

Ham Hydro, Teddington

Ecological Review

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Ham Hydro, Teddington

Ecological Review

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This document has been prepared and checked in accordance with
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Comments

Comments

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1. Introduction

- 1.1. Waterman Energy, Environment and Design Ltd (Waterman) was commissioned in October 2013 by Lensbury Ltd to undertake a technical review of ecological reports prepared in 2012 by 'Turnpenny Horsfield Associates' and 'Furesfen' in relation to land bordering Teddington Weir Pool on the River Thames (hereafter referred to as the 'Site'). These reports were produced to support a planning application (London Borough of Richmond Upon Thames Planning Ref: 11/3908/FUL) for the following development proposals at the Site:

"Demolition of section of weir; installation of 3 reverse engineered Archimedean screw turbines to generate hydro electricity. New fish pass, sluice gate, cable routes to substation. Adapt maintenance access to that section of weir; plant room to be constructed on walkway; canopy above screws."

- 1.2. In total three ecological reports have been received for technical review comprising:
- 'Phase 1 Habitat Survey' (Turnpenny Horsfield Associates Report Ref: 559R0102 Chapter 1);
 - 'Bat Survey' (Furesfen – No Report Reference supplied); and
 - Section 2 and 3 of 'Ecology, Hydrology and Geomorphology – Review and Conclusions' (Ham Hydro CIC).
- 1.3. This ecological review considers these documents in turn, commenting on their technical content in complying with best practice survey and assessment guidelines, planning policy and legislative requirements. The review also assesses any implications of the survey findings that may affect the design and delivery of the scheme or the granting of permission for the overall application.

2. Phase 1 Habitat Survey

- 2.1. The report is considered to be set out on a logical basis. The survey work undertaken was based on best practice survey guidelines¹ and was undertaken in the optimal period for undertaking such surveys (i.e April to September) when the majority of plant species are above ground and in their flowering state. It is, however, noted that the report does not assign values to any of the identified ecological receptors. In this type of report it would normally be expected that values would be assigned to ecological receptors in accordance with recognised assessment guidance². The omission of this, however, does not necessarily have any bearing on the conclusions and recommendations made within the report.
- 2.2. Relevant legislation is referred to throughout the report in relation to the Site including:
- The Conservation of Habitats and Species Regulations 2010³ (see paragraph 2.3);
 - The Wildlife and Countryside Act 1981 (as amended)⁴;
 - The Natural Environment and Rural Communities 2006⁵;
 - Countryside and Rights of Way (CRoW) Act 2000⁶; and
 - Protection of Badgers Act 1992⁷.
- 2.3. It should be noted that the Conservation of Habitats and Species Regulations 2010 were amended on 16th August 2012 as a result of publication of the Conservation of Habitats and Species (Amendment) Regulations 2012⁸. As such, the Conservation of Habitats and Species Regulations 2010 should be referenced as the Conservation of Habitats and Species Regulations 2010 (as amended)⁹.
- 2.4. It is noted that relevant national, regional and local planning policies have not been included within this report. Given that the proposed development requires planning permission, it is considered that, as a matter of good practice, reference to relevant nature conservation planning policies should have been included to ensure that the recommendations within the report were compliant with such policies.
- 2.5. Biodiversity Action Plans (BAPs) have been referred to throughout the report. Relevant references include the UK BAP, London BAP and Richmond-upon-Thames BAP. The Site also lies within 300m of the Royal Borough of Kingston-upon-Thames and therefore the LBAP for this Local Authority is also referred to.
- 2.6. Reference is made in the report to planning regulations in relation to Tree Preservation Orders (TPOs). However, tree protection in relation to conservation areas is not referred to, which is a relevant consideration given that the Site falls within a conservation area.
- 2.7. The following section makes specific comment on the detailed content of the report.

¹ JNCC (2010). *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit*. Nature Conservancy Council.

² Institute of Ecology and Environmental Management (2006). *Guidelines for Baseline Ecological Assessment in the United Kingdom*. E & F.N. Spon, Chapman & Hall, London.

³ HMSO (2010) *The Conservation of Habitats and Species Regulations 2010*.

⁴ HMSO (1981). *The Wildlife and Countryside Act (WCA) (as amended)*.

⁵ ODPM (2006) *Natural Environment and Rural Communities Act*.

⁶ HMSO (2000). *The Countryside and Rights of Way (CRoW) Act*.

⁷ HMSO (1992). *Protection of Badgers Act*.

⁸ HMSO (2012) *The Conservation of Habitats and Species (Amendment) Regulations 2012*.

⁹ HMSO (2010). *The Conservation of Habitats and Species Regulations 2010 (as amended)*.

Summary

- The second paragraph states that ‘*A desk study was carried out for Teddington weir pool and the area within a 1km radius of the pool*’; however the data search from Nature on the Map states a 2km radius was used for designated sites data.

Introduction

- On page 4 there is no detail on the exact location of what is referred to as ‘*A small parcel of land on the left bank at Lensbury Club is planned for development*’. Furthermore, no details of the development proposals within this land parcel are provided within the remainder of the report.

Desk Study

- The report details that a 1km radius was commissioned from Greenspace Information for Greater London (GiGL) and 2km from Nature on the Map, however no justification is given to why these distances were used.
- Reference is made within the methodology section to data provided by the National Biodiversity Network. However, no further mention of this (i.e any results from this) is detailed within the report.
- No distance measurements of the designated sites and protected/BAP species from the Site are provided.
- Under the non-statutory sites section a sentence reads ‘*They are recommended for protection in planning*’. However it is not detailed which specific planning policy this refers to.
- The report does not identify that the Site lies within Teddington Lock Conservation Area which extends from above Teddington Weir to downstream of Teddington Lock and includes the banks of the river. All trees within a conservation area are afforded protection similar to trees covered by a TPO, regardless of species, as they may contribute to the landscape character or setting of the area. Anyone wishing to undertake work to a tree in a conservation area must serve notice on the Local Planning Authority six weeks prior to undertaking those works. For trees in conservation areas that are already subject to a TPO, the TPO regulations take priority and no separate conservation area notice is required. Any works to trees within the Site that fall within the conservation area would require consent.

Field Study: Methodology

- There is no justification of why the area 1km upstream and downstream of the weir pool was assessed for providing habitat for protected species. In addition, the report does not state which protected species have been considered and if there were any access issues at the Site.

Field Study: Results

- The report states that birds’ nests should be protected, however it doesn’t state how this would be done (e.g the provision of a buffer around the nest until nesting is complete).
- No survey timings for undertaking breeding bird surveys are referred to.
- No reference to wintering birds is made within the report.
- The report does not detail if any signs of badgers were recorded within the survey area.

- Under the hazel dormouse section, the report states that '*some of the habitat surrounding the weir pool is suitable for dormice*'; however it does not detail which habitats and the size of them this specifically refers to.
- The report states that the survey timing for undertaking dormouse nest-tube surveys is May to September. It should be noted that best practice guidance¹⁰ states that dormouse nest-tube surveys can be undertaken from April to November.
- Under the hedgehog section, the report states that '*should any destruction of terrestrial habitat occur, hedgehog habitat or hibernating hedgehogs could be disturbed*'; although it does not detail which habitats this specifically refers to.
- Under the water vole section, the report states that '*water vole have been seen in close proximity to the site*'; it is not clear whether this statement refers to the data search or observations made by the surveyor.
- No survey timing for undertaking a water vole survey is referred to.
- Under the reptile section, the report states that '*All reptile species, excluding grass snakes, are UK Biodiversity Action Plan Priority Species*'; however this is not factually correct. Grass snakes are listed as a UKBAP priority species.
- The reptile section also recommends that '*the ECoW carries out a walkover survey to ensure no reptiles are present*'. This statement requires further detail. For example, a walkover survey is unlikely to find reptiles if undertaken when reptiles are hibernating and therefore the recommended time of year for undertaking a walkover survey should be stated. In addition, more explanation is needed on what a walkover survey would actually involve (i.e does this include supervised vegetation clearance?).
- No specific survey timing for undertaking a reptile survey is referred to.
- Under the amphibian section, the report states that (with reference to great crested newts) '*the terrestrial area surrounding the Lensbury Club ponds may offer suitable habitat*'; however no ponds are detailed on Figure 1 or mentioned elsewhere within the report. The standard methodology for determining a pond's suitability to support great crested newts is the Habitat Suitability Index¹¹ and this has not been referenced when determining suitability.
- The amphibian section also states that '*The ECoW should incorporate a search for amphibian species in the walkover search prior to any ground clearance*.' A walkover survey is unlikely to find amphibians if undertaken when amphibians are hibernating and therefore the recommended time of year for undertaking a walkover survey should be stated. In addition more explanation is needed on what a walkover survey would actually involve (i.e does this include supervised vegetation clearance?).
- Under the invertebrate section, the report states that '*Prior to initiating the works, it is recommended that the ECoW carries out a walkover survey for the above-mentioned protected species of invertebrate both at the Lensbury Club clearance works and along the right bank with a contingency access plan*.' A walkover survey is unlikely to find invertebrates if undertaken at an unsuitable time of year and therefore the recommended time of year for undertaking such a survey should be stated.
- Given the report states that there is potential for the Site to support protected/notable species, it is unclear why further surveys for such species have not been recommended within the report.

¹⁰ Bright et al (2006). *The Dormouse Conservation Handbook*. English Nature.

¹¹ Oldham et al (2000). *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal.

Discussion

- No comments.

Figure 1

- No redline boundary is present on Figure 1.
- Ponds are referenced with the amphibian results section, however no ponds are shown on Figure 1.

2.8. In summary, the report is considered in most instances factually correct, although there are a number of inconsistencies or omissions as detailed above, and the report would benefit from some clarification in places. However, the report states that the Site, in particular the Right Bank, has the potential to support a number of protected/notable species such as reptiles, amphibians, invertebrates, dormouse, badger, water voles, otters and birds. However (assuming there are no other reports produced that Waterman have not had sight of) no clear justification has been provided in the report as to why no further surveys for these species have been undertaken, Therefore, based on the information provided within the report, there may be insufficient survey data for the Local Planning Authority to determine the planning application, unless further justification is provided as to why such further surveys have not been undertaken (i.e. the proposed development is not considered to impact such species).

3. Bat Survey

- 3.1. The report is considered to be set out on a logical basis.
- 3.2. Relevant legislation was referred to throughout the report in relation to the site including;
 - The Conservation of Habitats and Species Regulations 2010 (as amended);
 - The Wildlife and Countryside Act 1981 (as amended); and
 - The Natural Environment and Rural Communities 2006.
- 3.3. It is noted that relevant national, regional and local planning policies have not been included within this report. Given that the proposed development requires planning permission, it is considered that, as a matter of good practice, reference to relevant nature conservation planning policies should have been included to ensure that the recommendations within the report were compliant with such policies.
- 3.4. Biodiversity Action Plans (BAPs) has been referred to within the report, although only at a national level (i.e UKBAP) and the NERC Act (2006). References to the London BAP, Richmond-upon-Thames BAP and Royal Borough of Kingston-upon-Thames BAP should have also been cited where relevant.
- 3.5. The bat surveys were undertaken at an appropriate time of year and within suitable weather conditions. However, it is not considered that other aspects of the survey methodology follow recognised best practice guidelines¹², despite these guidelines being referenced in section 6 of the report (see below). Overall the report does not set out a clear survey scope methodology and therefore it is difficult to understand what type of surveys, have actually been undertaken at the Site. Furthermore both 'electricity sub-station' and 'gauging station' are referred to throughout the report, although no explanation is given within the report to whether these are two different names for the same building or whether it is referring to two separate buildings. These queries need to be clarified along with those outlined in the remainder of this section.
- 3.6. Information presented within the report is considered to be confusing and in contradiction throughout different sections and errors have been found. Detailed comments are provided below.

Summary

- No comment, other those detailed in the following sections.

Introduction

- In section 1.3 the scientific name stated for horse chestnut is incorrect. This should be *Aesculus hippocastanum* not *Pachycnemis hippocastanaria* which is the name of a moth species.
- Section 1.5 states '*Eight/nine species of bat have been recorded at this location on account of the presence....*'. It is not clear whether this is referring to the results of a data search, the results of the survey or something else.

Methodology

- In section 2.1, no details are provided with regard to the distance of the search radius of bat records. Furthermore, no records have been sought from the local bat group or GiGL which would normally be expected in this type of report.
- In section 2.2, the report states that a walkover survey was undertaken. It is not clear whether this included detailed inspections of trees for their bat roosting potential. In addition, it is not

¹² Bat Conservation Trust (2012). *Bat Surveys: Good Practice Guidelines*. Second Edition BCT.

evident if detailed internal and external inspections were carried out at the electricity sub-station/gauging station.

- Both 'electricity sub-station' and 'gauging station' are referred to throughout the report. No explanation is given within the report to whether these are two different names for the same building or whether it is referring to two separate buildings. Furthermore no plan is provided to show the location of the buildings(s). More clarity is required.
- Section 2.2 also states that there is '*a void within the buttress at the weir bridge*', however there is no further mention of this feature with regards to roosting bats within the remainder of the report.
- Section 2.3 states that bat activity surveys were undertaken at the Site, however no plans detailing the transect routes walked by surveyors or where static bat detectors were placed at the Site are presented within the report.
- Section 2.3 does not state the number of bat surveyors used to undertake the surveys.
- Section 2.3 states that Bat Box 4 Frequency Division detectors were used. This survey equipment is considered acceptable however the use of Time Expansion detectors would be preferable given the superior recording quality of bat calls to clarify the species recorded such as *Myotis* species.
- Section 2.4 states that '*Readings were undertaken of the existing illumination using a lux meter*'. However no information has been provided with regard to the model of the lux meter, whether it was calibrated, the external weather/lighting conditions and where the lux level readings were taken.
- It is not understood what section 2.5 (informatives) relates to.

Results

- In section 3.1 it is stated that '*eight species of bat are regularly recorded locally*'. However it is unclear how this conclusion has been drawn. Furthermore, no exact location data or distances from the site have been provided for the records stated.
- Table 1 states the frequency of each species, however it is not stated where this information has been sourced. It does state that the table has been adapted from Mitchell-Jones (2004)¹³ however this publication does not provide frequency data for bats specific to the London area.
- Section 3.2 describes several habitat features of value to bats, however a value of these features based on best practice guidelines¹³ has not been provided.
- Section 3.3 details light meter readings of below 1 lux however no information has been provided with regard to what time and where the lux level readings were taken.
- Section 3.4 does not make reference to an internal inspection of the electricity sub-station and therefore it is presumed that this was not undertaken. Best practice guidelines¹³ state that where possible internal building inspections should be undertaken. As such, if access or health and safety restrictions prevented internal survey, then this should be stated within the report and any limitations this has for the planning application.
- Section 3.4 does not provide a comprehensive description of the building(s) or any features of value to roosting bats.
- Section 2.3 states that two bat activity surveys were undertaken at the Site, however section 3.5 and 3.6 refer to emergence surveys. The methodology of activity surveys and emergence surveys differ and therefore clarity is needed to define what type of survey was actually

¹³ Mitchell-Jones (2004). *Bat Workers Manual*. JNCC.

undertaken at the Site. Given that the electricity sub-station had bat droppings present, then three dusk emergence and/or dawn re-entry surveys during May to September should have been undertaken as a minimum to comply with best practice guidelines¹³, unless otherwise agreed with the Local Planning Authority (LPA) or Natural England giving justification. As such, based on the information provided within the report, it is considered that insufficient survey bat surveys have been undertaken at the Site (see below).

- Table 1 states that sunset was at 21:21 and Table 2 states that sunset was at 20:58. Best practice guidelines¹³ state that activity surveys should start 15 minutes before sunset and cease 2-3 hours after sunset. It is not apparent in the report if the surveys were conducted for the appropriate length of time.
- Section 3.7 states that '*The offside of the gauging station could not be viewed for evidence of bat ingress*', however it does not state why or what effect this has on the confidence of the survey results attained.

Discussion

- Section 4.1 states '*A seventh and eighth species (Natterer's and Nathusius's pipistrelle bats) were recorded on the R.B. during the same week*'. It is not apparent where this information has come from.
 - Section 4.1 also states that '*Soprano pipistrelles were confirmed roosting in small numbers in a tree at the Weir Island during recent surveys (Author's data, 2012). A noctule bat may also be roosting there casually.*' The exact location of this tree has not been provided and it is not known what survey work has been undertaken at the tree. Furthermore no reference has been made within the remainder of the report to the potential impact of the proposed development to roosting bats present at this tree.
 - Section 4.2 does not clearly state whether the gauging station is classified as a current bat roost. Furthermore, if the 'electricity sub-station' is a separate building to the 'gauging station', then the report does not detail any potential impacts of the proposed development to bats at this building. As such, the recommendations within this section are also unclear and may not comply with best practice guidelines¹³. Further clarity is needed.
 - Section 4.2 does not discuss whether the building has any potential to support hibernating bats.
 - Section 4.5 refers to research relating to the lesser horseshoe bat. The relevance of the inclusion of this in the report is not clear given lesser horseshoe bats are not present within London.
- 3.7. It is noted in section 1.1 that '*The Environment Agency has requested that the report address the potential to affect bats, chiefly by lighting*', however the scope of bat surveys undertaken at the Site is unclear within the report. Furthermore, the methodologies employed are not considered to be in line with current best practice guidelines¹³. As such, the potential impacts and recommendations detailed within the report are based on what appears to be insufficient survey data.
- 3.8. In summary, Waterman considers that there is currently information lacking in the Furesfen Bat Survey Report and therefore insufficient information exists to enable the Local Planning Authority to determine the planning application. The main omissions/deficiencies identified within the information currently available are summarised below:
- No information provided with regard to which (if any) buildings/built structures and trees would be affected by the proposed development;
 - Clarity of what bat surveys have been undertaken at the Site by Furesfen (i.e. activity surveys or building emergence surveys) and determination if these are in line with current best practice guidelines;

- Lack of survey information to determine the impact of the proposed development upon bats;
 - Location and timing of the lux level meters;
 - Location and recording time period of automated detectors;
 - Detailed internal and external building/bridge/built structure inspections for roosting bats (if proposed to be impacted by the development);
 - Detailed tree inspections (if proposed to be impacted by the development).

4. Ecology, Hydrology and Geomorphology – Review and Conclusions

- 4.1. Sections two (Habitat Survey) and three (Bats) of the 'Ecology, Hydrology and Geomorphology – Review and Conclusions' have been reviewed as part of this report.

- 4.2. Sections two and three provide a summary of the Phase 1 Habitat Survey and Bat Survey Report and as such a review of this text is provided within section 2 and 3 of this report and not repeated here. It is however noted that page 12 details information that has not been included within either the Phase 1 Habitat Survey or Bat Survey Report; in particular the following paragraph states:

"The Environment Agency (EA) has advised that the report, including the recommendation for a Bat roosting/emergence survey (detailed in a Biodiversity Mitigation Plan) at the gauging station/control hut (due to the presence of droppings), is accepted. The emergence/roosting survey does not need to be completed prior to planning approval but can be undertaken once Ham Hydro CIC has progressed towards construction. At that point Ham Hydro CIC can deal with any bat issues in the project planning.

Furesfen advise in the Biodiversity Action Plan that if bats are found to be present in order to avoid disturbance works may be undertaken November-March. Alternatively, work may proceed if a Method (of working) Statement is provided indicating that there will be no vibration, lighting, dust affecting the elevation of the building used by bats."

- 4.3. Reference is made to an email from Steven Naylor, Hydropower Project Manager (Thames West Area) dated 6th December 2012, confirming the EA's position in this respect. This document has not been available to Waterman during this ecological review.

- 4.4. The approach specified for bat surveys to be undertaken post planning is considered to be against normal practice, as detailed within paragraph 99 of the Government Circular (06/2005)¹⁴:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the procedure set out in section C below."

- 4.5. Further to the above statement, reference is also made to recent case law known as 'The Woolley Case' (R v Cheshire East Borough Council), during which a court judgment from the High Court clarified the legal duty of a Local Planning Authority when determining a planning application for a development which may have an impact on European Protected Species (EPS), such as bats.

¹⁴ ODPM Circular 06/2005: *Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*. Office of the Deputy Prime Minister.

- 4.6. As such, it is considered that, given the potential for roosting bats and actual evidence noted at the sub-station on Site, further bat surveys are required, in line with current best practice guidelines, prior to planning, to enable the Local Planning Authority to undertake their duties and fully determine the application.

5. Other Comments

- 5.1. It is noted that section 1.3 of the Bat Survey Report states that '*the Lensbury Club is currently being treated for Japanese Knotweed Fallopia japonica invasion*'. However reference to this was not mentioned with the Phase 1 Habitat Survey.
- 5.2. Section 3.5 of the Bat Survey report details the recording of a stag beetle *Lucanus cervus*, although the exact location on the Site is not specified. Stag beetles receive limited protection (sale) under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), but they are listed as a priority species on the UKBAP and London BAP. As such, if the proposed development is likely to impact upon habitats considered suitable to support stag beetle such as dead wood, hedges and trees, then a survey should have been undertaken (prior to planning) to determine their presence. In addition the potential impacts of the proposed development to this species should have been assessed and appropriate mitigation measures (if required) detailed. For reference, stag beetle surveys can be undertaken between mid-May and early August¹⁵.

¹⁵ London Wildlife Trust & English Nature (2000). *Stag Beetle: An advice note for its conservation in London*.

6. Conclusion

- 6.1. The ecological review has highlighted two sets of issues within the reports reviewed. These issues have been separated into those which are considered minor (not detrimental to the planning application being determined) and those which are considered more significant (potentially detrimental to the planning application being determined), as outlined below.

Minor Issues

- 6.2. Waterman have identified and commented upon various detailed matters within the reports that would benefit from further clarification and/or amends. For example:
- reference to relevant planning policy;
 - justifications with regard to data search distances;
 - results of data provided by the National Biodiversity Network;
 - provision of distance measurements of the designated sites and protected/BAP species from the Site; and
 - factual errors e.g. latin names.
- 6.3. It is not considered that the above points would be detrimental to the planning application being determined, however these points should be addressed to ensure that the reports are factually correct and in line with best practice.

More Significant Issues

- 6.4. Further issues have been identified which Waterman consider to be more significant concerns with regards to the LPA being able to determine the planning application based on the current information available. In principal, it is considered that the following further information is needed before the LPA can determine the application:
- justification within the Phase 1 Habitat Survey for why no further surveys were undertaken for those species identified as having the potential to be present on Site. In particular, clarification is needed to determine if the Right Bank (where there is potential for reptiles, amphibians, invertebrates e.g stag beetles, dormouse, badger, water voles, otters and birds) would be affected by the proposed development; and
 - potential further bat survey work.
- 6.5. With reference to section 4 of this report, the further survey work outlined above should be undertaken prior to determination of the planning application.
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