

Ms Joanne Simpson
London Borough of Richmond upon
Thames
Planning Department
Civic Centre (44) York Street
Twickenham
Middlesex
TW1 3BZ

Our ref: SL/2019/119116/01-L01
Your ref: 19/0646/FUL
Date: 12 April 2019

Dear Ms Simpson

Demolition of existing buildings (with the retention of a single dwelling) and redevelopment of the site to provide up to 116 residential units and 175 sqm commercial floorspace; landscaped areas; with associated parking and highways works and other works associated with the development.

Gould Road, Twickenham, TW2 6RT.

Environment Agency position

We **object** to the proposed development, due to its impacts on nature conservation and Water Framework Directive Requirements. We recommend that planning permission is refused. Specifically, the submitted planning application and associated documents indicates a significant of loss of riparian semi-natural habitat within 8m of the River Crane and contrary to various policy units stated below.

In addition, a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016 is required for the proposed development which is unlikely to be granted for the current proposal.

Water Framework Directive

The Thames River Basin Management Plan (RBMP) states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. Based on the information submitted with this application, there is a significant risk that the development may prevent achievement of good ecological status. Natural river corridors can provide a filtering effect on runoff to 'clean' runoff before it enters the watercourse. By not providing a natural corridor to the River Crane, there is an increased risk of roadside runoff into the watercourse, causing a deterioration to water quality. Natural river corridors provides habitat for many riverine animals including fish, invertebrates and macrophytes through the provision of refuge areas and diversity of available habitat. Lack of provision of a natural river corridor here may prevent the improvement in status of the Biological element of the current WFD classification (currently at poor [fish] and moderate [invertebrates and macrophytes]).

Therefore the proposed development does not meet the requirements of the Water Framework Directive unless the provisions of Article 4.7 of the Water Framework Directive can be met.

Richmond Local Plan

Additionally, Richmond Upon Thames Local Plan policy LP 15 states 'The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats.' With particular reference to point 5 of Policy 15 'enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise;' Within the submitted Phase 1 Habitat Survey Report further habitat improvements for the site are suggested. This includes the provision of in channel enhancements on the river. These suggestions however are not seen within the submitted information for the proposed development.

Consultation with Friends of the River Crane Environment as part of the applicant's community involvement indicated that there is support for more improvements to the river channel and corridor. This includes in channel improvements as well as improving the river corridor to provide habitat for river species.

The plans proposed as part of this scheme make note of a sensitive lighting plan that is suitable for light sensitive species such as bats that are known in the area. We support the plan to use such lighting schemes however we feel that the lighting is still encroaching on the river corridor and channel. Light spill could be better prevented through the use of a natural corridor as a screen for the river.

The River Crane Partnership, comprising of London Borough Hillingdon, London Borough Hounslow, Groundworks South, London Wildlife Trusts and others have created an ambitious River Crane Vision. This includes plans for the stretch of river included within this scheme. These plans include in river enhancements and providing a river corridor for the possible spread of protected species, the water vole (*Arvicola amphibius*) (protected under the Wildlife and Countryside Act 1981, as amended). The proposed scheme submitted as it stands, may provide a barrier to such improvement works.

Our objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity.

Overcoming our objection

To overcome our objection, an amended scheme should contain plans for the creation of a natural corridor formed as part of the walkway, setting back car parking further. The scheme could also include consideration to proposals by Crane Valley Partnership and the Friends of the River Crane Environment as well as those included in the Phase 1 Habitat Survey Report including in channel river enhancements. Planting schemes should be of native species and include a long term management plan.

Yours sincerely

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Planning Advisor

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