



ECOLOGICAL CONSTRUCTION MANAGEMENT PLAN

LOCATION: 32 Haverfield Gardens Kew Richmond TW9 3DD

CLIENT: Kisiel Group

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1. INTRODUCTION

1.1 BACKGROUND

In March 2024, Kisiel Group commissioned Greenwood Environmental Ltd to prepare an Ecological Construction Management Plan, in relation to a granted planning application at 32 Haverfield Gardens, in Kew, Richmond (Planning Ref. No. 22/1497/FUL). The granted permission allows for the demolition of the existing dwelling house and 22 garages and the construction of 5 x new residential dwellings (Class C3) with associated hard and soft landscaping, parking and associated infrastructure. This report is required to allow the discharge of Planning Condition U0150121 (Ecological CMP), which states:

“No development shall take place until an Ecological Construction Management Plan is submitted to and approved in writing by the local planning authority. The development shall thereafter be constructed in accordance with these details.

REASON: To prevent harm to wildlife and protect existing biodiversity.”

To fulfil the above brief, this Ecological Construction Management Plan (ECMP) has been prepared, which sets out the environmental protection measures for undertaking works associated with the proposed development, dealing with the protection of designated sites, habitats and species during the construction phase.

1.2 SITE DESCRIPTION

The application site comprises a former residential building to the front of the site and 22 single-storey garages to the rear. The buildings on site are surrounded by areas of hardstanding. The buildings and hardstanding are bound by garden planting such as scrub and trees, amenity grassland, and areas of ruderal vegetation.

The broadly rectangular site is approximately 0.17 hectares in size. The site is surrounded on all sides by the rear gardens and rear elevations of predominantly residential developments of varying heights and form. The lock-up garages are arranged in three rows. The wider landscape comprises urban land, consisting of a mixture of roads, Kew Green, Royal Botanical Gardens, and residential areas.

Figure 1 shows the location of the application site.



Figure 1. Site location plan

2. SITE BASELINE

2.1 DESIGNATED SITES

There are no statutory designated sites within 1km of the site.

In relation to non-statutory designated sites, the application site is within 50 meters of Kew Pond and Kew Green, designated for supporting a host of plant species rare in London and unusual non-native species, along with common nesting waterfowl and 100 metres from Royal Botanical Gardens, Kew, a World Heritage Site, supporting rare species and valuable habitats that host birds, badgers, reptiles, bats, and amphibians. Both these designations are however separated from the application site by residential buildings and their gardens.

2.2 HABITATS

The broad habitat types found within the application site are as follows:

- Buildings and Hardstanding
- Scattered Scrub
- Vegetated Garden
- Modified Grassland (Amenity Grassland)
- Scattered Trees

2.3 PROTECTED SPECIES

The dusk and dawn bat surveys in 2021 did not identify any evidence of an active bat roost within the dwelling or garages. The surveys recorded a population of common pipistrelle and soprano pipistrelle, utilising the site and habitats directly adjacent to the site for foraging and commuting.

The patches of scrub, trees and buildings on site provide suitability for use by nesting birds. No signs of active or disused nesting were however noted at the time of the survey in 2021. Furthermore, the survey in 2022 did not identify any local populations of black redstart utilising habitats on or directly adjacent to the site for nesting, resting, foraging, or traversing.

3. ECOLOGICAL CONSTRUCTION MANAGEMENT PLAN (ECMP)

This ECMP outlines measures to prevent impacts on retained habitats and protected/notable species. The purpose of this document is therefore to:

- Identify risks to protecting habitats and the function of the site for protected or notable species;
- Set out when and where ecological supervision will be required;
- Identify ecologically sensitive areas and indicate where protective buffers/fencing is required; and,
- Identify roles and responsibilities for undertaking the work in relation to protecting biodiversity on site during the construction phase.

3.1 GENERAL MEASURES

Site Induction - All personnel involved in the construction phase will receive environmental awareness training. The environmental training and awareness procedure will ensure that staff are familiar with the principles of the ECMP, the environmental aspects and impacts associated with their activities and the procedures in place to control these impacts.

3.2 DESIGNATED SITES

Royal Botanic Gardens, Kew, and Kew Pond and Kew Green are located approximately 100m and 50m away, respectively and are separated from the site via buffers in the form of other residential buildings and their gardens, to ensure the protection of these non-statutory designated sites against indirect impacts during the construction phase, the following measures should be implemented. The location of these designations is shown in Figure 2.

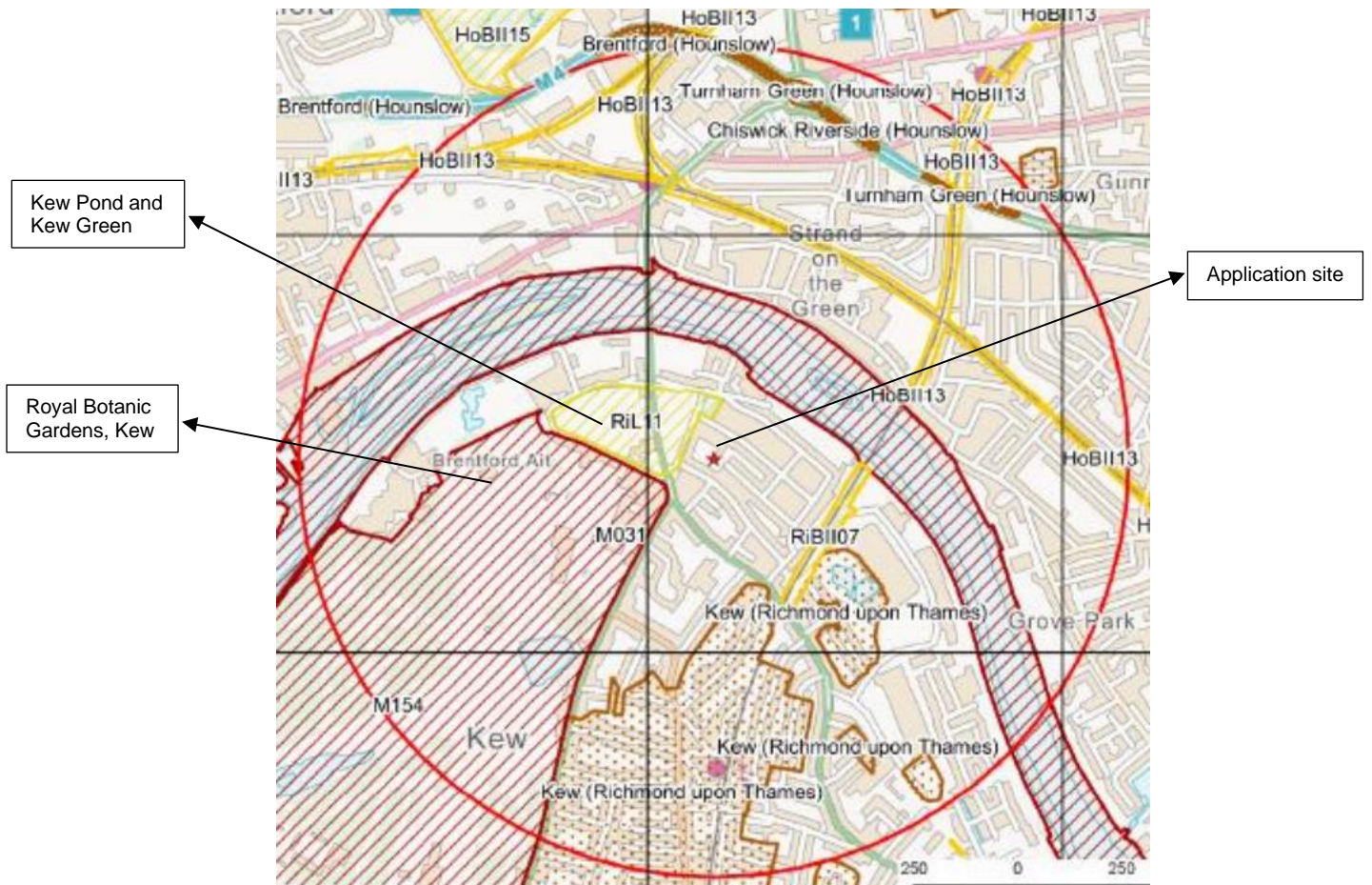


Figure 2. Location of non-statutory designated sites (Source: GiGL - Greenspace Information for Greater London)

- Surface Water Run-off - All operations on site will be carried out in a manner to minimise the production and discharge of polluted waters in accordance with "Guidance for Pollution Prevention" (GPPs).
- Fuel, Oil and Chemical Spillage - All fuel, oil and chemical deliveries will be supervised by the Site Manager, who will be trained to deal with any spillage to prevent a pollution problem occurring. All fuel, oil and chemicals will be stored on an impervious base within a bunded area and secured. All containers will be kept in a secure compound and be protected from vandalism and will be clearly marked with their contents. Any fuel, oil or chemicals on site will be located at least 10 metres from any watercourse. All mobile plant will be refuelled in a designated area on an impermeable surface and away from any drains. In case of any spillages, there will be a spill response kit available on site. Where it is impractical to refuel within a bunded area, a drip tray will be available to catch any spills.
- Material Storage - Stockpiles should be positioned as far away from sensitive receptors (i.e. eastern boundary of the site due to the presence of the non-statutory designated sites) and suitable measures implemented to prevent run off and dispersion if left for any length of time. Any powders should be stored in sealed bags

prior to use. All deliveries of dry powder should be undertaken in a manner to minimise dust emissions.

- Adequate dust and noise suppression facilities will be used on site throughout construction works, such as damping down areas and turning off machinery when not in use.
- Emergency Procedures - A Site Environmental Emergency Plan will be prepared prior to construction and communicated to all members of the project team including sub-contractors. Should an emergency incident occur, the Site Manager will be notified immediately. The emergency response will be co-ordinated by the Site Manager. Protective measures, mitigation, clean up and remediation actions will be identified from the evaluation and will be put into place, having regard for the nearby designated sites. A record of the emergency incident will be kept to show the nature of the corrective action undertaken.
- Inspections – Regular inspections to check that pollution control measures are in place will be undertaken by the Site Manager.
- ECMP Review - The ECMP is a live document that will be updated by the Site Manager/Contractor and reviewed on a regular basis, where required.

3.3 HABITATS - TREES

Trees are mostly located outside the site boundaries, but some trees are present within the garden area. To ensure the retained trees are safeguarded, a tree protection plan has been prepared to show the location of protective measures. These measures will be implemented in advance of construction and maintained until such time as soft landscape proposals require their removal. Therefore, the retained trees will be protected with protection zone / fencing in accordance with BS 5837:2021. For further details, please refer to the approved Tree Survey and Impact Assessment, available at <https://images.richmond.gov.uk/iam/IAMCache/3488495/3488495.pdf> .

3.4 PROTECTED SPECIES

Nesting Birds

As the trees, scrub and buildings on site have potential for nesting birds, it is recommended that the works to the vegetation and buildings are undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and end of August. If this is not possible, then any vegetation to be affected should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting, any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally, for example via the implementation of an appropriate buffer zone (species dependent) around the nest in which no disturbance is permitted until the nest is no longer in use. Vegetation clearance during the nesting season should be undertaken under the supervision of a qualified and experienced ecologist.

Badgers/Small Mammals

Vegetation clearance is recommended to be undertaken under the supervision of a qualified and experienced ecologist to ensure no evidence of badgers or hedgehogs is present.

Any deep excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape.

Bats

As a precautionary measure, it is recommended that the demolition works are carried out under the supervision of an experienced and licenced bat ecologist. This will entail the soft stripping of the roof tiles and any other potential roost features under supervision.

In the unlikely event that a bat is found during the demolition, all works must immediately cease and Natural England contacted to agree on a way forward.

Invertebrates

The removal of any areas of dead wood should be overseen by an experienced ecologist. If a stage beetle larva is found during the works, the larvae should be moved to the south-east section of the site, where works are not taking place. A hole should then be dug, and the larvae should be placed in the hole with old rotting wood from the original area. It should then be covered loosely with soil.

3.5 INVASIVE SPECIES

Cotoneaster, a non-native, invasive species, is known to be present on site. Invasive cotoneaster should therefore be removed prior to commencement of the works on site. The process will require the removal of all the above ground material, excavation of the cotoneaster root system and soil with dispersed seeds. Disposal of contaminated soil and plant material should be done in accordance with good practice guidelines at a licensed landfill; alternatively, the plant material could be burned on site.

4. RESPONSIBLE PERSONNEL

4.1 SITE MANAGER

Site Manager is to be responsible for the implementation of this ECMP and shall liaise with the Ecological Clerk of Works (ECoW) to commission and arrange an ecologist's input or site attendance, where required. Should management of the site change, new personnel will be made aware of and action this ECMP.

4.2 ECOLOGICAL CLERK OF WORKS (ECoW)

An ECoW is required to support the development and ensure that the site personnel will adhere to the requirements of this ECMP. Any ecologist must be suitably qualified, have at least four years' experience and in receipt of suitable training in how the responsibilities of the ECoW are to be discharged. The ECoW will be responsible for delivering the prescriptions requiring ecological expertise during construction.

REFERENCES

Guidance for Pollution Prevention (GPP) documents. Available at:
<https://www.netregs.org.uk/environmental-topics/guidance-for-pollution-prevention-gpp-documents/> n

Syntegra Consulting Ltd (May 2022). *Preliminary Ecological Appraisal Report*

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