

CIRC Construction Management Ltd
118 Pall Mall
London
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RT-MME-161385

Dear Yang Liu,

Report Clarifications – The Molesey Venture, Orchard Lane, East Molesey, KT8 0BN

Introduction

Middlemarch has undertaken numerous ecological surveys at assessments to inform a planning application for CIRC Construction Management Ltd at The Molesey Venture, Orchard Lane East Molesey, which measures approximately 0.75 ha in size and is centred at National Grid Reference 14620 67336. The proposals comprise 3 detached buildings containing 74 residential units with underground and surface level car and cycle parking, mechanical plant, soft and hard landscaping, and associated diversion of a Thames Water pipe following demolition of existing buildings. Surrey Wildlife Trust and Surrey Bat Group have asked for several clarifications within these reports, which are addressed in this letter.

1. MAGIC Priority Woodland Habitat

We would advise that the LPA request further information, to include photographic evidence, that there is no woodland within this area of the application site.

Defra's MAGIC map indicates the presence of a Priority Habitat – Deciduous Woodland, ID "PHID51455392_016738293" – adjacent to and potentially within the northwest corner of the development site boundary. The photographs below show that this northwest corner of the development site contains individual leyland cypress *Cupressus x leylandii* and eucalyptus *Eucalyptus* sp. trees, not woodland habitat. Introduced shrub is present at the base of the leylandii trees and bramble scrub / amenity grassland is present at the base of the eucalyptus trees. Delineating between woodland habitat and trees, scrub and grassland can ultimately be a nuanced and complicated process, however Middlemarch are confident habitats were not undervalued through our process of our delineation and assessment.

Furthermore, it is worth noting that the individual trees adjacent to the building in the northwest corner of the development site scored highly in the Biodiversity Metric, accounting for 1.95 habitat units – 58% of the site's urban tree units and 37% of the site's total habitat units. Investigation of the biodiversity metric calculations shows that enveloping these trees instead within woodland habitat would have resulted a lower valuation of both this area and the development site. This is because the adjacent woodland was assessed in the Biodiversity Metric Assessment RT-MME-159247-02 as being in 'Poor' condition. The woodland was found to have abundant Japanese knotweed *Reynoutria japonica* frequent cherry laurel *Prunus laurocerasus*, and appeared to be used as a dumping area for horticultural waste (grass cuttings, wood chippings, etc) which has caused the ground to become enriched in this area – exhibited by cow parsley *Anthriscus sylvestris*, cleavers *Galium aparine*, stinging nettle *Urtica dioica* and *Pentaglottis sempervirens* green alkanet growing in abundance.



Photo 1: Individual eucalyptus trees not considered to form priority woodland habitat



Photo 2: Individual eucalyptus trees not considered to form priority woodland habitat



Photo 3: Individual trees not considered to form priority woodland habitat



Photo 4: Individual trees not considered to form priority woodland habitat



Photo 5: Leylandii trees with introduced shrub at site's western / riverside boundary, not considered to form priority woodland habitat. Individual eucalyptus trees visible to right of photo.

2. Reptiles

We would advise that prior to determination, the Herpetofauna Reasonable Avoidance Method Statement and Landscape and Ecological Management Plan is updated to include information on the Reptile Mitigation Zone. This should include at least 1) Location Map, 2) Size, 3) Habitat Detail and 4) Programme for making the habitat(s) ready for reptiles.

The location of the Reptile Mitigation Zone is shown within the Biodiversity Metric Assessment Proposals drawing (C150247-02-02). It is also shown within the Landscape and Ecological Management Plan (LEMP) drawing, however we have made a minor amendment to this drawing and its key to make this clearer (see C160495-02-01 RevA within RT-MME-160495-02 RevA).

The Reptile Mitigation Zone is approximately 780 square metres in size. Alongside this specific zone, reptiles and amphibians are also expected to benefit from the wider enhancement of 0.431 hectares of grassland from 'Poor' to 'Moderate/Good' condition. Section 3.2 and its Table 3.1 provide a detailed 30 year management programme for this enhancement, which focuses around: an annual Aug-Sep grass cut to 150 mm; cuttings being raked into discrete piles <1 week of the annual cut; maintaining 2 m wide field edges cut on a rotational basis every 2 years; scarification and wildflower meadow seeding (including yellow rattle *Rhinanthus minor*) if deemed necessary as a result of monitoring; and creation of bare ground patches <5% of the total habitat. The methodologies for creating 4 log piles and 2 hibernacula within the Reptile Mitigation Zone and across the site are detailed in Section 3.11 of the LEMP report and summarised below.

Log piles

Bark should not be removed from logs and only untreated timber must be used. Logs should be partially buried vertically in the soil and stacked in shade. To encourage stag beetle *Lucanus cervus* larvae, coniferous species such as fir and pine should be avoided.

Hibernacula

To cover an area of approximately 2 sqm each, established via the piling of cut woody vegetation and large rocks or rubble to a height of 0.5 m. The top and three sides of the hibernacula should be covered in soil leaving the final side open to allow ingress by invertebrates, herpetofauna and small mammals.

Section 4 of the LEMP report includes a prescription for annual monitoring. Log piles and hibernacula are to be included in this monitoring and additional material added when necessary to ensure the features endure. It may also be worth noting that no reptiles and amphibians have been found on site. Therefore, the approach being taken is essentially to pre-empt good populations being present within the development site boundary.

3. 'Informal Orchard' Tree Planting

We would advise that tree planting provision is clarified prior to determination.

The correct tree planting provision within amenity grassland immediately north of the proposed development site and immediately south of the Reptile Mitigation Zone is 37 small-sized and 5 medium-sized native trees. This provides 0.48 more habitat units than 43 small-sized native trees and was an adjustment made close to a previous deadline. This discrepancy has been corrected within the LEMP report (see RT-MME-160495-02 RevA).

4. Bats

The report lists 10 surveyors and shows 10 survey points on the first survey, however on the second survey only 7 surveyors are listed whereas 8 are shown in the survey plan, and on the final survey only 6 surveyors are listed while 10 survey points are depicted on the plan.

One of the buildings (B7) was assessed as having low potential to support roosting bats, so in line with bat survey guidelines, only one survey was required of this building. The approach taken was 10 surveyors on the first survey and 8 surveyors on the subsequent surveys.

Bat survey guidelines are moving towards requiring infrared camera surveillance. In the second of three surveys, one surveyor was substituted for an infrared camera. On the final survey, two surveyors were substituted for infrared cameras. Surveyor/camera locations have been clarified within an amended version of the Dusk Emergence & Re-entry Bat Survey report to avoid confusion (see RT-MME-153851-02 RevB).

We also need to be sure that the types of bat boxes chosen are suitable for a situation like this, where there will be no monitoring, and so the boxes used should be self cleaning. We would also expect to see some roosting features included in the plans for the new build.

Middlemarch's Bat Mitigation Strategy (RT-MME-159247-01) details that three Schwegler 2F bat boxes will be installed on a suitable nearby tree as temporary mitigation, for a minimum of 5 years. The purposes of these boxes is to provide immediate substitution for loss of roosting features on site, via bats relocating themselves or being carefully relocated by a licenced bat worker during the supervised soft strip of Building B2. These bat boxes are not self-cleaning.

Permanent mitigation will then take the form of six Habibat integrated bat boxes (Habibat Bat Box 001) built into the façade of the new building, in close/immediate proximity to the roost identified during the dusk emergence/re-entry bat surveys effort. The design of these Habibat boxes is understood to be self-cleaning.



Photo 6: Screenshot of camera focused on the apex of Building 2 on the second Dusk emergence survey 30/06/2022

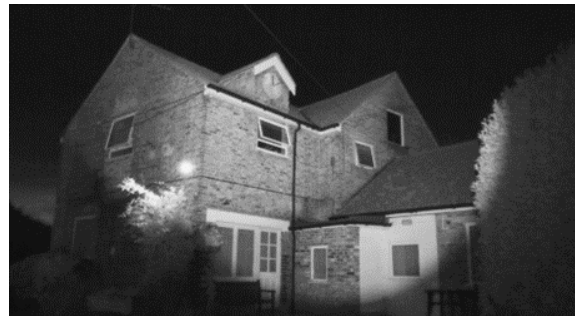


Photo 7: Screenshot of camera focused on Building 2 on the Dawn-Re-entry Survey 15/07/2022

I trust that these clarifications resolve queries raised by Surrey Wildlife Trust and Surrey Bat Group, however if you have any further queries, please do not hesitate to contact me.

Yours sincerely,

For and On Behalf of Middlemarch Environmental Ltd

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Checked & Approved By

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