Twickenham – Amendments to Ecology ES Chapter – 25th July 2011

Local Authority Comment	Response
This chapter does not consider the extent of the shadows cast over the River Crane and its implications on the ecology of the river and its banks and the combined effect of the new buildings and extra tree planting should also be considered. The overshadowing impact on the proposed ecological site enhancements and existing ecology of the site also needs assessment.	This has been addressed in more detail in the impact section (13.5) including the effects of shading on channel ecology and effects on river bank stability. The Ecology Chapter of the Environmental Statement assessed the impact of overshadowing of the River Crane corridor and wind on ecology in respect of the larger scheme (10/3465/FUL), and it was concluded that the larger scheme would have a negligible impact. Consequently, overshadowing of the River Crane Corridor and wind is not a significant environmental issue in relation to ecology. It follows that overshadowing of the River Crane corridor and wind as a result of the smaller scheme (11/1443/FUL) is likely to have less impact on ecology than the larger scheme and therefore as the larger scheme represents the worst case scenario the same conclusions of Ecology Chapter are robust for both schemes.
This chapter and chapter 15 regarding wind do not consider the implications of wind generated by the buildings on the proposed ecological site enhancements and existing ecology of the site and the River Crane and its banks.	This has been addressed in a new paragraph 13.5.15 which draws on additional assessment work on wind microclimate and concludes that the river crane will be suitable for humans standing in winter and sitting in summer from which we can assume that there are unlikely to be significantly adverse effects on ecological receptors.
A variety of deadwood habitats is mentioned within the trees section of the identified habitats but this has not been considered or evaluated as a separate habitat type.	This habitat has now been referred as 'trees and deadwood' and in the impacts & mitigation sections under 'habitats'
Given the proximity of the River Crane appropriate precautionary measures will be required to ensure protection of this sensitive ecological feature. Stating that the River Crane and associated habitats will be maintained throughout the development is not sufficient and detailed information to guarantee proper precautionary systems of work and protective measures must be provided as should a full method statement for the management of Japanese knotweed. Can you confirm that the removal and control of Japanese knotweed to prevent the risk of downstream transfer is set out within this chapter?	More detail on protective measures is provided in 13.5. Options for control of Japanese knotweed are provided in new para (13.6.13). A full method statement will be provided by site contractor in due course.
The discounting of the presence of herpetofauna without carrying out any survey is not acceptable.	More detail has been given in para 13.4.38 to justify why we do not consider herptile survey to be required in this case.
Recommendations for appropriate ecological mitigation, compensation and site enhancement	Opportunities for ecological mitigation and enhancement are detailed in section 13.6 and

are missing and should be provided.	include bat boxes, creation of stag beetle loggeries and new native species tree planting.
With regard to lighting (13.6.3), no details have been submitted that plot lighting columns, light spillage, lux levels and the effect of mitigation measures. Confirmation is thus required from a lighting consultant that the impact of the lighting will not have an adverse impact on ecology, secure by design principles and neighbour amenity. The use of sodium lighting is generally recommended by ecologists however there are other negative environmental impacts from sodium lighting including higher energy use and because the lamps are large it is more difficult to control the light emitted resulting in higher levels of spill and more light than necessary.	A detailed lighting strategy has been developed to minimise impact on the river crane and associated wildlife - refer to para 13.5.14 and separate lighting strategy.
Details of the protective fencing beside the Crane Path referred to in paragraph 13.6.3 should be submitted.	This has been detailed in the revised landscape masterplan.
Paragraph 13.5.2 references a 70m area that would be lost to facilitate the footpath however there is no detail of this and it is not defined on plan. The defined development boundary or zone of ecological influence is thus required.	The proposed footpath route has been re-aligned to avoid loss of trees (refer to revised landscape masterplan to show footpath location). A short section (approximately 70m) of bramble scrub at the eastern end of the footpath has been cleared to facilitate footpath construction.
The impact of noise on the River Crane is not fully addressed and details of both human activity and construction on the ecology of this area is required.	Noise impacts have been considered and will be minimised by installation of a timber screen between the development and river crane (details and location of screen shown on revised landscape masterplan).

Sacha Rogers Associate Director (Ecology)

25th July 2011