Ecological Impact Assessment

Island Site, Uxbridge
8th October 2024

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Tyler Grange

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Summary

S.1. This report has been prepared by Tyler Grange Group Limited on behalf of the Ratcliffe Groves Partnership. It sets out the findings of an Ecological Impact Assessment at Island Site, Uxbridge, hereinafter referred to as 'the site'. The proposals are for the demolition and erection of light industrial buildings, with associated landscaping and car parking.

S.2. An 'extended' Phase 1/UK Habitat Classification (UK Habs) survey and Preliminary Bat Roost Assessment was undertaken on the 30th of July, 2024. A summary of the results are as follows:

- The site is comprised of developed land, including a building and hardstanding (negligible ecological importance), some poor-quality modified grassland (negligible importance), some bramble scrub (negligible ecological importance); and
- The site contains habitats that could support roosting and foraging bats, and widespread nesting and foraging birds.

S.3. The site is not within the Zone of Influence of a statutory or non-statutory protected sites that the proposed development and operational use of the site could impact.

S.4. Habitats of negligible ecological importance to be lost to the development, such as developed land, modified grassland and bramble scrub, require no specific mitigation.

S.5. Following a Preliminary Bat Roost Assessment (PBRA), the building on site was classified as having moderate suitability for roosting bats. After the first survey on 16th August 2024 a single soprano pipistrelle bat emerged from under the facia of the brick annex and thus a roost confirmed. Two further surveys were carried out on the 16th September and 29th of September which further confirmed the presence of roosting bats with four soprano pipistrelle bats emerging on the second survey and three on the final survey. An endoscope survey was also completed of the brick annex before the final survey, confirming a minimum of five soprano pipistrelles roosting under the facia board of the brick annexe off the northwest corner of the building. A licence will therefore be required from Natural England before the demolition of this building.

S.6. A detailed bat mitigation strategy will be designed with the client and will fully mitigate the loss of the roost. Several options are being considered such as a bat tower made up of bat bricks and boxes, or bat boxes attached to the proposed building. This would enhance the site for wildlife and increase the habitat diversity on site providing a range of nesting, foraging and commuting opportunities for species such as invertebrates, bats and birds.

S.7. The Biodiversity Net Gain (BNG) assessment found that the proposals would result in a gain of 40.41% in habitat units. This would comply with policy G6 of the London Plan 2021 and the National Planning Policy Framework (NPPF).

S.8. The proposed development is therefore in conformity with relevant planning policies such as Policy EM7 of the London Borough of Hillingdon's Local Plan, Policy DMEI 7 of the Local Plan Part 2: Development Management Policies, as well as Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) concerning ecology.

Section 1: Introduction and Context

Introduction

1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of The Ratcliffe Groves Partnership. It sets out the findings of an Ecological Impact Assessment (EcIA) at the Island Site, Uxbridge, UB8 2RT (OS Grid Reference TQ 04590 83118), hereafter referred to as 'the site'. See **Figure 1.1** for the indicative red line boundary.

Figure 1.1: Indicative red line boundary (© Google Aerial Imagery)

1.2. This assessment has been undertaken to inform a planning application for the development of warehouses, with an area of parking to the south and associated landscaping. The site proposals are shown in **Appendix 1**. All buildings will be demolished.

Site Context

1.3. The site is approximately 0.68 ha in size and comprises developed land and sealed surface. The site is in an industrial estate and is immediately surrounded by Eskdale Road in all directions, which comprises hard standing, beyond is developed land which is either hard standing or buildings of light industrial use. Approximately 70 m west of the site is the River Colne, which marks the threshold of the Colne Valley Biodiversity Opportunity Area (BOA).

Purpose

1.4. This report:

- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"[1] [2] (ZoI) of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's development.
- Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 2**; and
- Can be used to inform a planning application for the site's development.

1.5. This assessment and the terminology used are consistent with published guidance[3] [4]. A full methodology is set out in **Appendix 3**.

Methodology

1.6. The habitat survey comprised an extended Phase 1[5] and UK Hab[6] survey.

1.7. The data search was based on records purchased from Greenspace Information for Greater London (GIGL) and Buckinghamshire and Milton Keynes Environmental Records (BMERC) as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC)[7].

1.8. The methodologies for bat surveys are set out in **Appendix 4**.

Quality Control

1.9. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and act under the direction of members and abide by the Institute's Code of Professional Conduct[8].

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[1] CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.
[2] Defined as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries.
[3] CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.
[4] CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.
[5] JNCC. (2010) *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. Joint Nature Conservation Committee, Peterborough.
[6] UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at https://www.ukhab.org)
[7] https://magic.defra.gov.uk/magicmap.aspx [Accessed 03/08/2024]
[8] CIEEM (2022) *Code of Professional Conduct*. CIEEM, Winchester.

Limitations and Assumptions

1.10. There were several limitations associated with the surveys:

- The second two bat surveys (16/09 and 29/09) were completed outside of optimal survey window as stated in good practice guidance (Collins, 2023). A confirmed roost requires at least two surveys to be completed between May-August with one survey possible in September. As the surveys were carried out late in the season and outside the peak period, it is possible that a maternity roost could have been missed. Therefore, for this report we have assumed a maternity roost could be present on a precautionary basis;

- The recommended three-week gap between each emergence survey as stated in good practice guidance (Collins, 2023) was not left between the second and third emergence surveys due to the lateness in the season. However, bats were still recorded roosting in all surveys, so this is not thought to be a major limitation to the survey and results.

- The weather during the final surveys was sub-optimal due to light rain in the last 30 minutes of the survey. However, an endoscope survey was undertaken prior to the emergence survey which fully inspected the roost and counted 5 of the 3 emerging bats, so this is not thought to pose a constraint to the survey findings;

- Access was not possible inside one of the warehouses with a pitched roof, but it was assumed to have the same interior as the other two warehouses which were accessed and scoped out as suitable for bats due to the open, exposed and metal structure present (Photograph 2.2). Therefore, this is not thought to be a limitation to the survey.

- The brick annexe (toilet block, see photograph of PRF5 in **Table 2.3**) to the northwest of the site could not be accessed internally due to a locked door. However, an endoscope survey was completed of the exterior. The endoscope could not reach into all noted cavities, as the gap between the facia board ran the entire length of the wall which could lead into the cavity wall. it is possible that bats present in the cavity wall would not have been seen and higher numbers of bats at a different time of year could be present.

Section 2: Ecological Features and Evaluation

Designated Sites

2.1. The data search returned two Natura 2000 sites within 10 km of the site, and six non-statutory designated sites within 1 km of the site. These are detailed in **Table 2.1** below.

2.2. The site does not fall into the Site of Special Scientific Interest (SSSI) Impact Risk Zone and no SSSI's are present within the typical Zone of Influence (ZoL) for a SSSI, 2 km.

2.3. In London, non-statutory sites designated for their biodiversity importance are known as Sites of Importance for Nature Conservation (SINCs). SINCs are recognised by the Greater London Authority and London Borough Councils as important wildlife sites. SINCs are broken down into three tiers dependent on the geographic scale at which they are of importance, and these are, from most to least important:

- Sites of Metropolitan Importance;
- Sites of Borough Importance (Borough grade 1 and Borough grade 2); and
- Sites of Local Importance.

Local Biodiversity Opportunity Areas

2.4. The data search also returned two records of two Biodiversity Opportunity Areas (BOA) within 1 km of the site boundary. BOA's are not designated sites, but an area identified for opportunities to enhance biodiversity. The first, Colne Valley BOA lies 0.1 km to the west of the site. Opportunities for this designation, as stated in the BOA description returned by BMERC are as follows:

- Management and Restoration of Rivers & Streams;
- Eutrophic Standing Water;
- Wood Pasture & Parkland and Traditional Orchards;
- Management, Restoration and Creation of Reedbed;
- Woodland;
- Lowland Meadows;
- Purple Moor Grass and Rush Pastures, Fens, Ponds; and
- Hedgerows.

2.5. The second South Bucks Heaths and Parklands BOA lies 0.6 km to the west of the site. Opportunities for this designation, as stated in the BOA description returned by BMERC, are as follows:

- Management of Lowland Calcareous Grassland;
- Management and restoration of hedgerows, woodland and Traditional Orchards;
- Management, Restoration, Creation of Lowland Heathland, Lowland Dry Acid Grassland, Wood Pasture & Parkland, Lowland Fen, Lowland Meadows and ponds.

Table 2.1. Designated Sites

Designated site	Distance and direction from site	Citation	Ecological Importance
South West London Waterbodies Ramsar, Special Protection Areas (SPA)	7.6 km south	Regular use by protected species Gadwall *Anas strepera* and Shoveler *Anas clypeata.*	International
Burnham Beeches Special Area of Conservation (SAC)	8.8 km west	One of the richest sites for saproxylic invertebrates in the UK, including 14 Red Data Book species.	International
Little Britain Site of Importance for Nature Conservation (SINC)	0.1 km west	A wide range of aquatic flora is found in several locally uncommon species.	Metropolitan
London's Canals SINC	0.3 km east	Remarkable variety of habitats including lakes, rivers, scrub, woodland and neutral grassland.	Metropolitan
Frays River at Uxbridge Moor SINC	0.5 km east	Reasonable diversity of wetland plants and waterfowl.	Metropolitan
River Misbourne Local Key Area Water Vole Key Area	0.9 km north	Water vole opportunity area.	Local

Habitats and Flora

2.6. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The site comprises developed land and sealed surface (0.64 ha), with small areas of modified grassland (0.02 ha), bramble scrub (0.01 ha) and vacant or derelict land (0.01 ha). The location of habitats are shown on the **Habitats Features and Preliminary Bat Roost Assessment Plan 17240/P01**.

Table 2.2 Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
Primary code: Grassland Secondary code(s): Modified grassland 27	This habitat comprised mainly of short-mown grass. Species present included ribwort plantain *Plantago lanceolata*, yarrow *Achillea millefolium*, common hogweed *Heracleum sphondylium*, bristly oxtongue *Helminthotheca echioides*, daisy *Bellis perennis*, creeping buttercup *Ranunculus repens*, dandelion *Taraxacum officinale* and white clover *Trifolium repens*.	The modified grassland of poor condition is very common in the wider landscape and is considered to be of **negligible ecological importance**.	
Primary code: Heathland and shrub Secondary code(s): bramble scrub h1a	This small area was comprised of overgrown bramble scrub and grasses of varying levels of density. Species present included ribwort plantain *Plantago lanceolata*, dandelion *Taraxacum officinale*, bramble *Rubus fruticosus*, false oat *Arrhenatherum elatius*, broad-leaved dock *Rumex obtusifolius*, mad womans milk *Euphorbia helioscopia*, burdock *Arctium minus*, thistle *Cirsium vulgare* and wall barley *Hordeum murinum*.	Bramble scrub dominated this small overgrown area, with common grassland species present. Bramble scrub is very common in the wider area and is typically of poor condition, therefore this habitat is considered to be of **negligible ecological importance.**	
Primary code: Urban Secondary code(s): Developed land; sealed surface: building	The majority of the site comprised warehouses and tarmacked areas for access and parking.	This habitat is considered to be of **negligible ecological importance** but has potential for roosting bats.	

Primary code: Urban Secondary code(s): Vacant or derelict land	Small vacant areas of the site where small shrubs such as *Buddleia* spp. had grown.	This habitat is considered to be of **negligible ecological importance.**	

Protected and Notable Species

2.7. The below section sets out the potential for protected species on site. Species which are considered likely absent from the site based on professional judgement, following consideration the of habitats within the site, signs of species presence at the time of survey and data search records, are not discussed.

Bats

2.8. The data search returned records for nine bat species within 2 km of the site. Species included; common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Serotine *Eptesicus serotinus*, noctule *Nyctalus noctule*, Nathusius's Pipistrelle *Pipistrellus nathusii,* and Daubenton's bat *Myotis daubentoniid* and three species which were only identified to the genus level: un *Myotis sp.*, *Plecotus sp.*, *Pipistrellus sp.*

2.9. All of these species were recorded 0.6 km from the site in 2021. In addition, one EPS licence for bats were returned within a 2 km radius of the site. The closest licence was granted located 0.3 km north of the site (case reference: 2014-3752-EPS-MIT) and was granted for the destruction of a resting place of common pipistrelle and soprano pipistrelle bats.

Bat Activity

2.10. The site lies within an urban context, with light pollution within and adjacent to the site. It is assumed that light-tolerant species, such as common and soprano pipistrelle, could forage within and adjacent to the site. The habitats on site do not provide significant commuting and foraging opportunities for bats due to their small size and low diversity. However, 0.1 km west of the site, there is an area (Colne Valley BOA) containing ample habitats for commuting and foraging bats such as Deciduous Woodland, (Priority Habitat), Broadleaved Woodland and the River Colne. However, these habitats are separated from the site by a row of industrial buildings.

2.11. Overall, the assemblage of bats (likely to common species) utilising the site for foraging and commuting is considered to be of **low ecological importance**.

Preliminary Bat Roost Assessment

2.12. A Preliminary Bat Roost Assessment (PBRA) was conducted alongside the 'extended' Phase 1 Habitat survey. This assessment was carried out on the entire building complex, as it will be removed as part of the development. See **Appendix 4** for methodology, **Table 2.3** below for results, and the **Habitat Features and Preliminary Bat Roost Assessment Plan 17240/P01** for locations.

2.13. The buildings on site comprised of three interconnected buildings of light industrial use. The main buildings were metal clad, double story with pitched roofs (see **Photograph 2.1**). A brick annex to the northwest of the main warehouse was single story with a flat roof (see Photograph of PRF in **Table 2.3**). The corridor to the east of the site was also brick, single story and had a flat roof.

2.14. 

Photograph 2.1 showing roof of main warehouses

Table 2.3 Preliminary Bat Roost Assessment Results

Structure/tree and Suitability	Potential Roost Feature (PRF)	Photograph
Building B1 - warehouse complex **Moderate suitability**	PRF1 – Gap between two buildings and lifted felt and loose brick.	
	PRF2- Gap under cladding/ felt. The interior of building B1 was observed during the PBRA and found the PRF did not lead into a suitable cavity in the building. Therefore, PRF2 is likely only suitable for a small number of individuals of crevice-dwelling species.	

	PRF3 - Ivy concealing PRFs.	
	PRF4 - Gap under cladding/ felt and loose bricks. This internal section of B1 was not observed during the PBRA but due to the nature and usage of the building, the PRF is likely only suitable for a small number of individuals of crevice-dwelling species.	
	PRF5 - Gap between facia board and brick wall. A brick annexe housing staff toilets off the northwest of the main warehouse had a gap between the facia board and the external brick wall, with potential further access into a cavity wall. The interior of the building was not surveyed.	

Further Surveys

Emergence Bat Surveys

2.15. Following the PBRA, the building was classified at being of moderate suitability for roosting bats. As such, one bat emergence survey was carried out on the 16th of August 2024 which confirmed the presence of a roosting bat in PRF5 of B1. Two further bat emergence surveys were undertaken on the 16th of September and 29th September 2024 as per good practice guidance[9]. The first survey had surveyors positioned on all PRFs identified in **Table 2.3**, see **Plan 17240/P02** for surveyor positions and PRFs. The following two surveys focused on PRF5, a brick annexe off the northwest of the main warehouse.

2.16. Multiple soprano pipistrelle emergences were recorded from PRF5 throughout the three emergence surveys (full results and data from the survey can be found in **Appendix 4** and **Plan 17240/P02**). There was one emergence on the first survey, two on the second and three on the third, all from PRF5. There was a total of two re-entries into PRF5 recorded across the surveys (both on the second visit).

Endoscope Survey

2.17. An endoscope survey of the brick annexe on the 29th of September 2024 recorded at least five individual soprano pipistrelles in the gap between the facia board and the brick wall of the building. There was a possibility of more individual bats being present which could not be seen as the gap behind the facia board extended beyond the length of the endoscope. It is unknown whether this gap leads to a larger space within the cavity wall which could support a larger number of bats.

Photograph 2.1 shows the locations of bats from the endoscope survey.

[9] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

Photograph 2.2 shows four of the bats from the endoscope survey.

Roost Classification

2.18. Five soprano pipistrelles were found roosting underneath the facia board of the brick annexe off the northwest of the building during the endoscope survey (see **Photograph 2.2**). At least five emergences and two re-entries were observed throughout the three emergence surveys. Several droppings were found and collected but eDNA analysis has not been carried out.

2.19. Soprano pipistrelles are a Species of Principal Importance (SoPI), under Section 41 of the Natural Environment and Rural Communities (NERC) Act. They are common and widespread throughout the UK.

2.20. While only a peak count of 5 individuals was recorded, given the lateness in the season when the surveys were conducted (mid-August to end of September) the roost could be used by a larger number of bats earlier in the year and on a precautionary basis for this report, we have assumed a maternity roost or a satellite roost could be present.

2.21. Given the number of bats found within the roost, the habitats present, the conservation status of soprano pipistrelle and considering the seasonal limitations, it is assumed that at most the site supports a **maternity roost** of **local ecological importance**.

Birds

2.22. The data search returned a number of records of protected and notable birds species within 2 km of the site. Of these, some species of relevance to the site include grey wagtail *Motacilla cinerea*, house sparrow *Passer domesticus*, starling *Sturnus vulgaris* and wood pigeon *Columba palumbus*.

2.23. The building has the potential to support common and widespread nesting birds, such as feral or wood pigeon.

2.24. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.

Invasive species

2.25. Areas of *Buddleia spp*. were found scattered throughout the site. This species is listed under London Invasive Species Initiative (LISI)[10], and as such is recommended to be removed through the redevelopment of the site.

[10] London Biodiversity Partnership (available at: https://www.lbp.org.uk/LISI.html), accessed 03/05/2024

Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

3.1. The proposals are for the redevelopment of the site for light industrial use, with associated car parking and soft landscaping. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy.

Designated Sites

Statutory Sites

3.2. Given the nature of the site proposals and the distances involved between the site and South West London Waterbodies Ramsar and SPA and Burnham Beeches SAC, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

3.3. The BMERC and GIGL data searches returned no national statutory sites within 2 km and 1 km respectively of the site. The site fell into no SSSI Impact Risk Zones.

3.4. The proposed development will not result in any impact to statutory sites, and as such is in compliance with the NPPF, the London Plan Policies: G5 and G6; the Hillingdon Local Plan policies EM1, EM7, DMEI 7, which seek to protect biodiversity.

Non-statutory Sites

3.5. London's Canals SINC, Little Britain SINC and Frays River at Uxbridge Moor SINC lie approximately 0.3 km east, 0.1 km west and 0.5 km east of the site respectively. No impacts to the nearby SINCs are anticipated as part of the operational phase of the development, given there is no significant change of use.

3.6. During the construction phase, potential impacts via chemical/fuel run-off, noise/visual/vibration impacts, dust, etc are not anticipated due to the distance between the site and the aforementioned sites and the lack of hydrological connectivity.

3.7. In summary, the production and implementation of a CEMP, to include standard best practice pollution prevention, is expected to be conditioned and therefore prevent impacts to the non-statutory designated sites above.

3.8. The proposed development will result in no impact to designated sites, and as such is in compliance with the NPPF, the London Plan Policies: G5 and G6; the Hillingdon Local Plan policies EM1, EM7, DMEI 7, which seek to protect biodiversity.

Habitats and Flora

3.9. All of the habitats onsite to be impacted by the proposals are of negligible ecological importance, namely building, hardstanding, vacant or derelict land with shrubs, modified grassland and bramble scrub, as such no specific mitigation is required.

3.10. The modified grassland and bramble scrub on site will be removed as part the proposed development. The loss of these habitats will be more than compensated for by the creation of modified grassland and mixed scrub habitat on site, along with the planting of beech hedgerows (see **Appendix 3**).

3.11. Overall, the planting of native scrub and grassland is expected to improve the site overall for biodiversity and achieve a 42.34% gain in biodiversity units. As such the proposed development will result in a **positive impact** at a **local level** and is compliant with London Plan Policies: G5 and G6; the Hillingdon Local Plan policies EM1, EM7, DMEI 7, which seek to protect biodiversity.

Protected and Notable Species

Bats

3.12. Building B1 was initially assessed as having moderate suitability to support roosting bats, with five PRFs. However following three surveys the brick annex was confirmed to support one day/mating roost used by at least five soprano pipistrelles. As the surveys had some limitations associated with them, we have assumed on a precautionary basis for this report that a maternity bat roost could be present. B1 will be removed as part of the proposals (see **Appendix 1**).

3.13. A detailed bat mitigation strategy will need to be designed with the client to compensate for the loss of the roost. If Natural England grants a licence, and a maternity roost is confirmed present the works to demolish the building will need to be timed to be outside of maternity season and only carried out between March-April and September/October. Appropriate mitigation will be put in place pre- and post-development, such as bat bricks and boxes and/or offsite compensation. Full planning permission will be needed prior to a licence being applied for and a licence application typically takes a minimum of 30 working days to process.

3.14. To enhance the site for roosting bats, bat mitigation is recommended to be incorporated within the scheme by either using integrated bat bricks or externally erected bat structures (expected to be secured via a suitably worded planning condition).

3.15. A suitable mitigation plan will allow the development to be compliant with the NPPF, the London Plan Policies: G5 and G6; the Hillingdon Local Plan policies EM7 and DMEI 7 which seek to protect biodiversity.

Birds

3.16. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.

3.17. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (the buildings and scrub) should be timed outside the nesting bird season (generally taken as March to August inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats and buildings are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledge and the nest is no longer active.

3.18. Habitat creation such as native hedgerow and scrub planting is expected to increase nesting opportunities on site. Additionally, two bird boxes are recommended to be incorporated within the scheme, targeting species of conservation concern known to be present (expected to be secured via a suitably worded planning condition). These mitigations will allow the development to be compliant with the NPPF, the London Plan Policies: G5 and G6; and the Hillingdon Local Plan policies EM7 and DMEI 7 which seek to protect biodiversity.

Section 4: Biodiversity Net Gain

4.1. Policy G6 of the London Plan 2021, as well as the NPPF, requires developments to demonstrate a net gain in biodiversity. In addition, policy EM7 of the London Borough of Hillingdon's Local Plan which asks for developments to achieve a gain in biodiversity where feasible, and Schedule 7A of the Town and Country Planning Act which has made a 10% net gain mandatory from February 2024 for all major developments.

4.2. A development achieves biodiversity net gain when the total biodiversity units present post-development is higher than that of the biodiversity units present on site prior to development. Defra's 4. metric has been used to calculate the biodiversity value of the site before and after development in terms of "biodiversity units" to calculate an overall biodiversity net gain or loss.

Existing Habitats

4.3. The following habitats are present within the red line boundary of the site and are shown on Habitat Features and Bat Roost Assessment Plan **17240/P01**. No watercourses or linear habitats were present. The rationale for condition assessments is detailed within the metric **17240/BNG**.

Table 4.1. Baseline Habitats and Areas Retained and Enhanced

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Grassland	Modified grassland	0.018	Low	Poor	0	0	0.02
Urban	Developed land; sealed surface	0.65	V.Low	N/A - Other	0	0	0.65
Urban	Vacant or derelict land	0.012	Low	Poor	0	0	0.01
Heathland and shrub	Bramble scrub	0.005	Medium	Condition Assessment N/A	0	0	0.01

Proposed Habitats

4.4. The proposals, as shown within **Appendix 1** and the Post-development Habitat Plan **17240/P03,** have been used to calculate the proposed habitat areas. The rationale for target condition assessments is detailed within the metric **17240/BNG**.

Table 4.2. Created and Enhanced Habitats

Broad Habitat	Proposed habitat	Area (hectares)	Created/enhanced	Distinctiveness	Target condition
Urban	Developed land; sealed surface	0.64	Created	V.Low	N/A - Other
Grassland	Modified grassland	0.031	Created	Low	Poor
Heathland and scrub	Mixed scrub	0.014	Created	Medium	Poor

Table 4.3. Created and Enhanced Hedgerows

Habitat type	Length (km)	Created/enhanced	Distinctiveness	Target condition
Native Hedgerow	0.04	Created	Low	Poor
Native Hedgerow	0.04	Created	Low	Poor
A net gain of 0.04 hedgerow units, +123.15%				

Results Summary

4.5. As described within The Statutory Biodiversity Metric **17240/BNG** and summarised below in **Figure 4.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a gain of 0.03 habitat units and 0.15 hedgerow units. This is a percentage gain of 40.41% in habitat units.

Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.03
	Hedgerow units	0.15
	Watercourse units	0.00
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.03
	Hedgerow units	0.15
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	40.41%
	Hedgerow units	N/A
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Figure 4.1: Biodiversity Net Gain Assessment Results Summary, taken from The Statutory Biodiversity Metric.

Management

4.6. The results of The Statutory Biodiversity Metricare based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by Defra.

4.7. Details of habitat establishment and long-term management will be provided through the production of a Habitat Management and Monitoring Plan (HMMP). The HMMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years.

Section 5: Conclusions

5.1. The proposed development will not result in any impacts to statutory designated sites. Three non-statutory sites: London's Canals SINC, Little Britain SINC and Frays River at Uxbridge Moor SINC were assessed, and no impacts are anticipated as a result of development, as long as standard best practice is followed to control impacts via air, run-off, and other pollutants. These are to be incorporated into a CEMP.

5.2. The development will affect habitats of negligible ecological importance. The enhancements and habitat creation proposed, including native species planting, will provide additional opportunities for biodiversity within the site.

5.3. The brick annex building which will be demolished has a confirmed day roost used by at least five soprano pipistrelle bats.

5.4. Once the roost has been fully characterised and it is established how bats are using the building during the peak season, a detailed bat mitigation strategy will be designed with the client and will fully mitigate for the loss of the roost, whether maternity, mating or day roost. If Natural England grants a licence, and a maternity roost is confirmed, works will be timed to be outside of maternity season and take between March-April and September/October. An appropriate mitigation strategy will be put in place pre- and post-development, such as a bat tower made up of bat bricks and boxes, or bat boxes attached to the proposed building.

5.5. Should vegetation or the building on the site be removed during the core nesting bird season (March-August, inclusive), a pre-works check by an ECoW would be required to determine whether active birds' nests are present.

5.6. The proposals would result in a net gain of 0.03 habitat units and 0.15 hedgerow units. This is a percentage gain of 40.41% in habitat units and 0.15 hedgerow units. A HMMP to ensure the long-term management of the proposed habitat enhancements is expected to be secured via a suitable worded planning condition.

5.7. In conclusion, in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant planning policies: the NPPF; London Plan Policies: G1, G5 and G6; the Hillingdon Local Plan policies EM1, EM7, DMEI 7, which seek to protect biodiversity. as well as legislation with regard to ecology.

Appendix 1: Proposed Site Plan [11565-P-100 Proposed Site Plan_A]

N

0m 5m 10m 15m 20m 25m 30m

SCALE

Existing overhead power lines

Total 5 no. staff / visitors parking bays for Unit 2 with drop down bollards

2.4m high paladin fence to perimeter

Secure pedestrian access gates

Total 5 no. staff / visitors parking bays for Unit 1 with drop down bollards

Proposed masonry bat tower. Refer to drawings no. 11565-D-100

Staff amenity area. Refer to drawing no. 11565-P-104 for landscaping plan

Staff amenity area. Refer to drawing no. 11565-P-104 for landscaping plan

Soft landscaping. Refer to drawing no. 11565-P-104 for landscaping plan

5m clear height to underside of office floor

Proposed condenser unit

Office entrance with GF amenities and first floor office space.

Pedestrian gate

Total 8 no. parking bays for Unit 1 with 4 no. EV charging bays within service yard.

8 no. spaces of secured covered cycle parking for Unit 1

Bin store

UNIT 1

UNIT 2

EKSDALE ROAD

SERVICE YARD

SERVICE YARD

32.1m

32.5m

30.8m

El Sub Sta

5m clear height to underside of office floor

Office entrance with GF amenities and first floor office space.

Pedestrian gate

Proposed condenser unit

Total 8 no. parking bays for Unit 2 with 4 no. EV charging bays within service yard.

8 no. spaces of secured covered cycle parking for Unit 2

Bin store

Heavy duty swing vehicle gates for Unit 2

New sub-station

Heavy duty swing vehicle gates for Unit 1

2.4m high paladin fence to perimeter

Existing overhead power lines

OWNERSHIP BOUNDARY

APPLICATION BOUNDARY

UNIT 1 (same to Unit 2)

GF-Warehouse GIA	1,094 sqm	11,776 sqft
GF-Amenity GIA	25 sqm	269 sqft
GF-Circulation	74 sqm	797 sqft
GF-Internal Wall	5 sqm	54 sqft
Total GF GIA	**1,198 sqm**	**12,896 sqft**

1F-Office GIA	119.54 sqm	1,287 sqft
1F-Amenity GIA	18.30 sqm	197 sqft
1F-Circulation	56.9 sqm	612 sqft
1F-Internal Wall	4 sqm	43 sqft
Total 1F GIA	**198.74 sqm**	**2,139 sqft**

TOTAL UNIT 1 GIA	**1,396.74 sqm**	**15,035 sqft**
TOTAL SITE GIA (UNIT 1 & 2)	**2,850.24 sqm**	**30,680 sqft**

Car Parking Total (Unit 1 & 2)	26
Cycle Parking Total (Unit 1 & 2)	16
EV Charging Total (Unit 1 & 2)	8
Rooflights	10% of warehouse area

REV.	DATE	NOTES	INIT.
D	11.10.24	Planning Issue	DS
C	18.09.24	Minor amendments to entrance door	CF
B	03.09.24	Minor amendments to TTP comments	JT
A	30.08.24	Planning drawings issued to design teams	JT

CLIENT / PROJECT

GLOBE EXHIBITIONS LTD.

ISLAND SITE, EKSDALE ROAD

UB8 2RT, UXBRIDGE

DRAWING TITLE

PROPOSED SITE PLAN

STATUS

PLANNING

DATE	DRAWN	SCALE @ A3
22.07.2024	JT	1:500

PROJECT NUMBER	UNIT / BLOCK	CI / SFB CODE	TYPE & NUMBER	REVISION LETTER
11565	P	100		D

DRAWING NO.

Site Location Plans	L	GA Plans	P	Elevations	E
Sections	S	Details	D	Prefix: Colour	C

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Appendix 2: Legislation and Planning Policy

Legislation

A2.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Environment Act 2021;
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities Act (NERC) 2006;
- The Hedgerows Regulations 1997; and
- The Protection of Badgers Act 1992.

A2.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).

A2.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A2.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

A2.5. The Environment Act gained Royal Assent in November 2022. Whilst the premise of Biodiversity Net Gain (BNG) has been around prior to this, the commencement of Statutory BNG on the 12th February 2024 has made Biodiversity Net Gain a condition of planning (not a planning condition). The target 'gain' is currently set at 10% but the Secretary of State has the ability to change this.

National Planning Policy

National Planning Policy Framework (NPPF), December 2023

A2.6. The updated National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A2.7. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

Section 11 of the NPPF, paragraph 120, sub-section b states that planning policies and decisions should:

b) "encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;

c) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"

A2.8. Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

A2.9. Paragraph 180 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "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);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; and

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A2.10. Paragraph 181 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Paragraph 185 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally

designated sites of importance for biodiversity[11]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[12]; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A2.11. When determining planning applications, Paragraph 186 states that local planning authorities should apply the following principles:

a) "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;

b) 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 outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) 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[13] and a suitable compensation strategy exists; and

d) 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."

A2.12. As stated in paragraph 187 the following should be given the same protection as habitats sites[14]:

a) "potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites[15]; and

[11] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

[12] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

[13] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

[14] The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

[15] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."*

A2.13. Paragraph 182 states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Planning Policy

The London Plan, The Spatial Development Strategy for Greater London, March 2021

A2.14. Policies relating to ecology and nature conservation can be found in Chapter 8: Green Infrastructure and Natural Environment, which are summarised as follows:

A2.15. Policy G1: Green Infrastructure

London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

- *identify key green infrastructure assets, their function and their potential function*
- *identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.*

Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

A2.16. Policy G5: Urban Greening

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.

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).

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.

A2.17. Policy G6: Biodiversity and Access to nature

Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- *use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.*
- *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.*
- *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.*
- *seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.*
- *ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*

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:

- *avoid damaging the significant ecological features of the site*
- *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*
- *deliver off-site compensation of better biodiversity value.*

D 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.

Proposals which reduce deficiencies in access to nature should be considered positively.

Local Plans, Supplementary Planning Documents, Core Strategies

Hillingdon Local Plan: A Vision For 2026 Local Plan: Part 1 Strategic Policies[16]

Strategic Objectives

A2.18. SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.

A2.19. SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.

A2.20. SO11: Address the impacts of climate change and minimise emissions of carbon and local air quality pollutants from new development and transport.

A2.21. SO12: Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans. Related Policies: EM1, EM7, EM8, BE1, T1

Policy EM1: Climate Change Adaptation and Mitigation

A2.22. The Council will ensure that climate change mitigation is addressed at every stage of the development process by:

1. Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport.

2. Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.

3. Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.

4. Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.

5. Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.

6. Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.

[16] London Borough of Hillingdon (2012), A vision for 2026 Local Plan: Part 1 Strategic Policies (adopted November 2012), (available at: https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal_Plan_Part_1_Strategic_Policies_15_feb_2013_a_1_1.pdf?m=1598370401647, [accessed 04/05/2024]

7. Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation as part of their proposals.

8. Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity, and a greater use of waste as a resource.

9. Promoting new development to contribute to the upgrading of existing housing stock where appropriate.

10. The Borough will ensure that climate change adaptation is addressed at every stage of the development process by:

11. Locating and designing development to minimise the probability and impacts of flooding.

12. Requiring major development proposals to consider the whole water cycle impact which includes flood risk management, foul and surface water drainage and water consumption.

13. Giving preference to development of previously developed land to avoid the loss of further green areas.

14. Promoting the use of living walls and roofs, alongside sustainable forms of drainage to manage surface water run-off and increase the amount of carbon sinks.

15. Promoting the inclusion of passive design measures to reduce the impacts of urban heat effects.

Implementation of Policy EM1- how we will achieve this

- The Council will implement Policy EM1 through the topic policies in the Hillingdon Local Plan: Part 1- Strategic Policies. The above criteria are essential to ensure that this Hillingdon Local Plan: Part 1- Strategic Policies and future Local Plan plans and programmes can help the borough respond positively to climate change. The implementation of the criteria is embedded within most of the Hillingdon Local Plan: Part 1- Strategic Policies.

- In addition to the above, there will be a requirement to include the criteria in the development of the Hillingdon Local Plan: Part 2- Heathrow Area Policies Local Development Document. This will ensure that this highly important growth area is fully considerate of the environmental challenges alongside the social and economic matters.

- All the above criteria will be fed into the preparation of the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). This LDD will provide further details which development proposals must follow.

- A separate Heat Mapping Exercise will be undertaken by the Council in accordance with the London Plan requirements. This will build on the work in the London Heat Mapping exercise which has revealed possible opportunities for district heat networking to provide a more efficient approach to community heating needs. Policies

in the Hillingdon Local Plan: Part 2- Development Management Policies LDD will require developers to investigate and link into identified networks.

Monitoring of Policy EM1- how we will measure success

A2.23. Monitoring of the Policy EM1 will be through the Annual Monitoring Report with specific links to:

- E1 (Core) Indicator: Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality. Target: No planning permission will be granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality (or any other targets set by Government).
- E2 (Core) Indicator: Change in areas of biodiversity importance. Target: i) Preserve the area of wildlife habitats; and ii) Minimise loss of designated areas to development (or any other targets set by Government).
- E3 (Core) Indicator: Renewable energy generation. Target: 20%of energy needs from renewable sources for larger applications (or any other targets set by Government).
- LO16 (Local) Indicator: The average standard assessment procedure (SAP) rating of local authority owned dwellings. Target: BV63 Increase energy efficiency of local authority owned dwellings. Target for 2006/07 was 71.5. Targets for, 2007/08, 2008/09 and 2009/10 are 67.5, 68 and 68.5 respectively.
- LO17 (Local) Indicator: Annual average concentrations of nitrogen dioxide (NO2) in specific parts of the borough. Target: 40 µg/.m^3.

Policy EM7: Biodiversity and Geological Conservation

A2.24. 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: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

A2.25. 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.

Implementation of Policy EM7 - how we will achieve this

A2.26. The Council will implement Policy EM7 by:

- Raising the profile of the biodiversity and geological interests both locally, regionally and nationally.
- Supporting, improving and managing biodiversity interests and local geological sites through the planning process.
- Protecting and where feasible extend habitat and improve ecosystems throughout the borough and to areas beyond, by maintaining existing trees, native vegetation (adaptable to climate change) and open space and provide new areas of such vegetation (including the linking of existing fragmented areas) for the benefit of wildlife in accordance with the local Biodiversity Action Plan.
- Seeking and pooling contributions in accordance with the Planning Obligations Supplementary Planning Document towards the implementation of actions contained within Hillingdon's Biodiversity Action Plan.
- Working with partners, private landowners and other utility providers to achieve multi-functional use of land use that promotes and enhances biodiversity, adds to the green grid or achieves other open space outcomes, including improved accessibility.
- Working with local community groups/ partners when reviewing the Biodiversity Action Plan.

Monitoring of Policy EM7 - how we will measure success

A2.27. Monitoring of Policy EM7 will be through the Annual Monitoring Report with a specific link to:

- E2 (Core) Indicator: Change in areas of biodiversity importance including; change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance. Target: i) Preserve the area of wildlife habitats ii) Minimise loss of designated areas to development (or any other target set by Government).

- Number of biodiversity and geological conservation sites lost to development.
- Number of applications refused on biodiversity or geological interest grounds.
- Number of local sites actively managed.
- Number of additional nature conservation sites designated.
- Implementation of Hillingdon's Biodiversity Action Plan.

Local Plan Part 2: Development Management Policies Document (adopted January 2020)[17]

Policy DMEI 7: Biodiversity Protection and Enhancement

A) 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.

B) If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit 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.

C) All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements. D) Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

RAF Uxbridge Supplementary Planning Document[18]

A2.28. The high amenity and environmental values of the landscaping, Green Belt and the River Pinn corridor are recognised on this site as well as the objective to preserve and enhance them. The potential to utilise the Green Belt as public open space was also a strong aspiration raised through the public consultation.

A2.29. There are a number of considerations, which will affect open space provision on the site and the strategy for this. These are:

[17] London Borough of Hillingdon (2020), Local Plan Part 2: Development Management Policies Document (available at https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2_Development_Management_Policies_-_ADOPTED_VERSION_JAN_2020_1.pdf?m=1598370641570),[accessed 03/06/2024]

[18] London Borough of Hillingdon (2009), RAF Uxbridge Supplementary Planning Document (available at: https://www.hillingdon.gov.uk/media/6641/RAF-Uxbridge---supplementary-planning-document/pdf/esRAF_Uxbridge_SPD.pdf?m=1625574527463), [accessed 04/05/2024]

- The provisions of the Green Chain designation for land in the north of the site, and potential for extension of the green chain
- The need to protect the openness of the Green Belt and the requirement that this be delivered as a District Park
- The need to protect the settings of the Listed Buildings and the aspiration to restore the historic landscape around Hillingdon House
- The protection of areas of significant wildlife habitat, mainly adjacent to the River Pinn
- The protection and enhancement of the biodiversity values of the River Pinn corridor
- The inclusion of sustainable urban drainage systems SUDS across the site, and flood management features as part of the green network
- The provision of recreational needs for the new residential population.

Appendix 3: Methodology and Results

Data Search

A3.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

A3.2. The following resources were consulted/contacted:

- Multi-Agency Geographic Information for the countryside (MAGIC) website[19];
- Greenspace Information for Greater London CIC (GiGL)[20]; (Data received on 29 July 2024);
- Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC) [21]; (Data received on 25 July 2024);
- Hillingdon Borough Council website[22];
- Joint Nature Conservation Committee (JNCC) website[23];
- Natural England (NE) designated sites website[24];
- Ordnance Survey mapping; and
- Google Maps, including aerial photography.

A3.3. The following areas of search around the boundary of the site boundary were applied:

- 1 or 2 km for protected and priority species (for GIGL and BMERC respectively), national statutory designated and non-statutory sites; and
- 10 km for European statutory sites.

[19] https://magic.defra.gov.uk/ [Accessed 25/07/2024]
[20] https://www.gigl.org.uk/ [Accessed: 25/07/2024]
[21] https://www.bucksmkerc.org.uk/about-us/ [Accessed: 25/07/2024]
[22] https://www.hillingdon.gov.uk/ [Accessed 25/07/2024]
[23] http://jncc.defra.gov.uk/ProtectedSites/ [Accessed 25/07/2024]
[24] https://designatedsites.naturalengland.org.uk/ [Accessed 25/07/2024]

'Extended' Phase I Habitat Survey and UKHabs

A3.4. An 'extended' Phase 1 survey was carried out on the 30th July 2024 by William Wells, BSc a suitably experienced ecologist and qualifying member of CIEEM, assisted by Charlotte Stewart MSc, a qualifying member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey[25] and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group[26].

A3.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

A3.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the statutory Metric, which included confirming 'pass' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Biodiversity Net Gain

A3.7. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the 'unit' value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and
- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

A3.8. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the 'unit' value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

A3.9. A calculation has been undertaken using the baseline habitats identified during the habitat condition assessment survey, which was carried out on the 30th July 2024, alongside the 'extended' Phase 1 survey above. All surveys were carried out by Charlotte Stewart MSc and William Wells BSc, both suitably experienced ecologists and qualifying members of CIEEM.

[25] Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.
[26] Butcher, B., Carey, P., Edmons, R., Norton, L. and Treweek, J. (2020). UK Habitat Classification – Habitat Definitions V1.1

A3.10. The UK Habitat Classification was used to identify habitat types. Note that the calculation is completed separately for non-linear and linear habitats. Habitat areas entered into The Statutory Biodiversity Metric in hectares were rounded to two decimal places.

Evaluation

A3.11. The evaluation of habitats and species is defined in accordance with published guidance[27]. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.

A3.12. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.

A3.13. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Impact Assessment

A3.14. The assessment identifies impacts and their effects as a result of the proposed development on important ecological features. This includes consideration of impacts at all relevant stages of the development, including construction and operation/occupation. The assessment includes reference to legislation and policy, and supplementary planning guidance where relevant.

Application of Mitigation Hierarchy

A3.15. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:

- Avoidance – measures to avoid harm to ecological features;
- Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;

[27] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

- Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and

- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.

Appendix 4: Bat Legislation, Methodology and Results

Legislation and Conservation Status

A4.1. All U.K bat species are listed on Appendix II of the Bern Convention and on Annexes II and IV of the EU Natural Habitats Directive. In England and Wales bats are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 and under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). It is an offence, with certain exceptions, to:

- Intentionally or deliberately capture, kill, or injure a bat;
- Intentionally or recklessly damage, destroy, and disturb bats in a place used for shelter or protection, or obstruct access to such areas;
- Damage or destroy a bat breeding site or resting place;
- Possess a bat, or any part of it, unless acquired lawfully; and
- Sell, barter, exchange, transport, or offer for sale a bat or parts of them.

A4.2. Actions that are prohibited can be made lawful by a licence issued by the appropriate Statutory Nature Conservation Organisation.

A4.3. Several species of bats barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii,* brown long-eared *Plecotus auritus,* greater horseshoe *Rhinolophus ferrumequinum,* lesser horseshoe *Rhinolophus hipposideros,* noctule *Nyctalus noctula* and soprano pipistrelle *Pipistrellus pygmaeus* are listed as Priority Species under the 'UK Post-2010 Biodiversity Framework which provides a statutory list of priority species in England, Scotland, Wales and Northern Ireland, as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (England), Section 7 of the Environment (Wales) Act 2016, Section 2(4) of the Nature Conservation (Scotland) Act 2004, and Section 3(1) of the Wildlife and Natural Environment Act (Northern Ireland) 2011. Decision-makers such as Local Planning Authorities must have regard for Priority species in all their activities, including when making decisions on planning applications.

Survey Methodologies

A4.4. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines[28], the Bat Workers Manual[29] and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition[30] and comprised:

- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats, including use of an endoscope;
- Day-time Bat Walkover (DBW) – Walkover of the sites to assess potential bat activity including foraging areas and potential commuting routes; and
- Emergence presence / absence surveys - to determine the presence or likely absence or roosting bats within buildings.

A4.5. Surveys were undertaken by Dan Bardey, (023-10979-CL18-BAT), Jason Short, Rachel Richards, Paul Moon, Ben Nelumbu and Charlotte Stewart.

Preliminary Bat Roost Assessment (PBRA)

A3.16. A PBRA was undertaken on the building within the Site boundary. The assessment was undertaken on 30th July 2024 by Will Wells BSc Qualifying CIEEM and Charlotte Stewart MSc. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the building and PRFs at the Site are shown on **17240/P01**. The building was inspected from the ground using binoculars, high powered torch, digital camera and endoscope for accessible features. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.

A3.17. The potential of the buildings to support roosting bats was assessed using the criteria shown in **Table A3.1** below.

Table A3.1: Building / Structure Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting 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).
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

[28] Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.
[29] Mitchell-Jones, A.J, & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8
[30] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

Suitability	Description of Roosting Habitats
	unsuitable features on occasion.
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[b] 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[c]).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[b] 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 in this table is made irrespective of species conservation status, which is established after presence is confirmed)
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[b] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

[a] Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

[b] For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

[c] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments. Common pipistrelle swarming has been observed in the UK and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland. This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.

A4.6. Consideration of the structures suitability to be utilised as a hibernation roost was also considered in line with published guidance [31] [32].

[31] Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.
[32] Middleton, N. (2019) Assessing Sites for Hibernation Potential. A Practical Approach, including a Proposed Method & Supporting Notes. Author: Neil Middleton (BatAbility Courses & Tuition) Version: Draft/V2.2019 Dated: 08.10.2019 Assessing-Sites-for-Hibernation-Potential-BatAbility-10.2019.pdf

Dusk Emergence Surveys

A4.7. All bat surveys undertaken by Tyler Grange were completed with reference to published guidance[33] [34] [35] [36].

A4.8. The emergence surveys were undertaken in accordance with best practice survey guidance, starting 15 minutes before sunset and finishing an hour and a half after sunset.

A4.9. During the first visit, four surveyors were positioned to observe best any bats emerging from previously identified PRFs or flying near to the building. An emergence from PRF5 of the brick annexe (toilets, Photograph of PRF5 in **Table 2.3**) was recorded during the first visit, so two further surveys were needed to classify PRF5. During the second and third visits, two surveyors were positioned at PRF5 to capture any further emergences.

A4.10. Nightfox whiskers were used to identify bats during the surveys, and BatExplorer software was used to analyse bat calls for species identification. Analysts of the sound files had all completed BatAbility's Certificate of Bat Acoustic Analysis (COBAA)[37] assessment course.

A4.11. The survey was completed during optimum weather conditions, and these are detailed in below **Table A4.2** along with the date and sunrise time.

Table A4.1. Dusk Emergence Survey Meta Data (Visits 1 -3)

Date: 16/08/2024	**Start Time: 20:06**	**End Time: 21:51**
Sunset: 20:21	**Weather at Start:**	**Weather at End:**
Cloud Cover (%):	5	5
Wind (Beaufort):	1	1
Temperature (°C):	20	16
Precipitation:	dry	dry
Date: 16/09/2024	**Start Time: 19:05**	**End Time: 20:50**
Sunset: 19:20	**Weather at Start:**	**Weather at Start:**
Cloud Cover (%):	10	10
Wind (Beaufort):	1	1
Temperature (°C):	18	12
Precipitation:	dry	dry
Date: 29/09/2024	**Start Time: 18:33**	**Start Time: 20:18**
Sunset: 18:48	**Weather at Start:**	**Weather at Start:**

[33] Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. Bat Conservation Trust, London.
[34] Natural England (2022) Bats: advice for making planning decisions, Available at: https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions [Accessed 20/07/2024]
[35] Mitchell-Jones, A.J. (2004) Bat Mitigation Guidelines. English Nature, Peterborough.
[36] Mitchell-Jones, A.J. & McLeish, A.P. (2012) The Bat Workers' Manual. Pelagic Publishing, Exeter.
[37] https://batability.co.uk/cobaa/

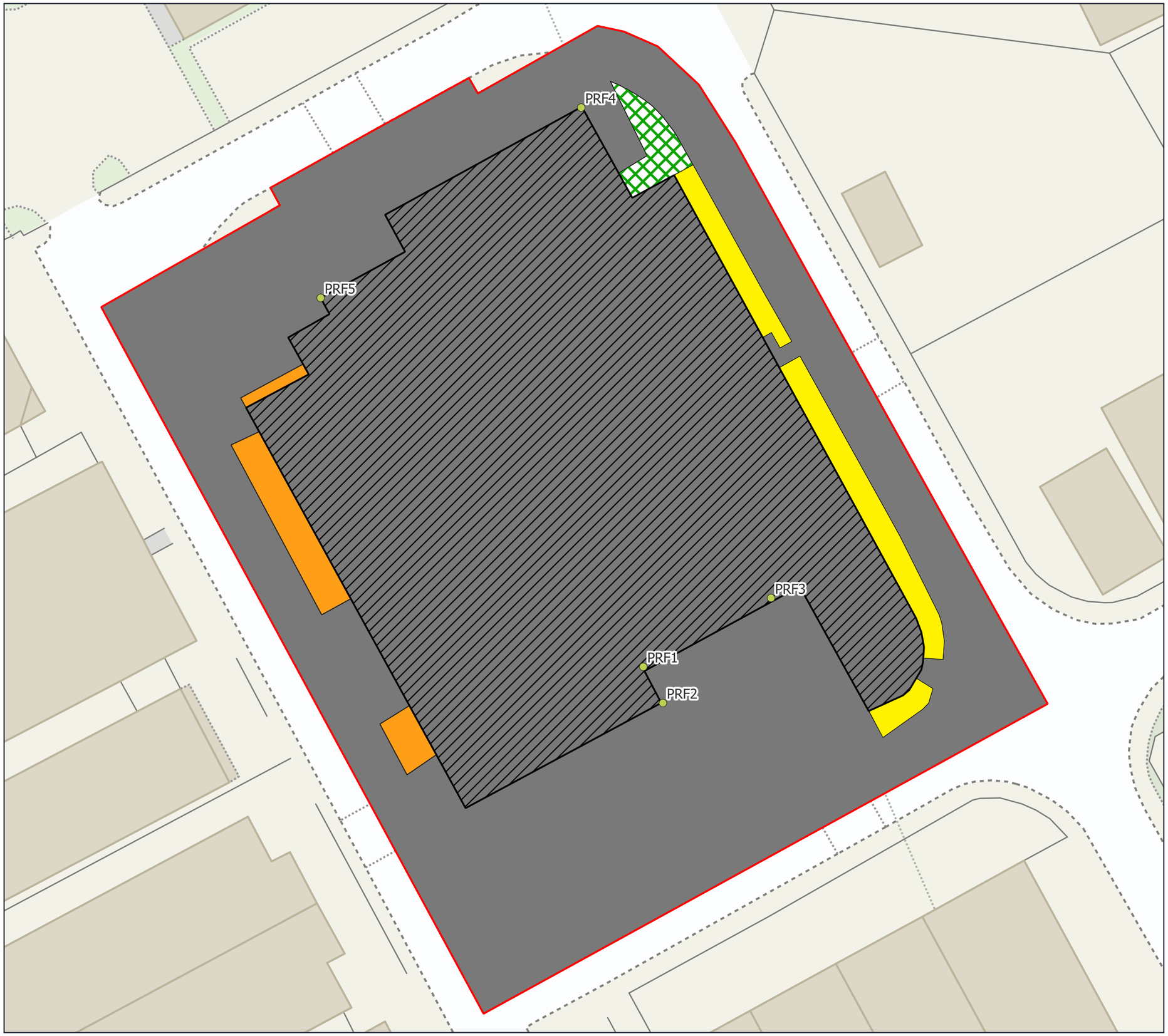
Cloud Cover (%):	100	100
Wind (Beaufort):	2	2
Temperature (°C):	12	9
Precipitation:	Dry	Light rain

Plans:

Plan 1: Habitat Features and Preliminary Bat Roost Assessment Plan **17240/P01**

Plan 2: Bat Survey Plan **17240/P02**

Plan 3: Post-development Habitat Plan **17240/P03**



Legend

- Redline Boundary
- Island Site Building
- Potential Roosting Features

Habitats

- Grassland - Modified grassland
- Heathland and shrub - Bramble scrub
- Urban - Developed land; sealed surface
- Urban - Vacant or derelict land

N

0 1 2 3 4 m

Project	Island Site, Uxbridge
Drawing Title	Habitat Features and Preliminary Bat Roost Assessment Plan
Scale	As Shown (Approximate)
Drawing No.	17240/P01
Date	October 2024
Checked	CS/CC

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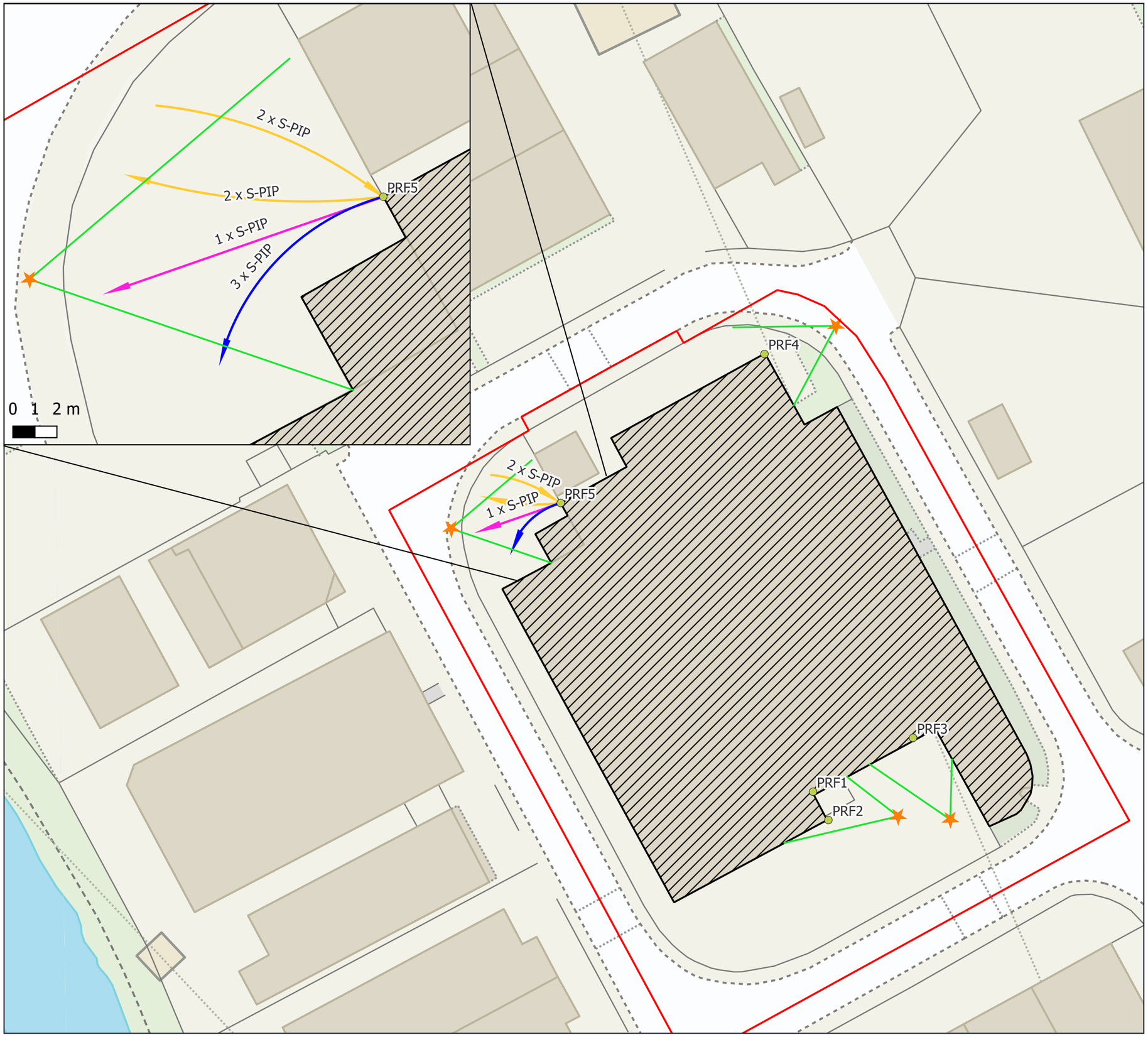

Legend

- Redline Boundary
- Island Site Building
- Surveyor Locations
- Surveyor Views
- Potential Roosting Features

Bat Flight Lines

- Visit 1 (16/08/2024)
- Visit 2 (16/09/2024)
- Visit 3 (29/09/2024)

N

0 1 2 3 4 m

Project	Island Site, Uxbridge
Drawing Title	Bat Survey Plan
Scale	As Shown (Approximate)
Drawing No.	17240/P02
Date	October 2024
Checked	CS/CC

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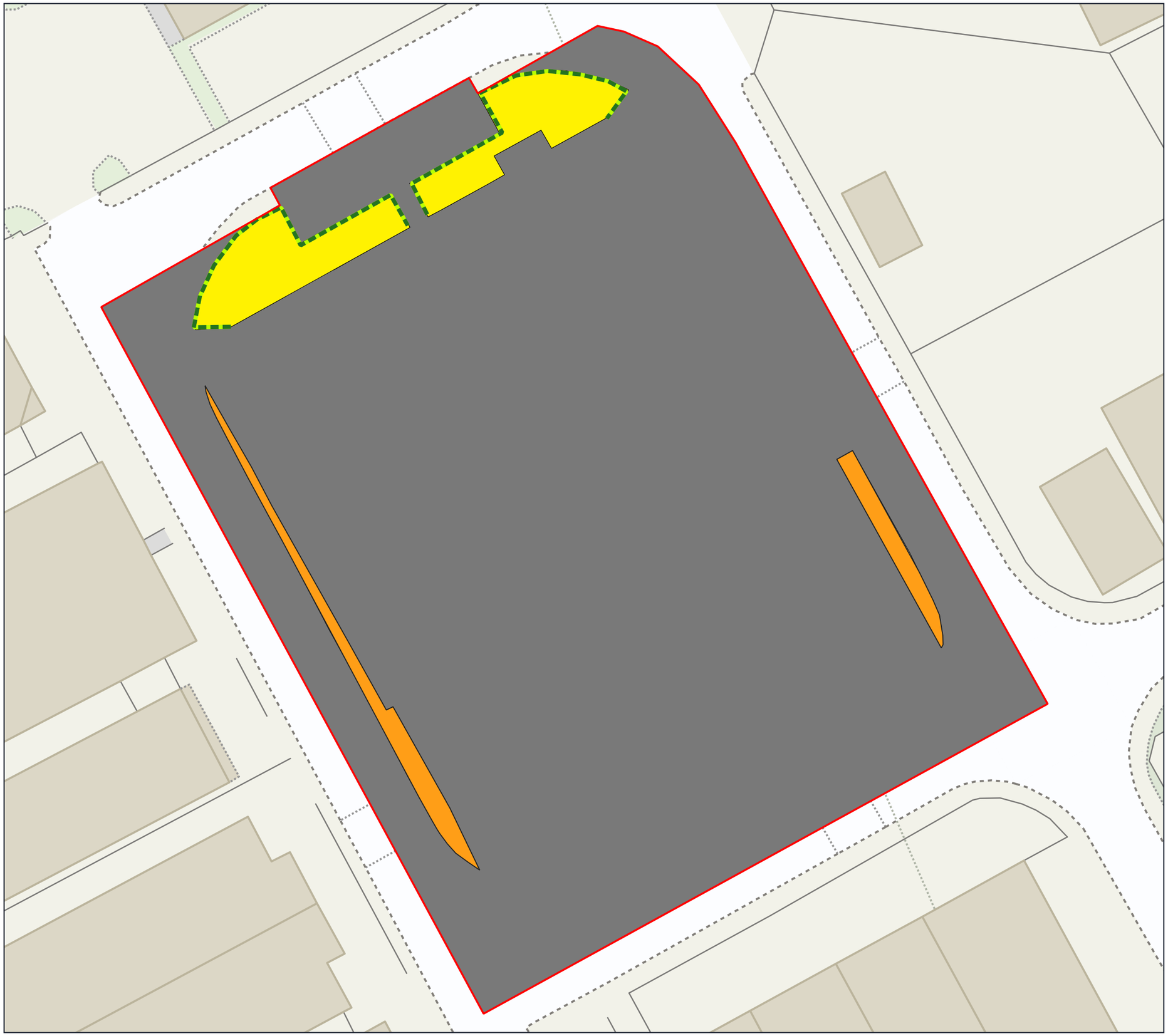

Legend

- Redline Boundary

Post-Development Habitats

- Beech Hedgerow
- Grassland - Modified grassland
- Heathland and shrub - Mixed scrub
- Urban - Developed land; sealed surface

N

0 5 10 15 20 m

Project	Island Site, Uxbridge
Drawing Title	Post-Development Habitat Plan
Scale	As Shown (Approximate)
Drawing No.	17240/P03
Date	October 2024
Checked	CS/CC

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