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Client: NHS, Royal Brompton and Harefield Hospitals, Part of the Guy and St Thomas NHS Foundation Trust

Project: Harefield Hospital

Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

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Prepared by:	Yasmine Airton	Yasmine Airton	Emer Heffernan	Emer Heffernan
Authorised by:	Daniel Perlaki	Jennie Caddick	Paul White	Paul White
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1.0 EXECUTIVE SUMMARY

Greengage was commissioned by NHS Royal Brompton and Harefield Hospitals, Part of the Guy and St Thomas NHS Foundation Trust, to undertake a Preliminary Ecological Appraisal (PEA) of land at Harefield Hospital in The London Borough of Hillingdon, hereafter referred to as the site.

This document provides a report of the PEA and has been produced to inform a planning application for the site which seeks to remove habitats for the relocation of the existing hospital generators.

This survey aimed to establish the ecological value of the site and identify the potential presence of notable, rare or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed works.

The desk study recorded four statutory designated Sites of Special Scientific Interest (SSSI's) and a National Nature Reserve (NNR) within a 2km radius of the site. The nearest was identified as Old Park Wood SSSI which was 530 metres north-west of site. The desk top review also revealed the presence of four Sites of Importance for Nature Conservation (SINC's) within a 0.5km radius of the site. The nearest was the Medipark Site SINC 0.17km north of the site.

Part of the site lies within a parcel of Priority Habitat Deciduous Woodland, which is a habitat of principal importance and listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. It is also a UK Biodiversity Action Plan (BAP) Priority Habitat.

During the site walkover, the site was found to comprise lowland mixed deciduous woodland (w1f). Invasive Non-native Species (INNS), including cherry laurel (*Prunus laurocerasus*), were recorded within the woodland. Mammal burrows, which may have historically been attributable to badger (*Meles meles*), were also identified. An updated Preliminary Ecological Appraisal (PEA), targeted badger scoping survey, and Ground Level Tree Assessment (GLTA) were undertaken on 19th September 2025. These confirmed that the mammal burrows remain disused, with no evidence of current badger activity or active setts, and that no trees within the site had potential to support roosting or hibernating bats.

The site had the potential to support the following species:

- Moderate potential to support badger;
- Moderate suitability for foraging and commuting bats;
- Moderate suitability for roosting bats;
- High potential to support nesting birds;
- Low potential to support great crested newt;
- High potential to support notable invertebrates;
- Low potential to support reptiles; and,
- High potential to support BAP species such as hedgehog.

Habitats on site have potential to support Great Crested Newt (GCN) however, due to the distance and presence of physical barriers to dispersal present between potential breeding waterbodies and the site, the likelihood of them occurring on the site is very low.

The site has low potential to support reptiles with woodland habitat on site being fragmented from other suitable parcels of habitat.

A precautionary method of works to facilitate site clearance is recommended to mitigate potential impacts to reptiles, stag beetle (*Lucanus cervus*) and hedgehog (*Erinaceus europaeus*). Although the likelihood of great crested newt (GCN) presence is considered negligible, precautionary measures outlined in this report will also ensure that any residual risk is minimised. Clearance of woodland should be undertaken under supervision of a Suitably Qualified Ecologist (SQE) following the methods set out within this report.

The following measures are recommended to ensure any future proposals are compliant with relevant legislation:

- Woodland habitat should be retained wherever possible. Should this not be possible, it should be replaced on at least a like for like basis with the same level of high distinctiveness;
- The proposed development should follow best practice pollution prevention guidance as to not adversely impact the remaining deciduous woodland Priority Habitat adjacent to site during the construction and operational phases from direct or indirect impacts. This may be secured through the production of a Construction Environmental Management Plan (CEMP) to mitigate the impact of pollution (including dust deposition, noise and light pollution, spills of hazardous chemicals) during the construction phase; and,
- Any lighting during the construction and operational phases should be sympathetic towards wildlife occupying the woodland and towards bats. Specific lighting recommendations will be provided within a bat activity survey report upon completion of this assessment.

The development will require a minimum of 10% net gain in biodiversity, which is evidenced through the Biodiversity Net Gain Assessment (BNGA)[1], using the Natural England Statutory Biodiversity Metric[2]. In order to achieve net gain, the following enhancements are likely to include:

- Creation of compensatory woodland on at least a like-for-like basis, following similar composition of the existing woodland on site;
- Hibernacula and log refugia piles incorporated into the landscaping plans;
- Bird boxes; and,
- Bat boxes.

Should the recommendations within this report be adhered to, the proposed development stands to be compliant with relevant UK and EU biodiversity protection legislation and planning policy.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'[3] should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still

likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This survey has been undertaken in September 2025.

2.0 INTRODUCTION

Greengage was commissioned by NHS Royal Brompton and Harefield Hospitals, Part of the Guy and St Thomas NHS Foundation Trust, to undertake a Preliminary Ecological Appraisal (PEA) of land at Harefield Hospital in The London Borough of Hillingdon, hereafter referred to as the site.

This document provides a report of the PEA and has been produced to inform a planning application for the site which seeks to remove habitats for the relocation of the existing hospital generators.

This survey aimed to establish the ecological value of the site and identify the potential presence of notable, rare or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed works.

2.1 SITE DESCRIPTION

Harefield Hospital is situated within the village of Harefield, 17 miles north-west of Charing Cross near Greater London's boundary.

The site extends to approximately 0.055 hectares centred on National Grid Reference TQ 05267 90758, OS Co-ordinates 505267, 190758 and comprises a parcel of deciduous woodland located on the south-eastern boundary of Harefield Hospital.

The site is bound by further woodland along Rickmansworth Road to the east. The woodland contains a chain-link fence through the centre which demarcates the hospital boundary. The woodland supports a relatively dense and shaded understorey, impeded access into the wood. To the south and west of the site are buildings connected to the hospital grounds. Towards the north lies the main entrance into the hospital.

Within the surrounding area Harefield Village green lies to the south-east of the site, separated by Rickmansworth Road. Residential housing is present to the north-east and south. Buildings, infrastructure and green space associated with the hospital estate is present to the west.

Within the wider landscape are fields and woodland, with four Sites of Special Scientific Interest (SSSI's) within 2 kilometres (km) of the site. Old Park Wood SSSI is situated 530 metres from the site boundary and exhibits some poor connectivity to other parcels of woodland scattered across the wider hospital estate.

3.0 METHODOLOGY

The PEA was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)[4] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[5], in accordance with BS42020:2013: Biodiversity[6]. The overall assessment consisted of:

- A desk top review to identify site specific biological information gained from statutory and non-statutory consultation;
- A site walkover and an updated site walkover, to carry out a UKHab habitat survey and protected species scoping assessment;
- A badger scoping survey of the site to assess the presence or likely absence of badgers and identify any evidence of setts, foraging or commuting routes; and,
- A Ground Level Tree Assessment (GLTA) to determine the potential suitability of trees on site for roosting bats.

3.1 DESKTOP REVIEW

A review of readily available ecological information and other relevant environmental databases (including Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website[7]) was undertaken for the site and its vicinity.

In addition, biological records obtained from Greenspace Information for Greater London (GIGL) were reviewed to identify the location and citations of local non-statutory designated sites and presence of records for rare, notable and protected species. This provided the overall ecological context for the site, to better inform the UKHab Survey.

Biodiversity Action Plans

UK Biodiversity Action Plans (BAPs) have been developed which set priorities for nationally important habitats and species. To support the BAPs, Species/Habitat Statements (otherwise known as Species/Habitat Action Plans) were produced that provide an overview of the status of the species and set out the broad policies that can be developed to conserve them. A list of priority species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act).

Local BAPs ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats. The local BAP relevant to this site is the London BAP.

3.2 SITE WALKOVER SURVEY

Greengage undertook the site walkover during sunny weather conditions on the 29th August 2024. Features within the site boundary and accessible features immediately bordering it were evaluated and the extent and distribution of habitats and plant communities were recorded. Features of ecological interest requiring further commentary were noted and their location was recorded using Target Notes (TN).

In addition, Greengage undertook an off-site walkover, assessing the ecological baseline of other areas within the hospital grounds. This included visitation of Harefield Ponds situated north-west of the site boundary.

An updated walkover survey was subsequently completed on 19th September 2025, alongside a badger scoping survey to identify any evidence of setts, foraging or commuting activity, and a GLTA to determine the suitability of trees for roosting bats.

Flora

The extent and distribution of different habitats on site were identified and mapped according to the standard UKHab Survey methodologies, describing the dominant botanical species and further ecological features of interest. Protected on Invasive Non-native Species (INNS) of plants were also noted where present. A habitat map has been produced to illustrate the results, as shown at Appendix A; Figure A.1.

Fauna

The site walkover survey included assessments to identify the potential value for notable, rare and protected species at site. This involved identifying potential habitats in terms of refugia, breeding sites and foraging areas in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from desk top study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;

- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and,
- Present - Presence confirmed for the survey itself or recent, confirmed records from information gathered through desk top study.

The species surveyed for on site included:

Badger (*Meles meles*)

The potential for badger to inhabit or forage within the site and for up to 30m from the site boundary was assessed. Evidence of badger activity includes the presence of setts (a system of underground tunnels and nesting chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines and paw prints.

Bat Species (*Chiroptera*)

The site walkover included a daytime evaluation of bat potential on the site, comprising an assessment of features to identify characteristics suitable for roosting, foraging or commuting bats. In accordance with Bat Conservation Trust's Good Practice Guidelines[8] and methods given in English Nature's (now Natural England) Bat Mitigation Guidelines[9] consideration was given to:

- The availability of access to roosts for bats;
- The presence and suitability of crevices and other places as roosts; and,
- Signs of bat activity or presence.

Definite signs of bat activity were taken to be:

- The bats themselves;
- Droppings;
- Grease marks;
- Scratch marks; and,
- Urine spatter.

Signs of possible bat presence were taken to be:

- Stains; and,
- Moth and butterfly wings.

Potential Roost Features (PRFs) include trees with holes, crevices or splits (the most utilised trees being oak, ash, beech, willow and Scots pine) and buildings with cracks or gaps serving as possible access points to voids or crevices.

Additionally, semi-natural habitats such as woodland, meadows and waterbodies can provide important foraging resources and vegetated linear features such as tree lines, hedgerows and river corridors are often considered valuable for commuting. Consideration was given to the presence of these features both immediately within and adjacent to the site.

Birds

During the site walkover survey, the potential for breeding, wintering and migratory birds was assessed. In particular, this includes areas of trees that could support nests for common or notable species.

Dormouse (*Muscardinus avellanarius*)

During the site walkover the potential for dormouse to be present on site was assessed. This included observations for suitable habitat such as well-layered woodland, scrub and linking hedgerows, particularly those comprised of species offering suitable food sources such as honeysuckle (*Lonicera periclymenum*) and hazel (*Corylus avellana*) in addition to direct evidence such as characteristically gnawed hazelnuts, chewed ash keys and honeysuckle flowers or nests.

Great Crested Newt (*Triturus cristatus*)

An assessment was carried out to identify any potential habitats that may support great crested newt (GCN) and other native amphibians. The aquatic and terrestrial habitats required generally include small, still water bodies suitable for breeding; and woodland, scrub or grassland areas where there is optimal invertebrate prey potential and refuges.

Invertebrates

As part of the site walkover the quality of invertebrate habitat and the potential for notable terrestrial and aquatic invertebrate species to occur was considered. There is a wide variety of habitats suitable for invertebrates including wetland areas, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows.

Reptiles

The potential for reptile species on site was assessed during the walkover survey. Native reptile species include grass snake (*Natrix natrix*), smooth snake (*Coronella austriaca*), adder (*Vipera berus*), common and sand lizard (*Lacerta vivipara* and *L. agilis*) and slow worm (*Anguis fragilis*). These species generally require open habitats with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained and frost-free areas are needed so they can survive the winter.

Otter (*Lutra lutra*)

The presence of waterbodies and watercourses within or with connectivity to the site was recorded. Bankside cover and potential holt (den) sites, including the presence of spraint, footprints or food remains were also noted.

Water Vole (*Arvicola amphibius*)

The potential for water vole to occur on the site was assessed during the site walkover survey. Potential for water vole is identified by the presence of waterbodies and water courses, including lakes, ditches, rivers and dykes. Waterbodies. The presence of burrows runs along the banks, latrines, footprints or food piles was also noted.

Biodiversity Action Plan Priority Species

Where the desk top review identifies the presence of BAP priority species (Species of Principal Importance) not protected by statute, effort was made to establish the potential for the site to support these species.

3.3 SURVEYORS

Yasmine Airton has a degree in Zoology (BSc Hons), an MSc in Biology and is a Graduate Member of CIEEM with 1 years' experience in ecological surveying. Yasmine assists with various field surveys and related reports such as Preliminary Ecological Appraisals and Ecological Management Plans.

Emer is a consultant with over 4 years' experience in ecological survey and assessment. She holds a BA in Geography and Information Science and an MSc in Environmental Resource Management. Emer's experience spans Preliminary Ecological Appraisal (PEA), Biodiversity Net Gain Assessment (BNGA) and species surveying, with ornithology being a particular interest.

Daniel Perlaki, who reviewed this report, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a Graduate member of CIEEM. Dan has over 7 years' experience in ecology survey and consultancy.

Jennie Caddick, who verified this report, holds a BSc (Hons) in Ecology and full CIEEM membership. She has 20 years consultancy experience working for a varied client base, with a focus on complex schemes where requirement for consultation and bespoke surveying has been used and holds Natural England survey licences for bats (Class 2), great crested newt, water vole and white-clawed crayfish. In addition, she has also held mitigation licences for otter.

Paul White, Associate Consultant, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, and is an Associate member of CIEEM. Paul has over 16 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written written by Yasmine Airton, reviewed by Daniel Perlaki and verified by Jennie Caddick. The update was undertaken by Emer Haffernan and reviewed by Paul White, who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and,
- Avoids invalid, biased and exaggerated statements.

3.4 CONSTRAINTS

The PEA was undertaken during an optimal time of year during ideal conditions by a Suitably Qualified Ecologist.

The site lies within the standard 2km desk top review search radius of three Local Environment Records Centres (LERCs). These were identified as Herts Environmental Records Centre (HERC), Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) and Greenspace Information for Greater London (GIGL). Biological records were requested from GIGL only as this LERC covered the majority of the 2km search radius from the site. In order to gather further information, from outside of the GIGL boundary, supplementary records were obtained from local websites and the Hillingdon Local Plan.

Additionally, some trees had a low level of ivy cover, although this was not dense enough to conceal potential roost features. No visitable holes, cavities or knot holes were noted on the trees, and they are therefore considered to have negligible suitability for roosting bats.

With consideration to the information presented above, no significant constraints that stand to impact conclusions drawn in this report, therefore presented themselves.

4.0 RESULTS

4.1 DESKTOP REVIEW

Designated Sites

Consultation with GIGL, local websites, the Hillingdon Local Plan and the MAGIC dataset confirmed the absence of statutory and non-statutory designated sites from within the boundary of the site.

Four statutory designated sites were recorded within 2km and include dual designation Ruislip Woods National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI) within 1.8km of the site boundary. Ruislip Woods NNR and SSSI is designated as the largest area of semi-natural woodland in Greater London.

Three other SSSI's are present within 2km of the site, with the nearest being Old Park Wood SSSI situated 0.53km from the site. Additionally, the site falls within the Impact Risk Zone (IRZ) for two of the SSSI's identified.

Records from GIGL identified 21 non-statutory Sites of Importance for Nature Conservation (SINC's) within 2km of the site boundary. Old Park Wood, Harefield Chalk Pit and Mid Colne Valley hold dual designations as SSSIs and SINCs. SINC's are recognised by Local Planning Authorities (LPA's) as important wildlife sites.

SINC's are designated based on their significance, with a hierarchy of SINC designations:

Sites of Metropolitan Importance: Sites which contain the best examples of London's habitats, including particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London. They are of the highest priority for protection.

Sites of Borough Importance (Grade 1 and 2): Sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss at a Borough level.

Sites of Local Importance: Sites which are, or may be, of particular value to people nearby (such as residents or schools). These sites may already be used for nature study or be run by management committees mainly composed of local people. Local sites are particularly important in areas otherwise deficient in nearby wildlife sites.

Table 4.1 below gives the locations and descriptions of the statutory designated sites within 2km along with the SINC's within 1km of the site.

Table 4.1 Statutory and Non-Statutory Designated Sites within 2km and 1km Search Radius

Site Name	Approximate Location	Description
Statutory Designations		
Old Park Wood SSSI	0.53km north-west	Old Park Wood comprises some of the most floristically rich ancient woods in Greater London and contains complex transitions through examples of widely differing woodland types. Birch-pedunculate oak (*Betula* spp. and *Quercus robur*) woods and dense stands of bracken (*Pteridium aquilinum*) occupy the upper strongly acidic gravels; these grade into acid pedunculate oak-ash-beech (*Fraxinus excelsior- Fagus sylvatica*) stands below, while in the damp and calcium rich valleys floristically diverse pedunculate oak-ash woods predominate. Old hazel (*Corylus avellana*) coppice occurs throughout these areas and becomes dominant in places. Some of the plants found in the field layer have a localised distribution and are a special feature of the woods, for example coralroot (*Cardamine bulbifera*) and thin-spiked wood-sedge (*Carex strigosa*). Others, including opposite-leaved golden saxifrage (*Chrysosplenium oppositifolium*), early-purple orchid (*Orchis mascula*) and southern wood rush (*Luzula forsteri*) are scarce in Greater London north of the Thames. Several of the herbaceous species are indicative of long-established, ancient woodland.
Harefield Pit SSSI	0.83km south	Harefield Pit provides a key section in the London Basin for a sequence through the Upper Chalk, Reading Beds and London Clay. It is also the only known site for calcareous floral remains in the Reading Beds. The site covers part of a disused chalk quarry which has been infilled leaving only the upper faces exposed above ground level. These display a superb Tertiary section including the contact between the Upper Chalk and the Reading Beds, which has here been intensively bored by crustaceans. The faces also show a full section through the Reading Beds, up into mottled fluviatile clays of the Upper Reading Beds. These are overlain by sandy clays with a diverse marine fauna, comprising the Harefield Member of the London Clay, for which this is the stratotype locality.

Site Name	Approximate Location	Description
		Harefield Pit is additionally of particular interest as the only known source of Charophytes in the Reading Beds. These are important palaeo - environmental indicators, and have potential for correlation with other coeval localities in Europe. The overlying London Clay Basement Bed has also yielded plant material.
Mid Colne Valley SSSI	0.91km west	The Mid Colne Valley is of significant ornithological interest, particularly for the diversity of breeding woodland and wetland birds, and for the numbers of wintering wildfowl. On the eastern valley slope is one of the last remaining examples of unimproved chalk grassland in Greater London. The ornithological interest of the site is considerable with over 70 breeding and 80 wintering species of bird regularly recorded. This high diversity reflects the close proximity of the wide range of habitats present: woodland, scrub, grassland, running and standing water, marginal fen and gravel banks. Breeding woodland birds include kestrel (*Falco tinnunculus*), lesser whitethroat (*Motacilla curruca*), nuthatch (*Sitta europaea*), tawny owl (*Strix aluco*) and three species of woodpecker. The gravel pits and River Colne attract one of the most important wetland breeding bird communities in Greater London and the Colne Valley: with coot (*Fulica atra*), greylag goose (*Anser anser*), little ringed plover *Charadrius dubius*, kingfisher (*Alcedo atthis*), mute swan (*Cygnus olor*) and tufted duck (*Aythya fuligula*) nesting regularly.
Ruislip Woods SSSI, NNR	1.8km south-east	The Ruislip Woods form an extensive example of ancient semi-natural woodland, including some of the largest unbroken blocks that remain in Greater London. A diverse range of oak and hornbeam (*Carpinus betulus*) woodland types occur, with large areas managed on a traditional coppice-with-standards system. The site is also unusual in Greater London for the juxtaposition of extensive woodland with other semi-natural habitats, mostly notably acidic grass-heath mosaic and areas of wetland. These habitats and especially the woodland contain a number of plant and insect species that are rare* or scarce* in a national or local context. The acidic soils give rise to a characteristically limited ground flora which is often sparse or absent under the dense shade of

Site Name	Approximate Location	Description
		old hornbeam coppice. The dominant species include bramble (*Rubus fruticosus*), bracken, honeysuckle (*Lonicera periclymenum*), creeping softgrass (*Holcus mollis*) and, in places, bluebell (*Hyacinthoides non-scripta*). Along rides, in areas of recently-cut coppice and on damper ground in the stream valleys, the ground flora tends to be more diverse. Many of the species are strongly associated with ancient woodland such as wood anemone (*Anemone nemorosa*), yellow archangel (*Lamiastrum galeobdolon*), yellow pimpernel (*Lysimachia nemorum*) and betony (*Stachys officinalis*). Several others are scarce in Greater London, including broad- leaved helleborine (*Epipactis helleborine*), violet helleborine (*E. purpurata*) and common cow-wheat (*Melampyrum pratense*).
Non-Statutory Designations		
Medipark Site (Borough Grade I) SINC	0.17km north	An interesting mosaic of habitats has developed within the former grounds of a demolished hospital building, including species-rich neutral to chalk grassland, scrub and some marginal secondary woodland. This site adjoins the eastern edge of Old Park Wood. The grassland supports a sizeable population of bee orchid (*Ophrys apifera*), as well as occasional pyramidal orchid (*Anacamptis pyramidalis*), common broomrape (*Orobanche minor*), glaucous sedge (*Carex flacca*), grass vetchling (*Lathyrus nissolia*) and dwarf gorse (*Ulex minor*), all regionally restricted plants of local distribution within the borough. The secondary woodland consists mainly of oak with some beech and common hawthorn (*Crataegus monogyna*), and a ground flora of bramble and bluebell. The invertebrate fauna is likely to be of interest and includes both marbled white and common blue butterflies, as well as the nationally scarce Roesel's bush-cricket (*Metrioptera roeselii*).
Harefield Green Pond (Borough Grade II) SINC	0.19km south-east	The pond supports a wide range of wetland plants, dominated by a large stand of great reedmace (*Typha latifolia*) with smaller areas dominated by trifid bur-marigold (*Bidens tripartita*), galingale (*Cyperus longus*) and sweet flag (*Acorus calamus*). The latter two species are locally scarce but may have been artificially introduced. Other wetland species

Site Name	Approximate Location	Description
		include yellow iris (*Iris pseudacorus*), Gipsywort (*Lycopus europaeus*), a variegated reed sweet-grass (*Glyceria maxima*) and water-pepper (*Persicaria hydropiper*). Like many public ponds it also contains abundant New Zealand pigmyweed (*Crassula helmsii*) an invasive introduced species which has so far proved very difficult to eradicate. It is likely that the pond supports populations of invertebrates and amphibians.
Harefield Hospital Ponds and the Old Orchard (Borough Grade II) SINC	0.38km west	The two ponds in the grounds of Harefield Hospital are examples of mid- and late-successional habitats; the eastern pond being full of water with a well-developed marginal flora and the western one of mainly willow scrub, mud and leaf litter with a small area of water. The western pond supports goat, grey and crack willows (*Salix caprea, S. cinerea, S. fragilis*) with frequent pedunculate oaks on the banks, interspersed with dense patches of bramble and occasional hard rush (*Juncus inflexus*). It provides potential habitat for birds, amphibians, mammals and invertebrates. The eastern pond supports occasional crack willow, weeping willow (*Salix x sepulcralis*) and sycamore (*Acer pseudoplatanus*) on its banks. Great reedmace (*Typha latifolia*) and the scarce bogbean (*Menyanthes trifoliata*) are present as dense stands along the pond margins interspersed by great willowherb (*Epilobium hirsutum*) and water mint (*Mentha aquatica*). In addition, an old orchard of over-mature apple (*Malus domestica*) and plum (*Prunus domestica*) trees is part of the council-owned Mount Pleasant Farm. These old fruit trees are likely to be valuable for invertebrates.
The Dairy Farm, Harefield (Borough Grade II) SINC	0.41km south	Although relatively small, this is an interesting site with a range of habitats and a varied topography. A number of notable plants have been recorded, including sneezewort (*Achillea ptarmica*) and bog stitchwort (*Stellaria uliginosa*) in the wet grassland, soft shield-fern (*Polystichum setiferum*) in the hedges, and pedunculate water starwort (*Callitriche brutia*) and common water-crowfoot (*Ranunculus aquatilis*) in the pond and ditches. Great horsetail (*Equisetum telmatia*) is frequent in the damp south-western field.

Site Name	Approximate Location	Description
Old Park Wood (Metropolitan Importance) SINC	0.53km north-west	See Statutory designations for details.
White Heath Farm and Harefield Grove (Borough Grade II) SINC	0.55km north	This is a farmland landscape consisting mainly of pastures, arable fields, copses and hedgerows, and has managed to retain the rural character of the landscape. The nature conservation interest is scattered through the landscape, and some large areas of low wildlife value have been omitted from the site. Much of the site is a mixture of improved and semi-improved, horse-grazed pastures, some of which have been ungrazed for a while. Some fields are dominated by a mix of perennial rye-grass (*Lolium perenne*) and bents (*Agrostis* spp.) whereas false oat-grass (*Arrenatherum elatius*) and cock's-foot (*Dactylis glomerata*) are dominant in others. Two arable fields, with maize as their usual crop, are included in the site for their ancient hedges and patches of other habitats.
Shepherds Hill House (Borough Grade II) SINC	0.82km east	The grounds of this field study centre contain scattered native trees and shrubs including frequent pedunculate oak, and occasional ash, hornbeam and hazel. Introduced species including abundant cherry laurel (*Prunus laurocerasus*) and occasional Scots pine (*Pinus sylvestris*), rhododendron (*Rhododendron ponticum*) and snowberry (*Symphoricarpos albus*) indicate its earlier role as a large landscaped garden. Beneath the trees, the lawns contain grasses such as sweet vernal-grass (*Anthoxanthum odoratum*) and red fescue (*Festuca rubra*), and wild flowers indicative of acid grassland, including heath bedstraw (*Galium saxatile*), mouse-ear hawkweed (*Pilosella officinarum*) and field woodrush (*Luzula campestre*).
Harefield Chalk Pit (Borough Grade II) SINC	0.83km south	See Statutory designations for details.
Mid Colne Valley (Metropolitan	0.91km west	See Statutory designations for details.

Site Name	Approximate Location	Description
Importance) SINC		
Breakspear House Wood (Borough Grade II)	0.95km south-east	This small woodland is dominated by ash (*Fraxinus excelsior*), with frequent pedunculate oak and sycamore (*Acer pseudoplatanus*). Stands of beech with occasional hornbeam and horse chestnut make up the rest of the canopy. The shrub layer is composed of abundant field maple (*Acer campestre*), hawthorn, English elm (*Ulmus procera*) and cherry laurel, with blackthorn (*Prunus spinosa*) thickets along some of the edges. The woodland floor is dominated by bramble, common nettle (*Urtica dioica*) and ground ivy (*Glechoma hederacea*) with frequent bugle (*Ajuga reptans*), wood false-brome (*Brachypodium sylvaticum*) and red campion (*Silene dioica*). The presence of ancient woodland indicator plants, which include Midland hawthorn (*Crataegus laevigata*), black bryony (*Tamus communis*), field maple and holly (*Ilex aquifolium*) suggest this site has been woodland since at least 1600. Speckled wood butterfly (*Pararge aegeria*) is present on plants in the patches of light which pass through the tree canopy.

Biodiversity Action Plans

The following UK BAP priority habitats were present at site or in the immediate vicinity:

- Priority Habitat Deciduous Woodland on site; and,
- Priority Habitat Traditional Orchards within 500m.

London BAP

The London BAP lists 26 priority habitats and species to protect and enhance, which are of importance to London's nature conservation, categorised into Habitat Action Plans (HAP's) and Species Action Plans (SAP's) respectively. Notable features of the London BAP that are of relevance to this report are:

- The woodland HAP;
- Bats SAP; and,
- Stag Beetle SAP.

Species Records

Records received during the desk top review identified a number of protected and BAP priority species within the 2km search radius of the site. Among others, these include the following species of relevance to the site:

- Amphibians and reptiles including great crested newt (*Triturus cristatus*) and slow worm (*Anguis fragilis*);
- Bat species, including Myotis bat species (*Myotis* sp.), Daubenton's bat (*Myotis daubentonii*), noctule (*Nyctalus noctula*), common pipistrelle (*Pipstrellus pipistrellus*), Nathusius's pipistrelle (*Pipistrellus nathusii*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auritus*).
- Bird species, including swift (*Apus apus*), tree sparrow (*Passer montanus*), house sparrow (*Passer domesticus*), starling (*Sturnus vulgaris*), song thrush (*Turdus philomelos*), tawny owl (*Strix aluco*), red kite (*Milvus milvus*) and skylark (*Alauda arvensis*);
- Mammals including European hedgehog (*Erinaceus europaeus*); and,
- Invertebrates including large skipper butterfly (*Ochlodes sylvanus*), small heath butterfly (*Coenonympha pamphilus*), small copper (*Lycaena phlaeas*) and stag beetle (*Lucanus cervus*).

The species listed above are primarily those that may be impacted by proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in the following chapter.

4.2 SITE HABITATS

The following UKHab category habitats, with secondary codes labelled in [square brackets] and as mapped at Figure A.1, were recorded on site during the site walkover.

Lowland Mixed Deciduous Woodland with Fence w1f [612]

The majority of the site was located within a larger parcel of deciduous woodland which separated the hospital estate from Rickmansworth Road to the east. The woodland comprised a varied species composition within the canopy, with frequent pedunculate oak, ash, sycamore, lime (*Tilia* sp.) and horse chestnut (*Aesculus hippocastanum*). Other species which were seen lower within the woodland structure include frequent silver birch (*Betula pendula*), hawthorn (*Crataegus mongyna*) and holly (*Ilex aquifolium*).

The woodland was relatively shaded, and the encroachment of INNS cherry laurel (detailed below) further limiting the diversity of the ground flora. Typically, the ground level plant community consisted of abundant ivy (*Hedera helix*) with occasional bracken (*Pteridium aquilinum*), bramble and privet (*Ligustrum vulgare*). A chain link fence could be seen towards the west of the woodland, followed by a dip in ground level to the west creating a slight embankment.

The woodland consisted of three age classes: mature canopy species; juvenile trees; and shrub species beneath. No veteran trees were identified.

Modified Grassland [g4]

Two parcels of modified grassland were located adjacent to the woodland, separated by a historical concrete walkway that will not be disturbed during the proposed works. The grassland was heavily maintained through frequent mowing, which limited the structural diversity and floristic composition of the sward. The habitat was dominated by perennial rye-grass (*Lolium perenne*), with scattered occurrences of common yarrow (*Achillea millefolium*), stinging nettle (*Urtica dioica*) and dandelion (*Taraxacum officinale agg.*). The regular cutting regime has resulted in a simplified community, typical of amenity-type grassland, with few opportunities for succession or development of more diverse sward characteristics.

4.3 SPECIES

Badger

The woodland on site provides good habitat to support sett creation with some foraging opportunity for badger also noted. During the field survey three disused mammal burrows were recorded in the north of the woodland with entrances on either side of the chain-link fencing (TN1, Plate 2-3, Appendix B). The burrows all showed signs of disuse, covered with recent vegetation and with no evidence of recent activity. In addition, no latrines, hair, foraging marks or other signs of badger activity were recorded on site or within the wider woodland area, up to 30m.

During the updated site walkover, a targeted badger scoping survey was undertaken. The previously identified mammal burrows remained disused, with entrances blocked by vegetation and some partially collapsed. The surveyor also assessed additional mammal burrows located outside the site boundary, adjacent to the chain-link fencing, which similarly showed no evidence of activity. These were found to be collapsed in places, obstructed by vegetation, and in some cases containing cobwebs internally.

Therefore, while the site retains moderate potential to support badger due to the availability of suitable woodland habitat, no badgers or active setts were present or recorded during the updated survey, corroborating the findings of the 2024 assessment.

Bat Species

Foraging and Commuting

The woodland on site is likely to attract foraging bats due to the varied species and structural diversity, and likely invertebrate assemblages, it offers. The site also provides moderate connectivity to other high value foraging habitat in the wider landscape, such as Old Park Wood SSSI and the Old Orchard SINC to the north-west of the hospital. Connecting woodland parcels also provide a potential commuting corridor towards the north, connecting to larger, more naturalised areas. Despite this, the habitat on site is relatively small and subject to a level of disturbance from the adjacent hospital activities, including night lighting. Overall, the site has moderate suitability for support foraging and commuting bats.

Roosting

Woodland on site supports numerous mature trees. A number of trees had a low level of ivy cover; however, this was not dense enough to conceal PRFs. No obvious PRF's were recorded during the site walkover on areas of exposed bark, which was present on many of the trees, and the woodland lacked veteran trees which often support higher value PRFs for roosting bats. In addition, records of common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) have been identified 500 metres from the site. Overall, the site has moderate suitability for summer roosting bats.

No evidence of trees with significant rot holes or hollows which could provide cold, stable temperatures during the winter period were seen although smaller PRFs may have been obscured by ivy growth which was noted. Therefore, the site was deemed to be negligible suitability for hibernating bats.

Birds

Deciduous woodland provides suitable nesting and foraging opportunities for woodland birds on site. No nests were seen during the site visit; however the canopy was dense in some places, and nests may have been present which could not be seen from ground level. Overall, the site has high potential to support birds.

Dormouse

No records of dormouse from the past 10 years within 2km of the site were returned within the desk study. Woodland on site lacks a suitable understory to support nesting opportunity and foraging opportunities for dormice. More suitable areas of woodland in the wider area, such as Old Park Wood SSSI are separated from the site by areas of hardstanding and the hospital infrastructure likely to limit the movement of this species. Overall, the site is deemed negligible potential to support dormouse, and they are not considered further in this report.

Great Crested Newt

The woodland on site contains some suitability for great crested newts to refuge and forage within due to its potential to support invertebrates. Records of GCN from 2019, with the nearest record being 503m from site were noted during the desk top review. This record was identified as being north-west of the site, which may infer it was from Harefield Ponds SINC on the hospital ground. In addition, records from MAGIC show four records of GCN license returns within a 1km radius of the site.

Two waterbodies deemed suitable to support GCN occur within 500m of the site, with interim habitats comprising a mixture of closely mown grassland and hardstanding, including the main hospital infrastructure. As GCN typically disperse no further than 250m from breeding ponds during their terrestrial life-stage, it is unlikely that GCN would be present on site as it is located 350 metres from the nearest pond.

In this instance, it is likely that Old Park Wood SSSI, as well as the adjacent Old Orchard SINC, would provide more suitable terrestrial habitat for GCN. Old Orchard SINC is significantly closer to the waterbodies and is therefore more likely to utilised by GCN.

Therefore, the site is deemed low potential to support GCN.

Invertebrates

The nearest record of stag beetle received from GiGL was 143 metres from the site in 2017. Woodland on site possesses deadwood and numerous scattered logs which provides suitable habitat for stag beetle larvae. Overall, the site was deemed high potential to support stag beetle. Additionally, the areas of bramble and holly may promote foraging of invertebrates such as speckled wood (*Pararge aegeria*) and holly blue (*Celastrina argiolus*). Overall, the site is considered to be of high value for invertebrates.

Reptiles

Woodland habitats typically don't allow sufficient light penetration for basking reptiles, however the occasional shrub layer present does provide some opportunity for basking and refuge. Despite this, the site is bound by closely mown areas of grassland and hardstanding which reduces habitat connectivity to more suitable areas such as the Old Orchard SINC and limits movement for reptiles onto the site. Therefore, the site is considered to have low potential to support reptiles.

Otter and Water Vole

There are no waterbodies or watercourses on site, or within the immediate vicinity of the site. In addition, no records of water vole or otter are present within the last 10 years. One record of water vole was recorded in 2007, which was identified 938 metres from site. As such, the site is deemed to have negligible suitability for these species, and they are not discussed further in this report.

Invasive Non-native Species

Cherry laurel was recorded scattered through the woodland on site, particularly at the centre of the woodland (Plate B.4). Cherry laurel is listed on the London Invasive Species Initiative (LISI) list, therefore INNS are confirmed present on site.

Other BAP Species

27 records of hedgehog were recorded within 2km of the site. The nearest was identified 163m from site in 2020. Woodland on site provides good nesting and foraging opportunities for hedgehog and, therefore was deemed to have high potential to support this species.

5.0 EVALUATION AND DISCUSSION

5.1 SITE PROPOSALS

The proposed development seeks to remove an area of deciduous woodland on site to install generators and related equipment on to the area of land. This will require removal of an area of woodland currently on site which is connected to a larger parcel of woodland bordering the east of the hospital.

5.2 BASELINE SUMMARY

The site and its surroundings have potential to support a number of ecological receptors of note, which could therefore be impacted upon by any future development proposals. Ecological receptors are listed in Table 5.1 below. Further recommendations for each receptor are provided from Section 5.2 onward.

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	Comments
Designated Sites: Statutory	Present within 2km	The nearest statutory designation is Old Park Wood SSSI situated 0.53km from the site. The site also lies within the IRZ for two SSSI's within the area. Due to the small scale of the proposed development, the distance from the nearest statutory designated site and absence of pollution pathways between the site and SSSIs, works are unlikely to impact on the SSSI's. Analysis using Natural England ArcGIS found that the IRZs in which the site lies do not trigger the requirement for consultation with Natural England due to the nature and scale of the development.
Designated Sites: Non-Statutory	Present within 2km	The nearest SINC's are Medipark Site SINC and Harefield Green Pond SINC which are situated within 200 metres of the site. These SINC's are in close enough proximity to be potentially impacted by construction activities on site and a Construction and Environmental Management Plan (CEMP) is recommended to detail mitigation/control measures to prevent negative impacts to the SINCs as a result of the development.
Notable/Rare Habitats	Present on site	The site includes Priority Habitat lowland mixed deciduous woodland which will be

Receptor	Presence/Potential Presence	Comments
		impacted directly from habitat loss. Recommendations regarding priority habitat on site is provided in Section 5.3.
Badger	Moderate potential	Mammal burrows which may be attributable to badger were identified within the woodland during the 2024 survey. During the 2025 badger survey, these burrows remained disused, with entrances blocked by vegetation and some partially collapsed. Additional mammal holes assessed outside the site boundary also showed no evidence of activity. Recommendations on how to proceed are provided in Section 5.3.
Foraging and commuting bats	Moderate suitability	The site was assessed and identified as being of moderate suitability for foraging and commuting bats. Further recommendation is provided in Section 5.3.
Roosting bats	Moderate suitability	The site is considered to be of moderate suitability for roosting bats with a number of large trees supporting ivy that could hide PRFs with suitability to support roosting bats. Recommendation is provided in Section 5.3.
Hibernating bats	Negligable suitability	No PRFs suitable for use during hibernation were noted at trees on the site. Ivy cover may have obscured features in places, but no evidence of roosting potential was identified. The site is therefore considered to present a negligible risk to hibernating bats. Recommendations are provided in Section 5.3.
Birds	High potential	The woodland provides suitable nesting and foraging habitat for breeding birds. Mitigation is detailed in Section 5.3.
GCN	Low potential	The woodland on site provides suitable terrestrial habitat for GCN. Two waterbodies located north-west of the site provide potential breeding habitat although these are

Receptor	Presence/Potential Presence	Comments
		beyond the typical 250m terrestrial range of this species, and barriers to dispersal in the form of roads and hospital infrastructure are present in between. Recommendation is provided in Section 5.3.
Invertebrates	High potential	Deadwood present within woodland habitat on site is suitable for invertebrates including stag beetle. Recommendation is provided in Section 5.3.
Reptiles	Low potential	The site contains small areas suitable for refuging and foraging reptiles. Recommendations are provided in Section 5.3.
INNS	Confirmed presence	INNS cherry laurel was present on site. Recommendations are provided in Section 5.3.
Other BAP species	High potential	The woodland, scrub and log piles provide suitable refugia for hedgehog and foraging habitat. Recommendation is provided in Section 5.3.

5.3 DISCUSSION AND RECOMMENDATIONS

Discussion is provided below on the key ecological receptors that stand to be impacted/benefit from proposed works on site and include commentary on appropriate mitigation, compensation and enhancement actions (where required).

A Construction Environmental Management Plan (CEMP), to be secured through planning condition in accordance with BS 42020: 2013 Biodiversity, should be produced and implemented for the site providing greater detail on the measures discussed below.

Designated Sites

Statutory Designations

The site lies within the IRZ of two SSSI's which were identified as Old Park Wood SSSI and Mid Clone Valley SSSI, with the nearest situated 0.53km from site. In addition, two further SSSI's were within 2km of the site. These were Harefield Pit SSSI and Ruislip Woods SSSR/NNR. However, due to the small scale of the development, works would be unlikely to impact on the SSSI's. In addition, proposed development is not of a type which has potential to result in detrimental impacts upon nearby SSSIs, therefore impacts are considered highly unlikely, and no specific mitigation is required. Analysis using

Natural England ArcGIS found that the IRZs in which the site lies do not trigger the requirement for consultation with Natural England due to the nature and scale of the development.

Non-Statutory Designations

The site is located within 200m of the nearest SINC's, identified as Medipark Site SINC and Harefield Green Pond SINC. To minimise the risk of detrimental impacts during construction, such as dust deposition, noise and light pollution and chemical spills, a CEMP should be produced to outline appropriate control measures. Measures to be included within the CEMP should include:

- Noise and vibration minimisation;
- Pollution and ground contamination control measures;
- Lighting (e.g. working during daylight hours whenever possible, avoidance of artificial lighting);
- Suitable materials storage; and,
- Waste management.

Notable/Rare Habitats

The lowland mixed deciduous woodland is present on site should be retained and protected wherever possible. Woodland scheduled to be lost should be replaced on at least a like-for-like basis and may require compensation through the creation of a larger area of woodland off-site, where this is later stipulated by the LPA or as part of the site Biodiversity Net Gain Assessment (BNGA). This is due to the high ecological value that the habitat holds, which is difficult to replace due to its status of high distinctiveness.

The proposed development should follow best practice pollution prevention guidance and tree protection measures as outlined in BS 5837 (2012) - Trees in Relation to Design, Demolition and Construction, so as to not adversely impact any retained deciduous woodland priority habitat on site. Details can be outlined within a CEMP, to detail the avoidance and protection measures relating to impacts on the remainder of the surrounding woodland during the construction and the operational phases.

Any lighting required during the construction and operational phases of the development should be sympathetic towards wildlife occupying the sensitive woodland on site. Further details of the lighting strategy recommendations are provided below.

Badger

Badgers are protected under the Protection of Badgers Act 1992, which makes it an offence to damage, disturb or obstruct access to a sett, or to harm or disturb badgers.

During the initial survey, disused mammal burrows were identified on site and a targeted badger scoping survey was recommended. This follow-up survey was undertaken on 19th September 2025 and confirmed that the burrows remained disused, with entrances blocked by vegetation and some partially

collapsed. Additional mammal holes outside the site boundary were also assessed and showed no evidence of activity.

However, as badgers may be present within the wider woodland landscape, the following measures should be implemented:

- A pre-commencement inspection of the site and surroundings (30m radius) to search for any new badger activity three months prior to the start of works on-site (N.B. if new setts are discovered further badger surveys may be required);
- Any excavations, ground works or trenches left overnight should be covered or have a ramp installed to allow trapped animals to escape;
- Excavations or trenches should be inspected each morning and evening to ensure no badger (or other animals e.g. hedgehog) have become trapped;
- Storage of construction materials on pallets or hardstanding, and checking for any sheltering animals prior to moving them;
- The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to habitats which badgers could use;
- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations;
- Use of plant and machinery should cease at least two hours prior to sunset and not commence until an hour after sunrise; and
- Alerting a Suitably Qualified Ecologist (SQE) in the event that a mammal burrow is identified on, or within 30m of the site, to advise on how to proceed.

Bats

Foraging and Commuting

The woodland on site provides some suitability for foraging and commuting bats; however, the area to be removed is small and its loss is not considered likely to significantly impact the local bat population or lead to fragmentation of habitat. It is recommended that the generator compound is not subject to constant artificial lighting, as inappropriate lighting could affect bat activity. Any required lighting should be minimal, directional and limited to operational needs only, in line with Bat Conservation Trust's (BCT) and Institution of Lighting Professionals (ILP)[10] guidance. This would include:

- Minimising the spread of light onto retained and remaining woodland areas using hoods, cowls and louvers;
- Ensure lighting is task orientated and switched off when not in use;
- The spread of lighting should be minimised to, or near, horizontal to ensure that only the task area is lit;
- Lighting should be switched off or dimmed down after curfew (10pm);

- Avoid using reflective surfaces under lights;
- Use narrow spectrum light sources; and,
- Avoid white and blue wavelengths of the light spectrum to reduce insect attraction. Where white light sources are required, they should be of a warm/neutral colour temperature <2,700 kelvin.

Roosting

A GLTA was conducted on 19th September 2025, which confirmed that no trees within the site had potential to support hibernating bats. No holes, cavities, knot holes or dense ivy cover capable of concealing potential roost features were identified.

Birds

Trees and understorey vegetation within the woodland on site have high potential to support nesting birds. To ensure impacts upon nesting birds are fully avoided, clearance of the site should take place outside of the nesting bird season (taken to run from March-August inclusive).

Where works will take place during March-August, an inspection of the trees and other vegetation, to be cleared and impacted must be undertaken by a SQE within 48 hours prior to clearance to confirm the absence of any nesting birds. Where an active nest(s) are discovered, then a species-appropriate buffer should be enacted, whereby all works should cease until the young have fledged and the nest becomes inactive (to be confirmed by a SQE).

GCN

The site is deemed to have low potential to support GCN, however due to the distance between potential breeding waterbodies and the site, including the presence of physical barriers to dispersal, the likelihood of them travelling onto the site is very low. To reduce any impacts to GCN (where present) from low to negligible it is recommended that a precautionary method of works is followed whereby on-site vegetation clearance should be:

- Supervised by a Suitably Qualified Ecologist (SQE);
- Cleared directionally, moving toward areas of vegetation of higher value with good connectivity due to be retained; and,
- Cut in two stages, to a minimum of 150mm, left for 24-48 hours to allow any GCN to disperse, and then the arisings removed during the GCN active period (from mid-March-mid-October).

Reptiles

Due to the small scale of suitable habitat on site and its low value for reptiles, a precautionary method of works is recommended whereby vegetation clearance should be undertaken under supervision of a SQE and following a two-stage cut during the active period for reptiles (from mid-March-mid-October). See recommendations for GCN described above.

Any logs/refugia should be dismantled by hand under supervision of an SQE.

Invasive Non-native Species

As a sign of good practice, the cherry laurel on site should be removed, with the arisings disposed of appropriately.

Other BAP Species

The methods described above for GCN and reptiles should ensure any proposed vegetation clearance works and dismantling of refugia piles are compliant with respect to hedgehog and stag beetle.

If hedgehog is encountered during clearance, then all works should cease and they should be moved by gloved hand to an area of safety, outside of the site and within suitable vegetation cover.

Additionally, it is possible that stag beetle larvae may be present within areas of deadwood. As such, a SQE should check the deadwood before removal and translocate any larvae encountered to a suitable location.

Biodiversity Enhancements

In accordance with the National Planning Policy Framework (NPPF), local policy drivers and recent changes to the legislative context (Appendix C), proposals should seek to provide measurable net gains in biodiversity. A BNGA[11] has been carried out using the Natural England Statutory Biodiversity Metric[12]. This confirmed that the scheme achieves the minimum 10% biodiversity net gain requirement through the purchase of additional off-site land to deliver compensatory habitat.

To further enhance ecological value on site, the following measures should be considered for incorporation into the landscaping plans:

- Wildlife friendly landscaping including native trees, shrubs and herbaceous planting should be included within the proposed areas of landscaping. Species included should be of known value for pollinators, in particular using species from the RHS Plants for Pollinators Guide[13]. Recommended tree species should be native and be selected for the ecosystem services they provide, such as carbon sequestration, drought tolerance and pollution tolerance;
- Provision of bird nest boxes hung onto the trees to provide opportunities for birds, should be included. If possible, further boxes should be integrated into the new and existing site buildings;
- Hedgehog boxes could be placed on site to encourage refuge;
- Bat boxes would provide potential roosting opportunity for species such as common pipistrelle. The boxes should be hung on existing trees and be integrated into the new and existing site buildings; and,
- Invertebrate habitat features should be incorporated to provide features of interest as well as ecological function. Stag beetle loggeries, solitary beehives and habitat panels should be placed within soft landscaping in suitable, sunny locations.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by NHS, Royal Brompton and Harefield Hospitals, Part of the Guy and St Thomas NHS Foundation Trust, to undertake a PEA of a site located at Harefield Hospital in The London Borough of Hillingdon in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

The PEA confirmed the site as having high potential to support nesting birds, hedgehogs and invertebrates, in addition to being of moderate suitability for foraging and commuting bats and low suitability for roosting bats. Mammal burrows, which may be attributable to badger, were previously noted within the on-site woodland and the site was initially assessed as having moderate potential to support badgers. However, the burrows appear disused, and no evidence of badger activity was recorded within or adjacent to the site. Precautionary mitigation measures have been recommended to account for the possible presence of badgers within the wider area.. The site was deemed to have low potential to support GCN and reptiles, and precautionary mitigation recommendations have been made, proportional to the level of suitability.

Recommendations have been made regarding timings of works or nesting bird checks to account for the potential for the site to support nesting birds.

Key mitigation, compensation and enhancement actions are described to enable legislative and policy compliance (see context at Appendix C), aiming to achieve net gains in biodiversity for the site.

Key actions should be included within a CEMP document for the site which could be secured through planning condition.

APPENDIX A SITE PLAN AND HABITAT MAP

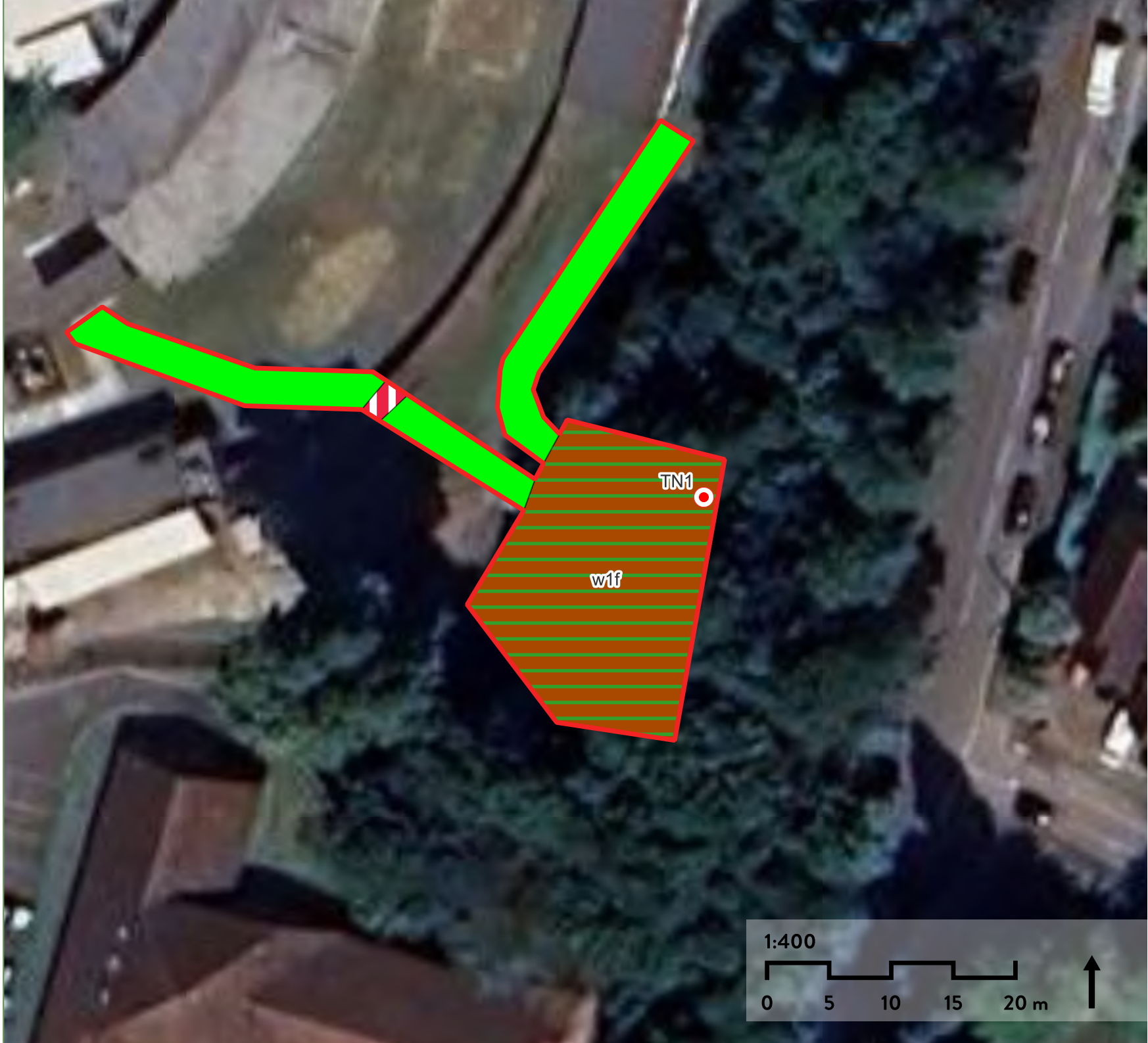
Figure A.1 Site plan and habitat map

HAREFIELD HOPSITAL

- Mammal burrows

Habitats

- g4 - Modified grassland
- u1b - Developed land. sealed surface
- w1f - Lowland mixed deciduous woodland



Title: UKHab map and site plan

Drawn by: EH
Date: 24/09/2025
Reviewed by: PW
Date: 24/09/2025

Project number: 552886
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL), Natural England

Greengage

APPENDIX B SITE PHOTOGRAPHS

Plate B.1 Priority habitat deciduous woodland on site

Plate B.2 Mammal burrow on site (2024)

Plate B.3 Mammal burrow on site (2025)

Plate B.4 INNS and LISI species cherry laurel on site

Plate B.5 Chain-link fencing running though woodland area

APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes The Environment Act[14] Wildlife and Countryside Act 1981 (as amended)[15]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[16], The Countryside and Rights of Way Act 2000 (CRoW Act)[17], and The Natural Environment and Rural Communities Act, 2006[18].

The Environment Act, 2021

The Environment Act, 2021 requires new development in England to deliver a minimum 10% Biodiversity Net Gain (BNG), as measured by the agreed metric (the current relevant version being the Natural England Statutory Metric), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the Local Planning Authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[19], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[20], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[21] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[22] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (Erinaceus europaeus), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[23] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[24] (and Biodiversity 2020 strategy[25] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[26] and EU Biodiversity Strategy (EUBS)[27], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Nesting Birds

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2019, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;

- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2019. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

Legislation Relating to Dormice

Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the hazel dormouse a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a dormouse;
- Possess or control and live or dead specimen or anything derived from a dormouse (unless it can be shown to have been legally acquired);

- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a dormouse; and
- Intentionally or recklessly disturb a dormouse while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

- Deliberately capture or kill a dormouse;
- Deliberately disturb a dormouse;
- Damage or destroy a breeding site or resting place of a dormouse; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead dormouse or any part of a dormouse.

Legislation Relating to Great Crested Newts

Great crested newts are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the great crested newt a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a great crested newt;
- Possess or control and live or dead specimen or anything derived from a great crested newt (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

- Deliberately capture or kill a great crested newt;
- Deliberately disturb a great crested newt;
- Damage or destroy a breeding site or resting place of a great crested newt; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead great crested newt or any part of a great crested newt.

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the

Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2019 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023[28] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: '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'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan[29]

Policy G1 Green infrastructure

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

2. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
3. Development Plans and Opportunity Area Planning Frameworks should:
    1. identify key green infrastructure assets, their function and their potential function
    2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
4. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
3. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

1. Sites of Importance for Nature Conservation (SINCs) should be protected.
2. Boroughs, in developing Development Plans, should:
    a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
    b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
    c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
    d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

3. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
   a. avoid damaging the significant ecological features of the site
   b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
   c. deliver off-site compensation of better biodiversity value.
4. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
5. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

1. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
2. In their Development Plans, boroughs should:
   a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
   b. Identify opportunities for tree planting in strategic locations
3. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[30]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. […] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

Local

Hillingdon local Plan 2012-2026[31]

Policy EM7: Biodiversity and Geological Conservation

The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part2-Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to

1. The conservation and enhancement of the natural state of:

- Harefield Gravel Pits
- Colne Valley Regional Park
- Fray's Farm Meadows

- Harefield Pit

2. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.

3. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.

4. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/assist in the delivery of actions within the Biodiversity Action Plan.

5. The provision of biodiversity improvements from all development, where feasible.

6. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.

7. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

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