



**Brighter strategies**  
for greener projects



**Client:** Havering and Wates Regeneration LLP  
**Project:** Chippenham Road  
**Report:** Bat Survey Report

| Issue/Revision: | Draft                             | Final                             |
|-----------------|-----------------------------------|-----------------------------------|
| Date:           | October 2023                      | February 2025                     |
| Comments:       |                                   |                                   |
| Prepared by:    | James Bumphrey                    | James Bumphrey                    |
| File Reference: | 552495JB24OCT24FV02_Bat<br>s.docx | 552495JB24OCT24FV02_Bat<br>s.docx |

## CONTENTS

|                                          |                                           |          |
|------------------------------------------|-------------------------------------------|----------|
| <b>1.0</b>                               | <b>EXECUTIVE SUMMARY</b>                  | <b>1</b> |
| <b>2.0</b>                               | <b>INTRODUCTION</b>                       | <b>2</b> |
| 2.1                                      | AIMS OF SURVEY                            | 2        |
| 2.2                                      | SITE DESCRIPTION                          | 2        |
| 2.3                                      | PROPOSALS                                 | 3        |
| 2.4                                      | PREVIOUS SURVEY                           | 3        |
| <b>3.0</b>                               | <b>METHODOLOGY</b>                        | <b>4</b> |
| 3.2                                      | SURVEYORS                                 | 5        |
| 3.3                                      | LIMITATIONS AND COMMENTARY ON METHODOLOGY | 5        |
| <b>4.0</b>                               | <b>RESULTS AND DISCUSSION</b>             | <b>6</b> |
| 4.1                                      | RESULTS                                   | 6        |
| 4.2                                      | RECOMMENDATIONS & MITIGATION              | 6        |
| <b>5.0</b>                               | <b>SUMMARY</b>                            | <b>9</b> |
| <b>APPENDIX A AUXILLARY SURVEY DATA</b>  |                                           |          |
| <b>APPENDIX B LEGISLATION AND POLICY</b> |                                           |          |
| <b>REFERENCES</b>                        |                                           |          |

### Tables

|                          |                                                   |   |
|--------------------------|---------------------------------------------------|---|
| Table 3.1                | Surveyor locations and conditions for each survey | 4 |
| Table A.1 - 2023 Results |                                                   |   |
| Table A.2 - 2024 Results |                                                   |   |

### Figures

Figure 3.1 - Surveyor Locations (Map source: Google maps)

## 1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Bat Survey by Havering and Wates Regeneration LLP, for a site on Chippenham Road.

This document is a report of this survey and has been produced to support proposed demolition of the existing buildings on site and construction of 138 residential units on site.

An external inspection of the buildings and trees on site noted low potential value for roosting bats in several buildings and trees.

No roosting bats were recorded during emergence / re-entry surveys undertaken August - September 2023 and August 2024.

Foraging or commuting activity from bats was recorded for common pipistrelle and soprano pipistrelle.

Recommended mitigation and enhancement measures based on current survey results include:

- Any trees with roosting potential to be removed only after pre-removal updated check/survey for roosting bats.
- If trees are to be removed during bird nesting season (March - August inclusive) this should only be after pre-removal check/survey for nesting birds.
- Pre-demolition inspection of buildings to determine no new potential roosting features are present.
- Incorporation of bat-sensitive lighting regime following guidance from The Institute of Lighting Professionals and Bat Conservation Trust.
- Provision of integrated bat boxes into the fabric of the new buildings / retained large trees.
- Wildlife-friendly landscaping to enhance the site as a foraging and commuting resource, including provision of newly planted trees with grassland and shrub planting.

Should the recommendations set out above been implemented then proposals have potential to lead to a long-term positive impact for bats at a local scale, as well as provide net gains in biodiversity value.

## 2.0 INTRODUCTION

Greengage was commissioned to undertake a Bat Survey by Haverling and Wates Regeneration LLP, of a site on Chippenham Road.

This document is a report of this survey and has been produced to support proposed demolition of the existing buildings on site and construction of 138 residential units on site.

### 2.1 AIMS OF SURVEY

The purpose of the survey was to further determine if there are any features or habitats on site that could potentially support bats, and to determine whether any bats are roosting in the building/trees on site. The surveys aimed to:

- Determine the presence/absence of bat species;
- Determine the intensity of bat activity both spatially and temporally to help estimate bat populations; and
- Determine the type of activity, most usually
  - Roosting;
  - foraging (by feeding buzzes); and
  - commuting (by high directional pass rates).

By using a collation of existing data for the area to support the survey, it is possible to determine the presence/likely-absence of bats across the site and in the wider area. This information can then be used to determine the form and extent of any mitigation, compensation or enhancement that may be appropriate.

### 2.2 SITE DESCRIPTION

The survey area extends to approximately 0.9 hectares (ha) and is centred on National Grid Reference TQ538919, OS Co-ordinates 553808, 191983.

The site largely comprises buildings of mixed uses surrounded by soft landscaping comprising short modified grassland, introduced shrub and trees. The site sits either side of Harold Hill Church, funeral home and single residential property. The area surrounding the application site is predominantly residential in character, comprising a mix of recent and 1960s buildings. The area is generally low to mid-rise in nature, with no listed buildings or other buildings of architectural merit in the vicinity. The site does not contain any statutory or locally listed buildings and is not located within a conservation area. There are no conservation areas or designated heritage assets within the immediate area. The public space in the area consists of predominately hardstanding, except for a few narrow strips of grass and some tree lined streets.

## 2.3 PROPOSALS

The proposal the construction of 138 residential units, landscaping works, car parking, cycle parking, plant and associated works.

## 2.4 PREVIOUS SURVEY

### Desk Based Assessment

Biological records were analysed to determine the records of bat species in the local area. Records were obtained from Greenspace information for Greater London.

Records for the following bat species were identified within 2km of the site:

- Lesser noctule (*Nyctalus leisleri*);
- Noctule (*Nyctalus noctula*);
- Common Pipistrelle (*Pipistrellus pipistrellus*); and
- Soprano Pipistrelle (*Pipistrellus pygmaeus*).

An assessment of the local area using aerial photography and available maps and biological data was also undertaken.

### Site Assessment

Access to external areas of the site was granted and the survey was undertaken on 8th August 2023 in sunny weather conditions.

During the ecological appraisal (Report ref: 552495JB24OCT23FV03\_EA\_Chip), a number of features with low potential to support roosting bats were found as summarised below:

- Buildings - Loose/missing roof tiles; and
- Trees - Cavities/holes/split limbs.

The visual assessment of the buildings for suitability of roosting features also entailed a check for signs of roosting bats, including the presence of droppings, urine staining, grease marks and signs of food remnants such as moth and butterfly wings.

With reference to the Bat Conservation Trust survey guidance (2024)<sup>1</sup> and the Bat Workers Manual (2004)<sup>2</sup>, for the reasons listed above, and given the legal protection afforded to bats (see Appendix B), the requirement for emergence/re-entry surveys was confirmed. This survey is required in order to establish the relative importance of the site for local bat populations, and to identify the presence/ likely absence of roosting bats.

Methodology of this survey is described in the below section.

This initial assessment informed the emergence / re-entry surveys completed in 2023 and 2024.

## 3.0 METHODOLOGY

### Emergence/Re-Entry Surveys

The scoping survey identified seven locations across the site.

Table 3.1 provides detail on locations for each surveyor and conditions for each survey.

Locations are shown on Figure 3.1.

Figure 3.1 - Surveyor Locations (Map source: Google maps)



Table 3.1 Surveyor locations and conditions for each survey

| Date     | Surveyor Locations                              | Building / Tree | Lead Surveyor                                            | Sunset/ Sunrise | Conditions              |
|----------|-------------------------------------------------|-----------------|----------------------------------------------------------|-----------------|-------------------------|
| 2023     |                                                 |                 |                                                          |                 |                         |
| 25/08/23 | 5                                               | B5              | JB                                                       | 5.58 am         | 15C, clear              |
| 04/09/23 | 1 (B4)<br>2 (T17)<br>3 (B4)<br>4 (B4)<br>6 (B3) | B4, B3, T17     | JB (assisted by IR camera, plus surveyors VD, JG and NC) | 19.39 pm        | 21-19C                  |
| 27/09/23 | 7                                               | B3              | JB                                                       | 18.47 pm        | 20-19C, 80% cloud cover |

| Date     | Surveyor Locations | Building / Tree | Lead Surveyor                                                               | Sunset/ Sunrise | Conditions            |
|----------|--------------------|-----------------|-----------------------------------------------------------------------------|-----------------|-----------------------|
| 28/09/23 | 2                  | T17             | JB                                                                          | 6.46 am         | 15C                   |
| 2024     |                    |                 |                                                                             |                 |                       |
| 28/08/24 | 1-7                | All surveyed    | DP (assisted by JK, MG, JR, YA, OH and un-maned camera for single location) | 19.53           | 19C, cloudy, low wind |

The emergence and re-entry surveys were undertaken during clear and warm conditions, with temperatures ranging from 15oC - 20oC.

The emergence surveys commenced 30 minutes before sunset and continued for 2 hours after sunset. The re-entry surveys commenced 1 hour 30 minutes before sunrise and was completed at sunrise.

Each surveyor was equipped with BatBox Duet Heterodyne detectors and an Echo Meter Touch bat detector to detect, visualise and record the calls of any bats present in the area.

## 3.2 SURVEYORS

James Bumphrey, who led the 2023 surveys and wrote this report, has an undergraduate degree in Environmental Sciences (BSc Hons), a Master's degree in Environmental Consultancy and a Natural England Great Crested Newt Licence. James has over 11 years' experience in ecology survey and consultancy.

Dan Perlaki, who led the 2024 survey, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy. Dan has over 7 years' experience in ecology survey and consultancy.

James and Dan were supported by field surveyors including Vincenzo De Iacovo, Julia Kukla, Matt Granger, Ollie Hamilton, Yasmine Airton, Joanne Reynolds, Jonathan Gibbs and Natasha Connor.

## 3.3 LIMITATIONS AND COMMENTARY ON METHODOLOGY

The 2023 surveys were undertaken in August/September at the end of the survey season. However, weather conditions were highly suitable with lowest temperature being 15C. Given the site location in an urban environment in southern England, the survey timings were not considered to be a significant limitation. An updated survey was also undertaken in August 2024.

Access was not available to a portion of the rear of B3. Recommendations have therefore been provided for a pre-demolition review of this area. Updated surveys will be undertaken as required.

## 4.0 RESULTS AND DISCUSSION

### 4.1 RESULTS

There was no evidence of roosting observed during the emergence and re-entry surveys.

During the 2023 emergence survey visits low levels of commuting and foraging activity were recorded around B4. Two species were recorded; common pipistrelle and soprano pipistrelle.

During the 2024 emergence survey visits, again low levels of commuting and foraging activity was recorded in the darker portions of the site away from street lighting. A noctule was also recorded passing over the site at height.

The first pipistrelle activity was recorded over 30 minutes after sunset indicating that there were no bats roosting on or near to the site.

The noctule was observed commuting at height and not considered to be roosting on or near to the site.

Further data is provided in Appendix A.

### 4.2 RECOMMENDATIONS & MITIGATION

Low levels of bat foraging and commuting activity were observed during the survey. No roosting was recorded.

Whilst foraging and commuting resources for bats are not formally protected by law, their protection is a material consideration within the planning process. Suitable best practice and mitigation recommendations are detailed below.

#### Tree Removal

It is understood that T17 will be removed. If this is to be undertaken during bird nesting season (March to August inclusive) then this should be preceded by a pre-felling nesting bird survey to confirm present absence of nesting birds. A pre-felling check/survey should also be undertaken for roosting bats either in the form of an endoscope survey or emergence survey (if felling to be undertaken during bat survey season).

Removal of any additional trees with nesting potential should be undertaken following the above described methodology.

Given the nature of tree use by bats it is recommended that, removal of trees should be undertaken following a 'soft fell' technique in accordance with the Bat Conservation Trust's Guidelines. This is where tree limbs are cut and left grounded over night to allow any bats to make their way out.

Wood from the tree should be retained on site for use within landscaping post-development.

## Buildings

An updated pre-demolition inspection of the buildings on site is recommended to determine no new potential roosting features have formed since the survey. This includes the area to the rear of B3 as noted above.

## Lighting

Artificial lighting can cause disturbance to bat species' roosting, foraging and commuting activity. Proposals should therefore impose measures to limit additional light disturbance at site following development. Bat-sensitive lighting should be incorporated into the scheme to minimise any potential impacts of increased lighting levels on foraging, commuting and socialising bats. Lighting should follow guidance provided by the Institute of Lighting Professionals and Bat Conservation Trust<sup>3</sup>. This involves the use of low-UV warm-white LED bulbs with directional, downward facing and shielded lights which point away from green features such as tree lines or areas of planting. External lights should be subject to curfew controls where possible with lights on movement sensors to reduce light pollution when not needed. Open green space (including any living roofs) should remain unlit, particularly between April and October, inclusive. Measures should be taken in internal light placement to reduce risk of light spill from windows, as per guidelines. Lighting at site should be modelled to confirm predicted intensity and spill;

## Wildlife Friendly Landscaping

To minimise impacts upon local bat populations identified at the site valuable habitat should be retained within the scheme where possible. Any unavoidable loss of foraging habitat should be compensated for through new planting of native trees, shrubs and wildflowers.

Compensatory areas of wildlife-friendly landscaping should include fruit and berry producing shrubs and trees and trees to encourage a richer invertebrate community and provide foraging resources for bats.

Further to the above recommendations it is considered unlikely that there will be a significant adverse impact on bats in the local surrounding area, and the overall impact from the proposed development is predicted to be negligible.

## Enhancement

Most species of bats will use bat boxes at various times of year but in particular they are favoured by pipistrelles, Leisler's, noctule and Myotis species. Pipistrelles, Leisler's, noctule and Myotis were identified during the survey and are known to be in the wider area, therefore, we would propose that bat boxes, bricks or 'habibats' should be incorporated, where appropriate, onto the trees onsite; the use of these bat boxes will increase roosting opportunities for bats in the area. Bat boxes or bricks should be positioned in sunny locations mainly to the south or west façade of the building or trees. However, a variety of different locations would provide a range of climatic conditions and attract several different species. The optimal height for a bat box is 3 to 6 metres with an entrance free from obstruction and

obstacles. The behaviour of bats varies from species to species but generally they will use a number of different roosts so it is best to erect several boxes in different locations across the site and include a range of aspects.

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## 5.0 SUMMARY

Greengage undertook Bat Survey visits in August - September 2023 and August 2024 in order to determine the presence or absence of roosting bats and to observe any bat foraging or commuting activity across the wider site.

No roosting activity was observed. Low levels of bat foraging and commuting activity were observed during the survey. Two species were recorded; common pipistrelle and soprano pipistrelle.

Mitigation measures have been recommended which include the provision of pre-felling (trees) survey/check, bat sensitive lighting, compensatory green space and enhanced landscaping and roosting opportunities.

Assuming recommendations are followed, the impact of the proposed development upon both local bat populations is expected to be negligible.

Enhancement measures for bats have been recommended to increase the biodiversity value of any proposed redevelopment. These enhancements include the provision of bat boxes to provide roosting opportunities and further foraging resources. Assuming these enhancements are followed, the development will result in net gains for biodiversity.

## APPENDIX A AUXILLARY SURVEY DATA

Table A.1 - 2023 Results

| Date     | Survey Results                                                                                                     |
|----------|--------------------------------------------------------------------------------------------------------------------|
| 25/08/23 | Common pipistrelle heard not seen 5.00                                                                             |
| 04/09/23 | Common pipistrelle passes 20.09 - 20.30<br>Soprano pipistrelle pass 20.21<br>Common pipistrelle pass 20.30 - 20.56 |
| 27/09/23 | Common pipistrelle heard not seen 19.11                                                                            |
| 28/09/23 | None                                                                                                               |

Table A.2 - 2024 Results

| Date     | Survey Results                                                                          |
|----------|-----------------------------------------------------------------------------------------|
| 28/08/24 | Noctule pass at height 19.56 and 20.20 (HNS)<br>Common pipistrelle foraging 20.19-20.43 |

## APPENDIX B LEGISLATION AND POLICY

### B.1 LEGISLATION

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.

The Wildlife & Countryside Act 1981 (WCA)<sup>4</sup> 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 Annex IV of the Habitats Directive<sup>5</sup>, 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 (Amendment) (EU Exit) Regulations 2019<sup>6</sup>, 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.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England. Additionally, 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.

### B.2 PLANNING POLICY

#### National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2023<sup>7</sup> 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.

### The London Plan<sup>8</sup>

#### *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.

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### *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<sup>9</sup>

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”.

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## Local

### Havering Local Plan<sup>10</sup>

#### *Policy 27 Landscaping*

The Council will support development proposals that incorporate a detailed and high quality landscape scheme which:

- i. Takes full account of the landscape character of the site and its wider setting;
- ii. Retains and enhances existing landscape features that contribute positively to the setting and character of the local area;
- iii. Demonstrates how existing landscape features will be protected during the construction phase;
- iv. Maximises opportunities for greening, through the planting of trees and other soft landscaping;
- v. Provides strong boundary treatment that integrates with and is sympathetic to the local landscape character and street scene; and
- vi. Supports natural habitats and opportunities for enhancing biodiversity. All proposals will be required to demonstrate that adequate arrangements have been made for future maintenance and management and major development proposals should be supported by a comprehensive Management Plan.

#### *Policy 29 Green Infrastructure*

The Council will seek to maintain and expand the network of green spaces and natural features in Havering and optimise the benefits of green infrastructure to the environment, economy and community. The Council will support development which includes green infrastructure on-site which is multifunctional and integrates into the wider green infrastructure network. Developers are expected to work with existing partnerships to support and enhance green infrastructure provision including:

- The All London Green Grid
- Thames Chase Community Forest
- Rainham Wildspace
- Land of the Fanns Landscape Partnership
- Roding, Beam & Ingrebourne Catchment Partnership

#### *Policy 30 Biodiversity and Geodiversity*

The Council will protect and enhance the borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering by:

- i. Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm 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 will normally be refused;

ii. Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided; If significant harm 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 will normally be refused;

iii. Supporting proposals where the primary objective is to conserve or enhance biodiversity;

iv. Encouraging developments where there are opportunities to incorporate biodiversity in and around the development;

v. Supporting developments that promote the qualitative enhancement of sites of biodiversity value, (by supporting proposals that improve access, connectivity and the creation of new habitats. Measures include maintaining trees, native vegetation, and improving and restoring open spaces and green infrastructure for the benefit of wildlife;

vi. Working with partners and local conservation groups to improve conditions for biodiversity in the borough.

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## REFERENCES

<sup>1</sup> Bat Conservation Trust, (2024); *Bat Surveys – Good Practice Guidelines*. Bat Conservation

<sup>2</sup> Mitchell-Jones, A.J. & McLeish, A.P. (2004) *Bat Works Manual*, 3<sup>rd</sup> Edition

<sup>3</sup> Institution of Lighting Professionals and Bat Conservation Trust (2018), *Bats and Artificial Lighting in the UK; Bats and the Built Environment Series*.

<sup>4</sup> HM Government, (1981); *Part I and Part II of Wildlife and Countryside Act (as amended)*. HMSO

<sup>5</sup> CEC (Council of the European Communities), (1992); *Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora*

<sup>6</sup> HM Government, (2019); *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. Statutory Instrument 2019 no. 579

<sup>7</sup> GOV.UK. (2023). *National Planning Policy Framework*. [online] Available at:  
<https://www.gov.uk/government/publications/national-planning-policy-framework>

<sup>8</sup> Greater London Authority (2021) *The London Plan: The Spatial Development Strategy for Greater London* (GLA)

<sup>9</sup> Greater London Authority (2018). *London Environment Strategy 2018*. London: Greater London Authority.

<sup>10</sup> Havering Council (2021) *Local Plan*