

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

Our ref: SL/2019/119116/05-L01
Your ref: 19/0646/FUL
Date: 10 July 2020

Dear Sir/Madam

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.

Thank you for consulting us on the above application.

We have reviewed the updated documents/drawings and consider that they satisfactorily addresses our earlier concerns.
Subject to the conditions below, we therefore withdraw our previous objection, dated 17/06/2020.

Environment Agency position

Development that encroaches on watercourses can have a potentially severe impact on their ecological value. The riparian zone is particularly important for foraging and migrating species, such as bats, along the river corridor and should be protected from the built environment.

Networks of undeveloped buffer zones might also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the river basin management plan. This is particularly important in urban areas where creating space for wildlife can help to mitigate water quality issues as well as providing areas of high biodiversity.

The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect a 5 metre wide buffer zone around the watercourse.

Condition

The development shall be carried out in accordance with the following drawings and documents:

- A3164 1005 – P7 - Jun 2020
- RGA133 Greggs – 2019 BAT ACTIVITY SURVEY REPORT v4 - Jun2020
- RGA133 Greggs – EXTENDED PHASE 1 HABITAT SURVEY REPORT – Jun 2020
- 1823 – Greggs Twickenham – Measuring Planes at 0.05m – 5 metre buffer zone

Condition

No development shall take place until a scheme for the provision and management of a 5 metre wide buffer zone alongside the River Crane has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone.
- details of any proposed planting scheme (for example, native species).
- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and a named body responsible for management plus production of detailed management plan.
- details of in channel enhancements should be located primarily along the stretch of river adjacent to the site and any agreement with FORCE or the Crane Valley Partnership should reflect that enhancements are taking place within the boundary of the site prior to elsewhere within the river.
- Details of any footpaths proposed within the buffer zone, which should be of permeable materials.
- Details of the lighting plan providing a dark corridor to the river and buffer zone where levels shall not exceed 2 lux.

Reason(s)

Land alongside the River Crane is particularly valuable for wildlife and it is essential this is protected. This is evidenced by the bat survey submitted detailing foraging bats along the river corridor as well as notes that stag beetles and kingfishers were identified during the survey. Providing an adequate buffer zone within the development will provide further habitat for these protected species and support the development in greening this urban area.

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. The provision of a natural river corridor here may support the improvement in status of the Biological element of the current WFD classification (currently at poor [fish] and moderate [invertebrates and macrophytes]). This approach 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. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Informative:

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Decision notice request

The Environment Agency requires decision notice details for this application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

Please do not hesitate to contact me if needed.

Yours sincerely

Mr Randeep Dhanjal
Planning Advisor

Direct e-mail kslplanning@environment-agency.gov.uk