and Ramsar	International	The Proposed Development will not result in any direct impacts on the SPA and Ramsar. There is no ecological connectivity between the development site and the designated sites, with impacts not considered likely to occur over the distances involved and in the context of the urban environment. Whilst the SPA and Ramsar are considered to be sensitive to recreational disturbance, the majority of the sites within the network forming the SPA and Ramsar are either restricted access or in private ownership with no public access. Furthermore, considering the proximity of the Site to alternate green space in the local vicinity, including the Grand Union Canal, and Lake Farm Country Park, recreational impacts upon the designated sites are not considered likely. Therefore, further consideration of these receptors is not required.
Metropolitan SINCs	Metropolitan	The Proposed Development will not result in any direct impacts upon the SINCs. Indirect impacts are also unlikely, with limited ecological connectivity between the development site and the SINCs, and over the distances involved and in the context of the dense urban environment associated with the Proposed Development site impacts are unlikely. Therefore, further consideration of these receptors is not required.
Borough SINCs	Borough	
Local SINCs	Local	
Habitats		
UK BAP Priority Habitats	Up to Borough	The majority of UK BAP priority habitats are distanced from the Proposed Development, with limited ecological connectivity across the urban environment and, given the urban context of the surrounding environment, limited potential for direct or indirect impacts. However, the open mosaic habitat alongside the site falls within the area of influence for indirect impacts associated with dust generation and encroachment of works, with no direct impacts occurring. However, through the adoption of best practice measures the significance of effects will be minor. Nevertheless, further consideration is required for the receptor.
Waterbodies	Metropolitan	The Grand Union Canal is distanced from the Proposed Development, and therefore direct and indirect impacts upon the habitat is not considered likely. The site may provide some supporting habitat for species potentially present on the site, but these are likely to be restricted to avian species with terrestrial connectivity impacted by the urban habitat between the canal and the Site.
Urban Trees	Up to Local	The Proposed Development will require the removal of at least some of the trees present within the Site to facilitate the development, which cannot be avoided without significant and undue constraint on the Site with the value of the trees not warranting strict protection. Consideration has been given to the potential to protect and retain trees around the periphery of the Site, where feasible and appropriate protection measures can be implemented. Indirect effects to retained trees and those in the wider area could occur during the completion of construction activities, and thus require consideration of mitigation measures to avoid adverse impact. As a result, further consideration is required for the receptor.
Species		
Flora	Within the immediate survey area	The presence of floral species is affected by the presence of artificial habitats and amenity landscaping, and maintenance thereof, with planting restricted to species that are relatively common and not of particular significance with no protected species identified on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) identified. As a result, further consideration of the receptor is not required.

Feature	Likely Biodiversity Importance	Discussion
Breeding Birds	Within the immediate survey area	The site offers some foraging opportunities for birds with berry producing shrub species present within the soft landscaping, whilst nesting opportunities are associated with the woody vegetation as well as the buildings present for those that utilise building fabric for nesting (e.g. feral pigeon and gull species). Therefore, whilst the bird community present is likely to comprise species that are relatively common in the urban environment, measures are required to mitigate potential impacts that could breach wildlife legislation and thus further consideration of the receptor is required.
Bats	Within the immediate survey area	The habitats within the site are of negligible value for commuting and foraging bats, with major roads surrounding the site restricting connectivity with the wider environment and thus likely to limit activity to individual and/or opportunistic opportunities. The buildings on the Site hold negligible potential for roosting bats, however a single tree holds low potential (PRF-i) for roosting bats, however given the limited connectivity with the wider environment and low number of bats identified in the desk study, the opportunity is not considered to be significant. Nevertheless, mitigation is required to address potential adverse effects on the tree containing the PFR and potential future use of the site by bats and, therefore, further consideration of the receptor is required.
Hedgehog & Small Mammals	Likely absence	Connectivity for the habitats within the Site are likely to limit the potential for the species to be present, with major roads and extensive hardstanding surrounding the site. However, through the adoption of standard mitigation any potential for the presence of the species can be addressed.
Reptiles	Likely Absent	The habitats within the Site are not typically suitable for the presence of reptiles, with the grassland being maintained at a short sward thereby offering little or no cover. Furthermore, records of reptiles in the study area are distanced from the Site with limited connectivity to the Site. As a result, reptile species are likely to be absent from the Site and, therefore, further consideration of these receptors is not required.
Invertebrates	Within the survey area only	The habitats within the Site provide limited opportunities for invertebrates, with landscape areas providing some cover and foraging resources. However, the site has restricted connectivity with wider landscapes, with major roads to the north and west and industrial areas to the south and east. No deadwood habitat is present on site that would provide suitable opportunities for stag beetle. Consequently, the invertebrate species and population present are likely to be of limited value and, thus, further consideration of these receptors is not required.
Invasive Species	Negligible	Two species (Himalayan cotoneaster and small-leaved cotoneaster) identified as invasive through Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were identified as present, along with the locally invasive butterfly bush, cherry laurel and Franchet's cotoneaster. Removal of these species is recommended, in line with guidance provided by LISI, however does not need to follow a particular process or disposal requirements, and therefore further consideration of these as receptors is not required.

Design Implications and Damaging Activities

Design

1.116 Due to the dominance of artificial habitats and associated highly managed amenity areas, the design of the Proposed Development has relatively limited potential implications to significant biodiversity features and the Site's exiting biodiversity value. However, the design does have influence over the retention of urban trees present within and surrounding the Site as a result of the layout of buildings and their massing. Where possible, consideration has been given, and should continue to be given, to the retention of existing trees, thereby maintaining features of biodiversity interest on the Site and minimising compensation requirements associated with BNG.

1.117 Consideration in the design phase should also be given to the lighting design, avoiding significant illumination of landscaping areas that hold potential to support nocturnal species as a result of foraging, commuting or roosting opportunities. Appropriate measures, in line with best practice guidance provided by the Institute of Lighting Professionals should be considered to minimise light spill whilst ensuring a safe and accessible environment, both in the construction phase and from the final developed site.

1.118 One of the most notable implications for the design phase is the potential for the inclusion of urban green infrastructure within the building fabric and public realm, with the potential to maximise biodiversity enhancement on the site through the inclusion of landscaping. As outlined in the Biodiversity Enhancement Design Opportunities report (see Appendix E), opportunities within the proposed design include the provision of green roofs, terrace and/or balcony planting, façade planting and public realm planting that can deliver meaningful biodiversity enhancement that also delivers an improvement on the amenity spaces within and surrounding the site.

Construction

1.119 The construction phase generally holds the greatest potential for adverse impacts on biodiversity features within a project, particularly as a result of the demolition of existing structures and the throughout the construction phase.

1.120 The demolition of the existing buildings has potential for adverse impacts on breeding birds that may utilise the building fabric for nesting and the clearance of woody vegetation has the potential for impacts on nesting birds associated with these habitats. In addition, adverse impacts upon adjacent trees and woody vegetation could impact upon the breeding birds potentially associated with these during the completion of construction activities, in particular as a result of any encroachment of works. However, with the adoption of appropriate measures the impacts can be mitigated.

1.121 The construction phase also holds potential implications in relation to the presence of a potential bat roosting feature, either as a result of the removal of the tree or construction related impacts upon the tree that could result in the loss of the feature or change in conditions, for example as a result of lighting. However, with the adoption of appropriate measures the impacts can be adequately mitigated.

1.122 Habitat clearance on the site has some potential for adverse impacts on features of biodiversity value, with shrubs on site holding some, albeit limited, potential to shelter faunal species. However, through the adoption of mitigation measures, adverse effects can be avoided.

1.123 Any encroachment of works into adjacent habitats could also have an impact on retained habitats, in particular urban trees present on the wider Hyde Park estate, which could have potential implications upon tree health and long-term viability.

1.124 Construction activities, including demolition, earthworks, construction and associated machinery and vehicular movements have the potential to generate indirect effects associated with noise and dust. The Institute of Air Quality Management (IAQM) guidelines identify an area of influence of dust effects on ecological receptors as 50 m from the generation source. However, none of the designated sites are present within this zone of influence, and therefore impacts from dust are unlikely. The faunal species associated with the site and surrounding area are not considered to be vulnerable to dust deposition and therefore impacts are unlikely to be significant.

1.125 The generation of noise during the construction phase is not considered likely to give rise to adverse effects, being in an urban context the faunal species present will be habituated to a certain level of noise and impacts will be temporary as a result. Consequently, adverse effects are unlikely to be significant.

Operation

1.126 Given the urban nature of the Site and level of activity in the surrounding area, adverse impacts on biodiversity during the operation of the Site are considered unlikely. Enhancements delivered through the development will be appropriate to the nature and scale of the scheme, with appropriate management of the enhancements provided through a long-term management plan which will ensure they continue to provide a biodiversity benefit in the long-term.

1.127 The increase in residential properties on the Site as a result of the development will have potential to influence recreational impacts upon sites within the area of influence. Whilst the South West London Waterbodies SPA and Ramsar are noted to be sensitive to recreational disturbance, the majority of the sites within the network forming the SPA and Ramsar have either restricted access or are in private ownership with no public access, some of which is as a result of their water storage function. Considering the proximity of the Site to the SPA and Ramsar and the availability of alternate green space in the local vicinity, recreational impacts from the Proposed Development upon the SPA and Ramsar are considered very unlikely and therefore are not likely to be significant.

1.128 The SINCs providing access to greenspace, including London's Canals Metropolitan SINC, Cranford Countryside Park and Open Space Borough SINC and Lake Farm Country Park Borough SINC, are specifically managed for nature conservation and amenity access. As a result, whilst the Proposed Development will introduce additional residential receptors that will utilise this space, the impact is not considered likely to be significant.

Mitigation

1.129 The application of mitigation measures is required to minimise or negate adverse effects on biodiversity features discussed above and/or deliver enhancement measures, complying with legislative and policy requirements.

1.130 The consideration of mitigation measures required has also taken into account the potential for the biodiversity value of the site to alter between the survey on which the identification of features is based and the commencement of construction activities, ensuring any change in circumstance is appropriately addressed.

Habitats

Trees

1.131 Any trees within or alongside the Site that are confirmed by an arboriculturist as being suitable for retention should be protected through the construction phase in line with British Standard 5837 – 'Trees in relation to design, demolition and construction'[30] and as instructed by the arboriculturist. The measures implemented should include the establishment of an appropriate Root Protection Area (RPA) for each tree, ensuring the roots are protected from irreversible damage as a result of sustained machinery movements. BS 5837 recommends an appropriate RPA is based on the stem diameter of each individual tree, although local conditions may need to be considered based on the urban nature of the site and subsequent influences on root spread. The establishment of protection of the RPA will afford some protection to the main trunk and canopy, although in some cases it may be appropriate to extend this to the edge of the canopy to provide full protection to the tree.

[30] *BSI (2012) British Standard (BS) 5837:2012 – Trees in relation to design, demolition and construction. British Standards Institute.*

1.132 If the development requires incursion into a RPA, the effects of such incursion should be considered by an arboriculturist to ensure the trees are not significantly affected. Similarly, any damage to trees during the construction phase should be reviewed by an arboriculturist and any remedial actions recommended should be carried out as instructed.

Shrub Clearance

1.133 Vegetation clearance on the site, notably areas of shrub and hedgerow, should be completed in sections, reducing the height of vegetation by hand to c. 300 mm height in the first instance to allow the habitat to be checked for the presence of small mammals or reptiles. Depending on the time of year, consideration should also be given to the potential presence of hibernating hedgehog. If found to be present, works should pause to allow the species to relocate off-site, or in the case of hibernating animals further ecological advice should be sought before proceeding.

Species

Breeding Birds

1.134 Depending on the construction programme, the potential for the Site to support breeding birds, either within woody vegetation (trees and shrubs) or artificial opportunities (buildings and structures), could comprise a constraint. The development programme should give due consideration to the nesting season (typically March to August inclusive), avoiding the sensitive period if possible. Otherwise, a search of the natural habitat and artificial opportunities should be carried out prior to the commencement of works on site by a suitably qualified ecologist to ensure that no active nests are present.

1.135 In the event that an active nest is discovered during a search of the building or adjacent vegetation prior to commencement or during the completion of construction works, the structure surrounding and supporting the nest should be retained without alteration until the young have fledged the nest. It may be appropriate to establish a buffer from the nest, with no plant or personnel entering this area until the young have fledged, and the nest should be monitored. In the event the nesting birds are agitated by the works, it may be appropriate to extend the buffer zone. By following this approach, the Proposed Development will not have a detrimental impact on nesting birds on the Site and the contractor/ developer will remain compliant with wildlife legislation.

Bats

1.136 As the tree with an identified PRF is assessed to be of low suitability (PRF-I), further surveys are not required in line with the BCT best practice guidance[31]. The level of mitigation required for the protection of bats depends on the implications of the development upon the associated tree and whether it can be retained through the development.

[31] *Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.*

1.137 As the tree is proposed to be removed, appropriate mitigation is required prior to the felling of the tree to minimise potential impacts upon bats. In line with the Bat Mitigation Guidelines[32], the PRF should be inspected prior to felling using an endoscope to determine the presence or likely absence of bats. Following this, guidance provided by the inspecting ecologist should be followed and may comprise felling of the tree/removal of the feature immediately, felling under a low impact class licence under the supervision of a licensed ecologist or require further survey and application for a development licence depending on the findings.

1.138 Due to the transient nature of the use of potential roost features and the presence and/or suitability of such features can alter over time, it is recommended that a walkover survey is carried out prior to commencement of construction activities to ensure any significant changes are identified and addressed. The check should ensure the condition remains as described in this appraisal, with any new features associated with the Site or immediately adjacent buildings/trees are picked up. The check should be carried out at an appropriate time, in line with best practice guidelines and with sufficient time for mitigation (e.g. a European Protected Species Development License Application) to be incorporated prior to commencement should it be required.

1.139 The Biodiversity Champion, see below, should ensure they are familiar with bat field signs, giving consideration to the possibility of their presence during site walkovers. Field signs include grease and urine staining on walls, discarded wings of insects, audible squeaking at dusk or in warm weather, droppings (similar in size and shape to that of a mouse, but crumble easily when rubbed between fingers) and bats themselves.

Best Practice Measures

Encroachment of Activities

1.140 There is potential for construction activities to encroach upon habitats and features in the wider environment as a result of their completion, which can have adverse effects on their condition. The establishment of a site boundary will reduce any potential encroachment of on-site activities and site personnel should be informed of the importance of the surrounding habitats through the site induction and toolbox talks.

Lighting

1.141 The following best practice measures provided by the Institute of Lighting Professionals[33] should be adopted in the lighting design for the construction and operational phases, including:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used;
- LED luminaires should 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) should be adopted to reduce blue light component;
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to 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. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.*

[33] *ILP (2023) Bats and Artificial Lighting at Night. Guidance Note 08/23. Institute of Lighting Professionals, Rugby.*

- Internal luminaires can be recessed (as opposed to using a pendant fitting) 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;
- Column heights should 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;
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt;
- Where appropriate, external security lighting should be set on motion sensors and set to as short as possible a timer as the risk assessment will allow;
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand;
- 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; and
- 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.

Staff Awareness

1.142 The principal contractor should appoint a 'Biodiversity Champion', or similar, with responsibility for ensuring mitigation requirements are fully adopted, monitored and to raise awareness of ecological issues on the site. The Biodiversity Champion role should:

- be familiar with the biodiversity features resent on the site and with potential to establish on the site during construction, including their legal protection and mitigation requirements;
- have sufficient authority to change site practices and take the required action necessary to avoid harm to species present/establishing during construction, and may include the need to temporarily halt works whilst further ecological advice is sought and remedial action taken to avoid harm and/or a legal offence;
- undertake regular inspection of the construction site, including consideration of mitigation measure implementation to ensure they are effective and appropriate, and give considering to the potential for species (e.g. breeding birds) to establish on the site during construction;
- raise awareness of ecological issues associated with the site and the mitigation requirements through targeted staff training, allowing site personnel to understand the ecological sensitivities of the site (or potentially on the site) and associated mitigation measures required. This will all site personnel to comply with the legal requirements for protecting plants and animals, and could be delivered through the site induction and topic specific toolbox talks as required;

- input into the design programme, to ensure ecological enhancement measures are implemented at an appropriate time of year and an appropriate time in the construction programme, to ensure they do not become a constraint to further works;
- oversee the installation of ecological enhancement measures in line with manufacturer recommendations and landscape/ecological guidelines, and maintenance of the features (habitats or artificial species boxes) following installation and up to handover;
- keep a log of all actions taken for biodiversity, including inspection findings, remedial measures and training undertaken.

Invasive Species Removal

1.143 The invasive species identified within the site are not of a type that require specialised removal, as with Japanese knotweed (*Fallopia japonica*) or giant hogweed (*Heracleum mantegazzianum*). As a result, care should be taken to ensure the entire plant is removed and appropriately disposed of, taking care to ensure all seeds/berries are also removed. This should, ideally, be completed prior to the establishment of seed heads or berries.

Best Practice Measures

1.144 Best environment practice measures incorporated into the construction phase, such as those controlling the emission of dust or noise and subsequent effects on sensitive receptors, will ensure potential adverse effects on biodiversity features are reduced.

Change in Ecological Value

1.145 Retention of all of the semi-natural habitats and trees with redevelopment of the site is not achievable, however proposals do allow for the retention of a total of 53 trees across the site, through the adoption of measures in line with BS 5837, with 2.17 habitat units retained. However, the loss of other semi-natural habitats and trees results in the loss of 3.09 habitat units and 0.11 hedgerow units.

1.146 Through the delivery of landscaping on the site within the design and landscape strategy, the development will seek to provide compensation for the loss of habitat from the baseline and deliver, where possible, enhancement to the biodiversity value of the site overall.

ENHANCEMENT STRATEGY

Enhancements Adopted

1.147 The proposed development incorporates a number of habitats and enhancement features within the building and general landscape design. Information on the areas of planting have been taken from the illustrative masterplan drawings, with the habitats classified in line with the UK Habitat Classification for the BNG assessment and are described in turn below.

Green Roofs

1.148 The landscape plans illustrate the provision of a number of green roofs located across different levels of the proposed development. Communal amenity roofs featuring landscape planting are proposed on the first floor of Blocks B and D, the sixth floor of Block B3, the seventh floor of Blocks D2 and C, and the eighth floor of Blocks D1 and B1. In addition, roofs classified as ‘biodiverse green roofs’ under UKHab Classification will be installed on inaccessible roofs on varying levels of each building.

1.149 The biodiverse green roof habitat, identified in green in Figure 1.6, will cover an approximate area of 4,306 m². At this stage, full details of the biodiverse green roofs are not yet available and are expected to be confirmed during the detailed design phase. However, the green roofs will be required to meet the following criteria :

- A varied substrate depth between 80 mm and 150 mm, with at least 30 % of the area having a depth of 150 mm to maximise its biodiversity condition;
- Planted and seeded with a wide range of dry grassland wildflower and sedum species[34]; and,
- To maximise habitat condition, the area of substrate at 150 mm should target 50 % coverage and the habitat should include artificial habitat features, such as log piles, stone piles or sand piles).

1.150 The biodiverse green roofs are considered under the urban habitat condition assessment, with the habitat providing diversity in their habitat structure and species present with an absence of invasive species, Additionally, it is expected that the green roof habitat can provide the required 50 % coverage at 150 mm depth and include artificial habitat piles, and consequently it is considered that the habitat can meet a 'good condition'.

1.151 While specific details of planting for the communal roofs have not been provided at this stage, it is not considered likely that the habitat will meet the requirement for 70% vegetation coverage for classification as intensive green roof and therefore would be classified as 'other green roof'. The provision of vegetation at roof level in that it comprises vegetation at roof level that is neither biodiverse nor intensive. Other green roofs do not require a formal condition assessment to be completed for the BNG assessment.

1.152 In addition, a number of private gardens/terraces are proposed at varying roof levels of each building, covering an area of 2,089 m^2, as identified in orange in Figure 1.6. Although comprising green roof habitat, the overlying influence on the habitat will be the residents and therefore classification as vegetated garden is most appropriate[35]. The vegetated garden habitat does not require a condition assessment to be completed for the BNG assessment, however in accordance with the guidance any additional habitat created within these gardens, such as trees, cannot be counted towards biodiversity net gain as private gardens are not considered capable of being legally secured for the purposes of BNG. The gardens are likely to provide predominantly ornamental planting around hardstanding areas.

[34] *The UK Habitat Classification identifies that a biodiverse green roof habitat should have a ratio of 60:40 between wildflowers and sedum species, with the species richness of dry grassland species including more than 25 native species.*

[35] *Classification as vegetated garden or other green roof does not materially influence the result in respect to BNG.*

Figure 1.6 **Extent of Green Roof Habitat** (from A12440-TPB-ZZ-R01-DR-A-041001-S2-P03)

Vegetated Gardens – Ground Level

1.153 The landscape plans include the provision of a number of private gardens located across the ground floor of the site, surrounding the perimeter of the proposed buildings and covering an area of approximately 1,770 m^2. The vegetated garden habitat does not require a condition assessment to be completed for the BNG assessment, however in accordance with the guidance any additional habitat created within these gardens, such as trees, cannot be counted towards biodiversity net gain as private gardens are not considered capable of being legally secured for the purposes of BNG. The gardens are likely to provide predominantly ornamental planting around hardstanding areas.

1.154 The extent of the ground level vegetated garden habitat is identified in orange in Figure 1.7.

Figure 1.7 **Extent of Vegetated Garden Habitat** (from A12440-TPB-ZZ-L00-DR-A-041001-S2-P03)

Grassland

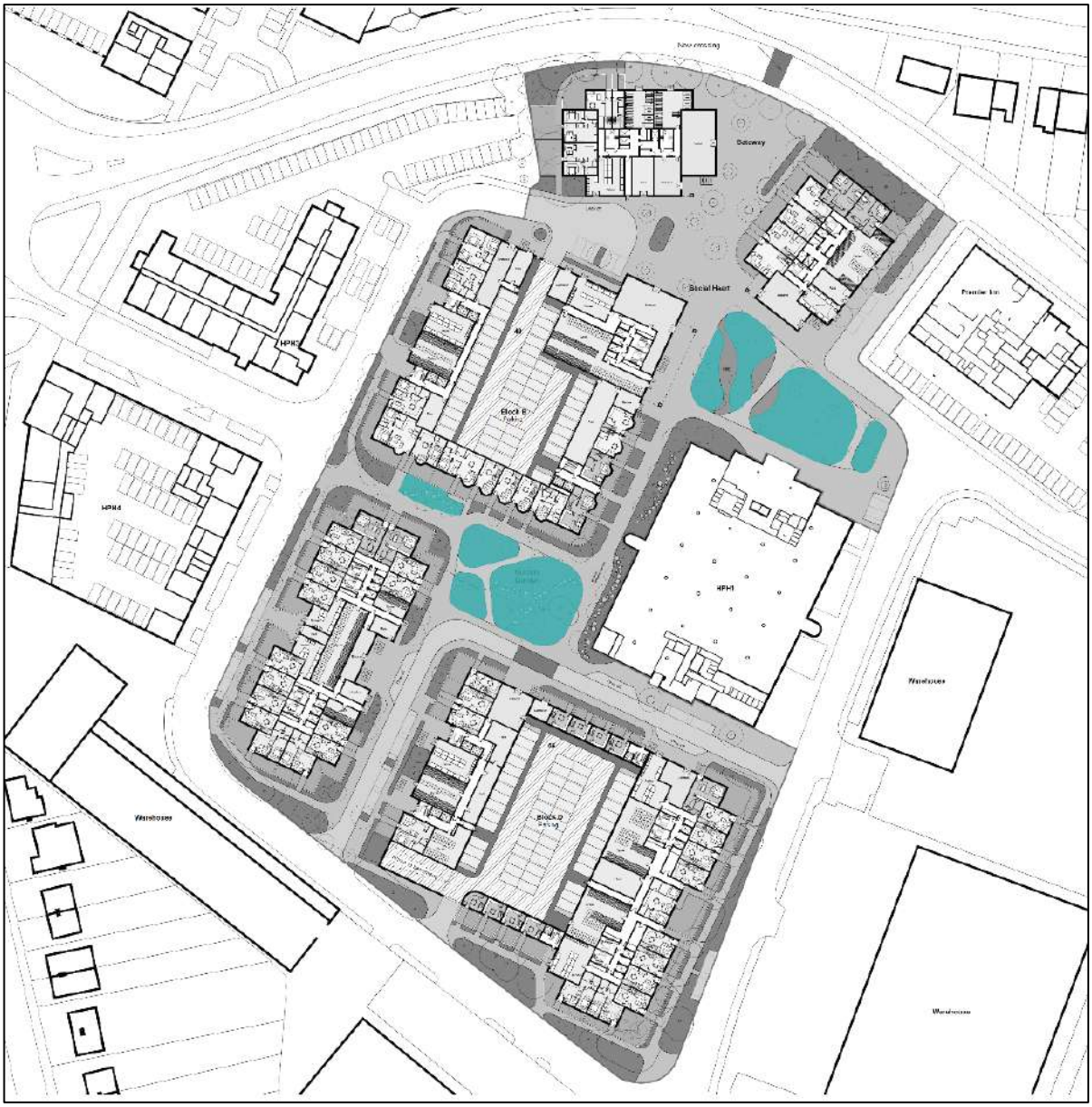
1.155 The majority of the ground floor landscaping is expected to feature wildflower or 'other neutral grassland' planting across the public realm of the Site. This includes a combination of larger open green spaces and smaller patches of grassland bordering the proposed buildings. While no detailed landscaping or planting plans have been provided at this stage, it is assumed that these areas will be planted and managed to align with the 'other neutral grassland' habitat definition under UK Habitat Classification (UKHab).

1.156 To meet this classification, it is expected that the grassland will be seeded or planted with at least eight suitable grass and herb species per square metre and maintenance will follow good practice wildflower meadow management. These grassland areas are anticipated to reach moderate condition, meeting the condition criteria for medium and very high distinctiveness grassland associated with a varied sward height (criterion B), low cover of bare ground (criterion C) and absence of bracken (Criterion D). The extent of the other neutral grassland habitat is identified in green in Figure 1.8 and covers a total area of approximately 2,479 m².

Figure 1.8 **Extent of Other Neutral Grassland Habitat** (from Drawing No. A12440-TPB-ZZ-L00-DR-A-041001-S2-P03)

1.157 In certain areas of the proposed green space, smaller sections of modified grassland habitat will be provided for amenity use of the residents, with increased footfall and the frequency of human activity. These areas include the play areas located centrally within the masterplan. It is assumed that a lower species diversity will be established in these areas, and that a more intensive maintenance plan will be required. As a result, these grassland areas are classified as modified grassland and considered to meet a poor condition in line with the low distinctiveness grassland condition sheet, with less than 6 species per square metre limiting its condition. The extent of this habitat is shown in turquoise in Figure 1.9 and covers a total area of approximately 1,395 m².

Figure 1.9 **Extent of Modified Grassland Habitat** (A12440-TPB-ZZ-L00-DR-A-041001-S2-P03)



Hedgerow

1.158 A number of hedgerows are proposed around the periphery of the Site, as identified in green in Figure 1.10. Whilst details of the planning are not fully known at this stage, we have taken a precautionary approach and considered these to comprise non-native or ornamental hedgerows. However, as the landscape design is progressed, consideration should be given to the hedgerows being of native woody species, such as hornbeam (*Carpinus betulus*), holly (*Ilex aquifolium*), hawthorn (*Crataegus monogyna*), blackthorn (*Prunus spinosa*) and/or hazel (*Corylus avellana*), in order to be classified as a native hedgerow and increase their biodiversity value.

1.159 Non-native and ornamental hedgerows do not require a condition to be identified for the BNG assessment, being attributed a poor condition by default. A total length of approximately 178 linear meters is identified within the indicative planting.

Figure 1.10 Extent of Hedgerow Habitat (A12440-TPB-ZZ-L00-DR-A-041001-S2-P03)

Tree Planting

1.160 The landscape strategy identifies in the indicative planting an opportunity for the provision of 113 small trees, planted throughout the site. All trees are expected to be of small size, with a diameter at breast height (DBH) below 300mm at planting, of which 22 trees are expected to reach a poor condition in line with the individual tree condition criteria passing those associated with tree canopy (criterion B) and an absence of anthropogenic impacts upon canopy extent (criterion D). The remaining 91 trees are expected to reach a moderate condition passing the criteria associated with tree canopy (criterion B) an absence of anthropogenic impacts upon canopy extent (criterion D) and oversailing vegetation (criterion F). The species of the trees are not currently known, and therefore all trees have been assumed to be non-native to provide a precautionary approach.

1.161 The location of these tree is shown below in Figure 1.11

Figure 1.11 **Extent of Tree Planting Across the Site** (A12440-TPB-ZZ-L00-DR-A-041001-S2-P03)

Species Enhancement

1.162 In addition to habitat enhancements, it is recommended that appropriate artificial habitat aids are incorporated into the development to aid species presence within the Site and support enhancement to the ecological functioning of the Site. The inclusion of artificial habitat aids is identified in CIRIA guidance[36] as having potential to make an important contribution to providing alternative wildlife refuges, enhancing the biodiversity value of developments cheaply and easily.

1.163 Additional value to the species enhancement can be provided by identifying appropriate nest boxes that target species of conservation concern locally or nationally. With this in mind, it is recommended that the following boxes are included in the design, the location of which should be considered as the development design evolves but should be achievable at a suitable location at roof level or the boundary

[36] *CIRIA (2007) BUILDING GREENER. Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA Report C644. Construction Industry Research and Information Association, London.*

wall and green wall habitat

Bird Nesting Boxes

1.164 In general, bird nesting boxes should be fixed at least 2m above floor level and located on a façade that provides an aspect that faces between a north-east and south-east direction, however swift boxes should be affixed at 4-5m above ground level and ideally in areas overlooking or adjacent to green roofs. The recommended boxes are made of 'woodcrete' or 'woodstone', a breathable material that is durable and rot-proof with the lifespan of boxes typically in the region of 25 years.

1.165 The following nest boxes are recommended to provide enhancement for species that are locally of conservation concern and to support opportunities for urban species locally:

- 4x House Sparrow Terrace, e.g. 1SP Schwegler Sparrow Terrace or similar, for surface installation on the proposed buildings;
- 3x Triple Cavity Swift Nest, e.g. No. 17A Schwegler Swift Nest Box or similar, for surface installation on the proposed buildings;
- 6x generic species nest box, e.g. 1B Schwegler bird box, for inclusion within retained trees.

Bat Roosts

1.166 Enhancement of the development site through the provision of artificial roosting aids is recommended to provide compensatory habitat for the loss of potential roost features within the site and support establishment of the species within the site, with increased foraging opportunities associated with landscape planting across the site that will provide additional and diverse prey resources. To complement this, it is recommended that artificial roosting habitat is provided to increase the availability of high value roost habitat.

1.167 Artificial roosting habitat for birds is not species specific and differences in box types are often related to requirements for installation or conditions provided. With a significant number of retained trees on the site, it is recommended that 3x bat boxes, of either 2F Schwegler bat box, 1FF Schwegler Bat Box or similar, are provided across the site. These can be installed in suitable trees, although should utilise an aluminium nail for installation to avoid impacts for arboriculturists in any future tree works required.

1.168 The boxes should be installed at a height of at least 3 m from the ground, with unobstructed access to the bottom of the box. As bats are legally protected from disturbance, the roost boxes should be located somewhere away from regular disturbance or illumination, which would deter bats from using the box.

Invertebrate Habitat Aids

1.169 Invertebrates are an integral component of our environment, providing a number of vital ecosystem services including the pollination of flowers, recycling of organic material and as a valuable foraging resource. Habitat aids for invertebrates are relatively simple to provide and can be incorporated within landscaping in sheltered locations that receive direct sunlight. Habitat aids are not generally species specific, instead providing suitable sheltering opportunities for a range of species.

1.170 It is recommended that 6x artificial nesting aids, such as the Schwegler clay and reed insect nest or similar, are provided within the landscape planting across the building and street level to provide sheltering opportunities for invertebrates. Additionally, within suitable areas of the grassland, log piles and deadwood should be considered, if achievable, to provide additional refuge for invertebrates.

Biodiversity Value of the Developed Site

1.171 As part of the assessment, it is important to establish the definitions of two terms to ensure the calculation is appropriate and avoids confusion in terms between the calculation methodology and project discussions. Therefore, for the purpose of the calculation, the following terms have been followed:

- Habitat Enhancement – the improvement of the condition of an existing habitat, thereby increasing the biodiversity value of a habitat type. Enhancement is achieved through measures that improve habitat biodiversity capacity and/or remove factors that detract from its value;
- Habitat Creation – the removal or loss of the present habitat in the action of creating the new one or creating habitat where none was previously present (including bare earth).

1.172 As a result, the proposals to include habitats as enhancements to the design are considered to be habitat creation in the calculation methodology. The planting types within the design have been assigned appropriate categories in line with the UK habitat Classification and, where relevant, discussion on the habitat condition is included in the descriptions above.

1.173 The strategic significance for the Site is discussed as part of the methodology, with a low strategic significance attributed to the landscaping provided on the site. The temporal risk factor, comprising the time between clearance of the site and the commencement of landscape planting, has been included as 3 years in line with the development programme, representing the maximum timeframe between clearance of the site and commencement of landscape planting for any of the phases, thereby providing a precautionary approach across the site.

1.174 The assessment of the proposed habitats and associated biodiversity units are presented in Table 1.14, which identifies the total biodiversity value of the habitats created to be 6.01 habitat units and 0.31 hedgerow units.

Table 1.14 Summary of the Baseline Habitat Value

Habitat	Area (ha) / Length (km)	Distinctiveness	Condition	Strategic Significance	Delivery Risk	Time to Condition	Unit Value
Area-Based Habitats							
Developed land; sealed surface	1.1294	Very Low	N/A	Low	Low	0	0.00
Biodiverse Green Roof	0.4306	Medium	Good		Medium	13	2.18
Other Green Roof	0.1083	Low	N/A		Low	4	0.19
Vegetated garden (Roof Level)	0.2089	Low	N/A		Low	4	0.36
Vegetated garden (Ground Level)	0.1770	Low	N/A		Low	4	0.31
Other neutral grassland	0.2479	Medium	Moderate		Low	8	1.49
Modified grassland	0.1395	Low	Poor		Low	4	0.24
Urban trees	0.0896	Medium	Poor		Low	13	0.23
	0.3705		Moderate		Low	30	1.02

Habitat	Area (ha) / Length (km)	Distinctiveness	Condition	Strategic Significance	Delivery Risk	Time to Condition	Unit Value
Hedgerow Habitats							
Non-native and ornamental hedgerow	0.178	Low	Poor	Low	Low	4	0.15

Residual Change in Biodiversity Value

1.175 The predicted change in the biodiversity value of the Site, as calculated through the Statutory Biodiversity Metric, identifies that the Proposed Development will result in an overall net gain of 55.77 % for area-based habitats and a net increase of 40.33 % for hedgerow habitats, as summarised in Table 1.15.

Table 1.15 Change in Biodiversity Value as a result of the Proposed Development

	Area Habitat Units	Hedgerow Units	Watercourse Units
Baseline Habitat Value	5.25	0.11	0.00
Value of Habitat Lost	3.09	0.11	-
Value of Habitat Retained	2.17	0.00	-
Value of Habitat Enhanced	0.00	0.00	-
Value of Habitat Created	6.01	0.15	-
Total Post-Development Habitat Value	8.18	0.15	-
Net Change (Biodiversity Units)	2.93	0.04	-
Percentage Net Change	55.77 %	40.33 %	-

1.176 However, the development proposals in their current form do not meet the trading rules associated with the BNG metric. Whilst the landscaping provides adequate compensation for the loss of low distinctiveness habitats, the loss of trees are not compensated for fully within the assessment resulting in a deficit of 0.78 habitat units associated with the individual tree habitat.

1.177 As a result, whilst the development can deliver a biodiversity net gain on-site, offsetting will be required to comply with the requirements of the statutory biodiversity net gain requirement as a condition to planning approval. The offsetting will, however, only be required to meet the Trading Rule requirements (0.78 habitat unit deficit for individual trees) with the Landscape Strategy already delivering a net gain overall and therefore providing a significant net gain once the trading rules are satisfied.

Offsetting

1.178 The Defra Statutory BNG metric identifies the unit shortfall to comprise 0.78 habitat units, with offsetting required to deliver either of the following to discharge the associated BNG planning condition:

- Identification of suitable opportunities for compensatory tree habitat creation or enhancement locally, within the Local Planning Authority, to deliver 0.78 habitat units;
- Identification of suitable opportunity for compensatory tree habitat creation or enhancement through an offsetting provider; or,
- Purchase of statutory biodiversity credits, identified in the BNG metric as 1.55 units at the A1 tier.

1.179 The appropriate offsetting approach will be investigated further and delivered as part of the Net Gain Plan that will be required to discharge the BNG planning condition. Alternatively, as further detailed design is brought forward as part of the Reserved Matters stage, consideration should be given to the

potential for additional tree retention or planting within the landscape proposals.

SUMMARY AND CONCLUSION

Baseline

- The site is not subject to any statutory or non-statutory designation for nature conservation, with the closest being London's Canals Metropolitan SINC, located 460 m to the north of the site;
- The site is identified in desk study records to be in an area of low ecological potential in GiGL's Biodiversity Hotspots for Planning resource, with the majority of the site in a location with no impact categories and a small area where one impact category overlaps the site on the western boundary;
- The site does not support any notable habitats, comprising Priority Habitats under the UK Biodiversity Action Plan or ancient woodland. Three areas alongside the site are identified in the desk study to support open mosaic habitat, although two of these are developed sites that would not meet the criteria. The remaining site is located to the west, although parts may be unsuitable as they provide a surface car park and amenity landscaping. All remaining BAP priority habitats are more than 800 m from the site;
- The site is characterised by its urban context, with buildings and artificial habitats such as hardstanding and pavements/roads dominating the site and semi-natural habitats comprising amenity landscaping as part of the Hyde Park estate. The habitats are generally of low ecological value;
- A daytime bat walkover concluded the site to hold negligible value for commuting/foraging bats and roosting bats as a result of the limited presence of features and lack of connectivity with suitable habitat in the wider environment, however one of the trees within the site was identified to support a potential roost feature (PRF-I) with a rot hole with potential to support individual bats identified in the northern part of the site;
- The site provides relatively limited supporting potential for other faunal species, limited to breeding birds associated with woody vegetation and the building fabric. The site supports several invasive species, including two identified on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Impacts and Mitigation

- The development has relatively limited potential for adverse effects on local biodiversity as a result of the dominance of artificial habitats within the site;
- The development will inevitably result in the loss of habitats from the baseline, including individual trees within the site. However, consideration should be given in the design to those that could be retained and those that cannot be retained should be compensated, firstly through the landscape proposals, in line with planning policy requirements and as part of the delivery of a net gain for biodiversity;
- Retained trees within and alongside the site should be protected through the inclusion of appropriate mitigation in line with British Standard 5837, including establishment of an appropriate Root Protection Area;
- Consideration should be given to sensitive timings for breeding birds in the programme, otherwise works should be preceded by a check by a suitably qualified ecologist and subsequent guidance followed;

- Mitigation is required prior to the removal of the tree containing a potential roost feature of low value, although further survey at this stage is not required. Prior to removal, an inspection of the potential roost feature using an endoscope should be undertaken by a licensed ecologist with works following subsequent recommendation and appropriate best practice guidance (e.g. immediate felling/felling under license);
- Best practice measures are recommended for the design and construction, including minimising light spill through the design, control of dust emissions, removal of invasive species and identification of a responsible person through construction.

Enhancement

- Soft landscaping within the Proposed Development includes the provision of areas of biodiverse green roof within inaccessible areas of the roof of buildings, other green roof habitat across accessible areas of roof and a variety of habitats across the public realm and ground floor including private vegetated gardens, other neutral grassland, modified grassland, native hedgerow and trees;
- The indicative landscaping associated with the proposed development demonstrates that it can deliver a net gain for biodiversity, with indicative proposals delivering a 56 % net gain in habitat units and 40 % in hedgerow units;
- However, the indicative landscaping does not fully comply with the trading rules associated with the statutory metric, with a shortfall of 0.78 habitat units associated with individual trees. This can be addressed through alteration to the indicative landscaping, to retain or plant further trees, or through offsetting, either through offsite delivery or a statutory credit purchase, as part of the Biodiversity Gain Plan in discharging the associated BNG condition to a planning approval for the scheme;
- Overall, the scheme demonstrates that delivery of policy and statutory requirements associated with BNG can be achieved, and that due consideration has been given to the application of the mitigation hierarchy in the application of this;
- Recommendation has also been made for species enhancements to be incorporated into the Proposed Development, adding further value to the biodiversity value of the final site although not contributing to the change in biodiversity habitat value score.

APPENDIX A – Legislative and Policy Context

Legislation

Statutory Designated Sites

Statutory designation of sites for nature conservation derives from a number of international conventions, European Directives and national legislation, establishing the following framework of designations:

- Special Area of Conservation (SAC) – designated under the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, transposed by the Conservation of Habitats and Species Regulations 2017 (as amended), for the conservation of particular habitats (listed on Annex I) and/or species (listed on Annex II) that are identified as being of European Importance;
- Special Protection Area (SPA) – designated under the European Council Directive on the Conservation of Wild Birds, transposed by the Conservation of Habitats and Species Regulations 2017 (as amended), for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex I of the Directive and migratory species);
- Ramsar – listed under the Convention on Wetlands or International Importance for the protection of internationally important wetland habitat, especially as waterfowl habitat. Whilst the sites are not directly legislated, the NPPF expects these to be given the same level of protection as SACs and SPAs;
- Site of Special Scientific Interest (SSSI) – designated under the Wildlife and Countryside Act 1981 (as amended) or the National Parks and Access to the Countryside Act 1914, on account of the sites being of special nature conservation interest for its plant/animal communities, habitats, geology or landform features;
- National Nature Reserve (NNR) – designated under the Wildlife and Countryside Act 1981 (as amended) as nationally important on account of its habitat, flora or fauna interest;
- Local Nature Reserve (LNR) – established under Section 24 of the National Parks and Access to the Countryside Act 1914 as locally important on account of its habitat, flora or fauna interest.

European Protected Species

The Conservation of Habitats and Species Regulations 2017 (as amended) affords protection to all European Protected Species (EPS) in England and Wales. Under this legislation it is an offence to deliberately capture, injure or kill individuals of any native EPS, a strict liability offence to damage or destroy sites or places which EPS use as a breeding site or resting place and an offence to deliberately disturb an EPS whereby the disturbance is likely to:

a) impair its ability;

   i. to survive, breed or reproduce, or to rear or nurture their young; or,

   ii. in the case of animals of a hibernating or migratory species to hibernate or migrate; or,

b) to affect significantly the local distribution or abundance of the species to which they belong.

Development licences are available from Natural England, under certain circumstances, that would allow activities that would otherwise be an offence under these Regulations. However, compliance with the licence methodology and conditions is important, with it being an offence to breach any condition imposed by any such licence.

EPS also receive partial protection through Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), through which it is an offence to intentionally or recklessly disturb an EPS whilst it is using a place of rest or shelter.

Flora

Section 13 of the Wildlife and Countryside Act 1981 (as amended) provides protection for all wild plants, which establishes an offence to uproot a plant without the permission from the land owner or occupier. Uprooting is defined in the Act as to '*dig up or otherwise remove the plant from the land on which it is growing*'.

Section 13 also establishes an offence to intentionally pick, uproot, destroy or trade in the higher and low plants plant species listed in Schedule 8 of the Act.

Section 14 of the Wildlife and Countryside Act 1981 (as amended) makes it an offence to plant or otherwise cause to grow in the wild the species identified in Schedule 9 of the Act. The protection was strengthened through Section 23 of the Infrastructure Act 2015, which enables environmental authorities to require works to be undertaken to remove or prevent their establishment.

The Environmental Protection Act 1990 establishes the requirement for licensed disposal of material containing Japanese knotweed (*Fallopia japonica*) and giant hogweed (*Heracleum mantegazzianum*), identifying such material as 'controlled waste' and requiring appropriate disposal.

Birds

Part 1 of the Wildlife and Countryside Act 1981 (as amended) provides legislative protection to all wild birds in England and Wales, making it an offence to intentionally kill, injure or take any wild bird, or take, damage or destroy the nest (whilst being built or in use) or its eggs. The Act also provides additional protection to those species listed in Schedule 1 from disturbance whilst it is building a nest, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Section 10, Part 1 of the Conservation of Habitats and Species Regulations 2017 (as amended) places a requirement on local planning authorities in the exercising of their functions to have regard to '*the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK*'. As a result, it is important to consider any habitat loss as a result of development and opportunities for the provision of habitats.

Biodiversity Net Gain

The statutory requirement for biodiversity net gain comes from Schedule 7A of the Town and Country Planning Act 1990 (as amended), inserted by Schedule 14 of the Environment Act 2021 and enacted by The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024. Through this, unless exempt through the Biodiversity Gain Requirements (Exemptions) Regulations 2024, all developments are required to deliver a minimum 10 % net gain for biodiversity as a condition of planning approval.

Planning Policy

National

Planning policy at the national level is provided by the National Planning Policy Framework (NPPF)[37], which sets out the Government's economic, environmental and social planning policies for England and articulates the Government's vision for sustainable development.

Protection and enhancement of the natural environment is a key component of the environmental objective of the NPPF, including improving biodiversity, with planning policy relating to biodiversity contained within Chapter 15 on conserving and enhancing the natural environment. Paragraph 180 states that "*planning policies and decisions should contribute to and enhance the natural and local environment by:*

- 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);
- recognizing the intrinsic character and beauty of the countryside, and the wider benefits from natural capita and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- minimizing impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Paragraph 186 of the NPPF relates specifically to biodiversity principles local planning authorities should apply when determining planning applications, which comprise:

- "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;
- 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 outweighs both its likely impact on the features of the site that make it of species scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- 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 and a suitable compensation strategy exists; and
- 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".

The NPPF is supported by Planning Practice Guidance[38], provided by the Department for Levelling Up, Housing and Communities, which provides further guidance on biodiversity, green infrastructure and biodiversity net gain. Of particular note, Paragraph 018 (Reference ID: 8-018-20240214) identifies that biodiversity information should inform all stages of development, with applications informed by an ecological survey where the type or location of development could have a significant impact on biodiversity. Additionally, Paragraph 018 identifies that detailed species surveys should only be required by local planning authorities where clearly justified, with assessments proportionate to the nature and scale of development proposals and their impact on biodiversity.

[37] *Department for Levelling Up, Housing and Communities (2023) National Planning Policy Framework. December 2023.*
[38] *Department for Levelling Up, Housing and Communities (2016) Planning Practice Guidance. Last updated February 2024.*

Within the Biodiversity Net Gain information, Paragraph 011 (Reference ID 74-011-20240214) identifies the minimum information required to be submitted as part of a planning application where the biodiversity net gain condition is likely to apply to the development.

Regional

The London Plan[39] provides strategic planning policy for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over 20 – 25 years.

The principal policy for biodiversity is provided by Policy G6, Biodiversity and Access to Nature, which requires the protection of Sites of Importance for Nature Conservation (SINCs) or, where this is unavoidable and the benefits of the development clearly outweigh the impacts on biodiversity, minimise impacts through the application of the mitigation hierarchy (avoid, minimise and mitigate, compensate). The policy also requires development proposals to manage impacts on biodiversity and secure net biodiversity gain, informed by the best available ecological information and addressed from the start of the development process, with those reducing deficiencies in access to nature considered positively.

Additional policies of potential relevance include:

- Policy D7, Public Realm, encourages the creation of new public realm and incorporation of green infrastructure such as street trees and other vegetation that supports rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity;
- Policy G1, Green Infrastructure, requires the protection of London's network of green and open spaces and green features in the built environment, with development proposals expected to incorporate appropriate elements of green infrastructure that integrate into London's wider green infrastructure network;
- Policy G5, Urban Greening, establishes the requirement for major development proposals to contribute to the greening of London through the adoption of measures as a fundamental element of design and demonstrated through an Urban Greening Factor appraisal; and,
- Policy G7, Trees and Woodland, requires development proposals to ensure, wherever possible, existing trees of value are retained and, where removal is necessary, adequate replacement is made.

Local

Local planning policy is currently derived from the Hillingdon Local Plan, which sets out the Borough's vision, strategy, objectives and policies for planning development within Hillingdon and includes policies for deciding development management decisions. The Local Plan is formed of two parts: Part 1[40] covers the Strategic Policies and was adopted in November 2012; and, Part 2[41] covers the Development Management Policies and was adopted in January 2020.

[39] *Greater London Authority (2021) The London Plan. The Spatial Development Strategy for Greater London, March 2021.*
[40] *London Borough of Hillingdon (2012) Hillingdon Local Plan: Part 1 – Strategic Policies. Adopted November 2012.*
[41] *London Borough of Hillingdon (2020) Hillingdon Local Plan: Part 2 – Development Management Policies. Adopted January 2020.*

The Strategic Objective in relation to biodiversity is to '*protect and enhance biodiversity to support the necessary changes to adapt to climate change*' and '*where possible, encourage the development of wildlife corridors*'. In support of this objective, Policy EM7 on Biodiversity and Geological Conservation identifies that attention will be given to the protection and enhancement of Sites of Importance for Nature Conservation, protected and priority species and habitats, provision of biodiversity enhancement through development, inclusion of green roofs and living walls and the use of sustainable drainage systems that promote ecological connectivity and natural habitats.

The Development Management Policies include the following of relevance to biodiversity and nature conservation:

- DMEI 1 – Living Walls and Roofs and on-site Vegetation: all development proposals are required to comply with the following:
  - all major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and
  - major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate;
- DMEI 5 – Development in Green Chains:
  - development in Green Chains will only be supported if it conserves and enhances the visual amenity and nature conservation value of the landscaping, having regard to: the need to maintain a visual and physical break in the built-up area; the potential to improve biodiversity in and around the area; and , the provision and improvement of suitable recreational facilities;
  - any new development that meets the above criteria, particularly in areas deficient in Green Chains, will be required to provide new areas of habitat and amenity space, linking into existing Green Chains.
- DMEI 7 – Biodiversity Protection and Enhancement
  - 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;
  - if development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit the appropriate surveys and assessments to demonstrate 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;
  - all development alongside, or that benefits from a from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements;
  - Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated or, as a last resort, compensated for, will normally be refused.

Local Ecological Initiatives

Biodiversity Frameworks and Action Plans

National

The UK Biodiversity Framework[42], which supersedes the Post-2010 Biodiversity Framework[43], establishes four key objectives for cross-UK work relating to biodiversity policy and supporting evidence. As with the Post-2010 Biodiversity Framework, it is assumed that the priority habitats and species, reported under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, remain conservation priorities for the UK.

Each component country in the UK is responsible under the Biodiversity Framework for developing their own policy towards meeting international biodiversity commitments, with those for England communicated through the Environmental Improvement Plan 2023[44]. The overarching aim of this plan in relation to biodiversity is to 'achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife' with the targets to halt the decline and increase species abundance, restore or create wildlife rich-habitat and increase tree canopy and woodland cover.

Regional

The London BAP[45], prepared by the London Biodiversity Partnership, aimed protect and enhance London's biodiversity, ensuring rare species are maintained and common species remain common thereby contributing to the maintenance of national and global biodiversity. Whilst the partnership has disbanded, the aims of the plan remain relevant with the priority habitats and species continuing to be considered conservation priorities for London. The habitats and species of potential relevant to the site include:

- Habitats: parks and urban greenspaces; tidal Thames; built structures.
- Species: bats; house sparrow (*Passer domesticus*); black redstart (*Phoenicurus ochruros*); dunnock (*Prunella modularis*), peregrine (*Falco peregrinus*), song thrush (*Turdus philomelos*), spotted flycatcher (*Muscicapa striata*), starling (*Sturnus vulgaris*) and hedgehog (*Erinaceus europeaus*).

Local Nature Recovery Strategy

The Local Nature Recovery Strategy (LNRS) for London, a new system of spatial biodiversity strategies in England, is currently being prepared by the Greater London Authority with the aim for London's ecological network to be bigger, better and more joined up. The LNRS is not currently available, with the GLA aiming to complete the strategy by 2025. However, in the absence of the LNRS the GLA identify that the current London and Local Plans should be referenced to inform decision making.

[42] *JNCC on behalf of the Four Countries' Biodiversity Group (4CBG) (2024) UK Biodiversity Framework. JNCC, Peterborough.*
[43] *JNCC and Defra (on behalf of the Four Countries' Biodiversity Group) (2012) UK Post-2010 Biodiversity Framework. July 2012.*
[44] *Department for Environment, Food and Rural Affairs (2023) Environmental Improvement Plan 2023. First Revision of the 25 Year Environment Plan.*
[45] *London Biodiversity Partnership (2007) London Biodiversity Action Plan. Access through www.gigl.org.uk*

All London Green Grid Strategy

The ALGG Supplementary Planning Guidance (SPG)[46] sets out the vision for the ALGG, which is to '*create a well-designed green infrastructure network of interlinked, multi-purpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network*'. The SPG sets out the establishment of the eleven Green Grid Area (GGA) frameworks and identifies that they should 'identify objectives and projects, taking into account cross boundary integration and promoting opportunities for improving the provision, quality, functions, linkages, accessibility, design, planning and management of the green infrastructure network'.

The Site falls within the River Colne and Crane Green Grid (Green Grid Area (GGA) 10), which covers the borough town centres of Uxbridge, in Hillingdon in the west, and Hounslow, in the south, along with the urban centres of Twickenham, Feltham, Yiewsley & West Drayton, Hillingdon and Hayes. The framework identifies that the area is fully within Green Belt jurisdiction and green open space is highly valued yet forms an even but fragmented mosaic with scattered ancient woodland, farmland and open water more dominant in the north and in the Colne Valley Park and urban development and Heathrow Airport more dominant in the south and east. The vision for the framework identifies it's opportunity to reveal, maintain and enhance a landscape scale network of high quality biodiverse and green open spaces with the objective to promote and enable access to the huge and rich biodiversity resource of the area, protected and enhance existing designated sites, address issues of invasive species and protect and enhance wild landscapes within urban areas.

The GGA 10 framework identifies a number of projects for improvement across the relevant area, however none of these are located in close proximity to the Site.

Local Strategies

London's Living Landscape

London's Living Landscape initiative[47] has been set up by the London Wildlife Trust as a '*recovery plan for nature*' that seeks to protect, conserve and enhance London's wildlife and draws on five key principles:

- Protect and conserve biodiversity, and where possible deliver net wildlife gain;
- Connect Londoners to their local natural greenspace;
- Connect local greenspaces to the wider landscape of London;
- Connect nature conservation and greenspaces to the wider sustainability agenda;
- Work in partnership to deliver these objectives.

Securing the protection of existing ecological assets is a key aim for the initiative, however establishing green links across London's fragmented landscape is a particular challenge for nature conservation. The initiative looks to establish strong connectivity between greenspaces, which will enhance the delivery of ecosystem services such as improved air quality, temperature amelioration and enhancement of wildlife populations.

[46] *Greater London Authority (2012) Green Infrastructure and Open Environments: The All London Green Grid. March 2012. Greater London Authority, London.*
[47] *London Wildlife Trust (2014) London's Living Landscapes. A recovery plan for nature. London Wildlife Trust, London.*

APPENDIX B – Delivering the Principles of Biodiversity Net Gain

Principle	Application in Practice	How to Address through the Project
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort compensate for losses that cannot be avoided and, where not possible, offset biodiversity losses by gains elsewhere.	An ecological appraisal has been undertaken early in the project to understand potential biodiversity constraints associated with the development site and review the development layout opportunities to consider the potential for opportunities to retain significant habitats.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve net gain.	By undertaking an ecological appraisal early in the project, the presence of such habitats within the development site can be identified and opportunities to retain these habitats considered. The site does not include any habitats or biodiversity features that are considered irreplaceable.
Be inclusive and equitable	Engage stakeholders[48] early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain.	Collaboration between various interested parties in the design, in particular the landscape architect and ecologist but potentially extending to additional consultants in relation to sustainable drainage and health, is important in ensuring opportunities for combined benefits can be realised through the proposals. The requirements of external stakeholders are well communicated through various strategies and policies, which will be referenced in the ecological assessment. Consultation may be undertaken where requirements are more bespoke or through the pre-application process.
Address risk	Mitigate difficulty, uncertainty and other risks to achieve net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any residual risk, as well as compensate for the time between the losses occurring and the gains being fully realised.	The BNG assessment will be based on Defra's Statutory Biodiversity Metric, which addresses risk through a series of multipliers. The difficulty of creation/enhancement multiplier addresses the uncertainty in the effectiveness of techniques to create/enhance habitats whilst the time to target condition addresses the time between creation/ enhancement and achievement of the target condition. In addition to this, where a development programme includes a delay between site clearance and the commencement of landscaping.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	Assessment of the net gain through Defra's Statutory Biodiversity Metric will quantify the biodiversity value of the final development site and net gain over the baseline. Enhancements proposed will consider local policies for nature conservation priority, where possible, such as those communicated in Biodiversity Action Plans or Nature Recovery Strategies.

[48] *Stakeholders are defined in the guidance as 'individuals and organisations who are actively involved in the project, or whose interests may be positively or negatively affected as a result of project execution or successful project completion'.*

Principle	Application in Practice	How to Address through the Project
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using credible evidence and local knowledge to make clearly justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses; • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; • Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; • Enhancing existing or creating new habitat; • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.	Defra's Statutory Biodiversity Metric, on which the assessment will be based, addresses the 'like-for-like or better' principle through the application of Trading Rules, which highlights where appropriate compensatory planting is not achieved for particular habitat types. The location of enhancement/compensation measures is considered through the Statutory Metric, adding weight to on-site and local measures compared to off-site measures. As a result, it is advantageous for the project to maximise opportunities for biodiversity on-site where possible. Where habitats on-site or within the ownership boundary can be retained and protected, opportunities to enhance the condition can provide 'easy-wins' in delivering a net gain for biodiversity, particularly where this can be established early in the development programme or, better still, prior to habitat losses. Consideration will be given in the Ecological Appraisal regarding the context of the site and its potential to maintain/enhance the site's contribution to wider ecological connectivity, particularly given its urban location.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.	Habitat creation and enhancement proposals will be based on actions that are undertaken to deliver new habitats or enhance habitat condition. Seeking to exceed on the minimum 10 % net gain mandated through the Environment Act 2021 and providing additional species measures will demonstrate additionality.
Create a net gain legacy	Ensure net gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity; • Planning for adaptive management and securing dedicated funding for long-term management; • Designing net gain for biodiversity to be resilient to external factors, especially climate change; • Mitigating risks from other land uses; • Avoiding displacing harmful activities from one location to another; • Supporting local-level management of net gain activities.	Consideration is required through the development of proposals to ensure solutions are practical for their location/use and resilient to external factors, such as climate change. This should be achieved by ensuring collaboration in the design team to balance competing requirements for space within the development, ensuring proposals for habitat creation are appropriate for their intended purpose/location and through consideration of the species proposed for planting to balance native species with those being resilient to warmer and more arid environments. Management forms a significant aspect of BNG, with the Environment Act 2021 requiring habitats created or enhanced to be managed for a minimum period of 30 years. A condition requiring a Landscape and Ecological Management Plan can be proposed to address adaptive management that secures long-term enhancement. The redevelopment of the site will not result in the displacement of harmful activities to another location.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	As above, collaboration in the design team can help realise mutual benefits through habitat creation, for example as a result of access to nature for tenants, occupiers or the public, improved air quality, provision of shading or as a sustainable drainage feature.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG assessment will be communicated in a clear manner, following the precautionary principle where appropriate and clearly demonstrating how the proposals will deliver on planning policy and legislative requirements to deliver a net gain for biodiversity.

APPENDIX C – Site Photographs

Photo 1: HPH2 building from Millington Road

Photo 2: Roof terrace planting on HPH2

Photo 3: Central courtyard garden in HPH2

Photo 4: Roof level of HPH2

Photo 5: Western façade of HPH2

Photo 6: Plant building and central amenity space between HPH2 and HPH5

Photo 7: Central amenity space between HPH2 and HPH5

Photo 8: Grassland and ground level planter with wildflowers between HPH2 and HPH5

Photo 9: Eastern façade of HPH2 and amenity space

Photo 10: HPH5 northern façade

Photo 11: Roof area of HPH5

Photo 12: Solar panels on southern end of HPH5 roof

Photo 13: Roller shutters controlling entrance to HPH5 basement

Photo 14: Basement area of HPH5

Photo 15: Row of trees in central amenity area between HPH5 and plant building

Photo 16: Western façade of HPH5

Photo 17: Southern façade of HPH5 and trees along Millington Road

Photo 18: Eastern façade of HPH5 and amenity planting alongside access road

Photo 19: MSCP in south-east area of the site and access road

Photo 20: Car deck of the MSCP

Photo 21: Roof deck of MSCP

Photo 22: Eastern façade of MSCP and associated soft landscaping with trees.

Photo 23: Southern façade of MSCP and associated amenity planting

Photo 24: Eastern façade of One Hyde Park

Photo 25: One Hyde Park northern façade and associated parking and soft landscaping

Photo 26: Amenity planting along Millington Road and surface car park at the northern end of the site

Photo 27: Surface car park at the northern end of the site

Photo 28: Tree within surface car park landscaping with potential roost feature for bats

Photo 29: Rot hole on tree providing potential roost feature

Photo 30: Northern boundary of the site along North Hyde Road

APPENDIX D – Habitat Condition Sheets

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)

UK Habitat Classification (UKHab) Habitat Type

Grassland - Modified grassland

Habitat Description

Amenity grassland around the Hyde Park estate in Hillingdon, regularly managed to a short sward with very few forb species present and less than 6-8 species per m2 present.

ukhab – UK Habitat Classification

On-site or off-site, site name and location	Hyde Park, Hayes, London Borough of Hillingdo On-Site Habitat	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

Condition Assessment Criteria		**Habitat parcel reference**										
		A	B	C	D	E	F	G	H	I	J	
		Grid reference										
		TQ 09252 79357	TQ 09195 79346	TQ 09254 79316	TQ 09244 79307	TQ 09223 79276	TQ 09211 79267	TQ 09223 79298	TQ 09218 79324	TQ 09177 79335	TQ 09166 79324	
		Criterion passed (Yes or No)										**Notes (such as justification)**
A	There are 6-8 vascular plant species per m^2 present, including at least 2 forbs (these may include those listed in Footnote 1). **Note - this criterion is essential for achieving Moderate or Good condition.** Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m^2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No	No	No	No	No	No	No	No	No	No	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	No	No	No	No	No	No	No	No	No	
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)[2].	No	No	No	No	No	No	No	No	No	No	
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
G	There is an absence of invasive non-native plant species[3] (as listed on Schedule 9 of WCA[4]).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Essential criterion achieved (Yes or No)	No	No	No	No	No	No	No	No	No	No	
	Number of criteria passed	4	4	4	4	4	4	4	4	4	4	

Condition Assessment Result (out of 7 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 6 or 7 criteria including passing essential criterion A	Good (3)										
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)										
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Suggested enhancement interventions to improve condition score

Footnotes

Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – 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.

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)

UK Habitat Classification (UKHab) Habitat Type

Grassland - Modified grassland

Habitat Description

ukhab – UK Habitat Classification

On-site or off-site, site name and location	Hyde Park, Hayes, London Borough of Hillingdo On-Site Habitat	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

Habitat parcel reference	K	L	M	N	O	P	Q	R	S	T
Grid reference	TQ 09158 79309	TQ 09151 79294	TQ 09155 79281	TQ 09161 79264	TQ 09192 79254	TQ 09207 79245	TQ 09135 79182	TQ 09179 79195	TQ 09186 79209	TQ 09221 79129

	Condition Assessment Criteria	**Criterion passed (Yes or No)**										**Notes (such as justification)**
A	There are 6-8 vascular plant species per m^2 present, including at least 2 forbs (these may include those listed in Footnote 1). **Note - this criterion is essential for achieving Moderate or Good condition.** Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m^2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No	No	No	No	No	No	No	No	No	No	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	No	No	No	No	No	No	No	No	No	
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)[2].	No	No	No	No	No	No	No	No	No	No	
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
G	There is an absence of invasive non-native plant species[3] (as listed on Schedule 9 of WCA[4]).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Essential criterion achieved (Yes or No)	No	No	No	No	No	No	No	No	No	No	
	Number of criteria passed	4	4	4	4	4	4	4	4	4	4	

Condition Assessment Result (out of 7 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 6 or 7 criteria including passing essential criterion A	Good (3)										
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)										
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Suggested enhancement interventions to improve condition score

Footnotes

Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – 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.

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		1 to 12	13	14	15	16	17	18	19	20	21
		Grid reference									
Condition Assessment Criteria		TQ 09189 79301	TQ 0916 6	TQ 0915 6	TQ 09197 79237	TQ 09197 79237	TQ 0915 4	TQ 0915 2	TQ 09150 79259	TQ 09148 79259	TQ 09145 79261
		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).	Yes	No	No	No	No	Yes	Yes	Yes	Yes	Yes	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	3	3	3	3	3	4	4	4	4	4	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
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[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)
and:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		22	23	24	25	26	27	28	29	30	31
		Grid reference									
	Condition Assessment Criteria	TQ 09143 79262	TQ 0913 9	TQ 0914 2	TQ 09139 79276	TQ 09110 79206	TQ 0911 2	TQ 0911 7	TQ 09121 79194	TQ 09137 79181	TQ 09142 79177
		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).	Yes	Yes	No	No	No	No	No	No	No	No	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes	Yes	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	4	4	3	2	3	2	2	3	3	3	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)	Y	Y	Y		Y			Y	Y	Y
Passes 2 or fewer criteria	Poor (1)				Y		Y	Y			
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)
and:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		32	33	34	35	36	37	38	39	40	41
		Grid reference									
		TQ 09148 79173	TQ 0915 4	TQ 0915 9	TQ 09186 79210	TQ 09238 79198	TQ 0924 2	TQ 0924 6	TQ 09244 79189	TQ 09242 79185	TQ 09241 79181
Condition Assessment Criteria		**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).	No	No	No	No	No	No	No	No	No	No	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	Yes	Yes	Yes	Yes	No	No	No	No	No	No	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	3	3	3	3	2	2	2	2	2	2	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)	Y	Y	Y	Y						
Passes 2 or fewer criteria	Poor (1)					Y	Y	Y	Y	Y	Y
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
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Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		42	43	44	45	46	47	48	49	50	51
		Grid reference									
	Condition Assessment Criteria	TQ 09239 79176	TQ 0923 7	TQ 0923 6	TQ 09234 79166	TQ 09232 79163	TQ 0923 0	TQ 0922 7	TQ 09227 79152	TQ 09224 79146	TQ 09223 79144
		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).	No	No	No	No	No	No	No	No	No	No	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	No	No	No	No	No	No	No	No	No	No	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	2	2	2	2	2	2	2	2	2	2	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)										
Passes 2 or fewer criteria	Poor (1)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
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and:
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Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference	52	53	54	55	56	57	58	59	60	61
		Grid reference	TQ 09222 79140	TQ 0922 4	TQ 0921 9	TQ 09218 79133	TQ 09212 79135	TQ 0921 2	TQ 0921 2	TQ 09212 79135	TQ 09212 79135	TQ 09212 79135
Condition Assessment Criteria		**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).		No	Yes	No	No	No	No	No	No	No	No	
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).		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].		No	Yes	No	No	No	No	No	No	No	No	
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.		No	Yes	No	No	No	No	No	Yes	No	No	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.		No	Yes	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
		Number of criteria passed	2	6	2	2	2	2	2	3	2	2	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)		Y								
Passes 3 or 4 criteria	Moderate (2)								Y		
Passes 2 or fewer criteria	Poor (1)	Y		Y	Y	Y	Y	Y		Y	Y
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)
and:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		62	63	64	65	66	67	68	69	77	78
		Grid reference									
		TQ 09203 79138	TQ 0921 5	TQ 0921 1	TQ 09207 79129	TQ 09200 79139	TQ 0918 8	TQ 0918 3	TQ 09179 79153	TQ 09277 79271	TQ 09262 79277
Condition Assessment Criteria		**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).	No	No	No	No	No	No	No	No	Yes	No	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	No	No	No	No	No	Yes	Yes	Yes	No	No	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	2	2	2	2	2	3	3	3	3	2	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)						Y	Y	Y	Y	
Passes 2 or fewer criteria	Poor (1)	Y	Y	Y	Y	Y					Y
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
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Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		79	80	81	82	83	84	85	86	87	88
		Grid reference									
		TQ 09245 79285	TQ 0926 4	TQ 0925 4	TQ 09282 79335	TQ 09279 79331	TQ 0927 6	TQ 0927 2	TQ 09269 79318	TQ 09265 79313	TQ 09246 79343
Condition Assessment Criteria		**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).	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	No	
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.	No	Yes	Yes	No	No	No	No	No	No	No	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	
	Number of criteria passed	2	4	4	3	3	3	3	3	3	1	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)		Y	Y	Y	Y	Y	Y	Y	Y	
Passes 2 or fewer criteria	Poor (1)	Y									Y
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

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Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		89	90	91	92	93	94	95	96	97	98
		Grid reference									
	Condition Assessment Criteria	TQ 09237 79349	TQ 0921 2	TQ 0919 5	TQ 09194 79354	TQ 09193 79363	TQ 0919 4	TQ 0920 1	TQ 09213 79375	TQ 09221 79373	TQ 09228 79372
		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).	No	No	No	No	No	No	No	Yes	Yes	Yes
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	Yes	Yes	Yes	No	No	No	No	No
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.	No	No	Yes	Yes	Yes	No	No	Yes	Yes	Yes
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes	No	Yes	No	Yes	Yes	Yes	No	No	No
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Number of criteria passed	2	1	5	4	5	3	3	4	4	4

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)			Y		Y					
Passes 3 or 4 criteria	Moderate (2)				Y		Y	Y	Y	Y	Y
Passes 2 or fewer criteria	Poor (1)	Y	Y								
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.											

Suggested enhancement interventions to improve condition score[2]

Footnotes

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Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees
Individual trees – Rural trees
Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Individual trees (description applied to the urban or rural environment):
Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):
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.

On-site or off-site, site name and location	Hyde Park Hayes, London Borough of Hillingdon On-Site	**Survey date and Surveyor name**	Tom Hall 22nd November 2024
		Survey reference (if relating to a wider survey)	-
Limitations (if applicable)	-		

		Habitat parcel reference									
		99	100	101	102	103	104	105	106	107	
		Grid reference									
		TQ 09235 79370	TQ 0924 1	TQ 0924 8	TQ 09253 79361	TQ 09259 79357	TQ 0926 5	TQ 0927 1	TQ 09276 79346	TQ 09282 79340	
Condition Assessment Criteria		**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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
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).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
C	The tree is mature (or more than 50% within the block are mature)[1].	No	No	No	No	No	No	No	No	No	
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.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
	Number of criteria passed	4	4	4	4	4	4	4	4	4	

Condition Assessment Result (out of 6 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**									
Passes 5 or 6 criteria	Good (3)										
Passes 3 or 4 criteria	Moderate (2)	Y	Y	Y	Y	Y	Y	Y	Y	Y	
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[2]

Footnotes

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APPENDIX E – Biodiversity Enhancement Design Opportunities Report

Hyde Park, Hayes

Biodiversity Enhancement Design Opportunities

Prepared for:
Columbia Threadneedle

Date:
December 2024

CONTENTS

INTRODUCTION

1.1 The inclusion of biodiversity enhancement within development proposals is an integral part of the planning process. National and local planning policy require the inclusion of enhancement measures within development design proposals, whilst Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021 and enacted by the Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024) places a mandatory requirement for development proposals to deliver a minimum 10 % net gain for biodiversity, imposed as a pre-commencement condition to planning approval.

1.2 Alongside the provision of habitat and supporting opportunities for faunal species, such as sheltering and foraging habitat, biodiversity enhancement can bring a number of ecosystem services and sustainability benefits to a project. For example, green infrastructure can provide amenity benefits to the local community as a result of improved access to and interaction with nature, temperature regulation and mitigation of the urban heat island effect and stormwater attenuation.

1.3 The purpose of this Report is to identify the requirements for Biodiversity Net Gain and principles that can be embedded into the design approach, and identify the various green infrastructure design opportunities for consideration in the development design that could help deliver a notable enhancement of the site for biodiversity and deliver additional ecosystem service benefits derived from these. The Report also provides evidence of the early-stage consideration of opportunities to maximise BNG through the development and an opportunity to document consideration of what is feasible within the development design.

1.4 The opportunities for enhancement have been made based on the concept design presented in the Pre-Application Meeting 2 Presentation (October 2024), illustrated in Figure 1.1.

Figure 1.1 Concept Design for the Redevelopment of Hyde Park, Hayes

PRINCIPLES OF BIODIVERSITY NET GAIN

1.5 The application of the Mitigation Hierarchy is a fundamental element of delivering BNG, ensuring development proposals consider the baseline environment and opportunities to retain habitats where possible and not use the process to justify losses. This requirement is set out in British Standard (BS) 8683[1], which states that development should:

- '*first avoid impacts on biodiversity, by identifying all possible avoidance measures especially to avoid impacts on irreplaceable and vulnerable habitats, statutory and non-statutory designated sites and biodiversity of high conservation value'*;
- '*then be applied to minimise impacts, before restoring damaged habitats and other ecological features*';
- '*then, as a last resort, offsetting any residual impacts*'.

1.6 BS 8683 also establishes the '*like-for-like or better*' principle as a fundamental element of BNG, whereby a net gain is achieved by '*restoring affected biodiversity or offsetting residual biodiversity loss with the same type of biodiversity (like-for-like) or with a type that is of higher conservation value*'. This principle prevents replacement of high value habitat with a greater extent of habitat of lower conservation value.

1.7 The Construction Industry Research and Information Association (CIRIA), in partnership with the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA), have produced guidance on biodiversity net gain[2], setting out good practice principles for the delivery of BNG through development. These principles are identified below, and we have set out how they can be addressed through the project, in Annex 1:

- Apply the mitigation hierarchy;
- Avoid losing biodiversity that cannot be offset elsewhere;
- Be inclusive and equitable;
- Address risk;
- Make a measurable net gain contribution;
- Achieve the best outcomes for biodiversity;
- Be additional;
- Create a net gain legacy;
- Optimise sustainability;
- Be transparent.

1.8 With the application of the mitigation hierarchy significant to the delivery of BNG, careful consideration will need to be given to the requirement for certain habitat losses around the Site. Whilst a number of the habitats present are of relatively limited biodiversity value, particular attention will be required to the existing trees present around the Site and ensuring due consideration given to their retention or, where this is not possible, the justification for their loss.

[1] *BSI (2021) British Standard 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. British Standards Institute, London.*

[2] *CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. Construction Industry Research and Information Association, London.*

ENHANCEMENT OPPORTUNITIES

1.9 The following sections provide a brief introduction to the different design opportunities available for the introduction of green infrastructure within development proposals and how these can bring both biodiversity benefits and wider environmental benefits to the development designs and future occupants of the scheme. Whilst the following provide a summary of the potential benefits, the findings of the Ignition Project[3] at the University of Salford provides further evidence to the benefits of the various green infrastructure opportunities.

Green Roofs

1.10 Green roofs are one of the principal biodiversity enhancements in the built environment, where land for development is at a premium and proposals seek to maximise floorspace. Green roofs bring a range of benefits to development proposals, notably:

- **Biodiversity value**: green roofs enhance the biodiversity value of a development, providing foraging opportunities for a range of invertebrates, birds and, potentially, bats. Inaccessible roofs provide quiet 'havens' for wildlife in urban areas, and all types can help providing habitat connectivity through urban areas to link otherwise isolated pockets of biodiversity interest;
- **Amenity**: green roofs can provide outdoor space which provides a connection with nature in otherwise urban areas, both for occupants with access or occupants and the local community as a result of the softening of the artificial materials of development;
- **Building performance:** the presence of green roofs will reduce the potential effects of exposure to elements to the roof finish, increasing the longevity of the roof type compared to conventional roofing systems, and can reduce energy usage as a result of the shading and insulating effect that reduces diurnal surface temperature fluctuations and heat transference to/from the building. Green roofs can also be combined with photovoltaic panels, with a positive effect on efficiency during hotter weather as a result of transpiration from the plants which maintain temperatures at an optimum level for energy generation;
- **Environmental:** green roof habitats are effective at reducing peak run-off flow from roof areas, reduced effect on the urban heat island effect as a result of reduced absorption and re-radiation of heat and the capture of carbon through primary production.

1.11 CIRIA guidance[4] indicates the term 'green roof' to include balcony and terrace planting, and whilst most green roof habitat types are typically suited to inaccessible areas of buildings some are designed for amenity use and provide a more garden like environment for occupiers/visitors. The guidance identifies three common categories for green roofs, which are:

- Extensive – with thin soil, little or no irrigation requirements, low water retention and nutrient poor conditions for plants;
- Intensive – with deep soil, irrigation requirements, high water retention and fertile conditions for plants; and,
- Simple Intensive – constructed using various substrate depths, thus combining elements of extensive and intensive roofs.

[3] *Morrison, R. and Hartley, S. (2020)* IGNITION Nature-Based Solutions Evidence Base Headline Findings Report. July 2020. The Ignition Project, University of Salford.

[4] *CIRIA (2007) BUILDING GREENer. Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA Report C644. Construction Industry Research and Information Association, London.*

1.12 The UK Habitat Classification methodology[5], on which the assessment of Biodiversity Net Gain is based, provides three classifications for green roofs. These have been adopted for consistency with the Biodiversity Net Gain approach and are discussed in turn below.

Intensive Green Roof

1.13 Intensive Green Roofs are defined in the UK Habitat Classification methodology as '*high-maintenance green roof that is designed as a park or garden and includes shrubs, trees, perennials and grasses*', and must meet all three of the following criteria:

- ≥ 50 % native and ≥ 30 % non-native species of pollinator interest (≥ 80 % overall);
- ≥ 70 % of the surface is soil and vegetation (including water features); and,
- ≤ 30 % is hard standing (such as paving or firebreaks).

1.14 Intensive green roofs are characterised by a thick substrate layer, usually greater than 200 mm, which enables a wide range of plants and vegetation to establish and are capable of supporting relatively high species diversity and structure. Complimentary resource use allows for greater productivity and stability of the habitat, with the resultant structural diversity capable of intercepting more light. As a result, temperatures on intensive roofs are lower than green roofs with a monoculture and, as a result of the more diverse structure and complimentary resource use, the habitat has a greater tolerance to environmental change and can better adapt to natural fluctuations in environmental conditions and be more resilient to pests or invasion by weeds.

Biodiverse Green Roof

1.15 Biodiverse green roofs are defined in the UK Habitat Classification methodology as an '*extensive green roof designed specifically for biodiversity that:*

- *has a depth of substrate (not including a blanket or turf) that varies between 80 and 150 mm, with at least 30 % of the roof at 150 mm deep; and*
- *is planted and seeded with a wide range of dry grassland wildflowers and Sedum species'*.

1.16 This definition aligns with CIRIAs simple intensive green roof type, with varying substrate depths combining elements of extensive and intensive green roofs. The thinner substrate layer creates a relatively harsh environment for plant growth as a result of limited water availability, wide temperature fluctuation, high exposure to wind and solar radiation, with a relatively small range of plant species normally used in these conditions. The variation in substrate depth does, however, provide a balance to this, drawing in the benefits of the deeper substrate associated with the intensive green roof and complimentary resource use that allows for a greater diversity of plants to establish.

1.17 The biodiverse roof provides variation in the habitat present, often recreating the brownfield habitat type that contains a series of early successional communities and provide variation in habitat conditions that attract a variety of faunal species as result of the different sheltering and foraging opportunities established.

Other Green Roof

1.18 Other green roof habitat within the UK Habitat Classification covers all green roof types that do not meet the definitions of the above, including wildflower turfs and sedum blankets, where the substrate depth or planting types do not meet the biodiverse roof requirements, and formal terrace/balcony planting, where the planting extent or type does not meet the intensive green roof requirements.

[5] *UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at https://www.ukhab.org).*

1.19 Landscaping across terraces and balconies often takes the form of formal raised planters with mix of wildflowers, shrubs and tree planting, although in some cases may be incorporated into the roof structure to provide planting at ground level. Terrace landscaping can also be used to replicate the garden environment, with lawns and shrub planting, or for the establishment of an allotment with raised beds used to grow flowers, fruit or vegetables. Balcony planting is often provided in the form of balustrade planters, combining the building edge protection with the opportunity to provide space for planting.

1.20 The landscaping can often help break up external terrace areas, providing screening to different areas, and on tall buildings the landscaping across multiple levels can help aid the movement of species between the public realm and landscaping on upper floors.

1.21 Alongside biodiversity benefits, including the provision of sheltering and foraging opportunities for a range of faunal species, and associated ecosystem service benefits for habitats, including primary production, the inclusion of landscaping across terrace/balcony areas can provide amenity benefits to occupants in terms of aesthetics and access to nature.

1.22 Green roof habitats within this category will comprise green roofs with shallow substrates, usually c. 50 mm to 80 mm and supporting principally sedum species, and those that do not provide variation in substrate depth, closely aligning to the extensive green roof type within CIRIAs definition. The biodiversity potential associated with these habitats will generally be restricted as a result of the conditions created, for example shallow substrates will have a lower capacity for nutrient and water and be subject to higher temperature fluctuation and as a result the species that are adapted to the harsh environment created are more limited than for green roofs with greater substrate depths.

Green Walls

1.23 Green wall habitats provide an effective method of providing biodiversity enhancement within a development site, in particular for sites with significant vertical facades or where opportunities within the public realm or across roof spaces are limited. CIRIA guidance[6] identifies green walls as '*walls that have plants growing on or integrated within them*', with three types of green wall identified:

- Walls with climbing plants, either supported by the wall itself, a structure attached to the wall or a self-standing structure;
- Hanging walls, which allow plants to hand down from planters suspended from a height; and,
- Walls with plants growing within them, either purposefully or accidentally.

1.24 Green wall habitats can provide a range of biodiversity and ecosystem service benefits, including:

- **Biodiversity value:** provides additional structure to amenity habitats, encouraging species movement between the street level and landscaped terraces/green roofs, and providing foraging and sheltering opportunities for invertebrates, birds and, potentially, bats;
- **Aesthetics:** softening artificial features of buildings or public realm, creating variation in the types of surfaces and an opportunity for the introduction of colour;
- **Building performance:** provides both a shading and an insulating effect that reduces diurnal fluctuations in surface temperature and reduces the influence of artificial surfaces on the urban heat island effect;
- **Air quality:** effective at trapping dust and concentrating certain dust-derived pollutants into plant tissue.

[6] *CIRIA (2007) BUILDING GREENer. Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA Report C644. Construction Industry Research and Information Association, London.*

1.25 Green wall habitats can have high maintenance requirements, in particular façade-bound wall systems that incorporate formal irrigation systems to sustain them with a steady supply of water and nutrients. Maintenance access also requires consideration, to ensure management and maintenance activities, such as cutting or replacement planting, can be completed.

1.26 Green walls installed within the internal environment of buildings will have very limited biodiversity potential, with faunal species generally unable to access the habitat and take advantage of the opportunity provided. As a result, green walls in the internal environment are not considered to comprise a biodiversity enhancement, but do hold high aesthetic value and benefits to occupants.

Public Realm Landscaping

1.27 Where available within the Site Boundary, public realm landscaping can provide a notable opportunity for biodiversity enhancement with a range of habitat types that can bring a variety of ecosystem services. In more densely urbanised environments or for individual building proposals the habitats provided are typically more formal landscaping in the form of raised planters or areas of herbaceous or shrub planting, whereas developments in less densely urbanised environments or for multiple buildings/masterplan proposals space is often less restricted and opportunities can include the provision of grassland or scrub/woodland habitats.

1.28 The public realm landscaping also offers an opportunity for shared environmental benefits, with Sustainable Drainage Systems (SuDS) providing opportunities to help manage surface water run-off, providing stormwater attenuation, and provide biodiversity opportunities through appropriate planting. There are a range of opportunities that can be adopted within most project types, including rain gardens, swales, detention basis and ponds. Permanent water features can provide notable habitat for faunal species, as a water source, whilst the other options can incorporate appropriate planting that is tolerant of the expected conditions and enhance the foraging and sheltering opportunities provided.

1.29 The provision of individual trees is an important consideration for the public realm, these will provide important biodiversity resources, particularly in the urban environment where they provide a valuable sheltering resource and connect isolated habitat pockets, as well as providing a range of ecosystem services, including regulation of temperatures and the urban heat island effect through shading and evapotranspiration.

Off-Site Enhancement and Offsetting

1.30 Off-site enhancement and offsetting should be considered as a last resort, in line with the application of the mitigation hierarchy as a fundamental principle in the delivery of a BNG, as it '*comprises a form of compensation that trades losses of biodiversity in one location with measurable gains in another*'[7]. Such measures may be required where development proposals fall short of the mandatory minimum of 10 % BNG or where the Trading Rules, which ensure delivery of the 'like-for-like or better' principle, are not satisfied.

1.31 The Environment Act 2021 allows for the provision of off-site enhancement by several means:

- Off-site enhancement: developers can use areas outside of the development site to deliver habitat enhancement or creation to offset losses on site, which can be recording in the Statutory Biodiversity Metric and should comply with the associated trading rules;
- Offsetting scheme: biodiversity offset credits can be purchased from a recognized offsetting provider to offset losses on the site, with a preference for schemes local to the site and requiring credits to comply with the associated trading rules;

[7] *CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. Construction Industry Research and Information Association, London.*

- Statutory credit purchase: the government have established a statutory credit purchase scheme a last resort option for developers that are unable to deliver BNG through on-site creation/enhancement or off-site creation enhance/offsetting. The Statutory Metric identifies the associated shortfall that would require purchase if relevant.

Species Enhancement

1.32 The provision of artificial habitat aids is an important aspect in the delivery of biodiversity enhancement, with CIRIA guidance[8] identifying that the provision of these can make an important contribution to providing alternative wildlife refuges, enhancing the biodiversity value of developments cheaply and easily.

1.33 Additional value to the species enhancement can be provided by identifying appropriate nest boxes that target species of conservation concern locally or nationally. A range of bird boxes are available that tailor design to meet the specific needs for a variety of species, whereas bat boxes are more generic and provide suitable habitat for a range of common species typical to the urban environment.

1.34 The habitat boxes for birds and bats can either be incorporated into a building façade or affixed to the external surface or landscaping elements (e.g. trees). For the surface mounted boxes, it is generally recommended that those of woodcrete material are specified, as these are a durable, rot-proof and breathable material, reducing the need for regular maintenance. These box types are also favoured as studies have shown them to result in higher occupation rates than traditional wooden boxes[9].

1.35 Invertebrates are an integral component of our environment, providing a number of vital ecosystem services including the pollination of flowers, recycling of organic material and as a valuable foraging resource. Habitat aids for invertebrates are relatively simple to provide, and can be incorporated within landscaping in sheltered locations that receive direct sunlight. Habitat aids are not generally species specific, instead providing suitable sheltering opportunities for a range of species.

SUMMARY AND FEASIBILITY REASONING

1.36 The opportunities for biodiversity enhancement within the early concept design for the proposed development are summarised in Table 1.1, with an opportunity for discussions on the feasibility of these to be recorded in an update to the Report.

[8] *CIRIA (2007) BUILDING GREENer. Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA Report C644. Construction Industry Research and Information Association, London.*

[9] *Browne, S. (2006) Effect of nestbox construction and colour on the occupancy and breeding success of nesting tits Parus sp. Bird Study 53, pp 87-192*

Table 1.1 Key Environmental Features and Designations

Area	Feature	Opportunities	Feasibility
Building	Intensive Green Roof	The concept design includes a number of flat roof areas that have potential for the inclusion of green roof habitat in some form. As a result, it should be possible to include green roofs within the building/landscape design. The type of green roof suitable in each location will be dependent on various factors, such as the structural loading of the buildings and whether the habitat will be accessible as part of the amenity space for tenants. The multi-storey car park provides a unique opportunity through its retention to create a green roof habitat for community use, with recreational or allotment facilities alongside landscape planting adding value to a potentially underutilised space. In addition, green roof habitat can be provided in combination with photovoltaic panels to create bio-solar roofs. The combination of these is beneficial to energy generation, with transpiration from the vegetation on the roof helping to maintain temperatures above the panels at an optimum level. Additional opportunities for green roof habitat may exist in smaller structures, if present, such as cycle racks and bus stops.	
	Biodiverse Green Roof		
	Other Green Roof	The classification of the green roof habitat will be dependent on the type of planting and substrate build-up provided, with the latter often dictating the vegetation types that can be accommodated. Consideration should be given to the descriptions provided and criteria required for classification, as these differ between that supporting Biodiversity Net Gain and the Urban Greening Factor. Where possible, the roof design should look to incorporate the relevant requirements to allow for the highest level of biodiversity value as this will deliver the greatest benefits in respect to BNG.	
Public Realm	Ground Level Planters/ Introduced shrub	The concept masterplan includes areas in which landscaping of public realm can make a significant contribution to the Site, providing attractive landscaping that delivers on biodiversity and amenity requirements. The use of public realm planting can help deliver connectivity of habitats through the site and the permeation of biodiversity across the development. Consideration should be given to the inclusion of diversity in habitat structure and species, with a range of wildflower species that provide variety in sheltering and foraging opportunities. This could be delivered through a mix of ground level planting and raised planters.	
	Sustainable Drainage Systems	The masterplan has some areas in which landscaping proposals could combine landscape planting and SuDS to deliver biodiversity, amenity and sustainable drainage benefits to the site. The vegetated SuDS could take the form of rain gardens or swales.	

Area	Feature	Opportunities	Feasibility
	Urban Trees	The masterplan allows for the provision of trees across the public realm, providing an opportunity for replacement of any tree losses associated with redevelopment of the Site. To maximise the value of the trees in biodiversity terms, native species should be favoured where feasible and planting of trees alongside other vegetation where the tree oversails the vegetation will add value to the habitat provided.	
Building and Public Realm	Green Wall	The concept design will have a number of opportunities for the inclusion of green wall habitat, including accessible terraces as well as public realm habitats. Grenn wall habitats can be provided as part of the building façade, softening their appearance and providing additional structure to landscaping along with connectivity between ground level and roof level planting. Notably, the retained multi-storey car park provides a significant opportunity for the inclusion of vertical greening. Green walls can also be used on accessible roofs and terraces or in the public realm to break up spaces or to screen areas such as bus stops or cycle racks. However, the inclusion of green wall habitats will need consideration to ensure they comply with fire safety regulations.	
	Species Enhancement	The development will provide opportunities for the inclusion of artificial species enhancements, although the type may depend on building façade materials. Consideration should be given to the potential for the inclusion of built-in boxes for birds and bats, although the suitability of these may depend on fire safety regulations. Alternatively, surface mounted boxes for birds and bats should be included to increase sheltering opportunities for birds and bats, in particular associated with buildings alongside the canal and green links on the site. Green roof areas should also incorporate artificial habitat piles for invertebrates, such as rubble or log piles, which will help maximise the condition criteria should biodiverse green roofs be feasible.	

ANNEX 1 Delivering the Principles of Biodiversity Net Gain

Principle	Application in Practice	How to Address through the Project
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort compensate for losses that cannot be avoided and, where not possible, offset biodiversity losses by gains elsewhere.	Undertake an ecological appraisal early in the project to understand potential biodiversity constraints associated with the development site and review the development layout to consider opportunities to retain significant habitats.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve net gain.	By undertaking an ecological appraisal early in the project, the presence of such habitats within the development site can be identified and opportunities to retain these habitats considered. Where impacts do occur, consideration will be required to provide bespoke compensation, agreed with the Local Planning Authority and considered independent of the Statutory Defra Metric.
Be inclusive and equitable	Engage stakeholders[10] early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain.	Collaboration between various interested parties in the design, in particular the landscape architect and ecologist but potentially extending to additional consultants in relation to sustainable drainage and health, is important in ensuring opportunities for combined benefits can be realised through the proposals. The requirements of external stakeholders are well communicated through various strategies and policies, which will be referenced in the ecological assessment. Consultation may be undertaken where requirements are more bespoke or through the pre-application process.
Address risk	Mitigate difficulty, uncertainty and other risks to achieve net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any residual risk, as well as compensate for the time between the losses occurring and the gains being fully realised.	The BNG assessment will be based on Defra's Statutory Biodiversity Metric, which addresses risk through a series of multipliers. The difficulty of creation/enhancement multiplier addresses the uncertainty in the effectiveness of techniques to create/enhance habitats whilst the time to target condition addresses the time between creation/ enhancement and achievement of the target condition. In addition to this, where a development programme includes a delay between site clearance and the commencement of landscaping.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	Assessment of the net gain through Defra's Statutory Biodiversity Metric will quantify the biodiversity value of the final development site and net gain over the baseline. Enhancements proposed will consider local policies for nature conservation priority, where possible, such as those communicated in Biodiversity Action Plans or Nature Recovery Strategies.

[10] *Stakeholders are defined in the guidance as 'individuals and organisations who are actively involved in the project, or whose interests may be positively or negatively affected as a result of project execution or successful project completion'.*

Principle	Application in Practice	How to Address through the Project
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using credible evidence and local knowledge to make clearly justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses; • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; • Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; • Enhancing existing or creating new habitat; • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.	Defra's Statutory Biodiversity Metric, on which the assessment will be based, addresses the 'like-for-like or better' principle through the application of Trading Rules, which highlights where appropriate compensatory planting is not achieved for particular habitat types. The location of enhancement/compensation measures is considered through the Statutory Metric, adding weight to on-site and local measures compared to off-site measures. As a result, it is advantageous for the project to maximise opportunities for biodiversity on-site where possible. Where habitats on-site or within the ownership boundary can be retained and protected, opportunities to enhance the condition can provide 'easy-wins' in delivering a net gain for biodiversity, particularly where this can be established early in the development programme or, better still, prior to habitat losses. Consideration will be given in the Ecological Appraisal regarding the context of the site and its potential to maintain/enhance the site's contribution to wider ecological connectivity, particularly given its urban location.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.	Habitat creation and enhancement proposals will be based on actions that are undertaken to deliver new habitats or enhance habitat condition. Seeking to exceed on the minimum 10 % net gain mandated through the Environment Act 2021 and providing additional species measures will demonstrate additionality.
Create a net gain legacy	Ensure net gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity; • Planning for adaptive management and securing dedicated funding for long-term management; • Designing net gain for biodiversity to be resilient to external factors, especially climate change; • Mitigating risks from other land uses; • Avoiding displacing harmful activities from one location to another; • Supporting local-level management of net gain activities.	Consideration is required through the development of proposals to ensure solutions are practical for their location/use and resilient to external factors, such as climate change. This should be achieved by ensuring collaboration in the design team to balance competing requirements for space within the development, ensuring proposals for habitat creation are appropriate for their intended purpose/location and through consideration of the species proposed for planting to balance native species with those being resilient to warmer and more arid environments. Management forms a significant aspect of BNG, with the Environment Act 2021 requiring habitats created or enhanced to be managed for a minimum period of 30 years. A condition requiring a Landscape and Ecological Management Plan can be proposed to address adaptive management that secures long-term enhancement. The redevelopment of the site will not result in the displacement of harmful activities to another location.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	As above, collaboration in the design team can help realise mutual benefits through habitat creation, for example as a result of access to nature for tenants, occupiers or the public, improved air quality, provision of shading or as a sustainable drainage feature.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG assessment will be communicated in a clear manner, following the precautionary principle where appropriate and clearly demonstrating how the proposals will deliver on planning policy and legislative requirements to deliver a net gain for biodiversity.

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