

SUMMARY OF PROOF OF EVIDENCE (JANINE FOTIADIS-NEGREPONTIS)

Environment Executive Summary

Background and Conclusion

LBRuT declared a Climate Emergency in July 2019 listing new development as a major threat to the local environment and asserting that ‘open spaces and conservation areas’ within the borough would be given protection ‘to ensure’ that ‘biodiversity and ecosystems’ were maintained, stating that: *‘There is considerable evidence that there has been a decline in biodiversity on a global, national and local scale over the years.’*

The Twickenham Riverside Trust is concerned that the Twickenham Riverside Scheme does not provide the protection that the Council has promised and also that it fails to comply with a range of national and local planning and environmental policies calling for the preservation of the environment, green spaces and biodiversity. In this context, the refusal to undertake an Environmental Impact Assessment of the impact of the proposed redevelopment is both incomprehensible and unacceptable, in view of the sensitive location of the scheme and the foreseeable environmental damage.

Environmental damage resulting from the scheme:

Wholesale felling of trees within the development site. Nearly 70 trees in total. Just one tree will remain in situ. Tree removals include a wide range of established native trees and non-native trees, an area of woodland, an extremely rare and protected female Black Poplar, particularly valued by the community and highly regarded for its biodiversity contribution, veteran Hornbeams dating back to the incarnation of the public lido, a grove of London Planes which enhance the visitor experience on the Gardens and a row of Pin Oaks which enhance the visitor experience on the riverfront.

Additional to substantial losses previously described, a further 100 metres of native hedgerow will be uprooted from the Gardens.

Consequences of the environmental damage on public health and biodiversity:

The environmental losses will directly impact the amenity of the public gardens and the embankment. The loss of extensive tree canopy within a busy area of public realm will result in the wholesale removal of dappled shade, visual amenity will be greatly reduced as will the filtration capacity of harmful airborne toxins deriving from the 32,000 vehicular movements on King Street (an Air Quality Management Area (AQMA)). The tree felling will additionally result in the loss of a green buffer between the service road which lies adjacent to the Gardens. A further serious consequence of the tree removals in tandem with the introduction of tonnes of manmade materials is the Urban Heat Island Effect. Temperatures will rise in the immediate locality at a time when global temperatures are rising year on year.

'London experienced a heatwave in 2003 that killed at least 600 people and its impact was exacerbated by the urban heat island effect. Cooling the urban environment through the use of green infrastructure, as part of a package of measures to combat climate change, will have important health and social benefits'. (5.51 supporting text to policy 5.10 of the London Plan)

Furthermore, the wholesale loss of habitat will be detrimental to the local wildlife existing foraging lines are to be completely severed and feeding opportunities utterly depleted.

Mitigation proposals

Mitigation proposals are woefully inadequate and fail to compensate the wildlife and the public in any meaningful way, they are as follows; the introduction of limited green roofs on a handful of outbuildings (to include bin storage), a planting programme that will see a reduction of trees to the site (new trees are to be small specimens with insignificant canopy and none of the distinct benefits that existing trees bring). New planting will take many decades to establish, meanwhile there will be a shortfall of habitat, foraging opportunities, natural shade, pollution filtration, green buffer and more. A small float with plants is proposed to be introduced to the river but this will fail to meet the needs of the existing wildlife on land and it is unlikely to establish

owing to local stresses (details of Thames Water abstraction/sewage plans are outlined in the full submission).

The c100m of native hedgerow to be uprooted will not be mitigated on site due to 'site constraints' namely overdevelopment.

The statutory requirement for new developments is for them to result in a minimum ten per cent net gain in biodiversity. Where *'significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'* (NPPF 179 (a)).

The Acquiring authority has been left scrambling 1) to mitigate against the proposed environmental damage, and 2) to deliver the statutory 10 per cent net gain in biodiversity.

The London Plan states that *'[...] all development takes place within a wider environment and green infrastructure should be an integral element and not an 'add-on'* (London Plan, 8.1.2).

There is an expectation on developers to incorporate, where possible, existing trees into new schemes. Controversially, as the scheme progressed through the design stages more and more trees were earmarked for removal. Resulting in the retention of just one tree out of the 70. Little to no effort was made to ringfence trees for safeguarding from the outset of the process.

Biodiversity mitigation hierarchy works on the basis that development plans will try and aim for as little biodiversity loss as possible through 1) Complete Avoidance 2) Minimisation where Possible 3) Restoration of areas within the development site 4) Offsetting, either onsite or offsite.

The scheme is marketed as being 'neutral impact' with a 19 per cent net gain in biodiversity. The Trust does not accept these claims and has pressed the AA to

undertake a Full Environmental Impact Assessment in view of the sensitive location of the scheme and foreseen environmental damage, but this was refused.

On close inspection this scheme fails to meet the even minimum threshold set out. It neither off-sets onsite or offsite adequately. It is hard to imagine a scenario where a private developer would be granted planning permission for a scheme that involves the removal of 70 established trees from a semi-urban area, where they are much-needed and enjoyed, within a conservation area, adjacent to the river Thames (greenbelt), within public gardens and other areas of public realm.

The CAVAT report (October 2022), gives a cumulative valuation for 70 trees within the site of £271,019.00 (CAVAT Valuation Twickenham Riverside, 3.3.5). It is notable that the most valuable trees are those found within the public Gardens.

Implications for Planning and Environment Policy

Finally, the scheme is contrary to The National Planning Policy Framework, The 25-year Government Environment Plan, The London Plan 2021 and The London Environment Strategy. Additional to the aforementioned policies the wholesale removal of trees conflicts with LBRuT's local policies and strategies, to include: London Borough of Richmond's Tree Policy (21 February 2023), Climate Emergency Strategy 2019-2024, Air Quality Action Plan 2019-2024, The Local Plan 2018, Parks Strategic Principles 2011 and the Biodiversity Action Plan.

The mass felling of amenity trees undermines the borough's new Tree Policy, which recognises the need to safeguard existing trees while enhancing tree stock for current and future generations. The policy seeks to halt adverse impact on public health, wildlife and social and economic wellbeing by giving clear protection to existing trees.

Over 3,000 members of the public signed a petition to safeguard the trees.