





PROVIDING TRUSTED ECOLOGICAL ADVICE

**FORMER GREGGS BAKERY, TWICKENHAM
 ECOLOGICAL CONSTRUCTION METHOD STATEMENT**

Project	Prepared & Checked by	Approved by	Client	Status	Date
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1 Introduction

1.1 Instruction

Following the grant of planning permission Richard Graves Associates Ltd (RGA) was commissioned by London Square Developments Ltd to produce a Construction Ecological Method Statement (CEMS) in order to discharge a condition of planning permission 22/2556/FUL, which states:

“Ecological Construction Method Statement:

No works, including works of demolition, shall start until an Ecological Construction Method Statement/Plan (or equivalent) is submitted to and approved in writing by the local planning authority. The document should include all possibilities where harm could come to wildlife and what mitigation will be implemented (such as tool box talks, good practice etc), including

- *Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each work day to prevent animals entering/becoming trapped.*
- *All vegetation must be removed outside of bird nesting season. If this is not possible vegetation must be approved by a competently qualified person.*
- *Details of acoustic screening and pollution mitigation measures beside the River Crane.*

The development shall not be implemented other than in accordance with the approved details for this condition.”

1.2 Previous Ecological Work in Respect of the Site

The site was subject to a number of ecological assessments and appraisals between 2018 and 2022 the most recent of which were:

- Greggs Phase 1 Ecology Report, Residential V0.9 (Cardy, 2022)
- Greggs Bakery Site and No 2 Gould Road, Twickenham, TW2 6RT, Scheme 1 – Residential-Led, 2022 Bat Activity Survey Report (Cardy, 2022)
- Biodiversity Net Gain Report (Graves, 2022)

The ecological assessments confirmed that no protected or notable species used the site for shelter or as significant part of their foraging habitat. A high level of bat activity, associated with the River Crane to the north, was recorded over several years of survey but with no evidence of roosting on site.

The only species recorded on-site were *Columbia livia* feral pigeon and *Vulpes vulpes* European red fox.

1.3 Site Location and Setting

The existing former Greggs Bakery Site covers approx. 1.1 hectares (ha), centred at Ordnance Survey (OS) grid reference: TQ 15321 73342, and is located in the London Borough of Richmond upon Thames in Southwest London. The site is situated in a largely residential neighbourhood. Immediately north of the site is the River Crane and the railway line and to the south of the site are a number of light industrial buildings.

The site is located between two residential terraced streets, Crane Road and Norcutt Road. To the north it wraps around Crane Road and to the south it borders Edwin Road. (Figure 2).

Figure 1: Aerial Mapping indicating the Greggs Bakery Site (outlined in red) © Google Earth 2019



1.4 Relevant Legislation

Certain habitats and species are protected in legislation, or to be given weight as material considerations in planning decisions. Relevant Legislation includes:

- The Conservation of Habitats and Species Regulations 2017 (as amended) (HMG, 2017) (Conservation Regulations)
- The Wildlife and Countryside Act 1981 (as amended) (HMG, 1981) (WCA)
- The Natural Environment and Rural Communities Act (as amended) (HMG, 2006) (NERC Act)
- The Environment Act 2021 (HMG, 2021)

The protection afforded to habitats and species detailed in the Conservation Regulations and WCA are legal requirements that must be complied with irrespective of planning status.

2 Ecological Expertise

2.1 Project Ecologists Qualifications and Experience

The developer, London Square Developments Ltd have appointed Richard Graves Associates Ltd to advise on all ecological aspects of the project. The following ecologists have been involved in all stages of the permitted development to date.

Richard Graves

Richard Graves BSc (Hons) MSc PGDip CECOL CEnv FCIEEM has over twenty-seven years' experience as a practising ecologist and has undertaken, commissioned and reviewed several hundred Extended Phase 1 Habitat Survey and protected species surveys all over the UK. Richard is a fellow of the Chartered Institute of Ecology and Environmental Management (CIEEM) a chartered ecologist and a chartered environmentalist. Richard is also class licenced for great crested newt surveys, a class licenced bat surveyor and a contributor to current good practice guidelines for bat surveys.

Dr Suzy Cardy

Dr Suzy Cardy BSc (Hons) MSc CECOL MCIEEM has over seventeen years' experience in the management and execution of the ecological elements of large-scale development projects including major rail infrastructure developments and one of the UK's largest translocation of protected species. Suzy has a Natural England licence to survey for great crested newts and dormice and has a Level 1 Bat survey licence. Suzy has worked with a variety of Clients across multiple sectors (transport, industrial, education, government, healthcare, commercial, leisure and power / energy).

3 Existing Conditions (Baseline)

3.1 Site Overview, Habitats and Species

On-site Habitats

This section provides a description of the habitats on site. The site currently stands as a single industrial unit which previously functioned as bakery. The former bakery is dominated by buildings and hardstanding (including car parking). The buildings include a number of occupied and unoccupied offices, warehouses, open-sided sheds, production buildings and one end of a terraced house (Number 2 Gould Road). Two tall silos are prominently located by the Edwin Road entrance.

The only vegetation on site comprised: occasional stands of *Buddleia davidii* buddleia, *Hedera helix* ivy and *Rubus fruticosus* agg. bramble over several of the buildings and walls and occasional ruderal vegetation in the cracks of the hard standing. The small garden to the rear of Number 2 Gould Road, included semi-mature trees and introduced shrubs. Fencing, walls and metal hoarding surrounded the majority of the site.

Off-site Habitats

There are no statutory protected sites within close proximity of the development site.

The Site of Metropolitan Importance 'M076 Crane Corridor SMI' (located approx. 280m west of the site) which is described as follows:

"For a length of over 5 kms, the River Crane is bordered by habitats of remarkable diversity, including woodland, pasture, heathland and areas of open water. Throughout, the width of the river corridor is exceptional by London standards. The river itself is one of the most natural in London, and is a stronghold for uncommon aquatic plants... Various damp pastures, old water meadows and associated ox-bow ponds also support a rich flora of regionally uncommon plants... Willow-alder woodland occurs in several places; this is a rare habitat in London. The breeding avifauna includes kingfisher, grey wagtail and reed warbler. The specially-protected water vole is also present. There are three Local Nature Reserves within the site; Crane Park Island (managed by London Wildlife Trust), Cranebank Water Meadows and Pevensey Road Open Space."^{Error! Bookmark not defined.}

An additional parcel, Mereway Nature Park, was added to SMI in April 2019. This is 50m to the northeast of the Site at its nearest extent.

The adjacent sections of the River Crane are channelised with concrete sides with no potential *Arvicola amphibious* water vole burrowing or *Alcedo atthis* kingfisher and *Riparia riparia* sand martin nesting habitat (although they do not exclude foraging habitat) and no suitable features for *Lutra lutra* otter holts. However, the River Crane, as a whole, has the potential to support these species.

The adjacent sections of the River Crane, to the north of the site, are channelised with concrete sides. Whilst, river channelisation can have adverse impacts for wildlife (due to the loss of suitable habitat, but also by the change in hydraulic conditions which make the remaining habitats less suitable) and the existing lighting is detrimental, the river is used as a commuting route by the local bat population.

Bats may also use the rail bridge which is in close proximity to the site and spans the River Crane. Other protected species such as: otters, kingfishers, sand martins, and eels are also likely to commute along the river to more optimal aquatic habitats (see the above desktop records for more information). Limited vegetation dominated by buddleia and bramble was observed growing on / through the concrete wall adjacent to the site (along the south edge of the river). The Waterloo to Reading railway line is situated a few metres to the north of the north side of the river, creating a strip of vegetation that is contiguous with the Mereway Nature Park (which provides varied grasses and bramble for a diverse range of species) and beyond this, Kneller Gardens.

Bats

Surveys completed in 2019 and 2022 (Cardy, 2022) recorded a total of eight determined species, *Pipistrellus pipistrellus* common pipistrelle, *Pipistrellus pygmaeus* soprano pipistrelle, *Nyctalus leisleri* Leisler's, *Nyctalus noctula* noctule, *Pipistrellus nathusii* Nathusius' pipistrelle, *Myotis daubentonii* Daubenton's bat, *Plecotus auritus* brown long-eared bat, *Myotis nattereri* Natterer's bat and one undetermined *Myotis* species with

most activity associated with the River Crane and for species known to be more tolerant of artificial lighting a depot to the north of the river and rail corridor.

Other Species

No other protected or notable species were recorded using the site. Feral pigeons were recorded roosting and nesting within some of the buildings and foxes were recorded using the site including the buildings.

4 Effects During Construction and Operation

4.1 Demolition

Demolition of the existing buildings and hardstanding will be the initial phase of construction. The potential impacts include the direct loss of roosting and nesting habitat and pollution from surface water run-off, fuel / chemical spills, emissions of dust and noise.

4.2 Construction

Following demolition, and any necessary remediation of ground conditions, the potential impacts during construction include pollution from surface water run-off, fuel / chemical spills, emissions of dust and noise.

4.3 Lighting

Lighting used during and phase of construction has the potential to have a detrimental effect on nocturnal wildlife.

5 Requirements During Demolition and Construction

5.1 Construction Environmental Management Plan

A construction environmental management plan (CEMP) has been prepared for the permitted development (London Square, 2022) which addresses all the environmental requirements of development. This document provides further detail in respect of the issues of particular importance to habitats and wildlife.

5.2 Demolition

Preconstruction Ecological Walk-over

As the status of protected species may change over time a site walkover by a suitably qualified Ecologist(s), will be undertaken prior to the start of any site clearance and demolition. This should be repeated should works be paused for more than approx. two weeks during the demolition / construction phases between March and November.

Pre-demolition Bat Survey

In accordance with the recommendations of the bat survey report (Cardy, 2022) a pre-demolition activity survey must be completed during the optimal active season (May to September) if demolition has not commenced until after the active season in 2025. If required the results of the survey will either confirm the status of the site, as previously identified, or if roosting is identified inform the need for further surveys and licencing. If the need for a licence in respect of any particular building, or feature of a building no works affecting that feature will proceed until an appropriate form of licence has been issued.

Pre-demolition Vegetation Clearance

Prior to the start of demolition any remaining vegetation on-site will be cleared. Clearance will be completed outside of the recognised bird nesting season (March – August). If clearance is required at any other time vegetation should be checked, no more than 72 hours in advance of the works, by a suitably qualified ecologist (SQE). The SQE will use visual cues and thermal imaging technology to identify any active nests. Should any active nests be identified, they must be left undisturbed, and with a suitable buffer, until they are no longer active.

Pre-demolition Nesting Bird Check

The Phase 1 Ecology Report (Cardy, 2022) recommended that a specialist pigeon / pest deterrent expert be consulted in relation to the feral pigeons present. A solution for this issue has been determined. Prior to demolition, if it not proposed between November and February, the interior and exterior of buildings will be checked by an SQE, using visual cues and thermal imaging to identify any active nests. Should any active nests be identified, they must be left undisturbed, and with a suitable buffer, until they are no longer active.

Toolbox Talk

Prior to the start of works, the site management team and demolition contractor will be fully briefed on the potential to encounter bats and other protected species by means of a 'Toolbox Talk' provided by a suitably qualified ecologist (SQE).

The Toolbox Talk will also highlight the presence and importance of the adjacent habitats, in particular The River Crane. The toolbox talk will be repeated with appropriate amendments when the construction

contractor takes over from the demolition contractor. The toolbox talk material will be available to the site management team to be used as part of the induction material provided to new site staff.

5.3 Demolition and Construction

Protection of Off-Site Terrestrial and aquatic Habitats

There are a number of important wildlife sites and habitats (in particular, the River Crane) that are in very close proximity to the site.

Surface Water Runoff and Water Pollution

No surface water run-off from the site will be permitted to enter The River Crane during demolition. The external walls forming the northern boundary of the site with the river will be the final sections of building / structures to be demolished and will be carefully pulled inwards (towards the site and away from the river).

Material arising from demolition will be sorted and either contained in specific skips or spoil mounds. Any spoil mounds will be located to the south of the site after the final walls are demolished. All post demolition materials will be removed from site for appropriate disposal at the earliest possible opportunity.

Wheel washing equipment will be installed at the site entrance (furthest from the river) with all used water pumped and disposed of appropriately by tanker.

Storage of Chemicals

All chemicals will be contained within an appropriate secure storage area with sufficient bunding. Spill kits will be available on site with site operatives appropriately trained in their use.

Plant

Any plant and vehicles used on site will be supplied and maintained to a good state of repair.

The plant refuelling areas will have spill kits readily available in case of any diesel spillage, which will be cleaned up immediately. Any spill over 5 litres will be reported to the Sustainability Advisor for an investigation and review.

Arisings of Dust

The construction Environmental Management Plan (CEMP) (Section 4.1 Air Quality) details all the measure to reduce arisings of construction dust including:

- General management
- Construction traffic
- Earthworks and stockpiles
- Tool use
- Use of shoots and skips

Any arisings of construction dust will be reported at once and remediated using the appropriate method.

Noise

Appropriate noise controls will be implemented in accordance with Section 4.2 of the CEMP. There will be no construction related noise during the hours of darkness.

Lighting

Lighting during demolition and construction will be limited to the minimum required for safety and security. No lighting will be directed towards or intersect with, the River Crane corridor.

Making the Site Safe for Wildlife

Food Waste

In order not to encourage pests and other wildlife all food and waste food will be securely stored within the site compound and littering of food waste on site will not be permitted. Fully secured bins will be provided and food waste will be removed from the site on a daily basis.

Water

All butts / troughs will be covered overnight to ensure wildlife does not drown in them while attempting to drink.

Excavations and Pipe Works

To prevent wildlife becoming trapped or injured any excavations left over night will either be fully covered or provided with a suitable means of escape (a sloped facet or plank). Once pipework is installed in the ground it will be capped overnight to prevent wildlife entering it.

6 References

Cardy, S., 2022. *GREGGS BAKERY SITE AND No 2 GOULD ROAD, TWICKENHAM, TW2 6RT 2022 Bat Activity Survey Report*, London: Richard Graves Associates Ltd.

Cardy, S., 2022. *Greggs Phase 1 Ecology Report, Residential V0.9*, London: Richard Graves Associates Ltd.

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