



**London Borough of Richmond upon Thames**

**Local Plan**

# **Addendum Report (2)**

**Pre-Publication  
Site Allocations  
Development Plan Document**

**Sustainability Appraisal  
of new educational sites**

**July 2014**

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## NON-TECHNICAL SUMMARY

### 1 Introduction and purpose of this Addendum Report

The Council is currently preparing the Site Allocations Plan, which will set out the Council's proposals for land and buildings on significant sites within the borough, which are likely to be subject of development proposals during the next 15 years.

The Council has already undertaken public consultation from 1 October until 12 November 2013 on a previous version of the [Site Allocations Plan](#)<sup>1</sup>. A further pre-publication consultation was undertaken from 9 June until 21 July 2014 on new additional sites, for which a Sustainability Appraisal (SA) Addendum Report (June 2014) was produced.

This SA Addendum Report (2) is for the new educational sites to be included in the Plan. It should be read in conjunction with the previous SA reports (September 2013, and June 2014); it investigates the likely significant impacts of the new proposals on the borough and the wider area in terms of the contribution towards sustainability that might arise if the new proposals are implemented.

#### 1.1 The Purpose of the SA/SEA

The overall purpose of the SA (incorporating SEA) is to ensure that environmental, social and economic considerations have been integrated into the preparation of the SA Plan. The SA will:

- Ensure compliance with the SEA Directive, SEA Regulations and guidance on SEA/SA;
- Review the Local Plan's relationship with other sectoral plan's, and plans operating at a national, regional and more local level with regard to their policies and programmes;
- Establish the baseline environmental, social and economic characteristics of the area;
- Identify any current environmental constraints, issues and problems;
- Help develop viable options and alternatives; and
- Review the sustainability impacts of the options, and of the preferred SPD option.

#### 1.2 The Site Allocations Plan

The [Site Allocations Plan](#) (SA Plan) will include site-specific proposals for the whole borough, other than Twickenham, where the [Twickenham Area Action Plan](#) applies. The proposals in the SA Plan will reflect the needs of the borough, existing national, regional and local policies, site specific constraints and opportunities and will be subject to public consultation as part of the statutory planning process. The Plan looks ahead for 15 years after it is adopted in 2015.

This Addendum Report (2) only deals with the new educational sites to be included in the Site Allocations Plan and therefore this report should be read in conjunction with the Pre-Publication Site Allocations SA Progress Report (Sep 2013) and the SA Addendum Report (June 2014).

To ensure transparency and consistency in the SA/SEA process, the new educational sites have been subject to SA, as set out in Appendix 1 of this report, and they will be subject to public consultation from Monday 11 August 2014 to Monday 6 October 2014.

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<sup>1</sup> All documents from the previous consultation stages are available to view at: [www.richmond.gov.uk/site\\_allocations\\_plan](http://www.richmond.gov.uk/site_allocations_plan)

## 1.3 Methodology

The SA/SEA process consists of the following stages and is being undertaken in accordance with government guidance contained within the [CLG Plan making manual](#) on Sustainability Appraisals, launched in September 2009, which replaces the 2005 government guidance on 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents'. Note that whilst the National Planning Policy Framework (NPPF) has superseded the majority of Planning Policy Statements and government guidance, including PPS12, which contained advice on Sustainability Appraisals, the Department of Communities and Local Government (DCLG) is reviewing all their planning guidance, including the Plan making manual, but until it is officially withdrawn or revised, it remains extant. The methodology is as follows:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
- **Stage B: Developing and refining options**
- **Stage C: Appraising the effects of the plan**
- Stage D: Consulting on the plan and the SEA/SA report
- Stage E: Monitoring Implementation of the Plan

## 1.4 Scope of the SA/SEA

Baseline data and the development of the SA/SEA framework has been organised in accordance with the topics required by the SEA Directive and as outlined in the CLG Plan Making Manual. The scope of the baseline review has been refined to cover a broader spectrum of sustainability issues which are a reflection of the combined SEA/SA assessment.

## 2 Stage B and C: Developing and refining options and appraising the effects of the draft plan

Note that the Council has consulted on the draft Scoping Report in from 15 March until 19 April 2013 (Stage A), and the revised SA Scoping Report was published in July 2013 and is available on the Council's website: [http://www.richmond.gov.uk/sustainability\\_appraisal\\_ldf.htm](http://www.richmond.gov.uk/sustainability_appraisal_ldf.htm)

Stage B and C of the SA/SEA consist of developing and refining options and appraising the effects of the draft plan. This is an Addendum Report (2) to the SA of the Pre-Publication version and previous Addendum Report of the Site Allocations Plan, and therefore only options and alternatives for the new educational sites have been appraised.

## 3 Sustainability Appraisal of the options and draft proposals of the educational sites

The development and appraisal of the new educational proposals to be contained within the SA Plan is an iterative process. This process started with appraising the options as set out later in this report. The options were then refined to take account of the SA appraisal. The proposals will be subsequently incorporated into the Publication version of the Site Allocations Plan, which will be fully informed and accompanied by a Sustainability Appraisal Report (i.e. Environmental Report).

## 4 Results and conclusions of the Sustainability Appraisal of the new educational sites

There are 2 new additional educational sites, i.e. (a) Ryde House, East Twickenham and (b) St Michael's Convent, Ham Common. In addition, 2 changes are proposed to existing sites to provide for new school places, i.e. (c) St Clare Business Park, Hampton and (d) Cassel Hospital, Ham. All of the proposed additional sites that have been assessed in this report are likely to have positive impacts, particularly as a result of the inclusion of educational uses, which would provide for school places in the local areas where there is an identified need.

The proposals at Cassel and St Michael's Convent are considered to be sustainable options when compared to the alternatives. Both sites are within highly sensitive locations and provide the potential to conserve and enhance Listed Buildings and Conservation Areas, including their settings. The assessment highlighted that it should be investigated if the rear grounds of St Michael's Convent could be protected as OOLTI.

The proposal for St Clare Business Park would address the local need for primary school places and also provide for some commercial development opportunities .

The provision of retail and educational uses at Ryde House has been assessed as very positive as is it would contribute to the vitality and viability of the local centre as well as address the need for school places in the local area.

Conversions/redevelopments of existing sites and intensifying uses can lead to some potentially negative impacts or uncertainties, such as in relation to traffic, transport, parking and the local road network. The sites in Ham have very limited public transport accessibility and the additional educational uses could lead to local traffic issues, which would need to be mitigated.

Generally speaking, the positive as well as negative impacts increase the more action and intervention is taken on sites. It is considered that all proposal sites would make more efficient and better use of previously developed land in the long-term; however, an intensification of uses is also likely to have potential negative impacts on local traffic and waste streams. Wherever the SA identified potential negative impacts or dis-benefits, the SA makes recommendations on how mitigation measures could be incorporated into the final proposals for the Plan to reduce or mitigate some of these impacts; this includes for example requiring travel plans for all proposals involving educational uses.

The full Sustainability Appraisal assessments for all the new additional sites are included in Appendix 1 of this report.

## 1 Introduction and Purpose of this Addendum Report

- 1.1.1 The Council is currently preparing the Site Allocations Plan, which will set out the Council's proposals for land and buildings on significant sites within the borough, which are likely to be subject of development proposals during the next 15 years.
- 1.1.2 As part of the process for preparing the Council's Local Plan, the Council is statutorily obliged to undertake a Sustainability Appraisal (SA), incorporating the requirements for a Strategic Environmental Assessment (SEA), of the London Borough of Richmond upon Thames Site Allocations Plan.
- 1.1.3 We have already undertaken public consultation on a previous version of the Site Allocations Plan, i.e. the Pre-Publication version, whereby public consultation took place from 1 October until 12 November 2013. The responses received to this previous consultation have identified a number of new additional sites, which were subject to a further round of public consultation from 9 June until 21 July 2014. An Addendum Report (1) was produced for the new additional sites.
- 1.1.4 This SA Addendum Report (2) is for the new educational proposals to be included in the Plan. It is an addendum to the Pre-Publication version of the Sustainability Appraisal of the Site Allocations Plan, dated September 2013, and the previous SA Addendum Report, dated June 2014; this report should therefore be read in conjunction with the previous SA reports. It investigates the likely significant impacts of the new educational proposals on the borough and the wider area in terms of the contribution towards sustainability that might arise if the new proposals are implemented.
- 1.1.5 To ensure transparency and consistency in the SA/SEA process, all new sites have been subject to Sustainability Appraisal, as set out in Appendix 1 of this report, and they will be publicly consulted on from Monday 11 August 2014 to Monday 6 October 2014.
- 1.1.6 For further information about the Sustainability Appraisal process, the relevant plans, policies and programmes, the baseline characterisation and sustainability issues of the borough and monitoring proposals please see the main Sustainability Appraisal Progress Report (September 2013).

## 2 Sustainability Appraisal Framework

- 2.1.1 In order to help assess the sustainability of the policies in the Local Plan, and to monitor its achievement in sustainability terms, sustainability objectives and indicators have already been developed in order to measure the operation of the Local Plan.
- 2.1.2 The Sustainability Appraisal (SA) objectives are based on the issues, which are affecting the borough, as identified in the previous SA Progress Report (September 2013) and in the SA Scoping Report (July 2013). The table below sets out the existing SA Objectives that have also been used for appraising the new proposed additional sites.

SA objectives for the London Borough of Richmond upon Thames Local Plan			
	Env	Econ	Soc
1) To prevent and reduce the amount of waste that is produced and increase the proportion that is reused, recycled and composted, recovered (including energy recovery) before lastly disposal.	✓		
2) To reduce pollution (such as air, noise, light, water and soil) from any source and ensure air and water quality improves and safeguard soil quality and quantity.	✓		
3) To reduce the need for travel, encourage alternatives to the car, make best use of existing transport infrastructure and improve public transport integration.	✓		✓
4) To mitigate climate change by reducing greenhouse gas emissions and promoting sustainable energy use through maximising energy efficiency, use of zero- and low carbon technologies and renewable energy, and provide satisfactory water and sewerage infrastructure.	✓		✓
5) To ensure resilience to the effects of climate change through effective adaptation, in particular avoiding or reducing flood risk from all sources and conserving water.	✓	✓	✓
6) To conserve and enhance biodiversity, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	✓		
7) To promote high quality places, spaces and buildings and conserve and enhance the borough's landscape and townscape character and its heritage assets and their settings..	✓	✓	✓
8) To protect and enhance the quality and range of parks and open spaces and plan positively for the creation, protection and enhancement of the green infrastructure network.	✓		✓
9) To make best and efficient use of previously developed land and existing buildings, implement sustainable design and construction practices and remediate and reuse contaminated land.	✓	✓	✓
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.		✓	✓
11) To facilitate and improve the health and well-being of the population, reduce health inequalities and deliver safer and more secure communities.			✓
12) To promote the independence of people and communities by improving the quality, range and accessibility of services and facilities, such as health, transport, education, training, employment, environment, leisure, sport and recreation opportunities.		✓	✓
13) To increase the vitality and viability of existing town centres, local centres and parades.		✓	✓
14) To promote and strengthen a buoyant, diverse and resilient local economy and facilitate inward investment that will secure sustainable economic growth.		✓	✓
15) To increase the amount and quality of commercial development opportunities to meet the needs of the local and sub-regional economy.		✓	✓

**Table 1:** SA objectives for the Richmond upon Thames Local Plan

### 3 Testing the new proposals for inclusion in the SA Plan

#### 3.1 Introduction and methodology

3.1.1 The Sustainability Appraisal (SA) procedure was to appraise each of the new proposed additional sites against the SA objectives and identify the effects over the short, medium and long term using the key shown in the table below. The full findings of this SA are set out in Appendix 1 of this document.

++	Very sustainable
+	Sustainable
?	Uncertain
-	Unsustainable
--	Very unsustainable
Neutral	Neutral

+/-/? In some instances, the option could have both positive and negative effects against a sustainability objective. The reasons for including both pluses and minuses in the appraisal are explained in the commentary. In other instances, where there is some uncertainty as to whether the effect will occur, a question mark may be added.

**Table 2:** Key to the SA matrices

- 3.1.2 The assessment looks at key discernible effects, but there may be other impacts on the environment such as an increase in the need to travel, which will in all likelihood have a wide range of effects on the environment including on water quality because of contaminants and on biodiversity through land take. The system does not attempt to score or weight options, but to flag up likely significant impacts. The impact of proposals and policies identified as having significant adverse effects on a sustainability objective may, with appropriate mitigation, be modified to reduce its negative effects.
- 3.1.3 For this exercise short term is considered to be a 5 year period, from 2014 up to 2019; medium term is 2019 to 2024; long term is 2024 to 2029 and beyond.
- 3.1.4 The SA of the new educational sites of the Site Allocations Plan was conducted by a team of Council planning officers.
- 3.1.5 In some cases, knowledge of the potential impacts of a proposal/policy may be limited, particularly where cumulative effects are concerned and the appraisal therefore involves making a certain amount of subjective judgements of the likely sustainability impacts of proceeding with any proposal/policy over the short, medium and long term. The judgement is made by reference to what the sustainability objective is trying to achieve and the possible impact a proposed action may have.

- 3.1.6 In this stage of the SA the purpose is to identify what the sustainability issues may be of delivering the site-specific proposals, looking for positive and potentially negative impacts. Where the potential for negative impacts are identified, the SA makes recommendations on how these could be avoided or mitigated against.
- 3.1.7 The appraisal is based on the information available at this time. It is evident that detailed aspects of proposals and/or policies, including their delivery, will be subject to further detailed plans contained within for example site briefs and/or planning applications.
- 3.1.8 The full detailed analysis and matrices of the SA for each proposal site can be found within Appendix 1.

## **3.2 List of new educational proposal sites**

- 3.2.1 The following new educational proposals were subject to full Sustainability Appraisal:

Changes to existing SA Plan proposal sites:

- St Clare Business Park, Holly Road, Hampton
- Cassel Hospital, Ham Common, Ham

New proposal sites:

- Ryde House, East Twickenham
- St Michael's Convent, Ham Common

## **3.3 Summary of assessment of the new educational sites**

- 3.3.1 All of the proposed additional sites that have been assessed in this report are likely to have positive impacts, particularly as a result of the inclusion of educational uses, which would provide for school places in the local areas where there is an identified need.
- 3.3.2 Cassel Hospital and St Michael's Convent are likely to be declared surplus to requirements during the Plan period, i.e. 15 years, and the proposals for conversion of the existing buildings into residential/education/community uses are considered to be the sustainable options in the long-term. Both sites are within sensitive locations, and whilst the appraisals were carried out without having detailed designs and layouts, these sites provide the potential to conserve and enhance Listed Buildings and Conservation Areas, including their settings. Any proposals for conversion need to be very sensitively designed, take account of and enhance the historic environment and ensure that they will not lead to any harm to on-site and/or adjacent/nearby open land and biodiversity designations. The assessment highlighted that it should be investigated whether the rear grounds of St Michael's Convent could be protected as OOLTI to ensure no inappropriate development will take place in the rear gardens.
- 3.3.3 The proposal for St Clare Business Park would lead to some loss of employment land, however, the amended proposal would address the local need for primary school places that are required in the local area.

- 3.3.4 The proposal for Ryde House is considered to be a sustainable option particularly because the current site has been vacant for several years. The incorporation of retail would contribute to the vitality and viability of the local centre, and as additional school places are required in this area, the provision of a new primary school would contribute to addressing the local need.
- 3.3.5 Conversions/redevelopments of existing sites and intensifying uses are likely to lead to some negative impacts on the local area, particularly in relation to traffic, transport, parking and the local road network. The sites in Ham have a “very poor” PTAL rating and therefore very limited public transport accessibility. The proposed additional educational uses could lead to local traffic issues, and the assessment has highlighted that these harmful impacts need to be mitigated.
- 3.3.6 Generally speaking, the positive as well as negative impacts increase the more action and intervention is taken on sites. For example, an intensification of uses on a site would most likely be considered as making more efficient and better use of previously developed land, thus contributing to the protection of the borough’s parks and open spaces; however, an intensification of uses may also have potential negative impacts on local traffic and waste streams. Wherever the SA identified potential negative impacts or dis-benefits, the SA makes recommendations on how mitigation measures could be incorporated into the final proposals for the Plan to reduce or mitigate some of these impacts, this includes for example requiring travel plans for all proposals involving educational uses.
- 3.3.7 This SA Addendum Report, which has assessed objectively the various options and alternatives for the sites, will fully inform the refinement of the SA Plan proposals. The full Sustainability Appraisal assessment for all the sites that will be included in the draft Site Allocations Plan can be found in Appendix 1 of this report.

## **4 Next stages**

- 4.1.1 The next stages in the SA process are completed alongside the preparation of the Site Allocations Plan. The new educational sites will be subject to public consultation from Monday 11 August 2014 to Monday 6 October 2014. This SA Addendum Report (2) will form part of this consultation.
- 4.1.2 Following the consultation on the new educational sites, the Council will consider any responses received to the consultation and this SA Addendum Report. The results of the consultation will determine whether any further changes are required to the final version of the SA Plan.
- 4.1.3 Following consideration of comments received, the Council will prepare and finalise the Publication Site Allocations Plan, including the final Sustainability Appraisal report (i.e. Environmental Report). This will again be consulted on and accompanied by Sustainability Appraisal (Stage C and D of the SA process).

## APPENDIX 1 – Sustainability Appraisal matrices of new educational proposal sites

Proposal Site: St Clare Business Park							
Option A: Retain status quo							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel							Neutral
4. Climate change mitigation							Neutral
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Parks & open spaces							Neutral
9. Best use of land & sustainable construction	-		-	-			The site is existing developed land falling into disrepair and in part is under-utilised
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral
12. Accessible local services							Neutral
13. Town centres							Neutral
14. Local economy							
15. Commercial development opportunities							
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i> Whilst the site contributes to the local economy, provides jobs and delivers flexible business, office and charity space, it is considered under-utilised and therefore does not make the best use of previously developed land.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects )</i> None							

<b>Proposal Site: St Clare Business Park</b>							
Option B: Designate within the Site Allocations Plan as Key Employment Site							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel							Neutral
4. Climate change mitigation							Neutral
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Parks & open spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral
12. Accessible local services							Neutral
13. Town centres	+		+			+	Provides for a mix of commercial uses that add to the vitality and viability of the local centre
14. Local economy	++		++	++	++	++	Would provide business development and contribute to the local economy
15. Commercial development opportunities	++		++				Increase the amount and quality of commercial development opportunities in a number of different employment uses such as offices, sheds, workshops etc.
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i>							
This site contributes to the local economy and provides jobs and land for employment development.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects )</i>							
None							
<b>Proposal Site: St Clare Business Park</b>							
Option C: Redevelopment to provide high quality business space and education							

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste	-		-	-	-	-	Additional and intensified uses would increase the waste stream resulting from this site
2. Pollution & soil							Neutral
3. Travel	-		-	-		-/?	Potential increase in traffic due to additional educational use
4. Climate change mitigation							Neutral
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Parks & open spaces							Neutral
9. Best use of land & sustainable construction	+		+			+	Sustainable design and construction techniques can be incorporated into redevelopment proposals; educational use on the site would also be a good use of previously developed land
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral
12. Accessible local services	++		++	+	+	+	An educational use on this site would address the need for primary school places in the local area
13. Town centres	+		+			+	A mix of commercial uses as well as a primary school would add to the vitality and viability of the local centre
14. Local economy	+		+	+	+	+	Businesses would contribute to the local economy
15. Commercial development opportunities	+/-		+/-	+/-	+/-	+/-	Depending on the size and scale of the educational use on this site, some employment land may be lost; although the proposal still provides for some high quality business space such as offices, sheds, workshops etc.

**Summary of assessment:** *(likely sustainability impact of the option)*

Overall positive as well as negative impacts; positive impacts in relation to providing for much needed school places in the local area. However, the assessment identified some potentially negative impacts in relation to increase in local traffic and waste streams as a result of the educational use, which would require mitigation; in addition, the proposal would also lead to some loss of employment land although it would continue to provide for some commercial development opportunities.

**Possible Mitigation:** (measures to mitigate likely negative effects and enhance positive effects )

A school travel plan should be required to ensure less negative impact on the local road transport network. More activity and development on the site will inevitably generate more waste. This can be mitigated through the application of the waste hierarchy and reuse of construction and demolition waste.

**Conclusions:** compare the different options

Whilst Option B may be considered as sustainable because the assessment identified no negative impacts, Option C provides for much needed primary school places that are required in this area. Some of the identified negative impacts in Option C, such as on transport and waste, could be mitigated; although it would lead to some loss of employment land, the proposal still provides for some business space.

**Proposal Site: Cassel Hospital****Option A: Retain status quo (West London Mental Health Trust premises)**

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel							Neutral
4. Climate change mitigation	-			-	-	-	It is unlikely that the existing buildings incorporate energy efficiency measures
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral; partly designated OSNI; badger setts are present
7. Landscape & townscape							Neutral; Listed Building (Cassel Hospital), within Conservation Area; generally sensitive area/environment
8. Parks & open spaces							Neutral; majority of grounds is designated OOLTI; opposite Ham Common (MOL, POS)
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral
12. Accessible local services							Neutral
13. Town centres							Neutral
14. Local economy							Neutral

15. Commercial development opportunities							Neutral
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i> Largely neutral.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects )</i> Not applicable							
<b>Proposal Site: Cassel Hospital</b> Option B: Conversion of buildings for residential/community use							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste	-		-	-	-	-	New and intensified uses would be likely to increase the waste stream from this site
2. Pollution & soil							Neutral
3. Travel	-/?		-/?	-/?	-/?	-/?	Converting the existing buildings and intensifying the use of this site is likely to lead to an increase in traffic, particularly as the site has a “very poor” PTAL rating and therefore very limited public transport accessibility.
4. Climate change mitigation	-/?		-/?	-/?	-/?	-/?	Although there may be an opportunity to incorporate low/zero carbon and renewable energy technologies, this is likely to be limited due to historic building constraints. An increase in traffic would also lead to an increase in CO2 emissions.
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity	?		?	?	?	?	This site is designated OSNI and an intensification in uses could impact on the biodiversity.
7. Landscape & townscape	+/?		+/?	+/?	+/?	+/?	A proposal for residential / community use is likely to contribute to the preservation of the Conservation Area, Listed Building and general character of the local area.
8. Parks & open spaces	?		?	?	?	?	This site is designated OOLTI and located opposite Ham Common, which is designated MOL, Public Open Space, and which also includes a Historic Park and Garden. There should be no new buildings on any designated land and no harmful impacts from the conversion onto the character of the area.
9. Best use of land & sustainable construction	+/?		+/?				If the site is declared surplus, it could be considered that it would make better use of land.

10. Housing	+		+	+			Opportunity for more new homes, possibly affordable homes
11. Health, well-being, secure communities	?		?			?	Potential loss of social infrastructure, although it is expected that some community provision will be re-provided on this site.
12. Accessible local services	-		-	-	-	-	This area is poorly provided with local services as it is outside of (including outside the 400m of) town centres and areas of mixed use.
13. Town centres							Neutral
14. Local economy							Neutral
15. Commercial development opportunities							Neutral
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i>							
Overall some positive as well as some negative impacts but also some uncertainties, which will depend on the details of any scheme. Although it would lead to a loss of a social infrastructure, it would provide for some new homes and for community use. The proposal should contribute to the preservation and enhancement of the Conservation Area and the Listed Building, including taking account of the sensitive local character.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects)</i>							
To mitigate the loss of the social infrastructure, there should be some reprovision on this site, possibly in the form of community use. There should be no new development on designated OOLTI. Biodiversity – this is a very sensitive site and designated OSNI; any proposal needs to ensure that it will conserve and enhance the on-site biodiversity. Travel – ensure any proposal would have no impacts on local traffic and parking provision. Waste – more activity and intensification on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste.							
<b>Proposal Site: Cassel Hospital</b>							
Option C: Conversion of buildings to residential (including affordable units) and education and/or community uses							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste	-		-	-	-	-	New and intensified uses would be likely to increase the waste stream from this site
2. Pollution & soil							Neutral
3. Travel	--		--	-	-	-	Converting the existing buildings and intensifying the use on this site is likely to lead to an increase in traffic, particularly as the site has a “very poor” PTAL rating and therefore very limited public transport accessibility. An educational use could lead to harmful impacts on the local traffic and therefore this needs to be mitigated.

4. Climate change mitigation	-/?		-/?	-/?	-/?	-/?	Although there may be an opportunity to incorporate low/zero carbon and renewable energy technologies, this is likely to be limited due to historic building constraints. An increase in traffic would also lead to an increase in CO2 emissions.
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity	?		?	?	?	?	This site is designated OSNI and an intensification in uses could impact on the biodiversity.
7. Landscape & townscape	+/?		+/?	+/?	+/?	+/?	A proposal for residential / education / community uses is likely to contribute to the preservation of the Conservation Area, Listed Building and general character of the local area.
8. Parks & open spaces	?		?	?	?	?	This site is designated OOLTI and located opposite Ham Common, which is designated MOL, Public Open Space, OSNI and which also includes a Historic Park and Garden. There should be no new buildings on any designated land and no harmful impacts from the conversion onto the character of the area.
9. Best use of land & sustainable construction	+		+	+	+		If the site is declared surplus, it could be considered that it would make better use of land, particularly if it would provide for school places in the local area
10. Housing	+		+	+			Opportunity for more new homes, possibly affordable homes
11. Health, well-being, secure communities	?		?			?	Potential loss of social infrastructure, although the proposal would require educational / community provision on this site.
12. Accessible local services	-/+		-/+	-/+	-/+	-/+	This area is poorly provided with local services as it is outside of (including outside the 400m of) town centres and areas of mixed use. However, a new school on this site would address the need for primary school places in the local area and provide more accessible educational services for pupils and parents.
13. Town centres							Neutral
14. Local economy							Neutral
15. Commercial development opportunities							Neutral

**Summary of assessment:** *(likely sustainability impact of the option)*

Overall some positive as well as some negative impacts but also some uncertainties, which will depend on the details of any scheme. Although it would lead to a loss of a social infrastructure, it would provide for some new homes, community and most importantly educational uses. The proposal should contribute to the preservation and enhancement of the Conservation Area and the Listed Building, including taking account of the sensitive local character.

**Possible Mitigation:** *(measures to mitigate likely negative effects and enhance positive effects )*

The educational / community use would mitigate the loss of the social infrastructure. Open space – There should be no new development on designated OOLTI. Biodiversity – this is a very sensitive site and designated OSNI; any proposal needs to ensure that it will conserve and enhance on-site biodiversity. Travel – ensure any proposal would have no impacts on local traffic and parking provision. A school travel plan should be required to ensure less negative impact on the local road transport network. Waste – more activity and intensification on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste.

**Conclusions:** compare the different options

Overall, if the site is declared surplus to requirements, it is considered that Option C is the most sustainable as it would also provide for educational uses and school places that are required in the local area. However, it is a very sensitive site with very limited development opportunities and potential for intensified uses. Any proposals for a conversion need to be very sensitively designed, take account of the historic environment and ensure that they will not lead to any harm to the adjacent and nearby open land and biodiversity designations.

**Proposal Site: Ryde House, East Twickenham**

## Option A: Retain status quo

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil	-		-				Potentially contaminated land
3. Travel							Neutral; existing access constraints
4. Climate change mitigation	-		-				Existing buildings are unlikely to be very energy efficient.
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral; significant frontage along Richmond Road
8. Parks & open spaces							Neutral

9. Best use of land & sustainable construction	-		-	-	-	-	This is a long-term vacant site, whereby vacancy and marketing efforts have been undertaken
10. Housing							Neutral
11. Health, well-being, secure communities							
12. Accessible local services							Neutral
13. Town centres							Neutral
14. Local economy							Neutral
15. Commercial development opportunities							Neutral
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i> This is a long-term vacant site with a prominent frontage along Richmond Road. Retaining the status quo would be very undesirable as it would not make the most efficient use of land. This site could provide important facilities that contribute to the local centre of east Twickenham.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects)</i> Not applicable.							
<b>Proposal Site: Ryde House, East Twickenham</b> Option B: Retail and education							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste	-		-	-	-		Amount of waste is likely to increase; operation of waste hierarchy should minimise/mitigate any potential negative impacts
2. Pollution & soil	+		+				Potential to improve soil quality by remediating potentially contaminated land
3. Travel	--		-	-	-	-	A retail use would lead to local increases in traffic and particularly a new school would exacerbate the congestion and parking problems in the local area; traffic issues would need to be mitigated
4. Climate change mitigation	+/?		+/?	+/?		+/?	Opportunity to incorporate low- & zero carbon technologies and renewable energy; new buildings should be more energy efficient. An increase in traffic would also lead to an increase in CO2 emissions.

5. Climate change adaptation, flood risk & water	+/-		+/-				Potential to include climate change adaptation measures, such as green roofs; however, the site is within an area at risk of flooding, which needs to be taken account of when intensifying the uses on this site.
6. Biodiversity	?		?				Potential for improvements to local biodiversity for example by incorporating green roofs.
7. Landscape & townscape	+		+	+	+		Redeveloping this site provides the potential for improvements over the existing buildings, responding to the local character of the area and with the potential to enhance the streetscene, including the setting of the conservation area as well as the adjacent listed building and conservation area.
8. Parks & open spaces							Neutral
9. Best use of land & sustainable construction	++		++	+	+	+	This is a long-term vacant site; therefore, providing a mix of educational and retail uses would maximise the potential of previously developed land; there is also potential for incorporating sustainable construction measures
10. Housing	-		-				There are no opportunities for providing new (affordable) homes
11. Health, well-being, secure communities							Neutral
12. Accessible local services	++		++	+	+	+	Particularly the educational use would provide locally accessible services and contribute to addressing the need for school places in the local area
13. Town centres	++		++	+	+		Improvements to the frontage and provision of retail uses on the ground floor could add to the vitality and viability of East Twickenham local centre
14. Local economy	+		+	+			Potential contribution to more diverse economy due to retail offer and some provision of jobs
15. Commercial development opportunities							Neutral

**Summary of assessment:** *(likely sustainability impact of the option)*

Overall, this proposal is considered to have very positive sustainability impacts, particularly in relation to the provision of a ground floor retail use, which would contribute to the vitality and viability of the local centre, as well as the provision of a new school, which would contribute to addressing the need for school places in the area. There are also some negative impacts, such as in relation to local transport/traffic as well as waste and loss of an opportunity for providing new (affordable) homes.

**Possible Mitigation:** *(measures to mitigate likely negative effects and enhance positive effects )*

Redevelopment proposal would need to ensure that it contributes and enhances the setting of the Conservation Area, including the adjacent Listed Building and Conservation Area. Traffic – A school travel plan should be required to ensure less negative impact on the local road transport network. Waste – More activity and development on the site will inevitably generate more waste. This can be mitigated through the application of the waste hierarchy and reuse of construction.

**Conclusions:** compare the different options

Option B is considered to be more sustainable as the current site has been vacant for a long time; therefore, the creation of a ground floor retail unit would contribute to the vitality and viability of the local centre, and as additional school places are required in this area, the provision of a new primary school would contribute to addressing the local need.

**Proposal Site: St Michael's Convent, Ham Common, Ham**

## Option A: Retain status quo

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel							Neutral
4. Climate change mitigation	-			-	-	-	It is unlikely that the existing buildings incorporate energy efficiency measures
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity							Neutral; rear gardens are not protected by open land designations but they are expected to have high biodiversity value
7. Landscape & townscape							Neutral; Listed Buildings (St Michael's Convent and Vine Cottage), within Conservation Area; generally sensitive area/environment due to close proximity to Ham Common
8. Parks & open spaces							Neutral; opposite Ham Common (MOL, POS, OSNI)
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral

12. Accessible local services							Neutral
13. Town centres							Neutral
14. Local economy							Neutral
15. Commercial development opportunities							Neutral
<b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i> Largely neutral.							
<b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects )</i> Not applicable.							
<b>Proposal Site: St Michael's Convent, Ham Common, Ham</b> Option B: Conversion of buildings to residential (including affordable units) and education and/or community uses							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste	-		-	-	-	-	New and intensified uses would be likely to increase the waste stream from this site
2. Pollution & soil							Neutral
3. Travel	--		--	-	-	-	Converting the existing buildings and intensifying the use on this site is likely to lead to an increase in traffic, particularly as the site has a "very poor" PTAL rating and therefore very limited public transport accessibility. An educational use could lead to harmful impacts on the local traffic and therefore this needs to be mitigated.
4. Climate change mitigation	-/?		-/?	-/?	-/?	-/?	Although there may be an opportunity to incorporate low/zero carbon and renewable energy technologies, this is likely to be limited due to historic building constraints. An increase in traffic would also lead to an increase in CO2 emissions.
5. Climate change adaptation, flood risk & water							Neutral
6. Biodiversity	?		?	?	?	?	The rear gardens are of high biodiversity value and whilst the proposal does not allow for developing on the rear garden land, the proposed intensification in uses could impact on the biodiversity.
7. Landscape & townscape	+/?		+/?	+/?	+/?	+/?	A proposal for residential / education / community uses is likely to contribute to the preservation of the Conservation Area, Listed Buildings and general character of the local area.

8. Parks & open spaces	?		?	?	?	?	This site is located opposite Ham Common, which is designated MOL, Public Open Space, OSNI, and which also includes a Historic Park and Garden. The rear gardens are not protected by open land designations and it should be considered designating them as OOLTI.
9. Best use of land & sustainable construction	+		+	+	+		If the site is declared surplus, it could be considered that it would make better use of land, particularly if it would provide for school places in the local area
10. Housing	+		+	+			Some opportunity for more new homes, possibly affordable homes
11. Health, well-being, secure communities	?		?			?	Potential loss of social infrastructure, although the proposal would require some community / educational provision to be re-provided on this site.
12. Accessible local services	-/+		-/+	-/+	-/+	-/+	This area is poorly provided with local services as it is outside of (including outside the 400m of) town centres and areas of mixed use. However, a new school on this site would address the need for primary school places in the local area and provide more accessible services for pupils and parents.
13. Town centres							Neutral
14. Local economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment:</b> <i>(likely sustainability impact of the option)</i>  Overall, this proposal is considered to have very positive sustainability impacts as well as some negative ones and uncertainties, which will depend on the details of any scheme. The conversion of the existing buildings would provide new homes, community uses and it addresses the need for local school places. The proposal is likely to contribute to the preservation and enhancement of the Conservation Area and the Listed Building, including taking account of the sensitive local character. The grounds to the rear are not protected by designations such as MOL or OOLTI, and despite the fact that any proposal would have to take account of the Conservation Area and the setting of the listed buildings, there is a possibility that development could occur within this open land. It should be investigated if the open land to the rear can be protected as OOLTI.</p>							
<p><b>Possible Mitigation:</b> <i>(measures to mitigate likely negative effects and enhance positive effects )</i>  Travel – ensure any proposal would have no impacts on local traffic and parking provision. A school travel plan should be required to ensure less negative impact on the local road transport network. Open Land – it is recommended to designate the rear gardens as OOLTI to ensure the land will be protected in its open use for the future. Biodiversity – ensure that any proposal will conserve and enhance the on-site biodiversity. Waste – more activity and intensification on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste.</p>							

**Conclusions:** compare the different options

Overall, if the site is declared surplus to requirements, it is considered that Option B is the most sustainable as it would address the need for school places that are required in the local area, and in addition, the site would incorporate community and residential uses. The grounds to the rear, which are expected to be of high biodiversity value, are not protected by designations such as MOL, OSNI or OOLTI, and therefore it should be investigated if this open land can be protected as OOLTI. Due to the presence of two Grade II listed buildings, any redevelopment or conversion has to be carefully designed to take account of the historic environment and their settings.