

Mr Ajit Gill  
Planning Advisor  
Environment Agency  
3<sup>rd</sup> Floor  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

DP9 Ltd  
100 Pall Mall  
London SW1Y 5NQ  
  
Registered No. 05092507  
  
telephone 020 7004 1700  
facsimile 020 7004 1790  
  
www.dp9.co.uk

24<sup>th</sup> June 2019

Dear Mr Gill

**GREGGS BAKERY, GOULD ROAD, TWICKENHAM, TW1 6RT  
PLANNING APPLICATION REF. 19/0646/FUL  
EA REF. SL/2019/11911/01-L01**

We write on behalf of the applicant, London Square Developments Ltd, in response to your comments dated 12 April 2019, in relation to the above planning application. The design and consultant team have reviewed your comments and we clarify the points raised in turn below. This should be read alongside the Biodiversity Report (prepared by Richard Graves Associates) and the Flood Risk Assessment (prepared by Waterman Group) submitted with this application.

### **Riparian Habitat**

Your objection sets out that there will be a significant loss of riparian semi-natural habitat within 8m of the River Crane. Richard Graves Associates have confirmed that there is negligible riparian semi-natural habitat affected by the proposals. The river stretch fronting the site is channelised with vertical piled sheet metal or concrete sides with limited terrestrial ruderal vegetation overhanging the wall such as bramble and buddleia. As such, the adjacent riparian habitat offers negligible potential water vole *Arvicola amphibious* burrowing habitat or kingfisher *Alcedo atthis* / sand martin *Riparia riparia* nesting habitat.

However, it is acknowledged that these species are known to frequent other sections of the river and are likely to utilise the river adjacent to the site as commuting or / and foraging



habitat. It is also acknowledged that the river corridor adjacent to the site is currently likely to provide a dark corridor with restricted human disturbance, although up until recently, the site would have been subject to levels of noise disturbance and light trespass as a result of the existing Bakery operation. Photos of the existing environment are included for reference.

### **Water Framework Directive**

It is acknowledged that hard surfaces adjacent to river corridors have the potential to cause a deterioration of water quality, however the proposed drainage strategy mitigates the risk and provides an improvement over the existing situation in line with the CIRCA SuDS Manual. Further to this we are now looking into reducing the hard standing and parking provision adjacent to the river and further increasing ecology and soft landscaping ensuring the existing condition is greatly improved. Please refer to the Flood Risk Assessment (ref: WIE12357-100-R-1-3-1-FRA) submitted with the planning application for full details of the drainage strategy.

Waterman Group have confirmed that existing drainage records indicate that in the current situation there are surface water outfalls to the River Crane, however there does not appear to be any petrol interceptors or other forms of treatment present within this existing network.

As set out in paragraph 4.19 of the FRA the pollution hazard level (as set out in the CIRIA SuDS Manual) for surface water runoff from the roofs is classed as 'very low' and from the parking and highways is 'low'. The incorporation of green roofs, and permeable paving across the development's highways and parking areas would provide an appropriate level of treatment to surface water runoff prior to discharge to the River Crane. As a result it is considered likely that the quality of surface water runoff discharged to the River Crane is likely to improve as a result of the development.

Furthermore, Waterman are aware of the requirements for a flood risk activity permit for any works within 8m of a main river. Prior to any works taking place we would submit the relevant forms, details of works etc. to the EA for approval, along with the relevant fee.

### **Richmond Local Plan**

The proposals will deliver the following on site improvements as recommended within the Phase 1 Habitat Survey Report and as recommended by Friends of the River Crane Environment (FORCE):



- A contribution towards channel river enhancement would be provided to FORCE for implementation at appropriate locations along the river bank.
- River corridor kingfisher and Sand martin nest tunnels; and
- River corridor native hedgerow.

An Exterior Lighting Assessment Supplementary Report has been prepared by Desco, in consultation with the Project Ecologists, and is enclosed for your reference. This sets out that illuminance from the proposed development do not significantly impact the river 'Dark Corridor' and improve upon the existing conditions.

It is the intention that the proposals will work with the River Crane Vision rather than acting as a barrier to the improvement works. The proposals will be beneficial as the current site of nearly 100 m along the watercourse is entirely buildings and hardstanding with no green infrastructure. There is no opportunity to alter the river frontage of private development to the west of the Greggs site, with developed frontage immediately to the north. There is an opportunity to provide additional green infrastructure within the site, reducing (when considering the northern bank of the river) the gap in green infrastructure / wildlife corridors to approximately 15 m between the end of the proposed green corridor and the start of the nearby Mereway Nature Park. We are in discussions with Friends of the River Crane and the Crane Valley Partnership (CVP) to ensure our proposals facilitate the wider vision and deliver on improving this area of the river.

The proposals will protect and enhance the borough's biodiversity and will therefore meet the aims of Policy 15, particularly part 5 which seeks to achieve this by *"enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise"*. The proposals will also meet the requirements of paragraphs 170 of the NPPF which requires development to conserve and enhance the natural environment by minimising impacts on and providing net gains for biodiversity. The proposals will improve the existing biodiversity measures across the site and should therefore be supported in accordance with paragraph 175 of the NPPF which sets out that the local planning authority should apply various principles including *"development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."*

## Summary

To clarify, in order to overcome your reasons for objecting to the application, we set out the proposed measures which will be incorporated in the proposals:



- Creation of a wider natural corridor formed as part of the river walkway to include a river corridor hedgerow and native tree planting.
- The option to set the car parking further from the water's edge is being explored further as part of the proposals;
- The proposals will incorporate river corridor kingfisher and sand martin nest tunnels; and a 1.200 high wall and railing and river corridor native hedgerow.
- Bat Boxes, insect boxes and bird boxes will be installed on site (as set out at page 102 of the Design and Access Statement prepared by Assael Architects);
- The terrestrial planning scheme has been designed to include predominately native species where appropriate including, but not limited to: *Crataegus monogyna*, *Fagus sylvatica*, *Ilex aquifolium*, *Silene dioica*, *Lychnis flos-cuculi*, *Galium verum*, *Leontodon hispidus*, *Leucanthemum vulgare*, *Lotus corniculatus*, *Primula veris*, *Prunella vulgaris*, *Ranunculus acris*, *Rumex acetosa*, *Agrostis capillaris*, *Cynosurus cristatus*, *Festuca rubra*, *Sorbus aucuparia* and *Acer campestre*.
- A Landscape and Ecology Management Plan (LEMP) can be secured by condition attached to the permission.

We hope the above adequately responds to your comments raised and that the proposals can be supported on this basis. We would welcome the opportunity to discuss the proposals further as we update the scheme to ensure all mitigation measures are incorporated.

Yours sincerely

DP9 Ltd

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