CONSTRUCTION ECOLOGICAL MANAGEMENT PLAN (CEMP): BIODIVERSITY

SILVER BELLS ADMINISTRATION LTD.

LONDON HOUSE,
243-253 LOWER MORTLAKE ROAD,
RICHMOND, TW9 2LL

4TH SEPTEMBER 2024

REF: 22031

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Revision	Date	Author	Reviewer
0	04/09/2024	Carly Teague BSc (Hons) MSc MCIEEM	Jack Kellett BSc (Hons) MCIEEM

1. INTRODUCTION

Background

1.1 CT Ecology Limited was commissioned by Silver Bells Administration Ltd. to compile a Construction Ecological Management Plan (CEMP) in relation to land at London House, 243-253 Lower Mortlake Road House in Richmond (hereafter referred to as "the site"). This document was conditioned as part of the planning permission (Reference: 22/3052/FUL) for the redevelopment of the site.

1.2 This document has therefore been written to ensure compliance with Condition U0167443 of the associated planning consent:

> *'No works shall start until a Construction Ecological Management Plan (or similar) is submitted to and approved in writing by the local planning authority and thereafter constructed in accordance with these details.'*

1.3 A Preliminary Bat Roost Assessment (PBRA) of the site took place in May 2022, London House was assessed as providing limited potential for roosting bats. No evidence of roosting bats or secondary evidence was found anywhere within or external to this building during the assessment. Overall the structure was assessed as having Negligible potential to support roosting bats.

1.4 Although a targeted Preliminary Ecological Appraisal (PEA) was not required for the site, a subsequent ecology plan was compiled detailing ecological enhancements for the site.

1.5 The document is based on details provided in the PBRA (CT Ecology, 2022), and the ecology plan (Nicholas Dexter Ltd. 2023).

Site Description

1.6 London House is a disused office block, within an urban location in the northern extent of the London Borough of Richmond. The surveyed structure is accessed directly from the A316 Lower Mortlake Road which bounds the site to the south. Residential properties are to the north and west and beyond Lower Mortlake Road to the south. A petrol station and road junction are to the east.

1.7 Within the site, semi-natural habitats are restricted to a row of Leyland cypress (*Cupressus* × *leylandii*) trees along the northern boundary of the site.

1.8 Residential properties dominate the immediate area together with commercial and retail units to the south. Discrete areas of greenspace are in the wider Borough, the closest of which is Raleigh Road Recreation Ground, beyond residential properties to the north. The National Grid Reference for the centre of the site is TQ189 756.

Proposed Works

1.9 Current proposals are for the internal and external refurbishment of the existing building for office use together with a one-storey upwards extension to provide additional floorspace. Works are anticipated to commence in November/December 2024, with completion in December 2025.

2. ECOLOGICAL/BIODIVERSITY FEATURES

2.1 Following the recommendations made in the PBRA report in addition to details in the ecology plan, a series of measures are described in this document to protect existing ecological features at the site:

- Trees– retention of trees along the northern boundary of the site;
- birds – general nesting opportunities are associated with the trees along the northern boundary and within an open section of the plant room on the top of the existing building; and
- local Biodiversity Action Plan (BAP) Priority species – records of hedgehog (*Erinaceus europaeus*) have been recorded in the locality.

2.2 Biodiversity objectives were determined through consideration of the information collated during the ecological surveys at the site. These are detailed in Table 2.1 below.

Table 2.1: Biodiversity Objectives

Ecological Feature	Target
Boundary Trees	No net loss of habitat. Increase in species diversity and available habitat opportunities post development.
Widespread Nesting Birds	No disturbance to active nests, and increase the availability of suitable bird nesting habitat.
Priority Species	No risk of killing/injury. Increase in available habitat opportunities.

3. IMPACTS

3.1 Potentially damaging construction activities are listed below. These have been identified from: the proposed site layout and logistics plan as detailed in Appendix A; proposed construction practices; and current guidance on activities/operations likely to result in impacts to ecological features (CIEEM, 2016):

- Movement of machinery and vehicles;
- site clearance;
- digging/excavation or infilling;
- piling;
- pollution/silt runoff;
- dust/air pollution;
- noise;
- lighting;
- dumping, spreading, discharge or storage of materials;
- laying of pipes and cables;
- erection of temporary structures; and
- engineering works including drilling.

3.2 Taking into consideration the expected zone of influence of each of these activities, potential direct or indirect impacts resulting from the proposed construction activities have then been identified in the absence of mitigation. These include (but are not limited to) short-term impacts (i.e., disturbance) and long-term impacts (i.e., modification, loss, and fragmentation/ isolation).

3.3 Aspects of ecological structure and function considered when predicting impacts included available resources, environmental processes, ecological processes, human influences, historical context, ecological relationships, ecological role or function, ecosystem properties and other environmental influences, in accordance with current guidelines (CIEEM, 2016).

3.4 Potential impacts on ecological/biodiversity features (in the absence of mitigation) are summarised in Table 3.1 below.

Table 3.1: Potential Impacts on Ecological Features

Ecological Feature	Potential Impact
Boundary Trees	Yes- potential for works within root zones during construction activities/site preparation. Minor adverse, temporary, reversible impact.
Widespread Nesting Birds Common	Yes – a) potential disturbance of active nesting birds during building work. Minor adverse, temporary, irreversible impact; b) loss of suitable nesting habitat as a result of building conversion works. Minor adverse, permanent, reversible impact.
Priority Species	Yes – risk of disturbance during site works. Minor adverse, temporary, reversible impact.

4. MITIGATION

4.1 For each potential impact identified, all mitigation options provided follow the established mitigation hierarchy as set out in BS 42020:2013 (BSI, 2013). This seeks as a preference to avoid impacts, then to mitigate unavoidable impacts, and as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. All mitigation measures follow current best practice guidance (CIEEM, 2014), and are proportionate to the level of impact identified and to the nature and scale of the proposed works.

Boundary Trees

Avoidance

4.2 Tree Protection fencing will be set out in accordance with BS 5837:2012 around all retained boundary trees, in order to protect these features from accidental damage during construction activities. Temporary protective barriers will be installed as detailed in the Arboricultural Method Statement (David Archer Associates, 2023) and on the associated Tree Protection Plan (Drawing Ref: TPP03, David Archer 2023), accompanying the planning application. Please refer to the Tree Protection Plan (Drawing Ref: TPP03, David Archer 2023) for the locations of existing trees to be retained.

Mitigation

4.3 None proposed.

Compensation

4.4 Additional tree planting is included in the landscaping scheme. Please refer to the Tree Planting Plan: 0405, Rev G (Nicholas Dexter Ltd. 2023) for the locations of new tree planting.

Birds (General Nesting)

Avoidance

4.5 The open plant room on the top of the existing roof of the structure provides suitable nesting habitat for a range of widespread bird species.

4.6 The anticipated commencement date for the works is between November and December 2024. As this is outside the nesting period for birds, this species does not pose constraints to the construction schedule.

Mitigation

4.7 None required.

Compensation

4.8 To compensate for the loss (albeit limited) of suitable bird nesting habitat associated with the plant room, additional native trees and planting will be incorporated into the proposed landscaping to the rear of the site which will provide cover (and foraging resources) for a range of common bird species. These features are shown on the Planting Plan: 0405, Rev G (Nicholas Dexter Ltd. 2023).

4.9 Additional bird boxes have also been included in the associated Ecology Plan: 0405, Rev E (Nicholas Dexter Ltd. 2023).

4.10 A green roof will also be installed on the refurbished building. This will measure 771m^2.Specific details regarding the green roof were still being devised at the time of compiling this CEMP.

Priority Species (Hedgehogs, Foraging Bats)

Avoidance

4.11 If present, hedgehogs will most likely utilise the tree line to the rear of the building where cover is provided together with some connectivity to gardens to the north. To avoid impacts to this species, no works will commence within the tree root protection area along the northern site boundary, with cover retained throughout works.

4.12 Retention of the tree line will enable bats to continue to forage through the site during works.

Mitigation

4.13 Any small mammals encountered in the wider site will be allowed to move away or moved by hand to the retained tree protection area in the north of the site.

4.14 The tree line will not be directly illuminated during the works in order to maintain potential bat foraging routes. Any lighting associated with the construction phase will be directed on the building and the use of hoods/cowls will be used, as required, in order to limit upward and outward light spillage and to control light spill on the retained trees. Site storage and welfare will be located to the south of the building, between the building and the main road and away from the retained tree line.

Compensation

4.15 New landscaping will provide additional opportunities for Priority Species with additional planting serving to enhance potential bat foraging and commuting routes associated with the northern boundary.

4.16 A single bat box will be installed on one of the retained semi-mature trees within the north-west corner of the site. The Schwegler 3FS will be used, if available at the time of installation. This is suitable for smaller bat species including pipistrelles which have been recorded in the locality. There have been issues with sourcing Schwegler bat boxes over recent months. If this bat box is unavailable at the time of ordering, then as an alternative, a Greenwood's two crevice bat box is recommended. The bat box will be installed at a height of 2.5-3m and be oriented south-west, facing away from any light spill associated with the petrol station to the east. If the box cannot be sited on a suitable tree, this must be installed on the rear elevation of the building however this must be located a suitable distance away from the sparrow terraces and under guidance from the project ecologist.

Other

4.17 If at any time, evidence of a previously unidentified protected species is encountered then works must immediately cease and an ecologist consulted in order to ascertain the best way to proceed with the works which may involve the need for additional mitigation.

5. SCOPE OF WORKS AND SCHEDULE

5.1 Site clearance will not be required to facilitate construction activities, with the retention and enhancement of habitats associated with the northern site boundary. There will be no additional permanent land take, beyond the proposed development boundary, however two parking bays will be suspended at the entrance of the site for the duration of the works to facilitate material storage areas and vehicle turning areas. Hoarding will be placed around these areas to route the public around the outside of the site. This is shown on the Logistics Plan in Appendix A.

5.2 The site boundary together with the location and extent of ecological features and site enhancement measures are shown in the Ecology Plan, Tree Planting Plan and Planting Plan in Appendix A.

5.3 The mitigation and enhancements will be undertaken in accordance with the proposed programme of works. The programme will take into account seasonal constraints, the expected timetable of works (i.e., when construction works are due to commence) and any other timing considerations.

5.4 The Principal Contractor and the Project Ecologist will review the scope of works, design a timetable to agree and ensure appropriate on-site supervision is provided to avoid/mitigate impacts on protected species as outlined above (see Mitigation). The timetable for ecological supervision must be agreed prior to works commencing on site.

6. MECHANISMS TO SECURE DELIVERY

6.1 Prior to the commencement of any works on site, including the setting up of site compounds and access onto the site, the Principal Contractor (and any personnel appointed by the Principal Contractor) will receive a formal briefing by the project ecologist. This briefing will detail all relevant protected species issues as set out within this CEMP. A copy of this document must be read and understood by all contractors conducting the works.

6.2 The Principal Contractor will then be responsible for relaying any necessary information to contractors on site, either employed by them directly or third parties. Advice will be sought from CT Ecology in the event of complex issues arising or in cases where there is any doubt as to the action to be taken. Any proposed deviation from this CEMP will be discussed with CT Ecology prior to seeking approval from the Local Planning Authority, as necessary.

6.3 The site is currently owned by the client, and they are responsible for arranging site access and contractors accordingly.

6.4 The client or a third party employed to undertake specific services, will be responsible for implementing all of the necessary avoidance / mitigation / enhancement measures detailed within this CEMP. These actions will proceed under ecological supervision where relevant.

6.5 A suitably qualified and experienced ecologist, licensed/accredited where necessary, will be provided and act as an ECoW. The role of the ECoW is in accordance with BS 42020:2013 (BSI, 2013) and will satisfy the following requirement:

> *'An ecological Clerk of works should be able to demonstrate a level of experience and competence commensurate with the complexity of the role needed on site to deal with the wide range of ecological issues likely to be encountered and to adapt to new and unforeseen challenges raised by development activities*.'

7. REFERENCES

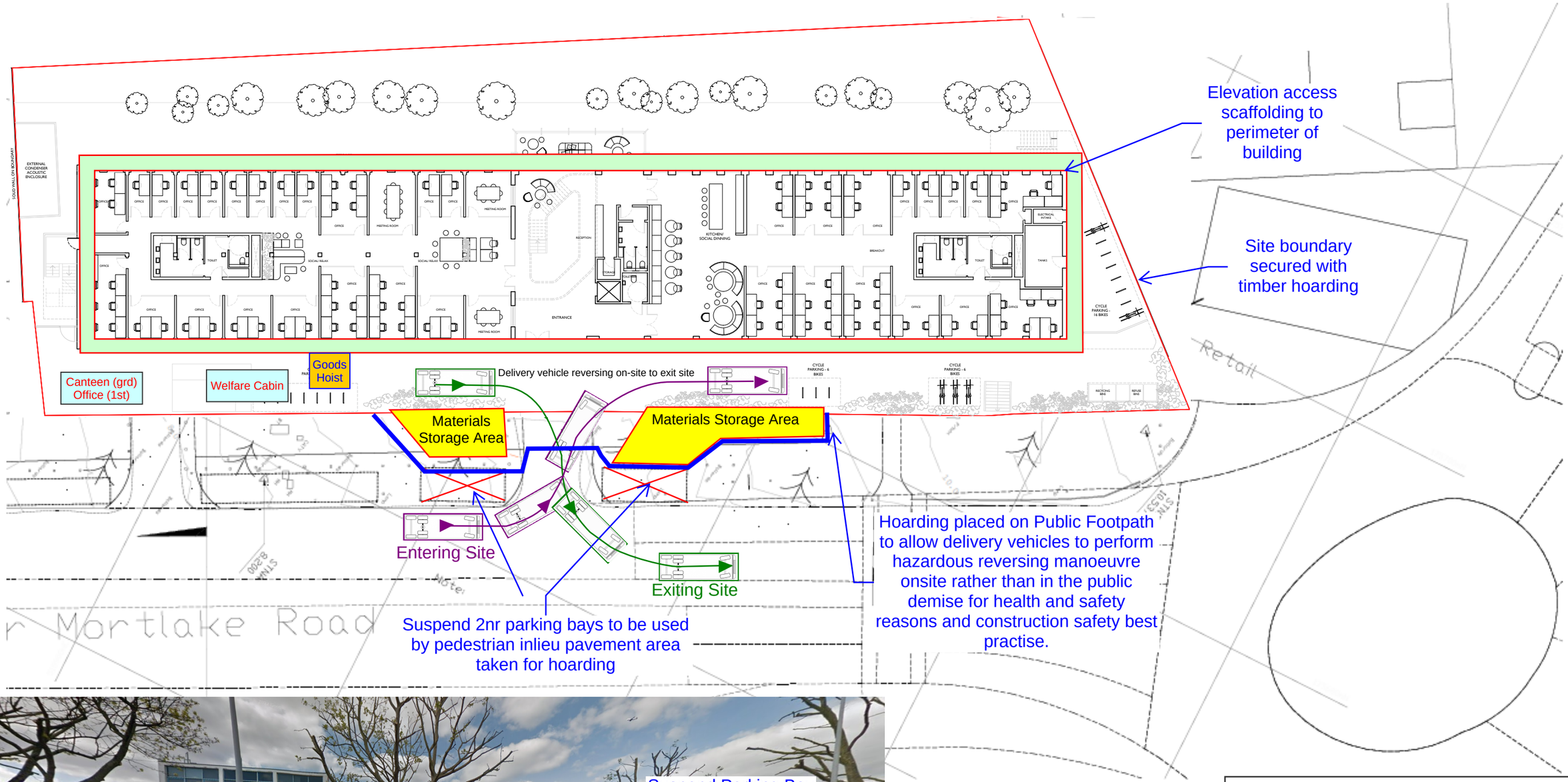
- British Standards Institute (2013). 24040:2013. *Biodiversity-Code of Practice for Planning and Development.* Standards Policy & Strategy Committee. Milton Keynes: BSI.
- CIEEM – Chartered Institute of Ecology and Environmental Management (2016). *Guidelines for Ecological Impact Assessment in the UK and Ireland – Terrestrial, Freshwater and Coastal.* Winchester: CIEEM [On-line]. Available from http://www.cieem.net/data/files/Publications/EcIA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf [Accessed on 11/01/2024].
- CT Ecology Ltd (2022). *Preliminary Bat Roost Assessment for Lower Mortlake Road, Richmond*. Unpublished report for Silver Bells Administration Ltd. CT Ecology Ltd. Brighton.
- David Archer Associates (2023).*Tree Protection Plan: TPP 03*. London House, 243 – 253, Lower Mortlake Road. David Archer Associates.
- Joint Nature Conservation Committee (JNCC) (2015). *The UK BAP Priority Species and Habitats.* [On-line]. Available from http://jncc.defra.gov.uk/page-5705 [Accessed: 11/01/2024].
- Nicholas Dexter (2023). *Planting Plan: 243 - 253 London House, Richmond (0405- G).* Nicholas Dexter. East Sussex.
- Nicholas Dexter (2023). *Tree Planting Plan: 243 - 253 London House, Richmond (0405- G).* Nicholas Dexter. East Sussex.
- Nicholas Dexter (2023). *Ecology Plan: 243 - 253 London House, Richmond (0405- E).* Nicholas Dexter. East Sussex.
- Joint Nature Conservation Committee (JNCC) (2015). *The UK BAP Priority Species and Habitats.* [On-line]. Available from http://jncc.defra.gov.uk/page-5705 [Accessed: 11/01/2024].

Appendix A
Site Plans

Figure 1: Construction Logistic Plan

7.6 Construction Logistic Plan

ECP Partnership



London House

Project:	243-253 Lower Mortlake Road, Richmond, TW9 2LL
Drawing Title:	Construction Logistic Plan
Drawing Number:	20220818

Figure 2: Tree Protection Plan

REV.	DATE	DESCRIPTION
C	17/08/2022	Architectural updates
D	22/09/2022	Updated to latest plans
E	17/01/2023	Updated to council comments
F	30/03/2023	Updated tree stategy
G	23/05/2023	Existing trees retained

Tree Planting Strategy

The landscape design has been redeveloped, with the existing Leylandii trees now retained and an addition of a more diverse mix of evergreen and deciduous trees. This new mix of trees will enhance the variety and number of habitats for local flora and fauna, increasing the ecological value of the site.

With the limited space available, most trees proposed are fastigiate, or columnar in habit. A mix of sizes, forms and canopy types (evergreen/deciduous) will add to the visual interest, whilst also helping alleviate overlooking issues with neighbouring properties.

The new trees have also been selected in a variety of delivered sizes, to reflect their mature form/size and rate of growth. As the proposed trees will fill the gaps between the existing Leylandii, the proposed tree sizes and locations have been specifically chosen to alleviate any overlooking, or light pollution issues with the neighbouring properties.

Trees

QTY	SPECIES / CULTIVAR	GIRTH / SIZE	FORM
4	Betula ermanii 'Grayswood Hill'	12-14cm	Standard
2	Carpinus betulus 'Frans Fontaine'	14-16cm	Standard
6	Quercus robur 'Fastigiate Koster'	18-20cm	Extra heavy standard
5	Thuja plicata 'Fastigiata'	18-20m	Extra heavy standard
3	Ilex aquifolium 'J. C. van Tol'	14-16cm	Standard

Betula ermanii

A medium-sized tree, sometimes multi-stemmed, with peeling cream bark on the trunk, papery brown bark on the branches; coarsely toothed, ovate leaves turn yellow in autumn; male catkins open with the leaves

Carpinus betulus 'Frans Fontaine'

A narrow, columnar deciduous tree, with smooth, grey bark which darkens with age. The tree can grow to 10m (33ft) high when mature. It can often hold its dead, brown leaves through the winter, before shedding them in spring when it comes into growth once more.

Ilex aquifolium JC Van Tol

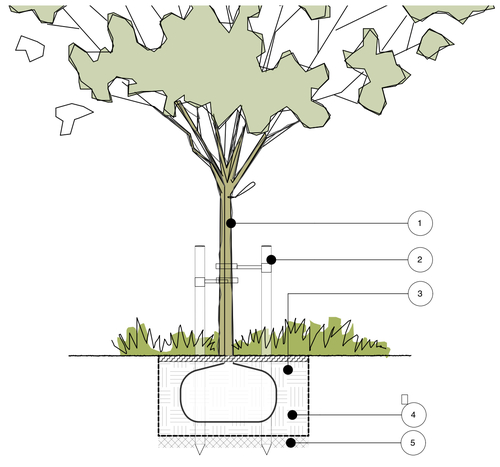
Evergreen self-fertile, female tree to 6m tall, of broadly upright habit with dark-purple young shoots and almost spineless, glossy, dark green ovate leaves. Small white flowers in late spring are followed by abundant, bright red berries

Quercus robur 'Fastigiate Koster'

'Koster' is a fastigiate form Oak with upright branches, spreading with age to ultimately reach approximately 20m high and 3m wide. Usually seed-raised so can be variable. Leaves are dark green with shallow lobes
20m (H) x 3m (W)

Thuja plicata 'Fastigiata'

A tall growing narrowly columnar form with ascending branches. Excellent as a single specimen or for hedging. Generally more satisfactory than Chamaecyparis lawsoniana. This variety is evergreen.
20m (H) x 3m (W)



1 **tree stock** to bs3936-4:2007:

rootballed tree: grown in open soil and delivered in hessian / wire biodegradable wrapping. wrapping to be left intact.

2 **double stake:** 75mm dia. driven through rootball into soil to 2/3 clear stem in accordance with bs4043:1989 inserted to windward side of tree. to be removed within 3 years of planting date.

3 **tree pit:** base and sides to be loosened to allow root penetration. dug immediately before planting.

4 **backfill:** topsoil / well rooted manure blended with existing soil 50:50 ratio

5 **course gravel:** 250mm to base of tree pit

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General notes:

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2. Contractors must check all dimensions on site.
3. Discrepancies must be reported to the Landscape architect before proceeding.
4. Not suitable for construction unless stated below
5. This drawing is to be read in conjunction with all relevant Architect's drawings, specifications and other Consultant's information.

client
Mr A. Khan

project
243 - 253 London House
Richmond

print size
A1

scale
1:150

issue date:
23/05/2023

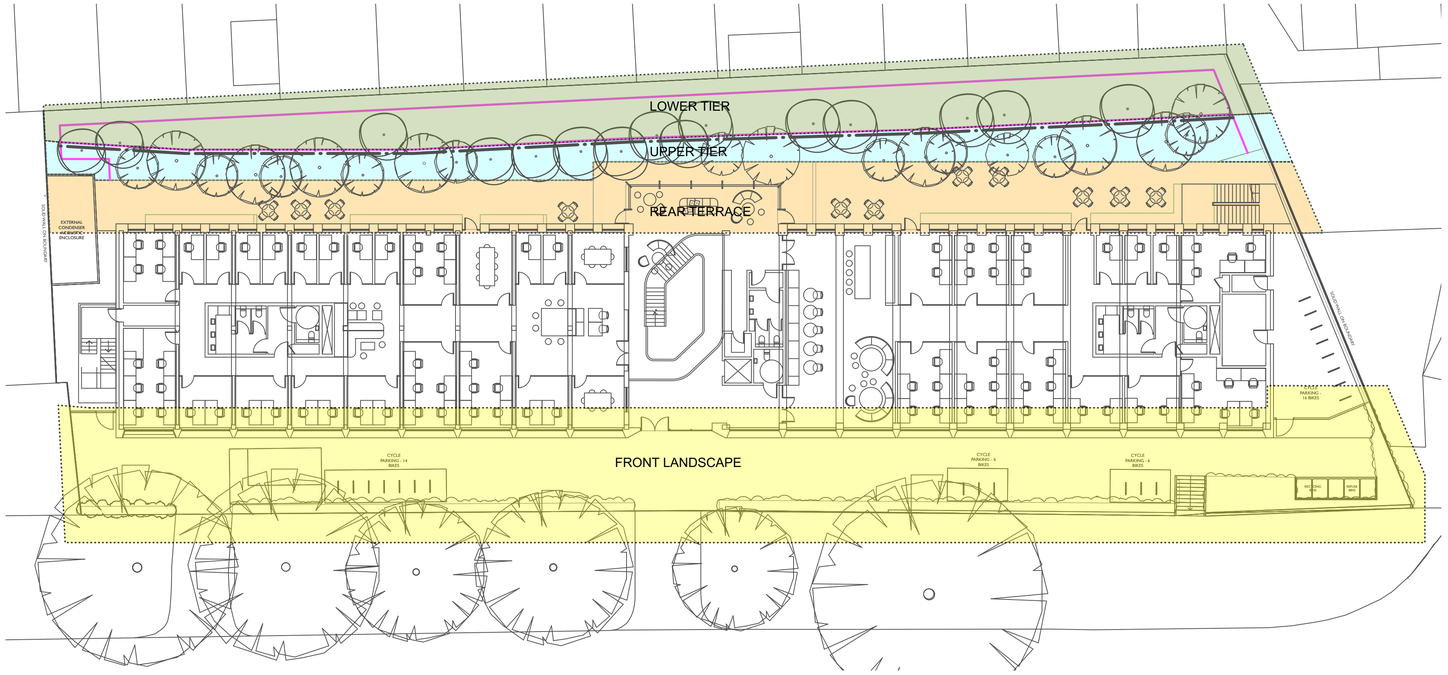
stage
Planning

DRAWING TITLE

Tree Planting

DRAWING ID.	SHEET NO.	REVISION / ISSUE
0405	- 3005 -	G

Figure 3: Planting Plan



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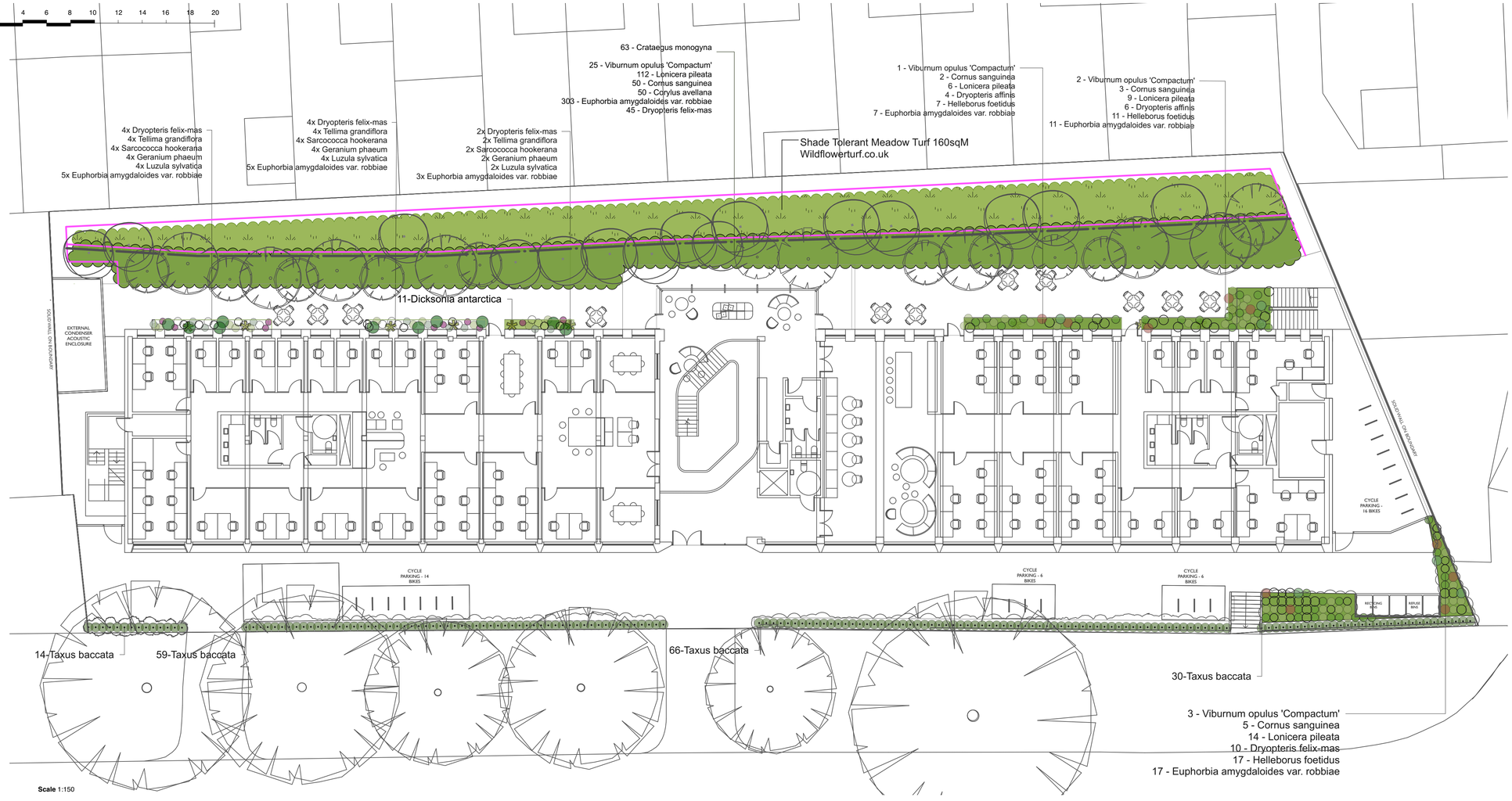

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Planting zones

4 planting styles, or zones, are proposed for the garden. These aim to create interesting spaces with year-round interest, that enhance both the visual and ecological value of the site.

Front Landcape:
The front area of the site aims to create a welcoming, open feel, where people can flow easily between the gaps in the planting border. Being located next to a busy road, the hedge will help form all year structure that helps define the site boundary.

Rear Terrace:
A simple verdant landscape combining ferns, grasses, elegant tree ferns to create a calming space with year-round form and interest.

Upper Tier:
New trees, shrubs and herbaceous perennials (in addition to the existing evergreen trees) will create year-round interest, as well as enhancing the ecological value of the site and alleviating overlooking/light pollution issues with neighbouring properties.

Lower Tier:
Further tree planting as well as native, shade tolerant wildflower meadow planting further add to the ecological value of the site as well as strengthening the tree line, to alleviate overlooking/light pollution issues with neighbouring properties.

REV.	DATE	DESCRIPTION
C	17/08/2022	Architectural updates
D	22/09/2022	Updated to latest plans
E	17/01/2023	Native plants updated
F	30/03/2023	Planting zones updated
G	23/05/2023	Statement updated

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project
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Richmond

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A1

scale
various

issue date:
23/05/2023

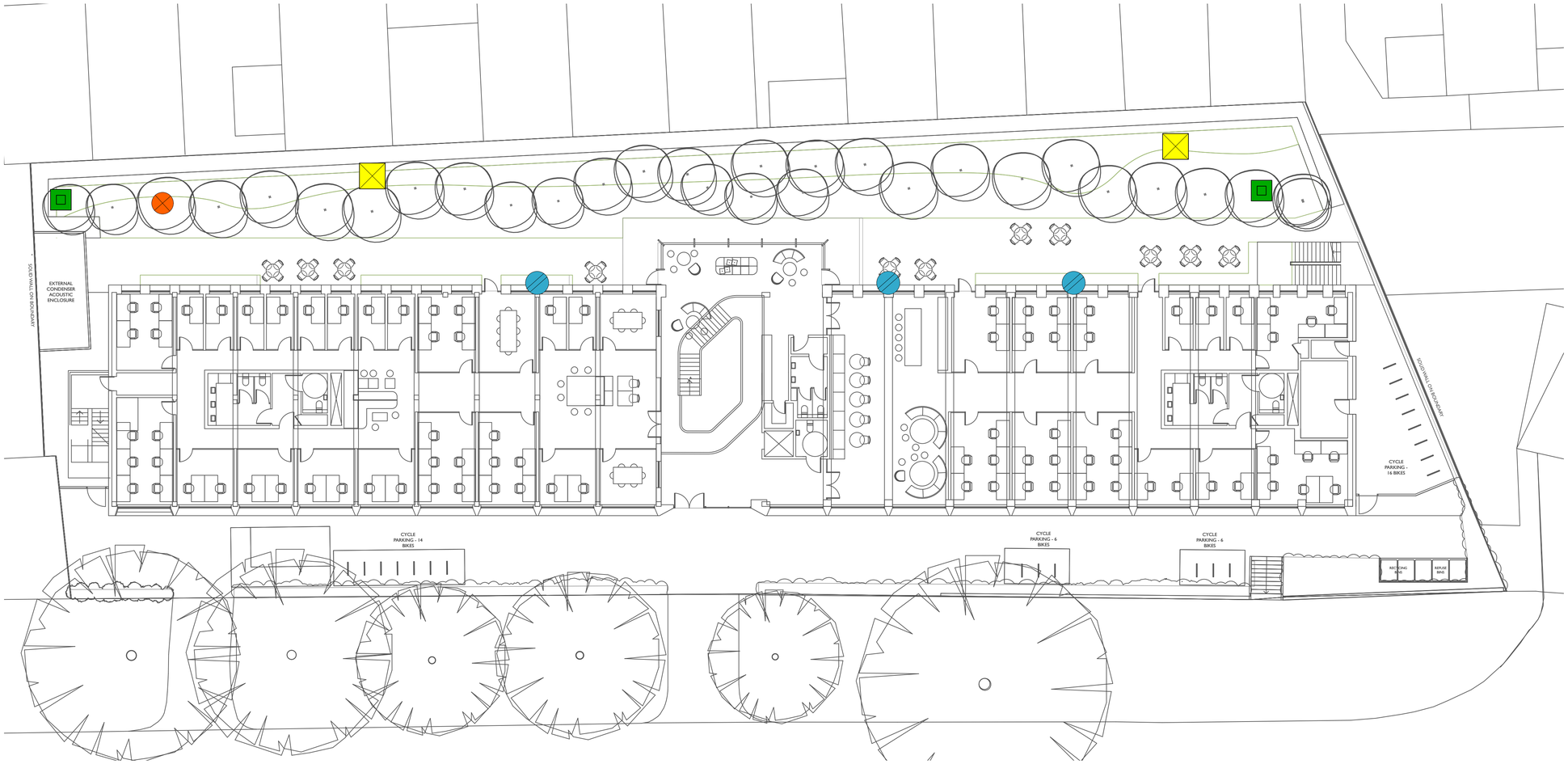
stage
Planning

DRAWING TITLE

Planting Plan

DRAWING ID. 0405 - SHEET NO. 3010 - REVISION / ISSUE G

Figure 4: Ecology Plan



REV.	DATE	DESCRIPTION
A	08/07/2022	Planning
B	16/08/2022	Updated to latest plans
C	17/08/2022	Architectural updates
D	22/09/2022	Updated to latest plans
E	20/01/2023	Updated to ecologist comments

Although **house sparrows** are our most common bird, the Big Garden Birdwatch has shown a 65% decline in their numbers over the past 15 years.

A lack of food and suitable food and nest sites has really taken their toll. Introducing new nesting sites is imperative.

The Wren is Classified in the UK as Amber under the Birds of Conservation Concern.

The diminutive wren can be found in almost any habitat where there are insects to eat and bushes in which to build their nest out of moss and twigs.

While other animals pollinate, **bumblebees** are particularly good at it. Their wings beat 130 times or more per second and the beating combined with their large bodies vibrates flowers until they release pollen, which is called buzz pollination. Buzz pollination helps plants produce more fruit.

Ecological Statement

The project aims to increase the ecological value and variety of habitats across the site. This has been achieved by:

- **30 new trees** are proposed along northern boundary to soften and buffer the development, as well as providing new habitats and food sources in the form of nectar and seeds.
- **Bird, bat and bee boxes** are extensively used throughout to create potential nesting sites for existing populations and encourage new wildlife to visit.

1no. schwegler 3fs - bat box (indicative location)

3no. schwegler sparrow terrace (indicative location)

2no. bumble bee box

2no. bug/bee hotel

NB if schwegler products cannot be sourced, suitable alternatives may be sourced **(must be approved by ecologist prior to purchase)**

The Schwegler 3FS general purpose bat box is suitable for many situations, and has proven particularly successful for Brown Long-eared Bat (Plecotus auritus)

The sparrow terrace can be fixed on to the surface of a suitable wall or incorporated into the wall. It is suitable for all types of houses in built-up areas, and on industrial and also agricultural buildings such as barns, sheds and factories.

Above Ground Bumble Bee Box. Place it in a warm spot, with shade during the hottest part of the day, low down in a flower bed or at the base of a hedge.

Schwegler Solitary bee and Bug Nest fixed to trees

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Ecology Plan

DRAWING ID. 0405 - SHEET NO. 6000 - REVISION / ISSUE E