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GVA
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Dear

**Re: Redevelopment at Manor Road, North Sheen
Formal request for screening opinion under Regulation 6 of The Town and Country
Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)**

Thank you for your letter dated 12th November 2018, on behalf of Avanton Richmond Development Ltd (the applicant) and the accompanying EIA Screening Report, to seek a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicants forthcoming detailed planning application for the residential-led redevelopment at Manor Road, North Sheen.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 14 December 2018, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Angus', with a long horizontal flourish extending to the right.

Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT – DEVELOPMENT MANGEMENT (PLANNING)

FORMAL EIA SCRENNING OPINION IN CONNECTION WITH THE REDEVELOPMENT AT MANOR ROAD, NORTH SHEEN.

REGULATION 6

Under Regulation 6 (2) of the EIA Regulations, the person making a request for a screening opinion, must provide the following:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular—
 - i. a description of the physical characteristics of the development and, where relevant, of demolition works;
 - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
 - i. the expected residues and emissions and the production of waste, where relevant; and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; and
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

An EIA Screening Report (the Report) has been submitted. This:

(a) Identifies the site. (Figure 1)

The Site is located in North Sheen, south-west London within the administrative boundary of the LBRuT. The Site comprises an area of approximately 1.5 hectares (ha).

The triangular shaped Site is bound by:

- The northern and easternmost extents of an access road which provided access to / from Manor Road (the B353) to the north.
- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

The existing Site currently comprises a low-rise retail store occupied by Homebase, Pets at Home and Pets4Vets. The retail store is located centrally of the Site, towards the southern end.

To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road, surface car-parking in the north-east and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

There are several trees planted within the surface car-parking area and at various locations around the Site's perimeter.

Figure 1: Site Location

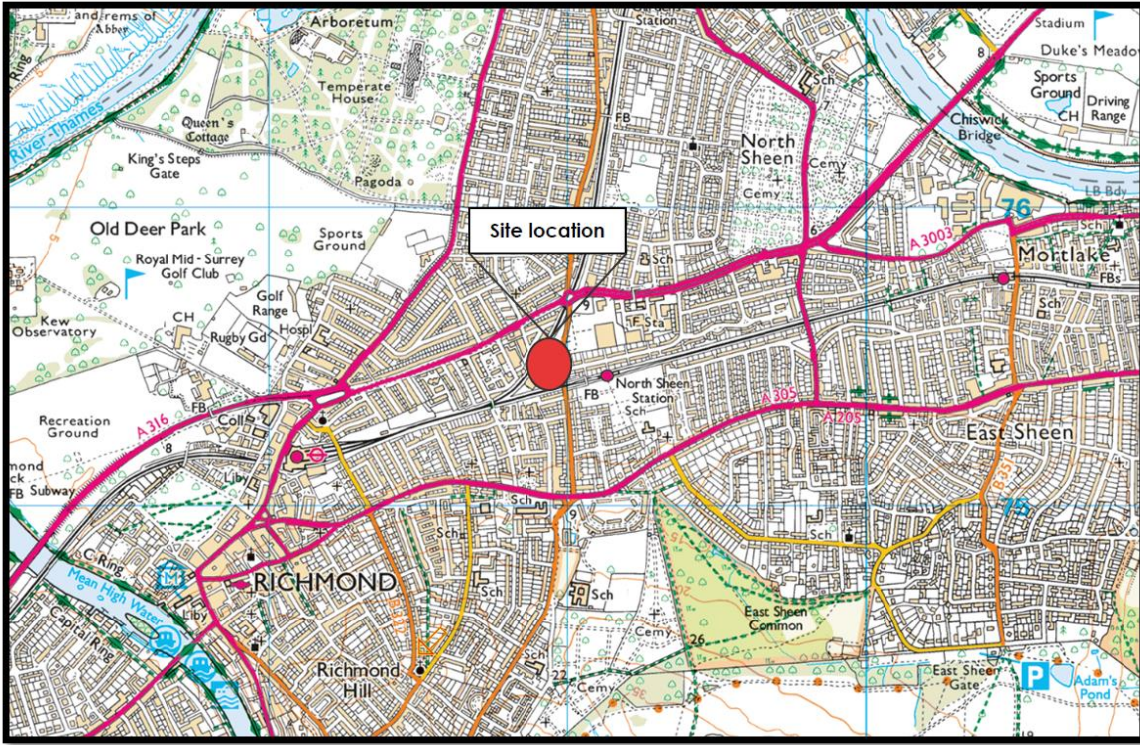


Figure 2: The Site

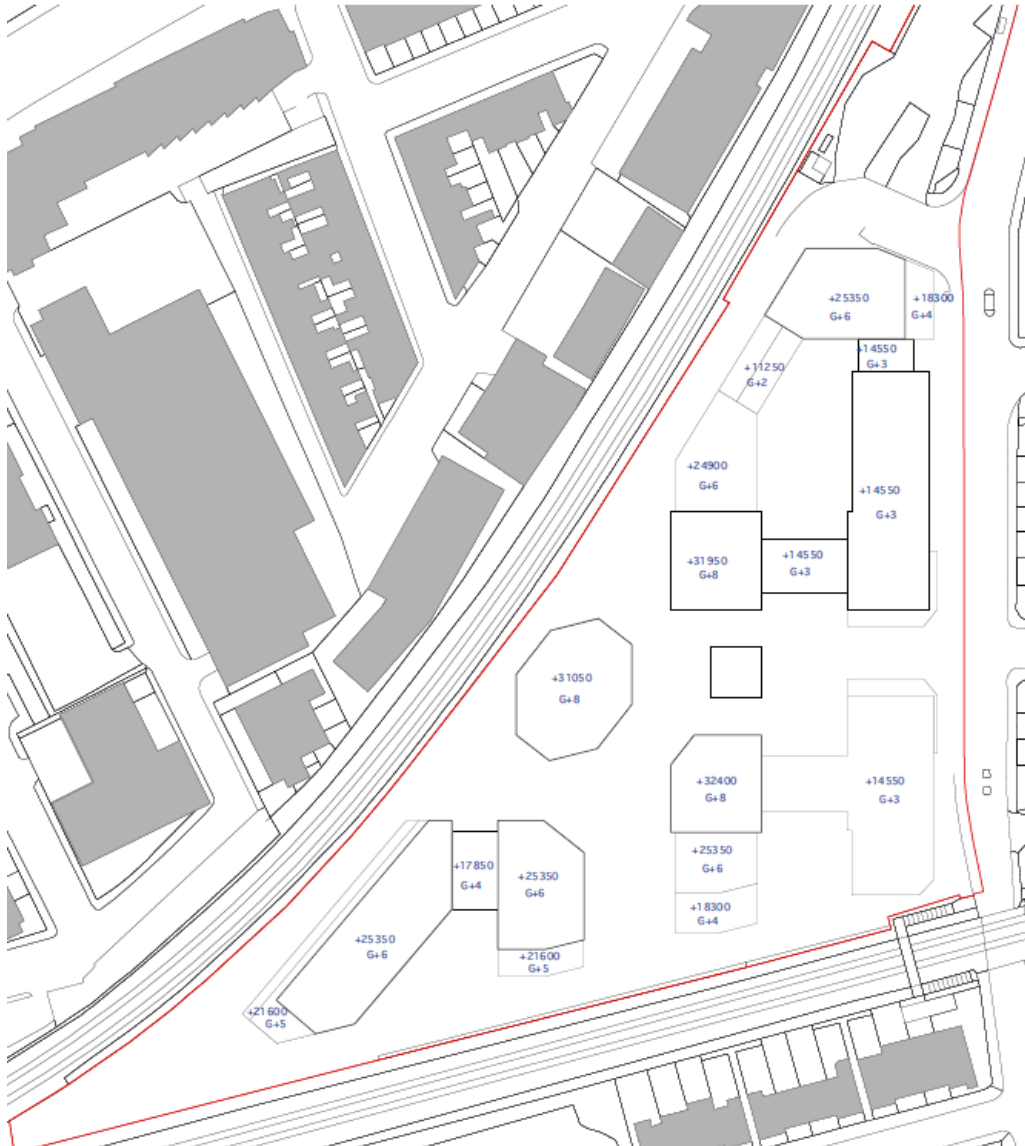


(b) Provides description / overview of the development:

- The Development will necessitate the demolition of all existing buildings and structures on the Site.
- The Development will provide in the region of 400 residential units (1, 2 and 3-bed units) with an appropriate provision of affordable housing) together with a small quantum of commercial floorspace. Since the submission of the EIA Report, the following breakdown has been provided:
 - 1 bed: 144 units
 - 2 beds: 162 units
 - 3 beds: 73 units

(i) Provides a description of the physical characteristics of the development and demolition works.

- The Development will necessitate the demolition of all existing buildings and structures.
- The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys.
 - Residential land uses will be present in all buildings.
 - The proposed commercial floorspace is likely to be concentrated around the Manor Road frontage.
 - Since the submission of the EIA Report, the following plan has been provided. This illustrates the heights:
 - 4-5 storeys along Manor Road
 - 4-6 storeys along the south boundary
 - 3, 6, 7, 9 storeys along west boundary



- It is proposed that these buildings will be predominantly brick.
- The siting and layout of buildings within the Site will define a new public and private realm. An appropriate quantum of children's play space will be provided.
- The Development will provide a small single-level basement within the north of the Site, providing storage for refuse and in the region of 650 cycle parking spaces for residents of the Development.
- Vehicular access and egress to / from the Site will be provided in the north-east of the Site via Manor Road.
 - Vehicular circulation will be limited along an access road provided, adjacent to the off-Site rail lines.
 - Vehicular circulation will be afforded within the centre of the Site, around the perimeter of the new central public space.
 - Emergency vehicular access will be provided to all buildings.
 - Car-parking will be kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired.

- Servicing will occur at street level, predominantly along the eastern boundary of the Site.

Provides a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

Section 5 of the report provides:

(c) a description of the aspects of the environment likely to be significantly affected by the development.

(d) a description of any likely significant effects of the proposed development on the environment resulting from—

- i. the expected residues and emissions and the production of waste, where relevant; and***
- ii. the use of natural resources, in particular soil, land, water and biodiversity; and***

Section 5 considers the following environmental topic areas...

- Transport and connectivity
- Core Social Infrastructure
- Townscape and Visual Effects
- Heritage Effects
- Biodiversity / Ecological Effects
- Geology, Ground Conditions and Contamination
- Water Resources and Flood Risk
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
- Waste
- Risk of Major Accidents and Disasters
- Health and Wellbeing
- Climate Change
- Cumulative Interactions of the Development

and considers the following environmental affects arising from:

- the site preparation, demolition and construction work associated with the Development (the Works)
- The operation of the completed development (the Completed Development)

(f) Identifies in Section 5, features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

This section addresses each of the potential environmental topic areas, and includes:

- Features of the development....
- Mitigation proposed
- Documents that will accompany an application

to avoid or prevent potential significant effects.

PREAMBLE

The EIA Regulations Threshold:

A screening exercise has been undertaken in accordance with Regulation 5 and 6 of the EIA Regulations. The Local Planning Authority (LPA) has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise.

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;

“sensitive area” means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981;
- a National Park ;
- the Broads(c);
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(d);
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The LPA is of the view that the proposal would be an Urban Development Project as defined under Schedule 2 part 10 (B) of the Regulations. The site is not located in a ‘sensitive area’ and therefore the thresholds set out in Schedule 2 of the Regulations have been applied:

- i. The development includes more than 1 hectare of urban development which is not dwelling house development; or*
- ii. the development includes more than 150 dwellings; or*
- iii. the overall area of the development exceeds 5 hectares.*

The EIA report confirms the site is approximately 1.5 ha and in the region of 400 residential units, and therefore exceeds the applicable thresholds, and so constitutes Schedule 2 development for the purposes of the EIA Regulations.

It therefore needs to be screened to determine whether it is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

National Planning Policy Guidance (NPPG):

When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the 2017 Regulations, however, the NPPG notes not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way:

- Characteristics of development
- Location of development
- Types and characteristic of the potential impact

When the LPA issues its opinion, they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3.

The NPPG advises only a very small proportion of Schedule 2 development will require an EIA. While it is not possible to formulate criteria or thresholds which provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid LPA to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced, which includes an indication of the types of impact that are most likely to be significant for particular types of development.

Development type	Schedule 2 criteria and thresholds	Indicative criteria and threshold	Key issues to consider
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings or (iii) the overall area of the development exceeds 5 hectares.	Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless: <ul style="list-style-type: none"> • the new development is on a significantly greater scale than the previous use, or • the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: <ol style="list-style-type: none"> i. area of the scheme is more than 5 hectares; or ii. it would provide a total of more than 10,000 m² of new commercial floorspace; or iii. the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings). 	Physical scale of such developments, potential increase in traffic, emissions and noise

In relation to this scheme, which this exceeds the Schedule 2 threshold (more than 150 units):

- The site is less than 5 ha
- The scheme does not provide more than 10,000m² commercial space
- There are less than 1000 dwellings

However, it should not be presumed, that those falling above the indicative threshold should be subject to assessment, or those falling below these thresholds could never give rise to significant effects, and therefore each development will need to be considered on its merits.

Where it is determined that the proposed development is not EIA development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment. Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance.

SCREENING OPINION

When screening Schedule 2 developments, the EIA Regulations (5 (4)) require LPAs to take into account the following:

1. Any information provided by the applicant
2. The results of any relevant EU environmental assessment, which are reasonably available to the relevant planning authority
3. Such other selection criteria set out in Schedule 3.

(1) Characteristics of the Development must be considered with particular regard to -**(a) The size and design of the whole development**

The existing triangular 1.5 ha Site, bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road, currently comprises a low-rise retail store with associated hardstanding comprising an access road, surface car-parking (for 150 cars) and servicing areas. A number of trees exist within the surface car-park.

The immediate environs are characterised by built urban form, which varies in scale, form, footprint and heights, comprising residential, retail, light-industrial and transport infrastructure. Buildings are generally low to medium rise, ranging from 2- 6 storeys, except the Towers to the NW, which extend to 11 storeys. There are a number of local land mark, including St Matthias Church (Grade II Listed) located to the south; and the Pagoda (Grade I Listed) at the World Heritage Site, in Kew. The EIA Report confirms that these are not visible from the site.

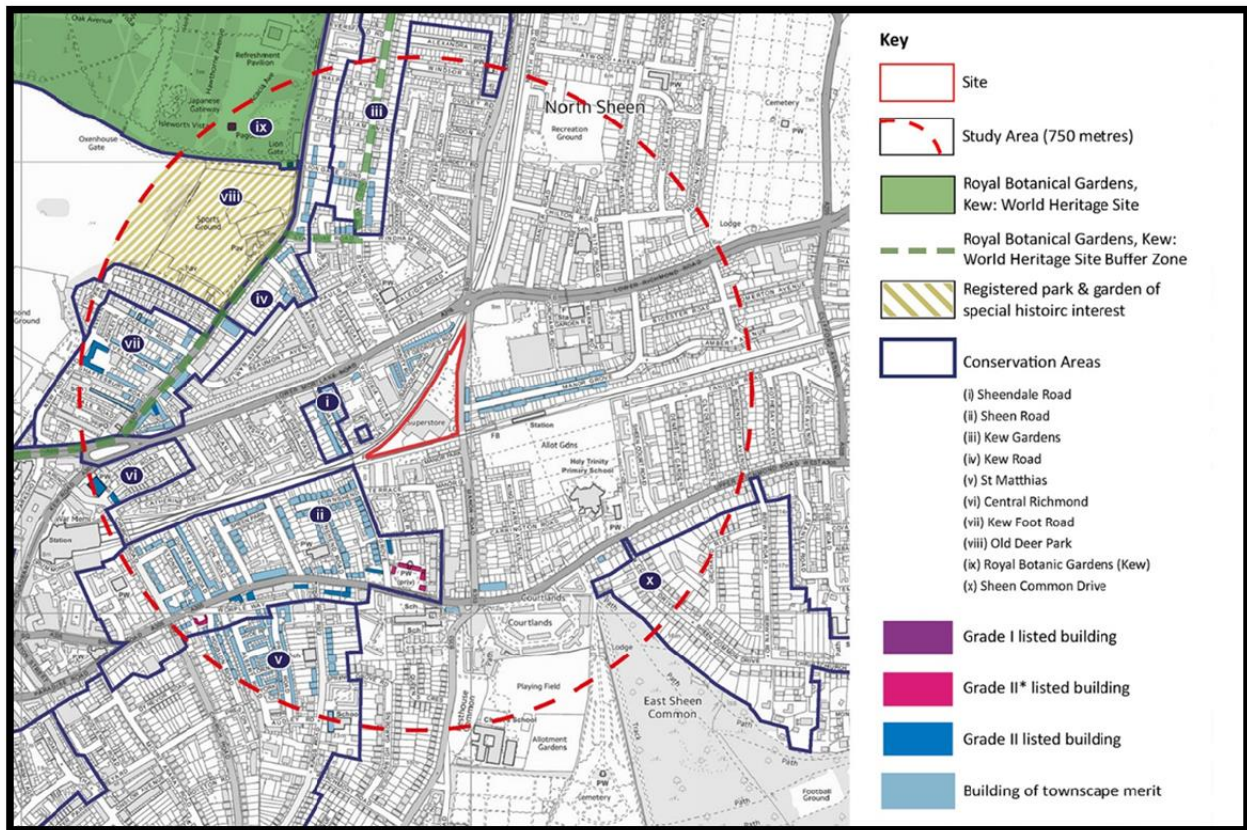
The site has the following principal designations:

- Critical Drainage Area
- Outer safeguarding zone for high pressure gas pipe
- Past industrial land use
- Area susceptible to surface water flooding

There are no specific heritage designations (designated or non-designated / statutory or non-statutory). Nor is the site within a protected view; setting of a listed building or World Heritage Site. The Site does not have any open space values (such as Other Open Land of Townscape Importance – OOLTI); and not within an archeologically priority area (or close proximity to one). However, the site is within the setting of:

- Other Land of Townscape Importance – Adjacent to the site on Manor Road and North Sheen Station Allotments.
- Conservation Area 31 'Sheen Road' – to the SW
- Conservation Area 50 'Sheendale Road' – to the west
- Non-designated Heritage Assets – BTMs on west side of Manor Road, Manor Grove, Trinity Road, St Georges Road; Sheendale Road; Townshend Terrace

The EIA report identifies the above ground heritage assets within a 750m study area:



The site is identified within the Richmond and Richmond Hill Village SPG, as forming Character Area 6:

“This character area occupies the angle of two busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past.

The north western part of the area was once covered by a gas works. Today the works area is confined to the land nearest the roundabout and is visually low key, except for the tall mesh fencing along the main roads. Much of the area is occupied by a large supermarket of modest height and its associated petrol station and large car park. The large shops on the west side of Manor Road are similarly laid out but have pitched clay tile roofs.

Some trees are present in and around the car parks, but the character is defined by large expanses of hard surfacing.

The central part of the area has a network of short roads: Orchard, Garden and Market. One two-storey Victorian house (former public house) survives on the corner of Orchard and Lower Richmond Roads, but the overall character is varied due to a mix of light industrial sheds, offices and modern apartment blocks. Cladding is in steel, timber and render. There are some planted beds but few street trees. Also, on Garden Road, there is a fire station and its exercise yard. East of Market Road are further light industrial sheds in brick with metal sheeting and small areas of car parking. On Lower Richmond Road is a small mid twentieth century shopping parade in red brick, with the fire station nearby.

Characteristic materials and features include: Red brick, stock brick, metal cladding, metal windows, planted beds.

Threats from development have been identified as: Lack of definition and coherence in street frontages due to loss of terraces and proliferation of small industrial yards and car parks.

Should redevelopment proposals come forward for appropriate uses there is an opportunity to re-plan and upgrade the public realm. There are also opportunities to achieve improvements to the visual appearance of the area, including when viewed from the A316 Lower Richmond Road. Proposals should demonstrate how they support this opportunity and also how they positively respond to the relationship with adjoining areas, which are primarily residential in character.

More appropriate paving, street furniture and street trees would enhance the character. Many of the pavements are presently in tarmac which could be replaced with a higher quality material.”

The EIA Report identifies the Zone of Theoretical Visibility (ZTV) and the Townscape Character Areas relevant to the Site and its ZTV, with areas of value being:

- East Sheen Open Space
- Richmond Hill and East Sheen residential
- Richmond Residential Fringe
- Kew Gardens and Old Deer Park
- Kew Gardens, Residential Fringes

In consultation with the Authority, several views of the site have been identified.

The Development will necessitate the demolition of all existing buildings and structures on the Site. It is envisaged that the Development will provide in the region of 400 residential units (1, 2 and 3-bed units with an appropriate provision of affordable housing) together with a small quantum of commercial floor space. The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys, with residential land uses in all buildings. A previous illustration indicates

- 4-5 storeys along Manor Road
- 4-6 storeys along the south boundary
- 3, 6, 7, 9 storeys along west boundary

Three of 4 of the buildings will include various building components and comprise a range of building heights and geometries to afford visual interest, avoid over bulky design, and public and private realms. The remaining building will be of an octagonal form. It is proposed most will be brick. The development will provide a small single level basement for storage of refuse and approx. 650 cycle parking spaces. Access will be via Manor Road in the northeast, with vehicular circulation adjacent to offsite rail lines. Car parking is kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired. Servicing will occur at street level, predominately along the eastern boundary.

The works: Any Works have a consequential impact on the physical environment of the site and setting of designated and non-designated heritage assets, whether from hoarding, plant and machinery. However, there are no below or above ground heritage assets on the site, and therefore the development will not have a direct impact on such. It is deemed any townscape and visual effects associate with the Works are anticipated to be limited, localised, temporary and reversible. Further, with Construction Environmental Management Plan (CEMP - to cover Good Construction Site Housekeeping Initiatives; Maintenance of adequate construction site hoarding; Orderly segregation of construction site activities), these impacts will not be significant:

Competed development: The EIA Report does not deem the scale to be disproportionate to the surrounding townscape and has the potential to enhance the townscape, by providing public realm, residential community and increased ground floor activity. Further, confirms:

- The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
- The application will be accompanied with a Townscape and Visual Assessment.
- Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

The size and scale of the development (notably height) is significantly different to the existing, and the question is whether this is going to give rise to significant impacts to trigger an EIA.

The prevailing pattern of development is built up residential / commercial land uses, with transport infrastructure (road and rail). Prevailing heights are:

- Northwest of the district line: Two storey terraced properties; single storey commercial units; flatted developments (3, 4, 5, 11 storeys)
- South of the site: Two storeys semi-detached and terraced properties, and 2/3 storey flatted developments.
- East of the site: Two storey terraced properties (some of which are Buildings of Townscape Merit); large commercial units; 4-6 storey flatted developments
- North of the site: Two storey residential properties; Two storey commercial units; 4 storey flatted developments

For the following reasons, based on the information provided; the Authority is of the view the scheme will have an urbanising effect on the local environment, and is of a size that will affect the townscape and heritage environment, however, for the following reasons this is not deemed to be of a scale that will raise significant effects that would trigger the need for a full EIA, and this can be dealt with through the planning application process:

- The brown field nature of the existing site
- The built-up nature of the surrounding area
- The varied form of buildings and heights in the locality and relationship between each other
- Varied heights within the development, with lower heights along Manor Road and the south boundary.
- Heritage assets being separated from the site by rail lines, built form, roads
- The site not being located within a viewing corridors or Protected Views
- The site not being within the setting of listed buildings or World Heritage sites

The EIA Report was referred to Historic England and based on the information to date, they do not wish to offer any comments, and suggest the views of the authority's specialist conservation advisers are sought.

(b) The cumulation with other developments and / approved development

The EIA Regulations require consideration of cumulative effects of the proposed development with other existing and approved developments.

The following developments are considered of relevance, regarding their air quality, transport and impact on social infrastructure due to their scale, proximity to the site and the A316. However, given (1) and (2) are pending decision they do not form part of the cumulative impact assessment; and (3) was approved subject to various transport mitigation measures and highway works recommended by TfL due to the location of the site on the A316.

TfL and the Councils air quality officer were consulted on this EIA Screening Opinion request, who raised several points. Overall, there are not considered to be any existing or approved developments near the site that cumulatively might give rise to significant environmental effects subject to the mitigation measures (including highway works, travel plans, air quality assessments etc) proposed through a normal application process and subject to this EIA screening.

1. Stag Brewery redevelopment – Redevelopment to provide secondary school with sixth form; 443 residential apartments; 150 units of either assisted living or residential; 224 unit car / nursing home; Flexible use floorspace for various commercial uses, community and leisure; and hotel, cinema, gym and office floorspace; and associate parking (18/0547/FUL; 18/0547/FUL and 18/0549/FUL)
2. Kew Biothane Plant, Melliss Avenue, Kew: Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 89 units, communal healthcare, therapy, leisure and social facilities (including a Restaurant bar cafe and swimming pool). Provision of car and cycle parking, associated landscaping and publicly accessible amenity including a children’s play area
3. Richmond College - 15/3038/OUT - Outline application for the demolition of existing college buildings and redevelopment of the site to provide:
 - 1) A new campus for education and enterprise purposes, comprising; Replacement College to accommodate up to 3,000 FTE day time students and a Science, Technology, Engineering and Maths of up to 6,100sqm;
 - 2) A new Secondary School for up to 750 students;
 - 3) A new Special Educational Needs (SEN) School for up to 115 students;
 - 4) A new ancillary 'Technical Hub' for Haymarket Media of up to 1,700sqm;
 - 5) Replacement on-site sports centre of up to 3,900sqm
 - 6) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316.
 - 7) Associated on-site parking (non-residential) for up to 230 vehicles
 - 8) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

(c) The use of natural resources, in particular land, soil, water and biodiversity

- Land and soil: The existing site is a previously development brownfield site, which is predominately hard surfaced. The site is not designated for any geological importance or interest and does not yield any significant geological resource. Neither is the site within an archaeological priority area.
- Water: The site is in Flood Zone 1 (lowest risk of flooding), an Area Susceptible for Surface Water Flooding; and there is a Secondary an Aquifer beneath the site. There is no evidence that the site contains any important, high quality scare resource.
- Biodiversity: These Site is an active retail park, and predominately comprises of buildings and hardstanding, with areas of scrub, amenity grassland, trees and hedge / flower beds. There are no statutory or non-statutory sites of nature conservation within the site, or adjacent. The EIA Report appendixes included a Preliminary Ecological appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA), which advises the site supports the following habitats:

Habitat	Importance
Amenity grassland	<ul style="list-style-type: none"> ○ Of low species diversity and comprises a heavily managed short sward. ○ Negligible ecological importance.
Buildings and Hardstanding	<ul style="list-style-type: none"> ○ Buildings offer little to the biodiversity resource to the site. ○ Negligible ecological importance.
Dense Scrub	<ul style="list-style-type: none"> ○ Small areas of dense scrub in the south-west corner between railway lines, comprising of largely native species composition. ○ Ecologically important within the context of the site only
Introduced Scrub	<ul style="list-style-type: none"> ○ Small size and largely composed of non-native species ○ Negligible ecological importance

Scattered Broad-leaved Trees	<ul style="list-style-type: none"> ○ Several planted, young to semi-mature tree species; along east boundary surrounded by amenity grassland, within the car park, in an area west of the car park and along the east boundary. ○ Common lime; sycamore, and silver birch. ○ Due to their age, position and native species composition = ecological important within the context of the site only.
Scattered Scrub	<ul style="list-style-type: none"> ○ Scattered scrub throughout the site; on the east site boundary; running along the west boundary ○ Largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain <i>Plantago lanceolate</i>. ○ Given small area and the largely non-native composition = ecological important within the context of the site only
Tall Ruderal	<ul style="list-style-type: none"> ○ One small patch on the southern boundary of the site, consisting of elder <i>Sambucus nigra</i>, common ivy, bramble, common nettle and cleavers <i>Galium aparine</i>. ○ Given the small area = Ecological important within the context of the site only.
Great Crested Newt	<ul style="list-style-type: none"> ○ Not considered to be a feature of the site.
Bats	<ul style="list-style-type: none"> ○ The building and trees have negligible potential for roosting bats. ○ Vegetation along southern boarder could act as a possible commuting corridor
Badgers	<ul style="list-style-type: none"> ○ No signs of badgers were identified on the site
Birds	<ul style="list-style-type: none"> ○ Limited potential to support breeding bird populations ○ Potential to support nesting and foraging birds ○ Any populations of birds utilising the site are considered to be of site important only.
Invertebrates:	<ul style="list-style-type: none"> ○ Limited suitable habitat ○ Invertebrate populations are likely to be of negligible ecological importance.
West European Hedgehog:	<ul style="list-style-type: none"> ○ One area of grass piles in the south-west corner could potentially be used by hedgehogs as a hibernaculum ○ Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of site importance.
Reptiles	<ul style="list-style-type: none"> ○ Reptiles are likely to be a small population of common species = deemed to only be of site importance. ○ Given more suitable habitat adjacent to the site, reptiles are less likely to use the less suitable habitats present on site. Therefore, the population present on site is deemed to be likely a small population of common species and are likely to be of negligible ecological importance.

The Works will include an element of intrusive ground works associated to the construction of the basement, foundation works and installation of piles. Further, the Development will clearly have an impact on the natural resource and existing habitats. However, the Report concludes that none of the habitats are considered of principle importance. Given these are either of negligible or site ecological importance only, it is deemed, through the provision of reports to accompany the application (required as part of the Local Validation Checklist), the adoption of design principles, and mitigation measures identified in the EIA Report (that can be secured by either condition or Section 106 Legal Agreement), the Works and Development is not deemed to give rise to significant environmental effect on natural resource.

Environmental topic	Report	Mitigation
Water	<ul style="list-style-type: none"> ○ Flood Risk Assessment ○ Sustainable Drainage Strategy 	<ul style="list-style-type: none"> ○ London Plan Drainage Hierarchy ○ Flood resilient and resistant measures ○ Reduction in surface water discharge to greenfield run-off rates wherever feasible; or the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development
Biodiversity	<ul style="list-style-type: none"> ○ PEA and PBRA ○ Bat Activity surveys ○ Tree surveys, AIA, AMS ○ Lighting strategy 	<ul style="list-style-type: none"> ○ Landscaping scheme – including native and local stock. ○ Inclusion of 1.2m between basement and ground to ensure sufficient depth for soil. ○ Sedum / brown roofs ○ Green walls ○ Ecological enhancement measures <ul style="list-style-type: none"> ○ Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and Richmond's Biodiversity Action Plan (BAP). ○ Green infrastructure – multi functional, delivering biodiversity and drainage benefits ○ Planting native flora in retained / new habitats. ○ Bug hotels ○ Hedgehog highway and boxes ○ Bird and bat boxes. ○ Time restriction for removal of vegetation – avoid bird nesting and hedgehog hibernation period, or under supervision by a qualified ecologist. ○ Sensitive lighting along rail corridors to avoid disturbance ○ CEMP: Best practice including measures to reduce noise; dust emissions; night time light emissions; avoid incidences of contamination run-off.

(d) Production of waste

It is inevitable that waste will be generated by the proposal, both through the Works and the completed development.

Any Works are likely to generate waste, and as such the emphasis is upon how to manage such. The EIA Report advises that the CEMP and Waste Management Plan will set out legal and best practice measures and protocols to ensure good construction site management to minimise waste creation and maximise re-use and recycling.

The proposed commercial and residential land uses are not deemed too given rise to particularly hazardous waste materials and general waste is not complex or an uncommon feature of such a scheme. Again, to minimise effects is down to management. The EIA report identifies that the development will include sufficient space and facilities for waste and recycling, and for collection and disposal.

As a response, and with the LVC and conditions to ensure such documents are submitted or secured with any decision, the development is unlikely to give rise to significant waste effects.

(e) Pollution and nuisance

The EIA Report confirms that the site is not within any COMAH sites; Geological hazards or Safeguarded aviation zones. However, recognises...

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site - which could be encounter and / or mobilised during the intrusive ground works.
- The site is within an Air Quality Management Area

Notwithstanding the above:

- The site is within a Critical Drainage Area and area susceptible to surface water flooding.
- The Outer Safeguarding Zone – High Pressure 30-inch Gas Pipeline Cadent Gas Ltd
- The site has a Past Industrial Lane use

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant.

The Council's Emergency Planning Officer does not have any observations in respect to the EIA report.

Land / soil contamination:

The site has a past industrial land use, and therefore during the Works there is the risk of contamination exposure to humans and wider environment. Further, there may be potential for UXO's. Whilst acknowledging such, the EIA Report deems that legislative requirements and best practice can be implemented to prevent the Works giving rise to significant impacts, including:

1. Site to be investigated prior to implementation of works; and if this identified contamination, a suitable remediation strategy will be devised and implemented.
 - a. Phase 1 Contamination Assessment
 - b. Depending on the outcome of the Phase 1, a Phase II Contamination Assessment and Remediation Strategy
2. Implementation of a CEMP, to ensure best practice environmental management controls (for contamination and UXO management) including, but not be exclusive to:
 - a. The use of Personal Protective Equipment
 - b. Procedures for the safe and contained storage of materials
 - c. Procedures for dealing with accidental material spoils.
 - d. With respect to the risk of Unexploded ordnance, any intrusive ground works will be subject to a UXO Watching Brief, which will set out appropriate steps to de-risk the situation.

The Scientific Officer has reviewed the EIA report and only recommended the standard contamination land condition. This will require (prior to commencement of development):

1. a desk study
2. details of a site investigation strategy
3. an intrusive site investigation
4. written reports
5. remediation strategy

6. a verification report, produced on completion of the remediation work,

Based on the reports (which is required as part of the LVC) and sampling and mitigation which could be secured through conditions on any future planning applications as well as the measures that could be applied and controlled through relevant Environmental and Health and Safety legislation, the development is not deemed to give rise to significant effects.

Whilst the Report states the site is not within any COMAH sites, it is within the Outer Safeguarding Zone for a high-pressure gas pipeline. To ensure any contamination, either during works or once Completed, and the safe evacuation in an emergency, it is recommended that the applicants refer to the HSE's Web app and apply the PADHI+ computer system.

Water resources and flood risk

The EIA Report identifies that the site does not contain any surface water features and the closest water feature to the site is the river Thames, approximately 1.5km away. Furthermore, the Site is within Flood Zone 1, an area of low flood risk. Whilst acknowledging such, the Council identifies the Site is susceptible to surface water flooding.

The EIA confirms that during works, the CEMP will ensure appropriate surface water drainage, to ensure no localised surface water flooding. Furthermore, given the completed development will:

- replace the existing hard surfacing and impermeable areas with a similar type of land cover.
- Include design measures to safeguard against surface water flooding
- Ensure additional demand for foul water drainage is addressed

The scheme is not given rise to significant adverse effects.

The authority agrees with such, and these reports / measures will either be required at validation of any application or condition:

- Flood risk Assessment
- Sustainable Drainage systems
- Foul sewerage and utilities statement
- CEMP

Air Quality:

The entire Borough is located within an AQMA. The EIA Report recognises that the Works have the potential to give rise to the following air quality effects:

- Dust emissions
- Emissions from operation of plant and machinery
- Emissions from construction traffic generation.

Accordingly, the following measures are suggested to manage such, including but not exclusive to:

1. CEMP:
 - a. Reasonable construction hours
 - b. Dampening down
 - c. Appropriate covering of dust generation stock piled materials
 - d. Avoiding dust generating activities during dry and windy weather conditions
 - e. Dust monitoring
 - f. Use of modern low emission plant and machinery
 - g. Machinery being turned off, whilst not in use

The authority also recommended a robust CMP to manage construction traffic to keep additional pollution on Manor Rd between the very busy South Circular and A316 at peak hours to a minimum

The EIA report identifies the potential air quality effects of the completed and operation Development form:

- Traffic generation

- Building plant – heating and power plant.

Given the existing use (and associated traffic, the limited parking the scheme proposes (subject to measures to control on street parking), the sustainable location of the site (PTAL 4/5); the inclusion of Air Source Heat Pump for each block; and the following reports (which will be required at Validation, and secured through condition / S106) the development is not deemed to result in significant impacts on air quality from traffic emissions and associated effects or heating.

1. An Air Quality Assessment – This should comply with requirements of the EU Directive 2008/50/EC, the draft London Plan 2018, The Mayor's Control of Dust and Emissions during Construction and Demolition SPG 2014, LBRUT's 2017- 2022 Air Quality Action Plan, LBRuT's draft Air Quality SPD and the latest Government Plan to reduce nitrogen dioxide in towns and cities published on 18th January 2016
- <https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions>
2. Mitigation measures will need to be conditioned both during the construction phase and once occupied to keep any additional pollution (NO2 + PM) both for existing receptors and site users to a minimum.
3. Provision of electric charging bays

Noise and Vibration:

The main sources of noise at the site are likely to arise from road traffic, servicing of the site, noise associated with the operation of the adjacent rail lines and noise from air traffic associated to Heathrow. There is a potential for vibration at the site due to the operation of the adjacent rail lines. The site has both noise generating and noise sensitive development adjacent to it. In addition, the Completed development will itself be considered as a noise sensitive development.

It is recognised the Works will have the potential to give rise to:

- Increased ambient noise and vibration generated by the physical component and construction plant and material
- Increased noise from construction related traffic.

The EIA Report suggests standard construction environmental management techniques to be included in the CEMP to reduce such effects, including, but not being exclusive to:

1. Limiting working hours
2. Use of construction techniques
3. Use of modern low noise emission plant and machinery
4. Noise and vibration monitoring.

The Completed development is deemed to give rise to the following potential noise and vibration effects:

- Traffic generation
- Noise from operation of plant

The EIA Report recommends:

1. A Noise and Vibration Assessment
 - a. Low noise emission plant
 - b. Acoustic screening, as necessary
2. A Transport Assessment
 - a. Vehicular servicing is controlled through a Delivery and Servicing Plan
3. Draft CEMP - including noise and vibration management

With such measures and reports and the following reports suggested below, again secured through the Validation checklist and / or conditions; the Authority does not deem the Development will give rise to significant effects.

- The design (and acoustic design) should be based on the requirements contained in the 'Development Control for Noise Generating and Noise Sensitive Development' SPD.
- Travel Plan (encouraging walking, cycling and public transport)

Lighting:

No details have been provided of external lighting, but it is expected that some safety lighting will be in-situ for the Works, and security lighting or way finding would be installed around the site (including car park). External lighting could potentially impact on protected species (i.e. bats), however, these particular elements are unlikely to represent a significant part of the overall scheme and, without pre-determining the assessment that would be carried out through the application process, further details could be secured, and appropriate conditions and mitigation could be applied including, Hours of use; Design to ensure lighting is sympathetic to bats that may be utilising the trees boundaries; Provision of low-level bollard lighting; Use of hoods or cowls; and provision of warm-white LED lighting.

Japanese Knotweed

The Authority is aware that the site had Japanese Knotweed within the bed along Manor Road previously. There is concern that any digging in that area may stimulate any (if they are present) dormant rhizomes. The PEA advises the site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2.

On such basis, details will be required in any submission to demonstrate how this will be controlled through Works and the completed Development.

(f) and (g) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change; and risks to human health (due to water contamination or air pollution).

As previously identified

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site;
- The site is within an Air Quality Management Area
- The site is within a Critical Drainage Area and Area Susceptible to Surface Water Flooding.
- The site is within the Outer Safeguarding Zone – High Pressure 30 inch Gas Pipeline Cadent Gas Ltd

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant. It is the authorities' opinion that such risks can be suitably prevented / avoided through the following reports and measures contained within them, that the Authority can require at point of Validation, and secure through either condition or Section 106 Legal Agreement;

1. Contamination Report - a desk study; details of a site investigation strategy; an intrusive site investigation; written reports; remediation strategy and a verification report, produced on completion of the remediation work,
2. Implementation of a CEMP, to ensure:
 - Best practice environmental management controls (for contamination and UXO management);
 - Dust strategy – hours, dampening, monitoring, type of plant – in compliance with Local and Regional policy and guidance
 - Noise and vibration management
3. Referral to the HSE's Web app and apply the PADHI+ computer system
4. Flood Risk Assessment and Sustainable Drainage Strategy
5. Foul sewerage and utilities statement

Climate change:

Previous sections have addressed air quality. The EIA Report confirms that the design of the development will be informed by Sustainability and Building Services Engineers, and ensure that the scheme is in line with policy requirements and a Surface Water Drainage engineer to safeguard against surface water flooding. Accordingly, the scheme will incorporate sustainability design measures to reduce carbon footprint and greenhouse emission, including:

- Selection and use of building materials from sustainable sources
- Design faces to balance solar gain against daylight availability.
- Insulation to reduce heat demand
- Thermally efficient windows to reduce head demand]
- Air tightness
- Mechanical ventilation with heat recovery
- Energy efficiency lighting
- Use of photovoltaic panels.

The following documents will accompany an application:

- Draft CEMP – dust, air quality, noise and vibration
- Draft CTLP
- Transport Assessment – Travel Plan and Delivery and Servicing Plan
- Flood Risk Assessment
- Air Quality Assessment
- Sustainability Statement

With the above measures, and the following documents that will also be required at validation, the scheme is not deemed to raise significant effects on climate change.

- Statement of Sustainable Drainage System
- Sustainable Construction Checklist
- BREEAM Pre-Assessment – non-residential buildings over 100m2
- Energy Report: Confirming zero carbon

(2) Location of Development:

The existing triangular-shaped site is bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road. The area surrounding the site is mostly densely populated. It is within a London Underground rail safeguarding zone across the western edge of the site. There is a bus terminus to the immediate north of the access road, which is not part of the scheme. A Sainsbury’s supermarket store (Site Allocation SA21 - for retail/residential) is situated immediately to the North East on the other side of Manor Road. Manor Road joins a strategic red route, the A316, which heads out of London towards the South West via the M3. The Royal Botanic Gardens World Heritage Site and Richmond Park, SSSI, National Nature Reserve and MOL are around 1km away.

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to

(a) The existing and proposed land use

The site is located within built up and densely populated part of the borough. The character of the area can be described as having a mixed use, which supports residential properties (flats and houses); retail; transport infrastructure (bus station and stops and rail lines); hotel; and light industrial and other commercial uses

To the north	<ol style="list-style-type: none"> 1. Residential uses 2. Commercial uses to the north of the District Line – along Bardolph Road, Lower Mortlake Road 3. Transport infrastructure including <ol style="list-style-type: none"> a. District Line b. A bus terminus c. Lower Mortlake Road – Red route
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To the north east	<ol style="list-style-type: none"> 1. Residential land uses, 2. Commercial uses – on Manor Road and Lower Richmond Road, 3. Transport infrastructure including <ol style="list-style-type: none"> a. The Lower Richmond Road (the A316), b. North Road 4. North Sheen Recreation Ground
To the east	<ol style="list-style-type: none"> 1. Sainsbury's store and associated parking areas, 2. Residential land uses 3. Transport infrastructure including: <ol style="list-style-type: none"> a. North Sheen Station and its associated rail-lines b. South Circular (the A205).
To the south-east	<ol style="list-style-type: none"> 1. Residential land uses 2. Allotments, 3. Transport infrastructure including: <ul style="list-style-type: none"> • Sheen Road & Upper Richmond Road West (the A305), 4. Northern extent of Sheen Common and East Sheen Cemetery.
South	<ol style="list-style-type: none"> 1. Residential land uses 2. Transport infrastructure including: <ol style="list-style-type: none"> a. Sheen Road (the A305) b. Queen's Road (the B353). <ul style="list-style-type: none"> • Network Rail line • Education use – Christ's School
To the southwest	<ol style="list-style-type: none"> 1. Residential land uses, 2. Transport infrastructure including <ol style="list-style-type: none"> a. Sheen Road (the A305), b. LUL District Line c. Southwest Trains overland rail lines, d. North-eastern extent of Richmond town centre including Richmond Station.
To the west	<ol style="list-style-type: none"> 1. Light industrial and other commercial land uses 2. Residential land uses, 3. Transport infrastructure including <ol style="list-style-type: none"> a. Lower Mortlake Road, Kew Road and Twickenham Road, b. Eastern extent of Richmond Athletic Ground.
To the north west	<ol style="list-style-type: none"> 1. Light industrial, other commercial and residential land uses, 2. Transport infrastructure including <ol style="list-style-type: none"> a. Lower Mortlake Road (the A316) and Kew Road (the A307), 3. Richmond Lawn Tennis Club, 4. Richmond Cricket Club, 5. The eastern extent of the Royal Mid-Surrey Golf Club, 6. London Welsh RFC and Bowling Green 7. The south-eastern extent of the Royal Botanic Gardens at Kew.

The site currently comprises a low-rise retail store with associated hardstanding, for access road, car parking (150 cars) and outside delivery and storage area. The site has an extensive frontage along Manor Road, and thereby prominent. The south and north west boundaries are adjacent to rail lines (District line and network rail). Thereby views to the site from these locations are either from private gardens or over adjacent land uses. The Lower Mortlake Road and Lower Richmond Road met at Manor Road roundabout, which is elevated, and therefore the site is not prominent from this location.

The existing land uses on the site (retail) and the proposed land uses (residential and retail) will have a different character, in terms of impact on local sensitivities, including, Transport, Traffic, core social infrastructure, (such as impacts on schools, health, recreation use etc).

Transport:

The site has a PTAL rating of 4/5, owing to the sites proximity to: North Sheen Station; Richmond Station and Bus stop interchanges. Manor Road is a busy classified road, which is often congested in response to the barrier downtime (amongst factors) and leads to the A316, which is part of Transport for London Road Network.

It is recognised that inevitably the Work will give rise to some disruption to the normal operation and functioning of the local road network. However, it is deemed that such can be planned, programmed and controlled to avoid significant disruption and effects. The following will both be required at validation of an application and can be conditioned / secured in a Legal Agreement:

- Construction Traffic Logistics Plan: Accesses, routes, hours; pedestrian routes and signage etc.

The EIA report states Baseline traffic surveys have been undertaken on the existing use, and compared to the proposed use:

Table 1: Existing and With-Development Two-Way Movements to / from the Site

Peak Period	Existing Two-Way Movements	With-Development Two-Way Movements	Change
AM 08:30 - 09:00	80	71	-9
PM 17:00 - 16:00	108	83	-25

With regards to the completed development, except for 12 car parking spaces, the Development will be car free. Therefore, the EIA report concludes that the scheme has the potential to reduce the number of car trips when compared to the existing situation, or not have significant vehicular traffic effects. This will be further avoided by:

- The implementation of a Travel Plan and Delivery Servicing Plans.
- Provision of approximately 650 cycle parking spaces to encourage sustainable modes
- A Transport Assessment will be submitted with the above.

The EIA Report has been reviewed by both TfL and Transport Strategy.

Transport Strategy: Within the context of Manor Road, also being a classified road intended to carry relatively high flows, predicted changes in numbers of vehicles are considered relatively small. The profile of traffic during the day would be expected to change and there would be a new residential population. The developer proposes a new pedestrian realm within the site and cycle parking. The surrounding highways are of conventional design and construction, and new conventional accesses would be created into/from the site for pedestrian and vehicle access. The EIA report would have benefited from including some consideration of pedestrian movement and road safety outside the site as the development is considered likely to result in an increase in local people crossing roads and accessing nearby public transport. However, the development is not considered irregular in transport terms and is unlikely to require any road safety or other highway improvements that are not commonly found in urban areas with mixed land uses. In summary, it is not deemed to represent an EIA development, and will not have strategic impact on background highway flows and air quality. It should be noted that measures would be required to restrict on street parking, to avoid unacceptable traffic and air quality impacts.

TfL: The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

- Works: The impact of construction traffic on the operation of the TLRN including buses, pedestrians and cyclists must be considered and could be mitigated through the provision

of a Construction Logistics Plan (CLP). TfL would encourage the applicant to submit a draft plan as part of the application.

- Completed development: TfL would expect the application to be supported by a robust Transport Assessment (TA) and depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme, unless these are adequately addressed as part of the application. A framework residential travel plan should be prepared and submitted and should include information on deliveries and servicing. Any mitigation measures relating to TfL infrastructure and services must be secured through a s106 agreement. Depending on the level of transport mitigation agreed, it may be appropriate for TfL to be a signatory to any s106 agreement. Less significant issues can be dealt with by use of planning conditions and in some cases TfL may request that it is consulted prior to any discharge of a condition.

In addition to the reports recommended in the EIA report, the Authority will require the

1. Transport Assessment – to also include:
 - Traffic generation details off-peak and at the weekend - quantify the change in traffic on Saturdays and Sundays, as these are considered the busiest days for the DIY store.
 - To be in accordance with TfL's latest Transport Assessment Guidance. Depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme
 - Must include a multi-modal impact assessment including baseline and future car, bus, rail and pedestrian and cycle trips and mode share.
2. Travel Plan: Produced in accordance with TfL's Travel planning best practice guidance.
3. Health Streets Assessment
4. Parking surveys on local roads
5. Contribution for CPZ review and implementation – to prevent on-street parking
6. PERS
7. CERS
8. Road safety audit

Schools:

The Works will not generate any significant effects.

The IEA Report states there are 8 open primary schools within approximately 1m of the site, which have surplus capacity of 567 primary places. There are 9 secondary schools, within approximately 2 miles of the centre, with approximately 413 mixed gender and multi-faith secondary school placed. The EIA report advises that the scheme is unlikely to generate a child yield in-excess of 567 primary school aged pupils and 413 secondary school agreed pupils, and therefore not deemed to generate any significant demand and over capacity issues.

Applying the GLA Population Yield Calculator, the development may generate approximately:

- Aged 0-3: 39.6 persons
- Aged 4-10: 39 persons
- Aged 11-15: 11.3 persons
- Aged 16-17: 4.8 persons
- Aged 18-64: 651.6 persons
- Aged 65+: 15.5 persons
- **Total: 761.7 persons**

The Infrastructure Delivery Plan 2017 states:

- Primary education: The Council has a duty, under section 14 of the Education Act 1996, to ensure that sufficient schools are available for their area for providing primary education. The Council's overarching School Place Planning Strategy, adopted in January 2015 and revised in October 2015, sets out its priorities and strategy for ensuring a sufficiency of places up to 2024. In the medium to long term, additional provision will be needed in the Barnes and Teddington areas, for which plans are in place.

- Secondary Education: In the October 2015, the Council updated the School Place Planning Strategy and identified the need for one more free school to be provided as part of the redevelopment of the Stag Brewery site in Mortlake. This was in order to meet the localised forecast demand in the eastern areas of the borough. It is noted that the forecast for additional places in the west of the borough has been met by the provision of the three new schools.

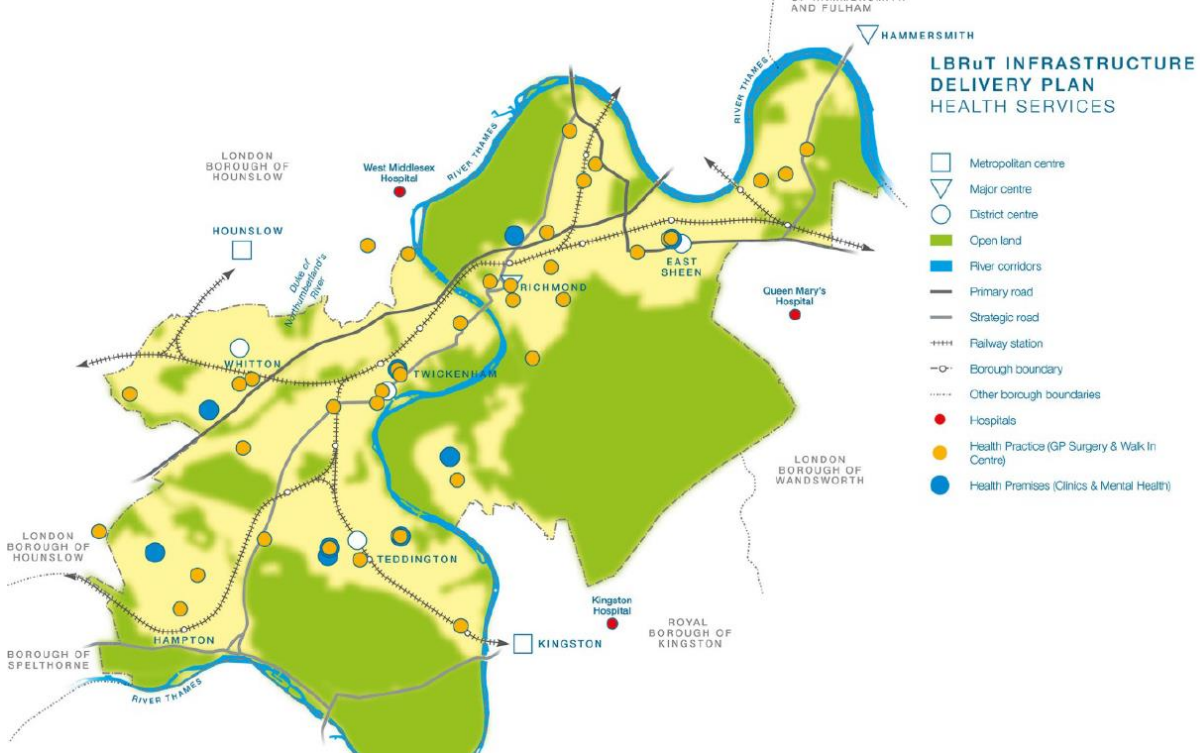
Achieving for Children have been consulted, who deem that whilst there will clearly be an impact, given the varied ages and relatively low numbers, the impact will not be significant. In addition: At present there is some spare capacity in the primary phase at nearby schools, and the proposed establishment of Livingstone Academy ought to take care of the anticipated secondary pupil yield from the development.

Health:

The Works will not generate any significant effects.

The EIA Report states there are 9 open GP surgeries within approximately 1 mile of the site, which are accepting new patients. Therefore, not deemed to raise significant adverse impacts on such facilities.

The Infrastructure Delivery Plan 2017 identified the following NHS Health Care (hospital and GPs)



The CCG's has identified the following localities as key priority issues:

- Kew (North Road Surgery)
- Teddington (Park Road Surgery)
- Twickenham (York Medical Practice)

CCG have been notified, who advise the distances between the site and local practices:

- Seymour House – 0.5km (8 mins walk)
- Paradise Road - 1.1km (17 mins walk)
- North Road – 1.2km (19 mins walk)
- Parkshot – 1.5 (23 mins walk)
- Sheen Lane – 1.9km (29 mins walk)

- New North Road site - 2.5km (38 mins walk)

In addition, there is a second tier of priority practices who have applied to the NHS England Improvement Grant fund; these are based in Twickenham, Hampton, Kew, Richmond and Barnes. However, population growth, particularly in Twickenham and Richmond, will place increasing pressure on GP premises in these areas.

Public health has been consulted and have no comments from an EIA point of view, however, will require a Health Impact Assessment (HIA) and a Rapid Health Impact Assessment (RHIA) is undertaken.

The scheme will clearly impact upon local health services. However, it is deemed a HIA and RHIA would identify potential need, and mitigation can be applied to avoid or prevent such impact. This may include contributions to expand GPs to cater for demand. If deemed necessary, this would be secured through a legal agreement. Indicative costs are identified using the HUDU model, which uses the numbers of proposed housing units, and the likely resulting population and calculates what health care floorspace is required and estimates the subsequent capital costs.

Recreation facilities

The Works will not generate any significant effects.

There are 9 open spaces and recreation facilities (public and private) within close proximity of the site, including:

1. North Sheen Recreation Ground
2. Penfold Tennis club
3. Fulham (North Sheen) Cemetery
4. Tangier Green
5. Pesthosue Common
6. East Sheen Common
7. Richmond Athletic Ground
8. Royal Botanic Gardens at Kew.

Whilst the proposed use may result in increased recreational use, given policy requirements for amenity and play space on site, and potential ability for legal agreements for improvements to public open spaces, the scheme is not deemed to generate significant adverse impact on such provision.

Wind climate:

The surrounding area predominantly contains relative uniform massing – generally low – medium rise buildings ranging from 2-6 storeys, apart from two 12 storey towers to the west of the site, off Lower Mortlake Road (the Towers). Given the distance between these and the site (approx. 120m²) the relatively low rise adjacent to these, The Towers are not deemed to give rise to significant impacts.

The Works (demolition of existing building) are not deemed to significantly impact upon wind conditions, given their relatively low nature.

The completed development is proposed to be ground plus 8 storeys. Figure 4 shows the building lines are staggered within the site. Whilst the scheme proposes some height, the EIA Report confirms that the design will be informed by an appropriately qualified and experienced wind microclimate expert so that the physical presence will not create uncomfortable or unsafe wind conditions within the site or adjacent and the application will be accompanied with a Desk Based Wind Microclimate Assessment. With such assurances, it is deemed significant impacts can be avoided.

Daylight, sunlight, overshadowing, light pollution and solar glare

The Works are not deemed to give rise to significant changes to light, and significant light pollution can be controlled through a CEMP.

The completed development will change light conditions within the site and adjacent to the site. However, the EIA Report confirms that the Applicants Daylight, Sunlight and Overshadowing consultants are informing the design of the Development to ensure any changes to the conditions of habitable rooms and amenity space are minimised and where changes do occur they are not unacceptable. Further, owing to the separation between the site and residential receptors, these are likely to be insignificant. In addition, the advice will also inform the design of the site layout (massing, siting, orientation, arranging of living space and fenestration design) to ensure suitable conditions for future occupants and solar glare. A lighting strategy will be adopted to ensure lighting will not exceed existing ambient artificial light levels.

The authority agrees with the above approach, and with such assurances and the following documents that will be required at validation, the scheme is not deemed to give rise to significant effects in this regard:

- Draft CEMP – light pollution management
- A sunlight / daylighting and overshadowing report - this will be measured adjacent BRE guidance.
- Lighting strategy

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

As previously concluded, the site is not known to contain high quality or scarce resources. There are no statutory or non-statutory sites of nature conservation within the site. As previously concluded, subject to mitigation and reports, the Development is not deemed to give rise to significance environmental effect in this regard.

With regards to the environmental sensitivity of the biodiversity in the geographical area, consideration has been given to:

Statutory Sites- There are two sites of European designation within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species the stag beetle *Lucanus cervus*. Given that the site is designated as a SAC due to the stag beetle population present, it is of **European importance**.
- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu*, which is listed as an Annex II species. Due to the presence of stag beetles and the presences of both wet and dry heathlands Wimbledon Common is considered a of **European importance**.

There are two sites of National designation within 2km of the site:

- Sion Park is located 1.7km north-west of the site and is designated a SSSI. Sion Park is 21.5Ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is of **local importance**.
- The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

Non-Statutory (Local) Sites

- Non-statutory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:
 - Sites of Metropolitan Importance
 - Sites of Borough Importance (borough grade 1 and borough grade 2)
 - Sites of Local Importance

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scarce plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pethouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scarce and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km-South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scarce and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail <i>Balea biplicata</i> and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scarce plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: <ul style="list-style-type: none"> - Marsh sow-thistle <i>Sonchus palustris</i> - Cut-grass <i>Leersia oryzoides</i>.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail <i>Balea biplicata</i> only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush <i>Bolboschoenus maritimus</i> and nationally rare invertebrates such as the, Thames/two-lipped door snail <i>Balia biplicata</i> .
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree <i>Juglans nigra</i> .

Potential impacts on the above sites may include, increased pollution (such as air, noise and light); and increased recreational use. However, given the distance of the development to the above sites and the sites being geographically isolated by buildings, greenspace, hardstanding and roads; the limited parking being provided on site, and with the following mitigation measures, that can be secured by condition and / or Section 106 Legal Agreement; significant impacts on such areas will be avoided.

- Incorporation of multi-functional green and play space within the site boundary,
- Limited car parking vision
- Electric charging points
- Lighting strategy

(c) the absorption capacity of the natural environment, paying particular attention to the following areas

- wetlands, riparian areas, river mouths
No likely significant effect – the site is not within the immediate vicinity of any such areas.
- coastal zones and the marine environment
No likely significant effect - the site is not within the vicinity of any such areas.
- mountain and forest areas
No likely significant effect on mountain or forest areas.

There are several trees on the site, and a group TPO applied. A Tree Survey and Constraints Plan; An Arboricultural Impact and Method Statement, and landscaping Scheme would be requirement of the Local Validation Checklist. These would identify the value of the trees, and which are of townscape or amenity value, and mitigation. Whilst there will inevitably be the loss of planting on site, the Authority has the ability (under policy LP 16) to secure replacement planting (on site or offsite) thereby to avoid significant environmental effects.

When considering the landscaping scheme, the applicants should provide details of the quality of the soil and suitability for landscaping within the site; and ensure sufficient soil volume is made available above the basement to support new trees.

- Nature reserves and parks

No likely significant effect through physical building works – the site is not within the immediate vicinity of any such areas.

With the increase in population, the Development may impact upon the usage on local parks, most notably North Sheen Recreation Ground in Dancer Road. Policy LP 31 requires financial contributions to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development. Consequently, no significant environmental effects on nature reserves or parks in the vicinity are considered likely.

- European sites and other areas classified or protected under national legislation:

The proposed development is not considered likely to affect birds protected through the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds). Various sites and species are also protected through the Habitats Directive (92/43/EEC) as set out in Schedule 2 of the Habitats Regulations 2017 which transposes the Habitats Directive into UK law. The site is not within the immediate close proximity to any European protected sites (the nearest being Richmond Park SAC).

Natural England has been consulted and based on the material supplied. They confirm that the site is not located within, or partially within any Site of Special Scientific Interest (SSSI) or Special Area of conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significant affect the interest features for this they are notified. The location of the development is not within, nor is it significantly close to a National Park, Area of Outstanding Beauty or Heritage Coats to impact upon the purpose for which these sites are designate. Therefore, in so far as statutory designated sites, landscapes and protected species are concerned there are no potential significant impacts.

The applicant is advised that they must provide information supporting this application sufficient for the Authority to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

- areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;

The entire Borough is designated as an Air Quality Management Area (AQMA). However, as already discussed, the development is within a sustainable location, on previously developed land, proposes minimal onsite parking, and subject to conditions, measures to restrict on-street parking and relevant reports, is not deemed to give rise to significant adverse effects. The relevant Environmental Health officer also does not deem the scheme to trigger an EIA.

- densely populated areas:

The site is in a medium-density area outside of the Borough's town centres. However, the development may cause impacts on the surrounding population in terms of the following:

- Noise, emissions, dust during construction
- Noise, light pollution, air quality and transport impact from proposed use
- Visual impact on townscape

The above matters have been discussed elsewhere in this report. Given the scale and siting of the development, the surrounding context (in terms of adjoining neighbours and land uses) and considering measures that could be applied and controlled through relevant Environmental and

Health and Safety legislation and planning conditions, the development is not deemed to give rise to significant effects.

- landscapes and sites of historical, cultural or archaeological significance.

The site is not located within an Archaeological Priority Area, and the EIA Report states that the site has a low archaeological potential due to previous disturbance. Historic England have been consulted on the EIA Report, and confirm that Archaeology does not need to be part of the EIA process due to there not being high potential for significant remains to be present on the site. However, recommend the detailed application should be accompanied by an Archaeological Desk -Based Assessment, and this can be a stand-alone report, which would enable GLAAS to make a decision on whether any further archaeological surveys or mitigation works will be necessary. On this basis, no significant environmental effects are likely.

The site is not within a conservation area, nor does not contain any listed buildings, World Heritage Status, Scheduled Monuments; Building of Townscape Merits. Neither is the site within the setting of listed buildings, the buffer of a World Heritage Site, or Schedule Monument. Opposite the site on Manor Road and on the north side of the district line are two storey Buildings of Townscape Merit, non-designated heritage assets. To the west and south west (again beyond the district line or network rail line) are two conservation areas, north of the site (beyond the district line).

The Authority is of the view the scheme is of a different physical scale to existing and will affect the setting of such, however, given, the varied heights within the development; built-up nature of the area; the varied form of buildings and heights in the locality and their existing relationship; Heritage assets being separated from the site by rail lines, built form, roads; the site not being located within a viewing corridors or Protected Views of such area; this is not deemed to give rise to significant adverse effects. Further, the EIA Report confirms:

- The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
- The application will be accompanied with a Townscape and Visual Assessment.
- Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

(3) Type and characteristics of the potential impact - The likely significant effects of the development on the environment must be considered in relation to criteria set out in points 1 and 2, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);**
- (b) the nature of the impact;**
- (c) the transboundary nature of the impact;**
- (d) the intensity and complexity of the impact;**
- (e) the probability of the impact;**
- (f) the expected onset, duration, frequency and reversibility of the impact;**
- (g) the cumulation of the impact with the impact of other existing and/or approved development;**
- (h) the possibility of effectively reducing the impact.**

The criteria set out in part 3 of Schedule 3 of the Regulations have been considered in the assessment above (see table below). The proposed development, both through Works and Completed development, could impact upon several areas of acknowledged interest in this borough.

		Works	Completed Development
Natural Resource	Physical changes to topography	The existing site is flat. The works will involve the construction of a basement, piling and foundations. The Works equipment will impact on the townscape; however, this is not complex, uncommon, of any great magnitude, temporary and reversible.	The development will impact upon the topography and townscape and have a greater urbanising effect. However, given the built-up nature of the site and area; varied character in height and form; non designated nature of site; and the measures outlined in the EIA Report, this is not deemed too given rise to significant effects.
	Impact on natural resource – land, soil, water, materials and energy	No significant impact.	Given the existing brownfield nature of the site, which is predominantly hard surfaced and its limited ecological value, the authority concludes the scale and characteristics of the development will not result in any significant effect on nature resources.
	Impact on high quality or scarce resources – forestry, agricultural, water / coastal, fisheries, minerals.	The Works are not deemed to impact upon high quality or scarce resource.	The Development is not deemed to significantly impact upon high quality scarce resource.
Waste	Production of waste	Any scheme will produce waste during Works, and therefore this is not deemed complex. The duration will be limited, and frequency and magnitude can be controlled through measures such as CEMP and waste management plan.	The scheme proposes 400 units and commercial floorspace, therefore will produce waste. However, this is not uncommon, complex or of great magnitude. Measures, such as refuse and recycling facilities, will reduce impact and ensure this is not significant.
Pollution and nuisances	Release of pollutants	The works will generate pollution through operating machinery, transport, plant, dust. Whilst these will occur on a frequent basis, these are not uncommon on a construction site, and will be for a limited duration, and measures can apply to reduce impacts, such as travel plans, CEMP, dust management plan, to ensure no significant.	The completed development will release pollutant from energy, vehicles, mechanical plant etc. However, these are not deemed to be complex, of magnitude or significant, when taking into measures to reduce such impacts, such as Air Quality Assessment; limited parking; sustainability design and energy measures.
	Noise, vibration, light, heat, energy pollution	The works will generate noise, vibration, pollution. However, this is not significant or complex. Measures can reduce any impact, and the duration will be limited.	Any development will generate noise, light, heat and energy pollution. Whilst 400 units, this is not deemed complex in this regard, and policy and measures can be applied to ensure no significant impact.
	Impact on contamination	The site has a past industrial land use, and therefore it is probably	The proposed land use is not deemed to give rise to

		contamination exist. However, with appropriate investigations and remediation, this is not deemed to give rise to significant effect.	contamination. Areas of soft landscaping are proposed. If contamination is found, remediation will be required, and this will mitigate impact and ensure no significant impact.
	Areas already subject to pollution and environmental damage – air quality	The site is adjacent to the A316, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, rail and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact (insulation, design measures, travel plans, cycle parking), sustainability measures.
Pollution and human health	Risk of accidents	No evidence to suggest an accident, however, any possibility can be reduced through CEMP, FRA.	No evidence to suggest an accident, however, any possibility can be reduced through referral to HSE, application of PADHI+.
	Risk to human health – air pollution and contamination	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during Works is not deemed of great complexity, the duration will be limited, and measures can be applied to reduce impact.	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during operation, whilst frequent and potential for long duration) this is not deemed to be significant, given measures applied to reduce impact. Such as design features, limited car parking, remediation, Travel Plans etc.
Water resources	Impact on water resources and flooding	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.
Biodiversity	Impact on: protected areas Sensitive areas	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; limited duration of Works, and measures to reduce impact, impact through Works, is not deemed to be significant.	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; and measures to reduce impact, impact is not deemed to be significant.

	Impact on protected spaces on / around the site	The PEA has not identified protected species on or around the site. No significant impact.	The PEA has not identified protected species on or around the site. No significant impact.
Landscape and visual	Impact on areas / features on or around the site protected or non-designated areas of landscape and scenic value	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will not be significant.	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the development will have a visual impression on both their settings, given the character of the area; this will be not being significant.
	Is the development going to be highly visible – where, what direct and distances	It is not uncommon for developments to have cranes etc. These will be visible from the immediate location and further afield, however, this is not to be of a magnitude to generate significant impact.	The development will be prominent from Manor Road, given the length of the frontage. Whilst it will be visible from the south and north west, this will either be over rail lines, properties etc. The A316 is slightly elevated to the north of the site, and with the existing landscaping, it limits its prominence. Notwithstanding such, given the built-up nature of the site, and tight urban grain, this is not deemed too given rise to significant adverse impacts. The applicant will be submitted a Townscape and Visual Appraisal.
Cultural heritage and archaeology	Impact on areas / features protected for their cultural or archaeological value. Local designation / non-designated heritage assets	The site is not of cultural, heritage or archaeological value. There are designated heritage assets within the setting of the site (conservation areas) and non-designated assets (BTMs). Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will be not being significant.	The site is not of cultural, heritage or archaeological value. Within the setting there are designated heritage assets (conservation areas) and non-designated assets (BTMs). There is a World Heritage site in Kew. Given the distance to the World Heritage Site (not with core or buffer zone), the varied character of the area (and relationship between existing pattern of development and heritage assets); the Applicants confirming a views analysis and heritage statement will be developed, and design measures applied to ensue no significant impact; (and the local and non-designated nature of the BTMs), it is not deemed to give rise to significant effects.
Transport and access	Impact on routes on or around the location to access recreation or other facilities.	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. No details have been provided, however, it is probable the Work will impact on this. A CLP will be required to demonstrate how the two can run concurrently and this can be	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. The indicative layout does not indicate an impact on such faculties.

		secured to avoid any significant impact.	
	Impact on transport routes susceptible to congestion or cause environmental problems	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact.
Land use	Existing land uses or community facilities that could be addressed – housing, industrial, health, education, places of worship, leisure, sports and recreation	No significant impacts deemed during Works, given nature; limited duration; reversibility.	The development will increase pressure on existing facilities, however, these are no complex, uncommon, and through unit mix, Health Impact Assessment, appropriate play and amenity space; contributions for improvements (if necessary) not deemed to raise significant impact.
	Any plans for future land uses around location that could be affected.	No significant impacts deemed during Works, given nature; limited duration; reversibility.	There is a site allocation for the Sainsbury's site opposite. (SA 21), which supports the comprehensive redevelopment for retail and residential uses. The continued use of the site as a food store and the re-provision of the existing retail floorspace is required. The Development is not deemed to prejudice such.
Land stability and climate	Is the site / area susceptible to and stability, winds, that could present environmental problems	No significant impact.	In response to build up pattern of development, and the Applicants confirming the design will be informed by a microclimate expert, there is no evidence to suggest a significant effect.
Transboundary effects	Is the project likely to leads to transboundary effects?	The Works will lead to construction traffic along the A316, through neighbouring boroughs. However, this is not deemed to be significant, especially given the limited duration and measures to reduce impact.	Given the distance of the site to neighbouring borough's and the limited parking on site, the scheme is not deemed to give rise to signage transboundary effects. Various consultees which consider transboundary matters (including TfL, Natural England, Historic England etc) have been consulted on this screening opinion and have not requested a positive EIA screening.

Any Works have a consequential impact on the physical environment, pollution, transport etc. Whilst the impacts through the works will be frequent, given the duration of the impacts will be limited to just construction; not being complex or uncommon; temporary in nature; a number being

reversible (air, noise, traffic, visual impact), with the mitigation measures put forward, these are not deemed significant. It is probable the Works will generate short term employment opportunities

Several impacts arising from the completed Development will not be reversible and due to the visible location of the development would not be limited to the immediate locality, potentially affecting a significant number of people. However, the Council:

1. Does not consider that the characteristics of the site and development would be likely to result in any significant effect on natural resources.
2. Whilst there is always the risk of pollution (air, noise, light, waste, contamination) being generated through operation, with the use of appropriate conditions, documents, and design measures will avoid significant impact or significant risk.
3. Does not consider, based on the evidence submitted, the Development would raise significant impact on protect and sensitive areas of biodiversity and protected landscapes.
4. Recognised that transport matters have been and can be addressed through design (limited parking) and Travel Plans, cycle infrastructure, on-street parking controls; and legal agreements to secure such.

The Completed development will have an urbanising effect on the townscape. The Authority considers that the key issue relating to the potential impact of the Development, both on-site and in the vicinity, relates to the visual impact. However, given the character of the area (form, built nature and height); the limited evidence of likely significant impacts on sensitive landscape or archaeological or nature conservation interests; and the design being influenced by heritage and townscape consultants, the impact is not deemed to be sufficient to warrant an EIA.

Therefore, it is of the Authorities opinion the development would not trigger the need for an Environmental Statement, under the terms of the EIA Regulations, to accompany any future planning application and any environmental effects associated with the Development can be adequately dealt with via the normal planning application process. The detailed planning application will need to be supported by an extensive suite of environmental technical studies and operational management plans.

Mitigation measures

The NPPG states, “Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”. Further, “Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance”.

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment, the type and characteristics of the potential impact are effectively reduced. The table below (column 2) identifies the features of the development / mitigation measures put forward by the applicants to avoid or prevent what might otherwise have been significant adverse effects on the environment. The third column identifies further reports / mitigation, recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission.

Issue	Features / mitigation / documents to be submitted to avoid or prevent potential significant effects:	Additional mitigation / reports recommended by the Local Planning Authority:
Transport and connectivity	<ul style="list-style-type: none"> • Car free development, except spaces for mobility impaired. • Construction Transport Logistics Plan • Transport Assessment 	<ul style="list-style-type: none"> • Contributions towards highways measures and parking controls around the site

	<ul style="list-style-type: none"> • Draft Travel Plan • Draft Delivery and Services Plan • Signposting 	<ul style="list-style-type: none"> • Highways and traffic management legislation. • Car Park Management Plan • Healthy Street Assessment • Parking survey • PERS/ CERS • Road Safety Audit
Core Social Infrastructure	<ul style="list-style-type: none"> • Appropriate quantum of play space will be provided within the Site • Generous hard and soft landscaped areas for public and private use 	<ul style="list-style-type: none"> • Health Impact Assessment
Townscape and visual Effects	<ul style="list-style-type: none"> • Construction Environmental Management Plan (CEMP) • A Townscape and Visual Assessment 	
Heritage Effects	<ul style="list-style-type: none"> • A Draft CEMP (including for above ground heritage asset construction management). • A Heritage Statement. • An Archaeological Desk-Based Assessment 	
Biodiversity / Ecological Effects	<ul style="list-style-type: none"> • Avoid conflict with bird nesting or hedgehog hibernation during the Works • Draft CEMP (including for biodiversity / ecological construction management). • A PEA and PBRA (a re-submitted version of the PEA and PBRA included at Appendix 1 for completeness). • A Lighting Strategy. 	<ul style="list-style-type: none"> • Provision of new public open space • Ecological enhancements • Arboricultural Method Statement • Landscaping scheme
Geology, Ground Conditions and contamination	<ul style="list-style-type: none"> • Environmental management controls • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). • Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy. • A Draft CEMP (including for contamination and UXO management). 	
Water Resources and flood Risk	<ul style="list-style-type: none"> • A Draft CEMP (including for surface water drainage management). • A Flood Risk Assessment (FRA) (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy). 	<ul style="list-style-type: none"> • Foul sewerage and utilities statement.
Air Quality	<ul style="list-style-type: none"> • Apply construction environmental management techniques • Air Source Heat Pump solution • A Draft CEMP (including for dust and air quality management). • An Air Quality Assessment. 	<ul style="list-style-type: none"> • Design of the development • Potential additional bus services, subject to TfL approval • Provision of the minimum number of vehicular parking spaces, • Electric vehicle parking spaces, • Cycle parking and infrastructure,
Noise and Vibration	<ul style="list-style-type: none"> • Apply construction environmental management techniques • A Draft CEMP (including for noise and vibration management). • A Noise and Vibration Assessment. • A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan). 	<ul style="list-style-type: none"> • Siting the least sensitive rooms nearest to the noise sources

		<ul style="list-style-type: none"> Acoustically attenuated natural ventilation and/or mechanical ventilation
Wind Microclimate	<ul style="list-style-type: none"> A Desk-Based Wind Microclimate Assessment. 	
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	<ul style="list-style-type: none"> Draft CEMP (including for light pollution management). A Daylight, Sunlight and Overshadowing Assessment. A Lighting Strategy. 	
Waste	<ul style="list-style-type: none"> A Draft CEMP (including for construction site waste management). An Operational Waste Management Plan. 	<ul style="list-style-type: none"> Refuse and recycling facilities
Risk of Major Accidents and disasters	<ul style="list-style-type: none"> A Draft CEMP (including for ground contamination, UXO and surface water drainage management). A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). <ul style="list-style-type: none"> Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy. An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy). 	<ul style="list-style-type: none"> HSEs Web App PADHI+ Foul sewage and utilities statement
Health and Wellbeing	<ul style="list-style-type: none"> A Draft CEMP (including for ground contamination, UXO, dust, air quality, noise and vibration and light pollution management). A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). <ul style="list-style-type: none"> Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy. An Air Quality Assessment. A Daylight, Sunlight and Overshadowing Assessment. 	<ul style="list-style-type: none"> Health Impact Assessment – The applicants are advised to control Javed Rahman, Public Health Lead.
Climate Change	<ul style="list-style-type: none"> Design features: <ul style="list-style-type: none"> The selection and use of building materials from sustainable sources and with low embodied carbon. The incorporation of appropriately designed façades to balance solar gain against daylight availability. The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand. The use of thermally efficient windows to reduce heat demand. The achievement of good levels of air tightness. Mechanical ventilation with heat recovery. The use of energy efficient lighting. All electrical heating systems to take advantage of decreasing UK grid electricity carbon factor. The use of photovoltaic panels mounted at roof level. A Draft CEMP (including for dust, air quality and noise and vibration management). A Draft CTLP. A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan). 	<ul style="list-style-type: none"> Sustainable Construction Checklist Sustainable Drainage Strategy BREEAM Pre-Assessment Energy Report.

	<ul style="list-style-type: none">• An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).• An Air Quality Assessment.• A Sustainability Statement	
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Conclusion

Based on the information provided, and for the reasons set out above and potential mitigation measures, which will assist in avoiding / preventing any potential significant effects, significant effects on the environment are not considered likely. As such, an Environmental Impact Assessment would not be required for any future planning applications under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended).

Decision: Negative Screening Opinion

Date of Opinion: 14th December 2018

Yours faithfully



Robert Angus
Head of Development Management