

**FORMAL SCOPING OPINION UNDER
REGULATION 13 OF THE TOWN AND
COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) (ENGLAND AND
WALES) REGULATIONS 2011**

In respect of the:

***Request for Scoping Opinion in respect of
information to be contained in Environmental
Impact Assessment to be submitted in support
of an application for outline planning
application for mixed use educational, office and residential
redevelopment of the Richmond upon Thames College site.***

Located at:

***Richmond upon Thames College Site, Egerton Road,
Twickenham***

Adopted by:

LONDON BOROUGH OF RICHMOND UPON THAMES

FOREWORD

1. This opinion has been prepared by the London Borough of Richmond upon Thames as Local Planning Authority with all reasonable skill, care and diligence.
2. It is based on the information provided to London Borough of Richmond upon Thames on behalf of the Applicant by Cascade and the comments and opinions resulting from consultation with the Applicant and Cascade and consultees prior to adopting this opinion.
3. This opinion is made freely available to members of the public. London Borough of Richmond upon Thames accept no responsibility whatsoever for comments made by third parties whom this opinion references. The London Borough of Richmond upon Thames accepts no responsibility whatsoever to third parties to whom this opinion, or any part thereof, is made known. Any such party relies upon the opinion at their own risk.
4. The fact that London Borough of Richmond upon Thames has given this opinion shall not preclude them from subsequently requiring the Applicant to submit further information in connection with any submitted development application to the Council.

SECTION 1. INTRODUCTION

Context

The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (hereafter referred to as 'the EIA Regulations') require that for certain planning applications, an Environmental Impact Assessment (EIA) must be undertaken. The term EIA is used to describe the procedure that must be followed for certain projects before they can be granted planning consent. The procedure is designed to draw together an assessment of the likely environmental effects (alongside economic and social factors) resulting from a proposed development. These are reported in a document called an Environmental Statement (ES). The process ensures that the importance of the predicted effects, and the scope for reducing them, are properly understood by the public and the local planning authority before it makes its decision. This allows environmental factors to be given due weight when assessing and determining planning applications.

Schedule 1 of the EIA Regulations lists developments that always require EIA, and Schedule 2 lists developments that may require EIA if they exceed the thresholds set out in Schedule 2 and are considered that they could give rise to significant environmental effects by virtue of factors such as its nature, size or location. The proposals do not fall within the descriptions of development set out in Schedule 1; however they do exceed the threshold of 0.5ha for urban development projects in Schedule 2.

Schedule 3 of the EIA Regulations sets out the screening criteria in relation to the Schedule 2 developments, drawing attention to the character and complexity of effects resulting from the scheme as well as a range of issues relating to the sensitivity of sites. The Proposed Development is considered an EIA development as it falls within the description and thresholds in Schedule 2 10(b) of the EIA Regulations as an 'urban development project' which has the potential to have significant effects on the environment.

The Applicant has also determined that the development will constitute 'EIA development' as it falls within the description and thresholds in Schedule 2 of the EIA Regulations, and that the scale of the development proposals could give rise to have significant effects on the environment.

Where a proposed development is determined to be an 'EIA development' the Applicant can ask the relevant planning authority for advice on the scope of the EIA (an EIA Scoping Opinion).

An EIA Scoping Report (Project No CC747 Version 2.0) was submitted to the London Borough of Richmond upon Thames (LBRuT) as the 'relevant planning authority' on behalf of Richmond Education and Enterprise Campus Development (the Applicant) on 21st July 2014. The Report requested an EIA Scoping Opinion (under Regulation 13 of the EIA Regulations) for a proposed development at Richmond upon Thames College Site, Egerton Road, Twickenham, TW1.

The remainder of this section deals with:

- Background to EIA Scoping;
- LBRuT's EIA Scoping Opinion; and
- Consultation.

Section 2 details the LBRuT's understanding of the Proposed Development.

Section 3 reviews the overall approach to the EIA in the context of prevailing EIA legislation.

Section 4 provides a review of the proposed scope and approach to assessment of each of the following EIA topics:

- Transport;
- Noise and Vibration;
- Air quality;
- Ground Conditions and Contamination;
- Waste;
- Water Resources and Flood Risk;
- Daylight and Sunlight;
- Ecology;
- Townscape and Views;
- Cultural Heritage and
- Socio-Economic.

Section 5 reviews the 'Assessments scoped out of the EIA' which the Applicant is proposing to exclude from the EIA.

Section 6 sets out the conclusions of this EIA Screening Opinion.

Background to Scoping

Section 13 of the EIA Regulations allows applicants to request from the local planning authority a written statement, ascertaining their opinion as to the scope of information to be provided in the ES. Whilst not a statutory requirement of the EIA process, requesting a Scoping Opinion clarifies the content and methodology of the EIA between the local planning authority and the applicant.

An EIA Scoping Opinion is the relevant planning authority's formal view on what should be included in the EIA.

The EIA Scoping process should aim to identify only the issues which have the potential to lead to significant effects, not an assessment of every single possible effect.

LBRuT's EIA Scoping Opinion

This EIA Scoping Opinion outlines the Council's opinion on the proposed scope of the EIA, and identifies any suggested amendments and/or concerns.

This Scoping Opinion has been informed by the information provided in the EIA Scoping Report and consultee responses and meetings held with the Applicant.

The issuing of this EIA Scoping Opinion does not prevent the planning authority from requesting further information at a later stage under Regulation 22 of the EIA regulations.

No indication of the likely success of an application for planning permission for the proposed development is implied in the expression of this EIA Scoping Opinion.

Outline planning permission would require multi-stage consent, and therefore, should outline permission be granted, the Council would need to consider whether EIA Screening would be required at later stages of the planning process e.g. reserved matters and/ or the discharge of conditions. The requirements for screening for EIA for such 'subsequent applications' are set out in regulation 8 and 9.

It will also be good practice for the Council to minimise the possibility that further environmental information is required at a later stage and the principal permission pursuant to the OPA will need to be subject to conditions or other parameters (such as a section 106 agreement) which 'tie' the scheme to what has been assessed.

The LBRuT acknowledges that EIA Screening would only be required where proposed development would be likely to have significant environmental effects which were not anticipated when any initial planning permission was granted.

Consultation

The EIA Regulations require that the LBRuT consults 'consultation bodies' prior to issuing an EIA Scoping Opinion. Consultees include any adjoining planning authorities, the Environment Agency, the Greater London Authority (GLA), Transport for London (TfL), Natural England, English Heritage, and other bodies designated by statutory provision as having specific environmental responsibilities and which the planning authority considers are likely to have an interest in the application.

Several discussions and meetings have been held with the applicants with regard to the content of the OPA and ES for the Proposed Development. An agreed approach has been established informally through discussions and the Scoping Report. During the scoping process, formal consultation occurred with the relevant statutory agencies and authorities and other relevant parties seen to have an interest in the future planning of the site and with relevant expertise and/or local knowledge in the environmental issues relevant to the site. For clarification, the main statutory and local authority consultees for the Scoping Report are the Environment Agency (EA), the Greater London Authority (GLA), Transport for London (TfL), Natural England (NE) and English Heritage (EH). The Scoping Report was also sent to a further 17 external consultees.

All external consultees contacted by LBRuT during the EIA Scoping process are listed at **Appendix A**. A summary of the comments received are provided in full at **Appendix B**. The responses from internal sections within the London Borough of Richmond upon Thames are also detailed. It should be noted that these comments were based on the original description of Proposed Development and site area.

The Applicant is strongly recommended to further consult with consultees as appropriate throughout the EIA process as the Proposed Development evolves.

In section 1.4 Consultation, Council officers would expect the following bodies to be added

- Friends of Heatham House
- SWLEN / Richmond BioDiversity Partnership
- Challenge Court residents
- Friends of Heatham House
- Heathfield South Neighbourhood Coordinator
- Chudleigh Road/Talma Gardens/Tayben Ave/Russell Road and Palmerston Road Neighbourhood Coordinator

Meetings should also be held with Nuffield Fitness Club, the Council Depot and Harlequins FC as adjoining land owner

SECTION 2. THE PROPOSED DEVELOPMENT

Background to the Proposed Development

The Applicant is seeking to submit an OPA (all reserved matters) for a mixed-use redevelopment of the Richmond upon Thames College (RuTC) site. The redevelopment offers the opportunity to renew the college and introduce a new secondary school in to LBRuT, re-provide the Clarendon School (special needs secondary school), up-grade the sports fields and intergrate these developments into a shared 'campus', with the development of a new technical media hub on the site, and an element of separate residential development.

There is potential for a future upgrade of Harlequins RFC North stand which is adjacent to the west of the RuTC site and the design fo the development will consider this interface.

Six west London Boroughs (Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames) have joined together to plan for the future management of waste produced in their areas. The West London Waste Plan (WLWP) plans for all waste in the plan area up to 2031. Further information can be found here:

- Illustrated Submission Plan from July 2014:

<http://www.wlwp.net/documents/August2014/SD3%20-%20'illustrated'%20Submission%20Plan%20-%20showing%20minor%20changes%20Jul%202014.pdf>

- Main modifications as proposed by the six West London Boroughs from October

2014: <http://www.wlwp.net/documents/Nov2014/WLWP%20-%20Schedule%20of%20Proposed%20Main%20Modifications.pdf>

Site Context

The proposed development, site and surrounding area is described in the Scoping Report, and briefly comprises an outline planning application for mixed use education, residential and office redevelopment of the Richmond upon Thames College site. The report states that the site occupies approximately 8.6 hectares of land, including the playing fields to the south. The development will be submitted to the local planning authority in the form of an Outline Planning Application (OPA).

It is noted that reference to 'Twickenham Rugby Club' is made, this should read the 'Rugby Football Union, Twickenham' (RFU).

Scheme Description

Details of the development design are being developed, but for the purpose of the EIA Scoping Report the following was provided as emerging broad development principles:

- A new college (Use Class D1) of approx. 20,000sqm (GEA)
- A new secondary school (Use Class D1) of approx. 7,500sqm (GEA)

- A new secondary school for children with special educational needs of 3,000sqm (GEA)
- A new technical media hub (Ancillary Use Class D1) of 2,000sqm (GEA)
- A replacement on-site sports centre (Use Class D2) of upto 4,000sqm (GEA) to serve both the college and wider community
- An upgrade of Craneford Way playing fields
- Enabling residential development of upto 2.5 hectares
- An energy centre to support development
- Possible alterations to existing means of vehicular access to Langhorn Drive and on-site parking and landscaping

In relation to the minimum requirements for an EIA Scoping Opinion set out in the EIA Regulations, the Scoping Report satisfactorily provides a brief description of the nature and purpose of the proposed development; including the range of floorspaces while drawing SK-039F indicates land use zones. Building heights in number of storeys and metres above ordnance datum are not provided in sufficient detail.

The description of the development does not include the proposed number of buildings, but it is acknowledged that this is because the Masterplan for the site is still evolving. It is understood that an outline planning application is to be submitted for the site as a whole (all Matters reserved).

Council officers would anticipate the description of existing and proposed development to be more detailed in the ES. A more comprehensive description of the existing buildings, their specific education purposes and floorspaces (for instance sports hall details) and student/staff nos is necessary as well as proposed buildings, floorspaces and building heights (those specified in 3.2 are too high), car/cycle parking facilities, internal access road, pathways, open space provision, children playspace as well as other site features such as trees, landscaping and any new links and access points to/from the Craneford Way Playing Fields. Residential development needs to specify units nos, mix and tenure as well as floorspace.

SECTION 3. REVIEW OF APPROACH TO EIA

This section comments on the over-arching approach to the EIA, as described in Sections 1-4 of the EIA Scoping Report.

The Environmental Statement will accompany an OPA which is intended to be limited to establishing the future principles of development in terms of the land use across the entire development site and the scale of development. This will be achieved through the submission of the following control documents:

- Parameter plans - anticipated to consist of: existing site plan, development zones and land parcels, land use plans for basement, ground floor and upper floors, development zone dimensions plans (maximum and minimum storey height and alignments), building dimension plans (maximum and minimum height, width and length), open space allocations, access routes.

- Development specification - anticipated to include details of the parameter plans and the type and quantity of development that could be brought forward at the Reserved Matters stage for each development zone.
- Design code - anticipated to provide guidelines for the appearance for the open spaces and public realm, landscaping including specifications for the planting, furniture and all other components, including streets and pavements. The code is also likely to include environmental and quality standards that each building and open space must comply with. The transport and energy interfaces between the components of the proposed development will also be considered.

The assessments undertaken and reported in the ES, as outlined in the Scoping Report, will be largely based on the information provided in these three documents.

This is considered acceptable to the Council subject to the degree of control provided by the parameters being considered appropriate to the context and level of mitigation feasible. At the time of initial receipt of the Scoping report, none of these documents were available to Council planning officers with the exception of a site location plan and a site sub-division plan.

Parameter Plans

The planning procedure set out is a multi-stage consent procedure, with a first stage that involves a principal decision (the outline planning permission) and secondary stages that comprise the implementing decisions (the consents pursuant to the reserved matters), needs for all the likely significant effects of a project on the environment to be identified and assessed at the time of the EIA procedure relating to the principal decision (See reference for a preliminary ruling in R v. London Borough of Bromley ex parte Barker (C-201/02) and Commission v UK (C-508/03)). To fulfil this requirement the applicant should assess each environmental impact (construction, operational, cumulative) on the basis of a **worse-case scenario** for development on a site wide basis and for development within individual development zones, all assessments taking into account the construction phases and occupancy phases and the consequential impacts. Of particular importance is the matter of timing of the phases which needs to be crystal clear.

While the use of Parameter Plans is acceptable to the Council these parameters should specify clearly both the 'maximums' and 'minimums' to allow an outline planning application to be assessed by the EIA. As discussed at previous meetings, the Applicant needs to ensure that the 'worst case' parameter is assessed in the EIA in relation to all topics and receptors and this may not be as simple as assessing all the proposed tallest, or all the proposed shortest buildings, but instead may be a complex mix of scenarios. It is also necessary to acknowledge that the worst case scenario may be different for different environmental disciplines. The ES will need to clearly demonstrate how the worst case scenario has been determined, and assessed for each individual environmental topic.

Apart from noting the need for minimum and maximum parameter heights for all development zones, the Applicant should be aware that the Council as Local Planning Authority has significant concerns that the proposed maximum parameter heights in some building's cases are simply too much, and would suggest that these are reduced as an amendment.

Phasing

The phasing of the proposed development (i.e. duration of demolition, construction and operation works) has been set out in the EIA Scoping Report. LBRuT expects the phasing to be adequately assessed in the EIA, and a detailed explanation of the proposed project timescales included in the ES.

The ES needs to include a clear phasing plan identifying the land parcels to which each development zone relates and the timelines for demolition, construction and operation. A further plan providing similar information for overall site infrastructure such as access routes, energy centre is also required.

Receptors

Potential Sensitive receptors should be expanded to include:

- All users of the College playing pitch to the south of the A316 and the College owned Craneford Way Playfields
- All users of adjacent sites including Nuffield Health Club, Twickenham Stoop and the Council Depot

With regard to the identified receptor 'Local community workforce', this should include Haymarket employees relocated to the proposed Tech-Hub from the Teddington Studios site.

As a more general point, The EIA appears to focus primarily on 'external' receptors outside of the site while the phased construction may require that construction and operational effects on sensitive on-site receptors, including future pupils, workers, residents and the wider community, as well as microclimate effects on proposed streets and other publicly accessible open spaces will need to be considered in the EIA.

Time Slices

It is noted in 2.4.4 that the Applicant intends to undertake a number of 'time slices' assessments throughout the project lifespan, which would enable various worst-case scenarios (with regards to both on and off-site receptors) to be assessed. This is welcomed however assessment of an 'operation' scenario should also include a time slice when all mitigation measures will have achieved full effect which typically tends to be 15 years after opening. The operation year allows for the assessment of the effects from the operation of the development - although it may not be necessary for all disciplines. The operation assessment year allows time for mitigation to establish itself e.g. screen planting to mature and become increasingly effective. A final significance of effects assessment should hence be added against a later future baseline year than 2022.

Approach to Cumulative Effects Assessment

There may be significant cumulative environmental effects resulting from the Development acting in combination with 'committed schemes' on nearby land, including the MOL south of the River Crane. The applicant must identify and assess the significance of any likely significant cumulative environmental effects in its EIA. The ES must include a description of those cumulative effects.

There is no legal definition of what qualifies as a 'committed scheme' in EIA. National guidance indicates that this includes "*existing or approved development*", ie schemes under construction and unimplemented schemes with planning permission. It is also considered best practice in EIA to include schemes where a submitted planning application is pending determination.

The EIA Regulations confirm that an ES is only required to include such information as the applicant can reasonably be required to compile, having regard in particular to current knowledge. There is no legal requirement for a cumulative assessment of future development of adjoining land *where there is no way of knowing what development was proposed or was reasonably foreseeable.*

On this basis, the Council's consideration of the adequacy of the applicant's EIA and ES, requires the ES assessment to include the potential cumulative impact of demolition and construction activities in connection with the redevelopments of the Richmond College development, former Royal Mail Sorting Office site including linked sites such as Twickenham Rough and Heatham House, and Twickenham Railway Station. Future development plans for adjacent sites accessed via Langhorne Drive, in particular a new north stand at Harlequins FC and Council Depot should also be considered. As regards employment re-provision and affordable housing, consideration of the approved development for Teddington Studios needs to be taken into account.

Alternatives Assessment

The EIA process provides an opportunity to consider alternative development options, as well as their respective environmental, social and economic implications, before a final design freeze is fixed. To accord with EIA regulations and statutory guidance, the ES should provide an outline of the main alternatives studied by the Applicant and design team with an indication of the reasons for the choices made, taking into account environmental effects. These alternatives will include:

- 'Do nothing scenario' – the consequences of no development taking place
- 'Alternative designs' – the ES should summarise the evolution to the final design proposal, the modifications which have taken place to date and the environmental considerations which have led to those modifications. A summary of the main alternatives considered, such as alternative mixes of use; site layouts, entrance points to buildings, floor heights and bulking; and materials used need to be presented, together with a justification for the final design

One of the alternatives should give consideration to including the wider Harlequins site to the west of the access road within a larger development site.

Policy

The planning policy context for the site reviewed in Section 4 should include reference to the Site Allocation Proposals for adjoining sites as well as the Redevelopment Site

- TW 8 Harlequins Rugby, Langhorn Way, Twickenham
Continued use as a sports ground with associated facilities including new north stand, indoor leisure, hotel or business uses
- TW 9 Central Depot, Langhorn Way, Twickenham
Council Depot facilities and continued waste management. Use of part of the site for, sports hall/leisure or other ancillary education facilities or limited residential, including affordable units or small business units
- West London Waste Plan

Format and Presentation

The Environmental Statement (ES) should be able to be read as a standalone document with no significant reliance on external documents. Large ESs can be split into volumes for ease of use but the relationship of the document to each other should be clear to the reader.

The ES should set out how 'significant' effects in the context of the EIA Regulations are determined as part of the EIA, and described in the ES. It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification.

SECTION 4. REVIEW OF POTENTIAL ENVIRONMENTAL EFFECTS BY TOPIC

This section summarises the review of the proposed approach to assessment of each EIA topic.

Review of Section 5. Transport

The project site is located alongside the A316 Chertsey Road which acts as an important transport link into and from London and locally to Twickenham Town Centre, the RFU Stadium, Twickenham Stoop (Harlequins RFC) and the current Richmond Tertiary College. Twickenham Stoop has recently expanded to a 14500 stadium.

A new unlit pedestrian and cycle link is due to be formed between the College site and Twickenham Rail Station as part of the redevelopment of the former Twickenham Sorting Office now under construction.

Access to the project site will be clearly curtailed on Harlequins and RFU match/event days when crowd/car congestion occurs along A316, Langhorne Drive and Whitton Road. The Transport Assessment needs to fully consider the proposed development's impacts for all users of the local footpaths (including the proposed footpath across Twickenham Rough) and highway conditions on both match/event days and normal days. A full explanation of the impacts during demolition, construction and operation of the proposed development need to be provided through the EIA.

Table 6.1 highlights the impacts of the proposed development to be assessed in the E.S. This should be expanded to include the following issues in relation to transport:

- Effects on local pedestrians, buses, trains, cyclists, cars and other vehicles (to include Depot service vehicles) from demolition, pre and post-construction works
- Effects on traffic flow and the local road network including any proposed modifications to the adjacent highway layout/access points from Langhorne Drive or elsewhere around the completed development including Craneford Way entrance (barrier controlled)
- Effects on walking and cycling accessibility through the Proposed Development area and on the public highway in the adjacent area and towards Twickenham town centre and rail station. Improvements to the pedestrian environment through and within the site are expected from the redevelopment of the site including a new footbridge from the southern part of the Craneford Way playing field (the footbridge design should provide for cycle users). Clarity is still needed on this aspect of the proposal and if proposed an assessment of any related impacts should be included in the relevant chapter of the ES e.g. ecological impacts on River Crane

- Effects from increased use of footpath to be created across Twickenham Rough by pupils, workers and residents at the new development.
- Measures such as electric vehicle charging points and car clubs should be considered for the development. A travel plan will also be required for each use.

The above effects need to be considered on match days at the local rugby stadia as well as normal days. The Council encourages early discussions with the Metropolitan Police and Transport for London to identify concerns regarding pedestrian movement and crowd control (including pedestrian safety and security) on Whitton Road, the A316 and other streets leading to the RFU/Harlequins Stadium on match days during the demolition and construction stages of the project.

Vehicle access and egress from the 'residential' element of the scheme on event days at RFU needs full consideration.

Access of service/maintenance vehicles to any new open space(private, semi-private or public) provision, childrens play facilities, new sports facilities, footbridge or existing riverbank affected by development on the Craneford Way playing fields will need assessment.

Review of Section 6. Noise and Vibration

One of the Council's key concerns is the potential for increases in background noise levels and vibration during demolition, construction and post development for surrounding residents in Craneford Way and Egerton Road. This would not only result from the processes involved in developing the area but also from the additional residents and pupils in the area. The use of a 2014 baseline noise survey is acceptable to the Council but this must be continually updated. This will allow the continual assessment of the impact of the development on existing residents

Noise impacts to residents from the more intensive use of the Craneford Way Playing Field should also be assessed and mitigation proposed if necessary including the consideration of improved soundproofing to affected properties from the outset.

To assist in good management of construction noise, vibration, dust and other emissions, a construction method statement will need to be developed. Guidance on control measures for dust and other emissions is given in 'The Control of dust and emissions from construction and demolition: Best Practice Guidelines', Greater London Authority, November 2006. A low vibration method of piling must be employed with visual alarms set at vibration levels detailed with the new BS5288 guidance. If the piling is due to be carried out for some time, the amount of hours per day may be restricted. The E.S needs to clarify piling methods and times.

Review of Section 7. Air Quality

7.1 Introduction and Key Issues

The site is within an Air Quality Management Area (AQMA), therefore any development should not further reduce air quality in the area and should safeguard the health of the current and potential community. The council therefore agrees that air quality should be classed as a key issue for consideration in the ES.

The listed issues for consideration are noted and should be expanded to include the consideration of impacts on air quality from the proposed Energy Centre/CHP provision. It should be noted that biomass boilers are generally not encouraged in AQMAs

The potential for the generation of dust (and therefore particulates) is noted but details of how these issues will be considered and the actions that will be taken in the event that the required level of air quality improvements cannot be achieved should be detailed in the ES. It is important to make clear at the earliest stage of the development that details provided should outline all measures (such as site management activities and the use of low-emission plant) that will be undertaken over the course of the development to reduce the environmental impacts of the development.

The Environmental Statement should provide details of the potential mitigation measures that will be required to safeguard the health and amenity of residents, students decanted to elsewhere on site and site workers in the area, pre-, post- and during the development.

Review of Section 8. Ground Conditions

The environmental impacts for assessment in this section are land contamination, and pollution prevention, including that linked to surface water run-off to the River Crane.

The approach to the investigation of contaminated land is considered to be appropriate utilising a desktop study and initial site tests (intrusive) to assess this element. It should be noted that the council will be assessing and approving all stages of the on-site investigation. In assessing potential impact and consideration of potential mitigation measures the Council would encourage the use of techniques that minimise environment impact.

While it is noted that ground investigations will be undertaken to investigate the site and an appropriate risk assessment will be carried out for land contamination. These documents would be required to be submitted to satisfy any contaminated land condition. The ES will need to give consideration to these issues, but it is likely that that alone would not be sufficient. There is a Land Contamination Supplementary Planning Guidance document available which provides advice on requirements for satisfying any contaminated land condition on a planning permission. It is recommended that this is referred to in the ES.

Para 7.4.8 should note that the Council's contact on this topic is the Scientific Officer, Simon Markoni, and not an Environmental Health Officer.

Review of Section 9. Waste

The proposed methodology and scope of assessment is considered satisfactory.

Review of Section 10. Water Resources and Flood Risk

The proposed methodology and scope of assessment is considered satisfactory.

Review of Section 11. Daylight and Sunlight

The proposed methodology and scope of assessment is considered satisfactory.

Review of Section 12. Ecology

The key environmental issues and opportunities at this site are:

- *Impact of development on habitat and species found in/beside the river Crane, Craneford Way Playing Fields and the trees lining A316*
- *Maximising environmental improvements to the River Crane and Duke of Northumberland River*

- *Ecological impacts and habitat improvement across the site*

Clarification is required as to whether floodlights, columns and surround fencing are involved in the proposed all-weather pitches within the school/college site or as part of the planned upgrade of the Craneford Way East Field.

It is noted that the front half of the project site (TfL land?) appears to have ecological or habitat potential for bat roosts within the line of trees, therefore the approach outlined in the scoping report is thought to be appropriate. Special consideration of the potential for improving the ecological value of the site, such as new habitat creation, green walls, living roofs, open space provision and landscaping should form part of the proposals.

Table 12.3 highlights the ecology effects from the proposed development. Increased recreational pressure on the River Crane and Duke of Northumberland River from the new residential population should be scoped in and Operation Impacts on Twickenham Junction Rough expanded to include noise as well as lighting. Noise impacts, both general and vehicular, on Bats during both construction and operation should not be scoped out.

ES should consider potential wider environmental impacts, especially cumulative impacts associated with the developments that are already under construction (i.e. Station, Sorting Office) as well as the nearby Harlequins and Depot sites.

Review of Section 13. Townscape and Visual Amenity

An identification of visual receptors and key views as shown on Fig 13.1, in particular the view from the Richmond Hill and nearby conservation areas, to be used for assessment has been largely agreed in consultation with London Borough of Richmond upon Thames.

Receptors are again agreed and comprise:

- Surrounding residents
- Users of local facilities including Twickenham Stoop and Nuffield Health
- Users of Craneford Way Playing fields (East and West) and other public open spaces
- People using public rights of way, alleyways, footbridges, cycle routes
- Pedestrians generally
- Passing traffic
- Statutory designations – LBs, Protected Views
- Local designations – CAs, BTM, River Crane Corridor

Appropriate visualisations to demonstrate significant viewpoints/long distance views can be prepared using shaded wireline drawings if impact is limited to skyline and building profiles however the views from surrounding streets such as Chertsey Road, Egerton Road, Craneford Way, the Playing Fields and Marsh Farm Lane Alley and Langhorne Drive need full photo montages.

The Council's 'Taller Building' policy (DM DC 3) needs recognition as a maximum height of 25m as proposed for certain development zones will be categorised as taller than any of its surroundings and this policy's requirement for a comprehensive townscape appraisal will be needed to be addressed within this section of the Environment Statement. A skyline assessment is necessary.

Site topography and survey of levels of surrounding streets, river and other adjacent sites need to form part of the baseline study of townscape/landscape character and visual quality of the site/surroundings. Otherwise, the scope of the visual and townscape assessment proposed in the report appears to be largely satisfactory and it is noted that the methodology is to conform to the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) adapted for townscape analysis.

The changing levels across the site and in relation to the River Crane, the neighbouring alley and Harlequins site to the west and other neighbouring buildings need to be highlighted. with the aid of illustrative material while details of previous site usage need further explanation.

Review of Section 14. Cultural Heritage

The site is noted as falling within an 'Archaeological Priority Zone' as defined by the London Borough of Richmond.

The proposed methodology and scope of assessment is considered satisfactory.

Review of Section 15. Socio-economics

Socio-economic effects should be considered a primary issue due to the nature of the proposed college, education and office development and the scale of the residential development proposed. It will be important that sufficient education, health care, playground and other community facilities/amenities are provided to serve the new residential population and to replace any facilities lost to existing residents and the local community.

Para 15.4 highlights the socio economic effects from the proposed development as a whole which will be assessed in the E.S. These impacts should also be broken down into the Phased Development Zones. In this regard, it is considered that the Community Infrastructure heading would benefit from being expanded to specifically make reference to

- Impact on child yield and education provision resulting from residential development
- Impact on education provision resulting from college/education development
- Impact on health care resulting from residential development
- Impact on playing fields and access to sporting facilities resulting from college development

Otherwise, the scope of the EIA and the full socio-economic assessment outlined is considered to be largely appropriate for this project. Particular attention should be paid to the potential individual and cumulative impacts on local services and amenities, such as the provision of, and public access to, community facilities within and outside of the development including local playgrounds, sports facilities, playing fields, school places, healthcare and allotments as these issues have been raised as of particular concern to borough residents. The quality, quantity and availability of the on-site facilities to the community (such as spas, theatres, sports pitches etc) needs to be clearly explained as part of the assessment, including broad terms and conditions of use, to enable the local planning authority to understand the actual contribution and benefit the new development will deliver to the local community.

The reference to local labour market shall include Haymarket staff in Teddington affected by the proposed Tech Hub.

The use of local employment agreements and skills plans are encouraged by the Council and impacts assessed if measure to be incorporated as part of the future submission.

The assessment of the requirement for housing in the area should include affordable housing and open market housing needs and to what extent this development contributes to meeting both. This section will also need to take account of cumulative development impacts linked to the Teddington Studio site as well as those at Twickenham Railway Station and the Former Sorting Office Site.

Finally, an assessment to include economic and community consequences of development (during and post-construction) for the operator and users of Harlequins Stadium and Nuffield Health Centre is a clear requirement as well as Twickenham Town Centre and the RFU.

SECTION 5. ASSESSMENTS SCOPED OUT OF THE EIA

While the Scoping Report does not specifically set out topics which the Applicant is proposing to scope out of the assessment, issues omitted from the Scoping Report and requiring consideration at the scoping stage include:

- Impacts on Sustainability/Climate Change;
- Health and Wellbeing;
- Telecommunications;
- Utilities;
- Micro-climate and
- Alternatives and Design Evolution

Comments on these topic areas are discussed below.

Sustainability

It is accepted that Climate Change and Sustainability can be scoped out of the EIA. It is understood that the proposed OPA will be supported by a number of standalone documents addressing energy and environmental sustainability issues including the Council's Sustainable Construction Checklist.

Health and Well-being

In the absence of a scoping response from NHS: Richmond requiring that the EIA process includes a specific assessment of health and wellbeing, it is considered suitable for health and wellbeing issues to be addressed through the Socio-Economic and other relevant topic chapters, as well as within various other documents and assessments submitted in support of the OPA (to which the ES should refer as appropriate).

Telecommunications

Analogue television broadcast has now been phased out and replaced by digital television, which is largely unaffected by atmospheric conditions. Given the switch to digital television broadcast, the Proposed Development would be unlikely to give rise to significant effects on digital television. In addition, EIA best practice is increasingly recognising that telecommunication issues do not raise environmental considerations which need to be addressed as part of the EIA process. Given this, it is considered that telecommunications can be scoped out of the EIA.

Utilities

The Council encourages pre-application discussions with relevant statutory undertakers to ensure that infrastructure is adequate.

Comments received from Thames Water as part of the EIA consultation exercise have identified the following matters as needing assessment as part of the EIA process

- The development's demand for water supply and network infrastructure both on and off site and can it be met
- The development's demand for Sewage Treatment and network infrastructure both on and off site and can it be met

If no significant effects are anticipated after discussions with the relevant electricity, gas and telecommunications infrastructure providers, these matters need not be included as part of E.S and can be scoped out. Instead, a Utilities Statement should be prepared and submitted as a stand-alone document accompanying the OPA.

If utility demands from the Proposed Development are considered to affect the existing networks, the impact, connection points and any capacity upgrades will need to be determined in collaboration with the Statutory Undertaker. A Utility chapter will need to be included within the EIA.

Micro-climate

An initial assessment of the microclimate implications has not yet been carried out but detailed assessment of daylight and sunlight, overshadowing will be contained in the ES. This needs to be extended to include light pollution, solar glare and wind microclimate.

Alternatives and Design Evolution

Comments made in regard to 3.5 apply

Other Matters

It is considered that the assessment would benefit from providing details of the proposed programme together with specific demolition and construction activities and methods. The Council would strongly recommend a stand alone chapter describing the likely content of the Phased Demolition and Construction Method Statement (DCMS) to be provided as part of the ES detailing the specific mitigation measures to be followed to reduce nuisance impacts from:

- Construction traffic
- Changes to access and the public rights of way
- Noise and vibration
- Utilities diversion
- Dust generation
- Soil removal
- Waste generation
- Lighting
- Surface and Foul Water

SECTION 6. CONCLUSIONS

The EIA Scoping Report (Project No CC747 Version 2.0) sets out the proposed scope of the EIA to accompany the proposed outline planning application for the Richmond upon Thames College Site.

This EIA Scoping Opinion, generated by LBRuT includes the Council's recommended amendments to this scope.

The Scoping Report covers the majority of the topics that the Council would require to be included within an Environmental Statement (ES) for the Proposed Development with the exception of 'Alternatives and Design Evolution' (para 3.5 noted), 'Micro-climate' and 'Utilities' (dependent upon further Statutory Undertaker responses) which require a specific chapter with that title. Issues needing to be more fully addressed have also been identified within each topic area and specific comments are detailed above. These are grouped by topic.

An indication of any difficulties encountered while preparing the information should be given.

Information in the ES shall be included in a non-technical summary in compliance with Regulations.

It should be noted that the redevelopment of the college site will be subject of intense scrutiny from the Council, residents and businesses in Twickenham. The preparation of the EIA is a key component in ensuring the sustainable development of the site and the best outcomes for the Proposed Development. In accordance with best practice it is expected that the EIA will be an extensive study of the relevant issues specific to this site. The specific environmental impacts that have been identified as likely to arise from this development should dictate the form and scope of the EIA and OPA together with the issues that have arisen through consultation.

Date of Opinion: 13/02/15

Jon Freer

Assistant Director of Environment

On behalf of the Council of the London Borough of Richmond upon Thames

APPENDIX A

Environment Agency
Greater London Authority
Transport for London
Natural England
English Heritage (archaeology)
English Heritage (built heritage)
Sport England
Thames Water
Network Rail
Friends of the River Crane
Heatham Alliance
Courtway Residents
Dene Estate Residents Association
Crime Prevention Officer
Metropolitan Police
NHS Richmond
South West Trains
Twickenham Town Centre Manager and Board
RFU
Harlequin's RFC
Heatham Residents Association
Friends of Heatham House
SWLEN/Richmond BioDiversity Partnership

APPENDIX B

Environment Agency (EA)

Following a review of the scoping report submitted, we consider the key environmental issues and opportunities at this site that need to be addressed within the EIA are as follows:

- Sustainable design and construction
- Flood Risk and Surface water management
- Potential for enhancing the River Crane corridor

We have produced advice with Natural England and the Forestry Commission on how new development can help improve the environment which can be viewed at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Detailed Comments

Section 8 - Ground Conditions

The site overlies the Kempton Park gravels, a secondary aquifer, any pathways for contamination must be strictly controlled to avoid pollution of the secondary aquifer and any baseflow feed to the River Crane from any historic contamination identified on the site from previous uses/facilities.

National Planning Policy Framework (NPPF) and planning practice guidance requires that all risks from contamination are identified so that appropriate action can be taken. Therefore, in completing any site investigations and risk assessments the applicant should assess the risk to groundwater and surface waters from contamination which may be present and where necessary carry out appropriate remediation. It is noted that this is the intention outlined in the scoping report submitted.

The EA response has considered issues relating to controlled waters. The evaluation of any risks to human health arising from the site should be discussed with the Environmental Health Department.

The EA recommends that the applicant carries out the following best practice for the assessment and remediation of contaminated sites:

- Applies the risk-based framework set out in the Model Procedures for the Management of Land Contamination (CLR 11) and follow the guidance in that document so that the best decision are made for the site
- Refers to the Environment Agency guidance on requirements for land contamination reports.

Environmental Permits

The development may require an Environmental Permit for certain activities. The Environmental Permitting Regulations (England and Wales) 2010, cover water discharge activities, groundwater activities, radioactive substances, waste, mining waste and installations.

For further information on permitting please see:

<https://www.gov.uk/environmental-permit-how-to-apply/overview>

For guidance on developments requiring planning permission and an environmental permit please see:

<http://www.environment-agency.gov.uk/business/regulation/139378.aspx>

It is recommended that pollution prevention measures are incorporated to protect ground and surface water. The EA has produced a range of guidance notes giving advice on statutory responsibilities and good environmental practice. This includes Pollution Prevention Guidance Notes (PPG's) for the specific activities listed below. Pollution prevention guidance can be viewed at:

<http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>

Section 9 – Waste

The Report takes into account all of the waste and possibly polluting activities we would expect. It is suggested that to aid the development through its various phases, Tier 3 for plant or euro 6 engined vehicles are used to offset NOX and PM10 contributions in the Air Quality Management Area. Also suggested that hazardous waste quarantine storage is provided at the site during construction, for unexpected possible contaminated wastes.

Section 10 - Water resources and flood risk

As the site is over 1 hectare with some areas within high flood zones, the production of a Flood Risk assessment (FRA) as stated in the scoping report is supported. The FRA produced for developments of this nature will have to demonstrate that the development will not be at an unacceptable risk of flooding, and will not increase the risk of flooding elsewhere.

Drainage strategy

The applicant should aim to achieve a Greenfield surface water runoff rate. If this is not possible justification should be provided and it must be no greater than 3 times the Greenfield rate or must achieve a minimum 50% reduction from the existing runoff rate, in line with the London Plan's Sustainable Design and Construction Supplementary Planning Guidance.

Sustainable drainage systems (SuDS) must be used on site to provide storage for surface water generated on site, in line with the National Planning Policy Framework paragraph 103, which requires development to give priority to the use of SuDS. Any storage volume required to attenuate surface water run-off from the critical 1 in 100 year storm event, with an appropriate allowance for climate change, must be provided on site. Rainwater harvesting and green roofs should also be included. Sustainable drainage schemes can also be a valuable asset for educational venues and provide multiple benefits. Potential SuDS schemes could also link with enhancements to the River Crane.

For more information on SuDS see here: <http://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>

Flood Risk Assessment (FRA)

The FRA should address all potential sources of flooding from the site. Wherever possible, all proposed buildings should lie outside the fluvial 1 in 100 year storm event, plus allowance for climate change flood extent. If this is not possible, flood plain compensation will be required.

Where required, the applicant must demonstrate a safe route of access and egress for any building located near or in the fluvial 1 in 100 chance in any year, plus allowance for climate change flood extent.

Section 12 – Ecology

Reference in the scoping report to potential for enhancements to the river Crane corridor in this area is welcomed. Consultation with the Crane Valley Partnership and local groups such as the Friends of the River Crane (Force) is welcomed.

This is an excellent opportunity for partnership working and funding to improve the river corridor in this area. This is supported in the Richmond Core Strategy policy CP12 River Crane Corridor:

12.A The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.” [London Borough of Richmond upon Thames Core Strategy, April 2009].

Development close to rivers should also help deliver the objectives of the Water Framework Directive to improve riverside environments like this site. This includes apply in mitigation measures (improvements to the river) identified in the Thames River Basin Management Plan (RBMP) designed to get the Crane water body to good ecological potential by 2027.

Any planned development of the site should consider both the aspirations of the Lower Crane Strategy as well as objectives of River Basin Management Plan (RBMP) and the possible implications the development may have on their objectives. In addition to the RBMP, The Lower Crane Strategy remains an aspiration document aiming to return the lower Crane at five locations below Mereway weir to a more natural looking and functioning river. This strategy includes the site of planned development.

For more information please see the following:

The Water Framework Directive

<http://www.environment-agency.gov.uk/research/planning/33106.aspx>

Crane Valley catchment plan

<http://cranevalley.org.uk/catchment/catchment-plan/>

Additionally the Crane Valley Planning Guidelines, April 2005, specify the following as “the main impacts to be considered” in assessing the environmental impact of redevelopment proposals:

- Impact on the River Crane, including surface water runoff, flooding and drainage
- Impact on community facilities and public services, in particular school places and open space and sporting facilities
- Impact on biodiversity
- Impact on the transport network, air quality and noise
- Visual impact, especially of larger buildings
- Impact of construction including use of materials and resources used
- Impact on and protection and enhancement of the West London Green Chain

Greater London Authority (GLA)

No reply

Transport for London (TfL)

The site is located on the A316 Chertsey Road which forms part of the 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. The application highlights that the A316 forms part of the Strategic Road Network, it is indeed part of the TLRN and should be clarified as such.

- TfL would expect the application to be supported by a robust Transport Assessment (TA) report to be provided as part of the planning submission in accordance with TfL's 'Transport Assessment Best Practice Guidance' <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>. 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.
- In order to inform the content of the EIA and TA, TfL strongly recommends that the applicant enters into as formal TfL pre-planning application process. This will assist in looking at the holistic transport impacts and advising of surrounding projects and programmes which may have bearing on the application. Further details are available at <http://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessment-introduction/tfl-pre-application-service?intcmp=9724>.
- Items for further discussion including with the council include the connectivity across the A316, the links to Twickenham and funding for improvements in the town centre and cycling improvements. Some of this will be captured through discussions on the CIL (see below) whilst others are directly related to the impact of the development.
- The EIA and TA must include a multi-modal impact assessment including baseline and future car, bus, rail, pedestrian and cycle trips and mode share. This should look to compare the existing baseline situation with the future impact on a finalised scheme. In addition a refreshed modelling assessment of the surrounding highway network is expected. The commitment to this in the EIA scoping is supported.
- The implications of construction traffic on the Transport for London Road Network (TLRN) will need to be agreed with TfL, the EIA will need to assess the worst case peak hour impact and include any peaks and troughs throughout the life of the development. The impact of construction vehicles on buses, pedestrians and cyclists must also be considered. A Construction Logistics Plan will be required to supplement the EIA. This should be in line with TfL's latest guidance and should include robust safety measures to protect vulnerable road users and pedestrians from the construction process.
- Parking levels should be kept to the minimum required to support the development, a number of circumstances should be taken into consideration, such as traffic conditions, Public Transport Accessibility, quality of walking and cycling routes and air quality and environmental considerations. Electric vehicle charging points and a car club will also be required.

- Cycle parking should be provided across the site in line with the latest London Plan guidance. It should be noted that changes to the cycle parking standards have occurred through the Further Alterations to the London Plan. These alterations are due at inquiry in September and may be adopted thereafter. As such the applicant is advised to have regard to the latest position on these standards.
- A Travel Plan will be required for each use to be delivered in line with TfL's latest guidance. Separate Delivery and Servicing plans (DSP) will be required for each use, this should be referred to in the EIA scoping report
- Any mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement. Less significant issues can be dealt with by use of planning conditions, in some cases TfL may request that it is consulted prior to discharge of a condition. Mayoral CIL will be applicable for the scheme and discussion should also occur around the use of the LB Richmond CIL which is due to come into effect from the 1st November 2014.
- The scheme should be assessed in terms of the phasing, the existing information is welcomed and should be updated in the assessment. Regard should be had to surrounding construction projects, highway improvement schemes and an assessment of the s278 process.

Natural England

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha. Therefore it is not a priority for Natural England to advise on the detail of this EIA.

However, it is expected that the final Environmental Statement (ES) will include all the necessary information as outlined in Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011. A full copy of Natural England's response is attached.

English Heritage (EH)

Having reviewed the Cascade report and in particular Section 14: Cultural Heritage, it is felt that it does scope the potential of archaeological heritage assets and the impacts of the development and considers what mitigation may be required through the design/construction techniques.

It is recommended that a full Archaeological Desk Based Assessment (DBA) should be undertaken and the results presented in the ES and this is welcomed. It is essential that the ES should have a full DBA submitted as part of the consideration of this proposal. The archaeology assessment should be focused on buried heritage assets and will consider the impact of the proposed development on the existing archaeological resource across the site and, therefore, quantify the perceived impact of the existing and proposed buildings (and other impacts) on these assets.

Do not agree with sections 14.6.1 to 14.6.3 of the Scoping Report as EH cannot at this stage determine which mitigation strategy will be recommended. The DBA will need to be seen and its findings reviewed. Do concur with Section 14.7 that

consultation with the Borough and GLAAS (as your archaeological advisers) during the compilation of the DBA will allow a staged approach to mitigation to be scoped out more fully.

The development covers a large area in a locality that is of recognised archaeological sensitivity and which has not been well served by previous archaeological investigations. It is anticipated that a programme of archaeological evaluation will most probably be appropriate here and dependent upon the results of the DBA this may be necessary predetermination of a planning decision. This would be in order to fully characterise the heritage asset and to determine the significance and value of the potential archaeological resource in order to make an informed planning decision.

Other Consultees

Sport England

If existing sports facilities are contained within the site or are proposed as part of the development, the feasibility study should address how the proposed development accords with Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'. A copy of which can be found at:

http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf

The feasibility study should also address the impacts of the proposed development on playing field provision and address the need arising as a result of the development.

Sport England understands that a Playing Pitch Strategy for Richmond is currently being undertaken and the proposals should therefore be informed by the recommendations of this strategy.

In terms of indoor built sports provision, Sport England holds a significant level of supply and demand data which can be used to identify the correct mix of indoor sports provision required. Sport England would be happy to provide this data and discuss further sporting facility needs with you separately.

Any new facilities should be built in accordance with Sport England's technical guidance notes, copies of which can be found at:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Sport England reserves the right to object to any subsequent planning application if they do not consider that it accords with their playing fields policy.

Thames Water

It is unclear at this stage what the net increase in demand on the infrastructure will be as a result of the proposed development. Thames Water is concerned that the network in this area may be unable to support the demand anticipated from this development. The developer needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

It is therefore recommended that any EIA report should be expanded to consider the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met
- There are sewers and water mains located within the development site area. The proposed EIA should include information on how these assets will be protected during construction, and also as a result of any vehicle movement within and accessing the site.

Network Rail

As stated in the report; *'access to the overground rail network is available approximately 600m to the east at Twickenham Rail Station'*. As a result Network Rail will be interested in reviewing the proposals future Transport Assessments which will include information on potential implications on the public transport network during all development phases.

Friends of the River Crane Environment (FORCE)

The objectives of FORCE is to promote for the benefit of the public, and to advance the education of the public in, the conservation, protection and improvement of the physical and natural environment of the River Crane.

In the context of these Council planning documents, FORCE is of the opinion that the Environmental Impact Assessment Scoping Report of July 2014 has the following serious omissions:

- Omission of a master-plan approach which sets the environmental impacts of the Richmond Education and Enterprise Campus ("REEC") development within the wider context of the lower Crane valley
- Omission of consideration of impacts on and enhancements to the West London Green Chain
- Omission of consideration of the impacts of the REEC development on open-space provision and the deprivation index in the lower Crane valley
- Omission of consideration of impacts on and enhancements to the Duke of Northumberland's River.

FORCE advise that they will review the final EIA to see if and how these omissions are addressed. FORCE also expects the final EIA to include presentation of a feasible set of environmental enhancements for the Crane Valley, with an evaluation and recommendation for a phased programme of enhancements to be brought forward for public consultation.

A full copy of FORCE's response is attached.

Heatham Alliance

Heatham Alliance is a community network founded in 2013. Its membership, drawn from the vicinity of Richmond College and neighbouring areas, is currently approaching 300 strong.

A response has been submitted by Heatham Alliance in response to the consultation. The aims of Heatham Alliance is to minimise the impact of the proposed redevelopment on the community, to maintain and encourage free public access to

the sports and recreation fields in Craneford Way and to improve the safety of pupils, students and the public along routes to and from the proposed campus.

Constraints on Responding to the Consultation

Due to the short notice and the timing of this consultation, Heatham Alliance's response is confined to the headline contents of the EIA scope relating to selected aspects relevant to Heatham Alliance members and the local community in general. The response focuses on key development proposals and operational issues; generally the demolition and construction phases are not covered at this time.

Heatham Alliance have advised that on initial reading of a selection of pages, it is evident that certain important aspects appeared not to be included in the report, such as playgrounds on the campus and the sports provision on Craneford Way East Field. A version of this 120-page report was requested in Word format to provide efficient and appropriate search functions but this was refused at the end of August. There may be further queries and responses in relation to this report that will arise in the coming weeks and will be addressed by Heatham Alliance in due course or in the planning process.

General Comments

The response focuses on factual information given in this report. Parts of the report are weakened by the very sparse information it contains about the proposed development, so the impacts on the community and the environment / ecology are not fully identified in this final version of the scope report.

For example, it is not stated whether floodlights, columns and surround fencing are involved in the proposed all-weather pitches. The report does not consider where these might be situated and whether other fencing may be included in the planned upgrade of the Craneford Way East Field.

A full copy of Heatham Alliance's response is attached.

Courtway Residents

In section 15 the socio-economic impact is covered. Pleased to see mention of affordable housing provision and the role the development will play in meeting local housing need.

It is important to be precise on this point and for the EIA to understand and report on tenure and affordability as part of this. For example, what is the impact of providing different types of affordable housing – houses/flats and their tenure - social rent, affordable rent, low cost home ownership, sub market rent?

One of the big potential challenges will be making affordable housing genuinely affordable. So the EIA should give specific consideration to what incomes would be required by purchasers of the affordable home ownership homes and how these can be brought within the reach of young people on average London incomes. To be more precise, consideration should be given to basing this assessment on average London incomes not average Richmond incomes which are amongst the highest in UK and so not a useful comparator for affordability.

Dene Estate Residents Association (DERA)

The Dene Estate Residents Association (DERA) represents some of the college neighbours on the A316. Support in general improved education facilities and housing on the college site. Local residents concerns about the impact on their environment must be taken into consideration.

Residents on the Dene Estate are very concerned about the additional traffic movements on the already busy A316. Our only vehicular access and exit is via Rosebine Avenue. Pedestrians risk their lives in trying to cross the road through a small gap in the centre railings or have to walk about a mile via the subway or the footbridge by Langhorne Drive to the nearest bus/ train link.

If there is a need to alter the Langhorne Drive junction the area to the west at Rosebine Avenue should be considered where a safe surface crossing over the A316 could also be incorporated something we have been seeking for many years.

The use of a regular public bus service through the college site to reduce car use. This service could be continued through the Dene Estate, Meadway area, and onwards as a circular route to link us with vital services in the area, to avoid using our cars and satisfying the "green objective".

The environment around The Duke Of Northumberland's River should be protected and enhanced with careful planting and repair of the river banks. This estate should also be protected from any development of the Council Depot, we are after all a Conservation Area.

Remaining Consultees

The applicant is advised that responses were not received from the following:

- English Heritage (built heritage)
- Crime Prevention Officer
- Metropolitan Police
- NHS Richmond
- South West Trains
- Twickenham Town Centre Manager and Board
- RFU
- Harlequin's RFC
- Heatham Residents Association
- Friends of Heatham House
- SWLEN/Richmond BioDiversity Partnership
- Richmond upon Thames – Sport, Parks and Youth Services

London Borough of Richmond upon Thames

Policy

Section; para	Planning Policy comments
Table 2.2	The provisional list of cumulative schemes has not been checked by the Policy Team. It should be clarified if it will include assessing all housing developments, or just large sites (10 units and above)
Section 4; Saved UDP Proposal Site T29	<p>The saved UDP proposal site includes the "Redevelopment to provide a new college and enabling residential development on the site of the existing college and playing field south of the A316. Retention and upgrading of Craneford Way east playing field."</p> <p>In more detail, this proposal requires the rationalisation, expansion and improvements to the College (either on the site of the current buildings and/or on the College playing field to the immediate south of the A316) with enabling development and associated open space. If development</p>

	<p>takes place on the College playing field south of the A316 the College's Craneford Way playing field to be upgraded. All College facilities to have increased public use reflecting the Council's dual use policy. Access to the trunk and local road network will be addressed at the development control stage.</p>
Section 4; Site Allocations Plan (SA Plan)	<p>The Site Allocations Plan is currently at pre-publication stage; publication is anticipated to take place later in 2014, with submission to Secretary of State in spring 2015 and adoption in autumn 2015.</p> <p>The draft proposal for this site includes the “Redevelopment to provide a new college, offices, secondary school and special school, residential including affordable and open space”. Note that the SA Plan proposal site does not include the playing fields to the south.</p> <p>In more detail, the SA proposal requires the provision of a new College, Secondary School, Special School, Offices and residential uses, within a comprehensive scheme. A new College building and headquarter offices fronting the A316 on the existing playing fields. New open space, including for educational establishments, private residential enabling development to fund redevelopment of College to the south of the site and affordable housing (see proposal for Teddington Studios site). If development takes place on the College playing field south of the A316 the College’s Craneford Way playing field to be upgraded. All College and School facilities to have public use reflecting the Council's dual use policy. Access to the trunk and local road network will be addressed at the development control stage. Any vehicular access through Heatham Estate must take account of residential amenity.</p>
Community Infrastructure Levy (CIL) and Planning Obligations SPD	<p>The Council’s CIL Charging Schedule was approved by Cabinet in July 2014 for adoption on 1 November 2014: http://www.richmond.gov.uk/home/council/decision_making_council/calendar_of_meetings.htm?mgl=ieListDocuments.aspx&CId=163&MId=3407</p> <p>The Council has also approved a revised Planning Obligations SPD, which will come into effect on 1 November 2014 in conjunction with the Borough’s CIL.</p> <p>The development proposal will therefore be subject to the Borough’s CIL Charging Schedule and the revised Planning Obligations SPD (2014). The revised Planning Obligations SPD explains the Council’s policies and procedures for securing Section 106 developer contributions once the Borough’s CIL comes into effect, including what types of site-specific contributions / mitigation measures will be sought through the Section 106 process.</p>
Potential sensitive receptors	<p>Para 3.4 should also include users of the playing fields, such as sports clubs/teams etc.</p>
Waste	<p>The Submission version of the West London Waste Plan has been submitted to the Secretary of State for independent examination in public on 30 July 2014. This DPD will need to be taken into account when assessing the impacts of waste and producing the Waste Strategy.</p>
Water resources and flood risk	<p>As identified in the report, a Flood Risk Assessment will need to be submitted with any planning application for this site. This needs to be carried out in line with NPPF and NPPG policies and guidance on flood risk, the Council’s Core Strategy policy CP 3, Development Management Policies DM SD 6, DM SD 7 and DM SD 8, including the Council’s Strategic Flood Risk Assessment. As the site is over 1 hectare, a surface</p>

	<p>water drainage strategy will also be required.</p> <p>Environment Agency consent will be required for any works within 8 metres of the Duke of Northumberland River and/or River Crane. This consent is irrespective of planning permission.</p> <p>The development will also need to comply with policies DM SD 9; this sets out the minimum mandatory targets for water consumption to be achieved for the different types of developments.</p> <p>Foul sewerage in particular could potentially lead to significant impacts on- and off-site if there isn't sufficient capacity in the public sewerage network (e.g. overloading of infrastructure, foul water flooding etc). In line with policy DM SD 10, the applicant is required to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. The developer will be required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation from Thames Water Utilities.</p> <p>Under the Water Framework Directive (WFD), the River Crane (including Duke of Northumberland River) has been classified as having a "poor" ecological status. Potentially contaminative uses will need to be directed away from locations that are particularly sensitive in terms of groundwater and surface water receptors in order to protect the surface water courses and the groundwater quality. This development proposal should therefore contribute to the improvement of the rivers water quality where possible.</p>
Socio-economics	<p>Retail</p> <p>The socio-economic section of the report covers the employment aspects, including the net gain/loss of employment on site. It does not cover impact on town centre of proposals but there is no retail or other restaurant/café type uses proposed which might draw trade from the town centre and have negative effects. The proposals result in an intensification of uses on the site which arguably will have positive spin-offs to the town centre through spending from workers, employment, residential and educational uses. The impact of that expenditure is covered in para 15.5, which appears to cover all the aspects of the scheme.</p>
Socio-economics	<p>Housing</p> <p>The socio-economic section of the report covers housing, stating the assessment will consider impacts upon the provision of housing and how the proposed development will assist the local authority in meeting its objectively assessed need housing target, including affordable housing provision. This is considered satisfactory for the purpose of the EIA, however further comments are provided which may be helpful in considering the overall impact of new housing although could be addressed in other parts of the planning application.</p> <p>The residential element of the proposal will contribute to the Council's future housing (including affordable) delivery and the borough's housing target (although not mentioned in section 4 nor the socio-economic section) is as set out in the London Plan, with a higher target currently being proposed under the Further Alterations, subject to Examination in Public in September 2014.</p>

	<p>The size of the enabling residential element, up to 2.5 hectares, is a substantial element of the new development, and its impact may need to be assessed against the other benefits of the proposed uses and the viability case for the overall development.</p> <p>There may need to be further assessment with regard to the scale of affordable housing needs in the borough and local priorities, including issues of affordability, to assess the impact of any proposal in terms of the proportion, tenure and mix of affordable housing proposed.</p> <p>It could be pertinent to recognise further policy requirements for the residential element that will apply to ensure high quality, sustainable development that protects local character, and meets the Council's space standards and addresses particular aspects such as inclusive access. This will be relevant in assessing the impact of the proposal and the benefits of the proposed residential element for future occupiers.</p>
Socio-economics	<p>Employment / Offices</p> <p>It is noted that the proposals are broadly in accordance with the UDP Site Proposal - although including a wide range of educational provision, but that they differ from the emerging Site Allocations Plan in respect to the office provision.</p> <p>The approach of the EIA in considering both direct and indirect employment generation in the construction stage and the operation stage is endorsed. It will be important for these to be assessed in the context of the existing and historic employment levels at the College.</p> <p>The impact of the New Technical media Hub will need to be assessed in terms of direct employment and also its contribution to the educational offer on site and in providing space for start-ups and other spin-off benefits to the local economy.</p> <p>The transport issues arising are important it is therefore essential to establish potential journey to work areas as a basis for assessing potential means of travel.</p>
Socio-economics	<p>Sports playing fields</p> <p>The EIA will include a baseline assessment of the current provision of recreational facilities (including sport pitches and playing fields) within the local area, along with any deficiencies or surplus capacity in such provision.</p> <p>The Council has commissioned consultants to undertake a Sport, Open Space and Recreation Needs Assessment for the borough, which includes a Playing Pitch Strategy. The consultants are auditing the local provision during the summer/autumn 2014, whereby the supply and demand assessment will be carried out during the latter parts of November/early December. It is anticipated that the final assessment reports will be available end of January/early February 2015.</p> <p>The EIA has to fully consider the loss of and partial replacement of the playing field. The applicant should note that an artificial grass pitch may accommodate more intensive uses in comparison to a natural grass pitch; however, if it is smaller in size, it may not be able to accommodate those sports for which there is an identified demand. The EIA therefore</p>

	<p>needs to assess and compare the different pitches (existing and proposed), and analyse which benefits an “upgraded” (potentially artificial) pitch would bring in comparison to the detriment of the loss of the natural (large) pitch, taking account of supply and demand in the local area. By the same token, it cannot be assumed that an indoor facility (sports centre) may outweigh the loss of a playing field as it will depend on the demand for different sports in the area.</p> <p>The methodology for the EIA has to follow the guidance and methodology contained within the “Playing Fields Policy - A Sporting Future for the Playing Fields of England”: https://www.sportengland.org/media/121630/document-5-a-sporting-future-for-the-playing-fields-of-england-planning-policy-statement-.pdf</p> <p>Para 15.4 and Table 15.1 – this should include users of the playing fields, such as sports clubs/teams etc. In addition, an assumption has been made that the change in provision of sports facilities/playing fields on the site is likely to result in “additional/improved provision” – this may be incorrect and the EIA should objectively assess the likely impacts arising from the development, including both positive and negative impacts.</p> <p>For information, if the development proposal may result in an objection by Sport England due to a loss of a playing field, and if the land is owned either by a local authority or an educational institution has been using the playing field, then Circular 02/2009 requires the Council to notify the Secretary of State. Sport England should therefore also be consulted on this EIA Scoping report and involved in any future discussions.</p>
Socio-economics	<p>Play space</p> <p>The proposal includes enabling residential development of up to 2.5 hectares, which is likely to result in a significant demand for local play space provision. The EIA scoping report omits the assessment for play space provision. In line with Policy DM OS 7, all developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. The EIA will therefore need to provide an assessment of needs arising from the new development and follow the benchmark standards outlined in the Mayor’s SPG on Shaping neighbourhoods: Play and Information Recreation (September 2012).</p> <p>It is expected that the EIA will incorporate a child yield/occupancy and play space needs assessments (including with a breakdown for the different age groups). When assessing needs and play space requirements, consideration can be given to nearby existing play areas, but it should be noted that appropriate facilities would need to be in actual walking distance in line with the Mayor’s SPG, i.e. within 100m for under 5 year olds, within 400m for 5-11 year olds and 800m for 12+ age group.</p>
Socio-economics	<p>Open space</p> <p>Policy DM OS 6 requires larger developments to provide on-site public open space within the scheme, with the aim to strike a balance between private, semi-private and public open space provision. The EIA should also include an assessment of open space provision in the local area, in line with policy DM OS 6 (Public Open Space). This should be based on actual walking distances rather than as the crow flies. The methodology should follow the public open space categorisation as set out in the</p>

	London Plan (table 7.2).
Socio-economics	<p>Education</p> <p>The assessment of the contribution of educational facilities on local baseline assessment is endorsed. As mentioned further above, there is a need to assess the contribution of the Media Hub to educational objectives.</p> <p>As with employment it will be necessary to consider the catchment area from which students will be drawn in order to assess local travel implications.</p>
Other comments	<p>Note that sustainable construction and energy are not scoped in to the EIA. The applicant should therefore note the following:</p>
Sustainable construction and energy (including energy centre)	<p>Relevant local plan policies in relation to sustainable construction are Core Strategy Policy CP1 Sustainable Development (Code for Sustainable Homes Level 3, BREEAM “excellent” for all other developments), CP 2 Reducing Carbon Emissions as well as Development Management Policies DM SD 1 Sustainable Construction (this sets out the additional requirement for 35% reduction in carbon dioxide emissions beyond Part L 2013 of the Building Regulations), DM SD 2 Renewable Energy and Decentralised Energy Networks, DM SD 4 Adapting to Higher Temperatures and Need for Cooling, and DM SD 5 Living Roofs.</p> <p>It will be expected that the applicant submits the relevant Code for Sustainable Homes and BREEAM pre-assessments, as well as an Energy Statement and the Sustainable Construction Checklist as part of any forthcoming planning application; this does not need to be part of the EIA report.</p> <p>Also understand that an on-site energy centre is proposed to support the development. The applicant should note that a high level heat mapping study has been undertaken for the borough: http://www.richmond.gov.uk/heat_mapping_study.htm</p>

Housing

Noted that the scoping report confirms that the EIA will consider the Socio-Economic impacts and , ‘In terms of housing, the assessment will consider impacts upon the provision of housing and how the proposed development will assist the local authority in meeting its objectively assessed need housing target, including affordable housing provision. It will also provide commentary on how increased housing supply will impact on the existing market.’ No further comments to make at this stage.

Transport

5.4 Sensitive receptors: It is stated that parking standards will be assessed against the London Plan and Draft Richmond Development Plan which is incorrect, the plan is adopted.

5.5.2 Baseline Surveys: Would like surveys of Haymarket Staff, how they travel now to Teddington and how they will travel to Twickenham, times of staff arrival, movements during the day and staff departure profiles as part of any Transport Assessment. Servicing of Haymarket must also be addressed in the same way, current and proposed including size of vehicles that need access.

It is noted that in the appendices the plan of the site has the red line area around part of the A316, Langhorn Drive and parking in the Stoop, confirmation that this is correct.

A signalled junction at A316/Langhorn Drive is no longer proposed so any surveys undertaken will need to include this junction including queue lengths on Langhorn Drive during matches at the Stoop that could coincide with departure profile of Haymarket staff in particular. Particularly important as we have had a spate of complaints recently on the barrier at Craneford Way being abused.

Urban Design

Photo viewpoints should include Richmond Hill. An additional view from Twickenham Station/ Sorting Office area (London Road) would be welcomed as it might impact on the tree line.

In regards to photomontages; 'wireframes' would be satisfactory for more distant views.

Ecology

The green/blue chains as per policy CP12 have not been included within the key issues (page 73). As the Cranford Way field lies along the Crane and depending upon the amount and extent of development within that part of land the development could impact the river corridor. This needs to be considered.

Do not agree with page 75 para 3 regarding no further reptile surveys required. If the proposed development of Richmond College includes the public recreational field to the south west of the college (i.e. the field alongside the Council Depot with the play area in the corner), then a reptile survey must be completed as part of the ecological assessment of the scheme.

Trees

The Council's Arboriculturalist has advised that they would require any scheme to ensure the retention of the tree line adjacent to the A316. There are a number of mature trees, within the site that should wherever possible be retained. If removal of any mature trees is to be considered, adequate mitigation planting would be required.

In order to consider the application a BS5837:2012 tree survey, Arboricultural Impact Assessment and Tree Constraints Plan would be required. This will ensure the basic application to the assessed. Further detail would be required under condition, unless there are areas of conflict that need further explanation at the time of the application.

Depending on the scheme the Council would welcome replacement trees throughout the site as well as new planting at the front to increase the screening from the A316.

Environmental Health

Satisfied that the main areas regarding noise quality have been suitably outlined and the EIA will provide the information we require in order to make decisions on the potential impacts.

Air Quality

The Council have two relevant NO2 diffusion tubes – tube 31 on the A316 near the rugby roundabout and tube 59 on Whitton Road, opposite Heatham House. Results for both sites exceed the Air Quality Objective and therefore exceed EU/WHO guidelines.

The college site is set back from the road so levels at this site will be lower but the development is likely to result in permanently higher levels for residents in Whitton Road (construction traffic at the development stage and more access traffic once complete).

The development would worsen the air quality of a residential area where levels of NO₂ already exceed the Air Quality Objective. As such, the Council would seek appropriate mitigation and a contribution towards the long term monitoring.

A construction management scheme to protect the residents during the construction phase will need to be considered. The Council are part of the South London Air Quality Cluster group. Croydon has recently done a lot of work in relation to a large development in Croydon – ensuring HGV's come one at a time, so no queue/reduced pollution for residents; ensuring each vehicle delivers and removes materials in one trip, so reducing number of movements and sourcing materials locally wherever possible – all makes a difference. In this area, the “one way” residential roads are narrow, in poor condition and with speed humps – not good for large HGV's. We could consider allowing access at the end of Egerton Rd from the A316 for limited times, which would reduce congestion/pollution in the whole area.

In regards to energy for the development, it is now considered better for NO₂ reduction to avoid CHP wherever possible and press for more renewables in addition to ultra low NO_x boilers.

Contamination

The section on ground conditions (contaminated land) is deemed satisfactory.

The applicant when assessing cumulative impacts should take into consideration the following two sites which are outlined in the Site Allocations Plan which forms part of the Local Plan – Twickenham Stoop and Depot Site