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Project name:
Melliss Avenue

Project ref:
60559375

From: Ashley Welch

Date:
1 March 2019

Memo

Subject: Melliss Avenue Bat Mitigation

Background

On 7th February 2019, AECOM received response from London Borough of Richmond upon Thames Council's (LBRUT) Biodiversity Officer broadly relating to the Proposed Development Site's suitability for foraging bats and suggested mitigation. It is understood that the LBRUT biodiversity officer observed uncovered pools of water, during a site visit in November 2018. In a response to the planning application, the LBRUT biodiversity officer concluded that these waterbodies are likely to attract midges and consequently recommended that a bat activity survey is undertaken to determine the value of these features for bats.

As the pools of water observed by the LBRUT biodiversity officer were not previously identified during the extended Phase 1 habitat survey in November 2017, an AECOM ecologist revisited the Site on 11th February 2019. This memo therefore describes the findings of this survey and outlines a response to the LBRUT feedback. Table 1 outlines our response to each comment. Agreement of the approach outlined within the conclusion was agreed with the LBRUT Biodiversity Officer, Tasha Hunter, via a phone call on 28th February 2019.

Table 1 Response to LBRUK's comments

LBRUK Comment	Response
With regards to the request for bat survey, it is felt that as the site clearly had a number of uncovered pools, including the large cement drum closest to the River Thames, there would be a high probability that these would be extremely attractive for midges etc.	The update survey confirmed that pools of water identified by LBRUT biodiversity officer were present within structures adjacent to the linear grassland that lines the Site's eastern boundary. However, all surveys and site visits carried out by AECOM and LBRUT's biodiversity officer have been undertaken outside of the active bat season during autumn and winter months when ephemeral waterbodies are more likely to hold water; in addition, the initial extended Phase 1 habitat survey undertaken by AECOM in November 2017 identified no pools. With respect to the drought conditions that occurred in the summer of 2018, it is unlikely that the concrete structures held water for much of the period in 2018 when bats would be most active (May to September). If water was present, it is likely to have been a minimal depth, and as such, the water within the concrete structures is unlikely to be significant for foraging bats along the River Thames corridor.
It is agreed that the River Thames would be the main commuting route for bats, however when the weather is inclement along the Thames, it is not implausible that bats will use the land side of the trees and therefore this site still holds value to bat movement and foraging.	It is important to note that these concrete structures are approximately 20m from the nearest tree and scrub belt. This area is only likely to offer bat species limited cover from inclement weather that may occur along the River Thames. This area is therefore unlikely to be used for foraging during such weather conditions.

LBRUK Comment	Response
As the applicant is reluctant to carry out activity surveys and combined with the open pools, we are therefore assuming that there is bat activity around the site.	On the basis of the extended Phase 1 habitat survey, a bat activity survey was initially not recommended due to the Site being assessed to be of low value to foraging bats and of negligible value to roosting bats. With this in mind, the tree and scrub belt adjacent to the tow path and grassland situated upon the bund will be retained as part of the Proposed Development and an additional species-rich grassland and a species-rich living roof are planned for the Proposed Development. Collectively, these habitats avoid the loss of linear habitat for bats and enhance the Site's value for invertebrates, a foraging source for bats.
We cannot support this development unless a tree belt is planted within a 10m dark wildlife corridor on the Northern side of the site.	Creation of an additional tree belt is unfeasible given the development's design and it is understood that no habitat can be created on the neighbouring Thames Water site. There is potential for a trellis planted with climbers to be installed along fencing erected within Melliss Ave Devco land, to provide linear habitat. This would need to run parallel to the existing security fencing due to restrictions on planting on the Thames Water site and could only extend along part of the length of the existing security fencing within the north-east corner. It is also understood that the trees proposed to be planting within the grassland are to be removed and instead the existing species-rich grassland will be retained. Details regarding trees and hedging will be detailed within the landscaping response.

Summary and Conclusion

It was agreed with the LBRUT Biodiversity officer that our assessment of the pools of water on site was appropriate. Given that pools of water were absent in November 2017 and contained a small amount of water during the subsequent visit, it was agreed that the pools are highly likely to be dry during the bat active season and therefore be of negligible value for foraging bats. LBRUT are also aware of the difficulties of planting within the adjacent Thames Water site. However, it was agreed that a trellis containing native climbing plants will be considered for the north-east corner, set in front of the existing Thames Water fencing, in order to add to the site's habitat connectivity.

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