

**FORMAL SCOPING OPINION FOR THE EIA PROPOSED MIXED USE DEVELOPMENT FOR TWICKENHAM SORTING OFFICE SITE INCLUDING 2 RESTAURANTS, COMMUNITY BUILDING AND RESIDENTIAL APPROXIMATELY 110 UNITS. (REG 10(1))**

A scoping exercise was initiated following a request received on 29 May 2012 under regulation 10 as described above from Peter Brett Associates to the London Borough of Richmond upon Thames. This Scoping Opinion has been prepared on the basis of the information contained within the accompanying Scoping Report.

The original scoping report provided a written outline of the quantum of development that will be applied for in a subsequent planning application. The report also stated that the developable area will comprise 2.3ha. The development proposed was summarised as follows:

- Residential – from 80 to 115 units
- A3 Use (Food and Beverage) – upto 3000sqm
- B1 (Business) – upto 2000sqm
- Community building – D1 and D2 uses for community purposes

The development will comprise 2 blocks ranging in height from 3 to 5 storeys with the highest element to the south-east of the site fronting London Road. Behind these frontage blocks will be an array of 3-storey terraced houses arranged on a north-south axis.

An addendum to the Scoping report dated 21 August 2012 has been received changing the description of development to omit reference to all B1 (Business) space, adjust the A3 floor space figure to 300sqm each. The number of residential units proposed is now fixed at 110 (28 houses and 82 flats) while the floor space to the community building is expected to be approx 1200sqm. The extent of the site has been reduced to exclude the wider metropolitan Open Land (MOL) to the west of the Sorting Office and the site area now amounts to 1.15ha. The scoping opinion request now only relates to developed eastern half of the site.

It is noted that the Addendum confirms that it remains St James intention to provide public access to this area. The London Borough of Richmond upon Thames will continue discussions on this matter with St James for the remainder of the pre-application process.

### **General Comment**

The redevelopment of Twickenham Sorting Office Site will be the 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 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. Although Schedule 4 of the EIA Regulations provide general guidance on this, the specific environmental impacts identified as likely to arise from this development will dictate the form and scope of the EIA, together with the issues that arise through consultation.

In addition to Circular 2/99, the EIA regulations, and best practice, there is a range of relevant case law, and examples of best practice the Council expects from the EIA process. The Council anticipates that the pre-application consultation exercise with the relevant authorities and various local groups and individuals will continue through the planning process, particularly where this input would add value to the assessment of likely environmental impacts. The purpose of the Environmental Impact Assessment should not be about justifying a preconceived development proposal, but rather an iterative process to encourage public participation throughout the process to ensure the most suitable and sustainable development of the site. From the discussions so far, and other correspondence, it would seem that St James have led a successful community engagement exercise with many relevant stakeholders and interested people such that the procedures of the EIA phase, and the overall finalised scheme, has had community involvement. The Council clearly expects to be involved throughout, particularly given the importance of this project for Twickenham and the wide range of issues to be considered.

### **Consultations**

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 issue relevant to this site. A list of the consultees contacted and a summary of the responses to the EIA Scoping Report are detailed below. It should be noted that these comments were based on the original description of development and site area.

Copies of the most important comments have already been forwarded by e-mail, however in addition to those there has been further scrutiny of the scoping report that has raised additional points that should be considered.

#### Environment Agency

Having reviewed the Environmental Scoping Report prepared by Peter Brett Associates LLP Ref: 26503 Revision 2 (dated May 2012), we would wish the following issues to be addressed within the EIA.

- Surface water Flood Risk
- Biodiversity and River enhancement
- The Water Framework Directive

#### Surface Water Flood Risk

Surface water runoff rates and volumes from the site must be managed in accordance with the London Plan (2011) which sets higher standards than NPPF for the control of surface water run-off. Policy 5.13 - Sustainable drainage (page 155) of the London Plan states that "development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible" in line with the drainage hierarchy.

Section 7.3.7 states that the FRA will include preparing a Surface Water Drainage Strategy to determine how surface water will be managed, such that flood risk is not increased and the potential for a pollution incident occurring is minimised. This does

not currently meet the requirements of the London Plan as it only seeks to not increase flood.

The SuD's hierarchy should be used when designing the drainage scheme to provide wider sustainability benefits such as groundwater biodiversity habitat and water quality improvement. SuDS can be designed to provide improved habitat for wildlife within the river corridor and the consideration /incorporation of Green/brown roofs are important also.

Section 7.3 should bring forward the recommendations made within the Thames Catchment Flood Management Plan (CFMP) – Crane Policy Unit. In particular, this recognises the important role that riverside re-development can play in:

Opportunities to recreate river corridors and wetland habitats in urban areas. The developer should acknowledge the opportunity for their site to contribute to flood risk, water quality, habitat, wildlife and recreation benefits from setting their development back from the riverbank and restoring/enhancing the riverside as part of their re-development of the site.

This should be assessed by establishing the baseline scenario for the site:

- length of riverbank which is modified or natural.
- existing floodplain storage/channel capacity for extreme fluvial events.
- existing channel obstructions

There is the potential for significant benefits through re-development at this site which will lead to improved channel storage capacity, improved biodiversity and habitat and access to and recreation with the watercourse. Such improvements will also enable other environmental objectives to meet such as reducing flood risk and the Water Framework Directive.

This is supported by LB Richmond-upon-Thames Core Strategy (adopted April 2009) Policy CP12 which states that the Council will seek to improve the River Crane 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. The Council has developed the Crane Valley Planning Guidelines for the main area of potential change, which includes the Royal Mail Sorting Office.

#### Biodiversity

We would expect the development to take the opportunity to naturalise the de-culverted section of the River Crane and provide setback for a biodiversity buffer zone. This should be thoroughly investigated through the EIA.

The development presents the opportunity to incorporate into a full and longer River Restoration project along with creating a continuous footpath through the development linking the town centre to the Recreation ground/college. Improvements to the river banks or in-channel could provide a much improved and aesthetically pleasing environment for those residing in, and passing through, the proposed new development - along with benefits for biodiversity. If this is not deemed possible then evidence should be provided and mitigation proposed.

The EIA should consider the potential for shading impacts on the River Crane through the siting of building and the potential impact of artificial light spill. Lighting should be kept to a minimum, cowled, directed away from the river channel and low lux levels - as much as security and health & safety allow.

The presence of non-native invasive plant species such as Giant Hogweed & Japanese Knotweed should be investigated and if found on site then the appropriate control and management /biosecurity issues need to be undertaken.. These are both present in the river catchment but not mentioned within the EIA Scoping.

We would want to be consulted on the landscape plan - planting list in close proximity to the river channel.

#### Water Framework Directive

We suggest completing a Water Framework Directive Assessment (WFD) for this site as part of the EIA process.

WFD aims to improve the environmental quality of river corridors like the River Crane and new development should contribute to improving river environments. As stated in your scoping opinion the current state of the river corridor is poor and redevelopment offers major opportunities to deliver environmental improvements

7.8.4 The site is located adjacent to linear natural features i.e. the River Crane to the north (although, along the northern boundary is canalised and heavily shaded in places), and railway corridor to the south."

WFD assessment should be included within your Methodology and consider:

- the potential impact of the development on the River Crane
- options that reduce impacts on water bodies;
- assess the risk of deterioration or failing to improve water bodies;
- assess potential environmental benefits of enhancing the River Crane at this site.

#### Crime Prevention Officer

Requests plans to be forwarded for comment pre-submission

#### Thames Water

While Thames Water accepts that section 7.3 covers hydrology and flood risk, we are concerned that section 8.3 makes reference to detailed assessments of utility infrastructure not being carried out. We would therefore like to make the following observations:

It is unclear at this stage what the net increase in demand on our 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

We would therefore recommend 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

Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0845 850 2777

#### Transport for London

(contact: Andrew Dorrian t: 020 7126 4258 e: AndrewDorrian@tfl.gov.uk )

Comments are set out below,

1. TfL operates a pre-application advice service which has been set up to enable developers and councils to understand TfL's views on transport and infrastructure prior to submission of the application. Given the scale of the development early engagement will be necessary and this should be set out in the EIA scoping report, details can be found here:  
<http://www.tfl.gov.uk/businessandpartners/15394.aspx>
2. TfL has prepared its own Transport Assessment best practice guidance to assist developers in scoping out the environmental and transport impacts, each scheme should be assessed on its own merits through pre-application advice, but the guidance is a good starting point and should be referred to in the EIA scoping report, details can be found here:  
<http://www.tfl.gov.uk/assets/downloads/businessandpartners/transport-assessment-best-practice-guidance.pdf>
3. The EIA and TA must assess consistent impacts and be consistent in assessment years, for example, if the implementation and occupation of development slips beyond the design year (end state), the EIA and TA must adequately assess these impacts.
4. The EIA and TA must include a multi-modal impact assessment including baseline and future car, bus, rail, pedestrian and cycle trips and the overall mode share.
5. In line with the approval at Twickenham Station and the Twickenham AAP this application must assess pedestrian and cyclist connectivity by way of the subway under London Road and the onward connections. Further discussion will take place through the application process with regard to necessary improvements to pedestrian facilities.
6. 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.
7. 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.
8. A Travel Plan will be required for each use, for residential travel plans a 'Full' travel plan including 'Delivery and Servicing' will be required, in

accordance with TfL's Travel planning best practice guidance, this should be referred to in the EIA scoping report, details can be found here:  
<http://www.lscp.org.uk/newwaytoplan/resources/file/Travel%20planning%20for%20new%20development%20in%20London.pdf>

9. Any mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement, it may be appropriate for TfL to be a signatory in order to received financial contributions and to give and receive obligations relating to transport. Less significant issues can be dealt with by use

### London Borough of Richmond upon Thames

#### Education

The number of new units proposed will mean that the effect on local schools will be likely to be considerable. An assessment of this impact cannot be optional but instead be an essential element of any Environmental Statement.

#### Parks

A specific section on trees should be incorporated which determines the arboricultural impact of the proposed development on trees within and adjacent to the site.

In order to fully assess the Arboricultural impact of the development, we will require the following information:

- 1) A full Tree Survey
- 2) Tree Constraints Plan
- 3) Arboricultural Implications Assessment.

All documents must be prepared in accordance with the current British Standard 5837: 2012 Trees in Relation to Construction - Recommendations.

It is recommended that the applicant consult with FORCE (Friends of River Crane Environment) as part of this document.

The proposed environmental impacts linked to the creation, public use and maintenance, including service vehicle access requirements, of the new park and towpath should be assessed.

#### Ecology

Para 7.8.3 (page 26) is not accepted, surveys have shown bats in the area including brown long eared – all bats are European protected species.

The survey work was last done in 2010 and unless the application is approved and works commence on site by the end of the year, another bat will need to be undertaken in 2013. The badger and reptile reports won't need to be redone.

The bat and breeding bird surveys may well need to be done again as Natural England tend to ask for surveys to be undertaken every 2 breeding seasons.

#### Trees

The sites trees aren't specifically focused upon within the Scoping report and the impact is not therefore clear. The sites trees are a significant feature of the landscape and act as a development constraint; without knowing any specifics I have to consider that there is a threat to their existence.

The trees are not afforded any protection at present; it is therefore expedient for me to serve a Tree Preservation Order. I will be doing so by the start of next week.

Urban Design

Townscape and Visual - potential effects: should have visual material as well as textual descriptions. Key views for visualisations need to be agreed.

Planning Policy

General comments:

- In summary, we agree with the elements/topics that will be assessed as part of the EIA and those that have been 'scoped out' (i.e. sustainability, utilities and microclimate), subject to Thames Water's confirmation that capacity exists in the sewerage network so that the proposal will not result in any significant impacts, e.g. overloading of sewerage infrastructure.
- We note that reference has been made to PPSs/PPGs (e.g. para 2.2.4) – these have now been superseded by the NPPF.
- It should be noted that this is a former employment site and that adopted policies in the LDF seek retention of employment floorspace within mixed uses schemes and maximisation of affordable housing above the normal requirements set out in CP15.

Detailed comments:

Section	Paragraph	Planning Policy comments
2.1 Location	2.1.4	The site is located within the Twickenham town centre boundary (see Development Management Policy DM TC 1), albeit at some distance from the designated shopping frontages.
4.1 Planning Policy	4.1.3	Whilst it is correct that the site falls outside designated shopping frontages, it is located within the Twickenham town centre boundary (see Development Management Policy DM TC 1). Only the western part of the site which is currently undeveloped is located outside the town centre boundary. This paragraph should therefore be corrected to reflect this accordingly. Also note that designated key and secondary shopping frontages are some 150-200 metres away from the site on London Road. The DMP does not delineate a PSA specifically. Retail is expected to be located within designated frontages, or be well-related to them as per policy DM TC1.
4.1 Planning Policy	4.1.3 – 4.1.10	There are also other Core Strategy policies of relevance, such as CP1 Sustainable Development (Code for Sustainable Homes Level 3, BREEAM "excellent" for all other developments), CP5 (Sustainable Travel), CP14 (Housing – e.g. setting out requirements for Lifetime Homes Standards and wheelchair standards) & CP 9 – seeking diversity of the evening economy in Twickenham etc
4.1 Planning Policy	4.1.14 – 4.1.16	There are many other Development Management Plan policies of relevance and importance, in particular policy DM TC 1 (Larger Town Centres), policy DM TC 5 (evening economy) as well as policies in relation to the sustainable design and construction of developments, housing and social infrastructure, employment, transport and parking as well as heritage and design policies.

4.2 Other Documentation	4.2.1	Whilst it is likely that an application for the Former Royal Mail Sorting Office is submitted and potentially determined prior to the Twickenham AAP being adopted, it is important that proposals on this site contribute to the regeneration of the town centre by positively enhancing the area. It should link well with the opposite station site and complement the town centre. Appropriate weight should already be given to this AAP as it has already been through two rounds of public consultations and the publication version is going to be published for consultation on the 6 July until 31 August; it is anticipated to be submitted for Examination in the autumn.
4.2 Other Documentation	4.2.2	<ul style="list-style-type: none"> <li>• The Sustainable Construction Checklist SPD was last updated in August 2011, which now consists of a Checklist and a Guidance Document; this update supersedes all previous versions of the Checklist.</li> <li>• The Residential Design Standards SPD will also be pertinent to any proposal for this site.</li> <li>• Also note that the Design Quality is SPD rather than SPG.</li> <li>• The draft Affordable Housing SPD (March 2012) has now been published.</li> </ul>
7.2 Socio-Economics; and 7.13 Cumulative Effects		<p>New employment generated on the site will also contribute to the local economy for e.g. through purchasing goods and services, and socially through the provision of jobs and opportunities for local residents</p> <p>The Construction activities should include training and skills development for local unemployed residents.</p> <p>Paragraph 7.2.6 should also refer to having regard to needs for affordable housing (specifically noting affordable within the point under population and housing) and inclusive access (for all proposed uses). The proposed mix of residential (i.e. unit type and size) may need to be identified to fully understand the impacts e.g. on amenity space required.</p> <p>Consideration of the impact of a considerable amount (3,000m<sup>2</sup>) of restaurant floorspace on-site, bearing in mind that Twickenham town centre as a whole has an estimated 3,500m<sup>2</sup> of restaurants at present (GOAD) which goes beyond that outlined (jobs). No mention in report of impact on anti-social behaviour (albeit that restaurant rather than drinking establishments are proposed – there is still a degree of overlap). Consideration of the cumulative impact of other sites (notably Twickenham station) in relation to this land use.</p>
7.3 Hydrology and Flood Risk	7.3.3	<p>The Surface Water Management Plan (SWMP) for the London Borough of Richmond upon Thames should also be taken into account when undertaking this assessment. The SWMP can be accessed via:</p> <p><a href="http://www.richmond.gov.uk/surface_water_management_plan.htm">http://www.richmond.gov.uk/surface_water_management_plan.htm</a></p>
7.3 Hydrology and Flood Risk	7.3.1 – 7.3.9	We would like to bring to the applicant's attention the requirement for prior written consent from the Environment Agency for any works affecting the River Crane (8 metre byelaw distance). This consent is irrespective of planning permission.

7.4 Land and Water Quality	7.4.2	Under the Water Framework Directive (WFD), the River Crane has been classified as having a "poor" ecological status. Potentially contaminative uses will 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. Proposals that contribute to the improvement of the River Crane's water quality will therefore be encouraged.
7.8 Ecology and Nature Conservation	7.8.2	Whilst this is not a site of European, national or metropolitan importance, the western part of the site is a designated "Other Site of Nature Importance" (OSNI), and this local designation needs to be considered and fully acknowledged in the assessment. OSNIs have been identified in consultation with the London Ecology Unit and local groups, including important habitats and species identified in the Borough's Biodiversity Action Plan. It is important to ensure that as well as protecting these from development and/or the construction process which is incompatible with their nature conservation and biodiversity interest, development in locations nearby will not cause harm.
7.12 Waste	7.12.1 – 7.12.10	The draft West London Waste Plan should be referred to and taken into account when assessing the impacts of waste and producing the Waste Strategy.
8.2 Sustainability	8.2.1	A high level heat mapping study to identify clusters where potential opportunities for decentralised energy networks may exist in this borough has been finalised and published. The outputs of the Heat Mapping Study, including an implementation plan to help the Council and developers to take the decentralised energy opportunities identified to the next stages can be accessed via: <a href="http://www.richmond.gov.uk/heat_mapping_study.htm">http://www.richmond.gov.uk/heat_mapping_study.htm</a> The Borough's Heat Mapping study can be taken into account when producing the Sustainability and Energy Statement.
8.3 Utilities	8.3.1 – 8.3.2	We note that according to section 8 of the EIA Scoping Report, required utility infrastructure with the exception of utilities in relation to flood risk and surface water drainage, are not likely to be significant and have therefore been scoped out of the EIA. Whilst we agree with this assessment in principle, it must be noted that foul sewerage from any proposed development on the site 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). Therefore, in line with Council policies (DM SD 7 and DM SD 10), 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.

#### Ground Contamination

On the whole the EIA Scoping Report does set out an appropriate methodology for dealing with the potential affects of land contamination at the subject site. However, the points below should be taken in to account.

6.2.7 - "Risk of Pollution during Construction" - This should include those risks to both human health and the wider environment arising from both investigating and remediating soils and / or groundwater the site.

7.4.2 - The framework for assessment of soils and groundwater etc should also make use of the Supplementary Planning Guidance on the Redevelopment of Potentially Contaminated Sites which is available on the Land Contamination section of our website.

7.4.8 - As identified here it is essential that prior to any (further) investigation works being carried out that a proposal is provided to and subsequently approved by the Council's scientific officer.

7.12.5 - The potential for the generation of '*contaminated or hazardous*' materials from '*the ground*' has been identified. As an extension of this point, ground conditions should be assessed with the principals of sustainable remediation applied. This should include minimising any off site disposal of soils and the use of sustainable remediation techniques.

#### Environmental Health (noise & vibration)

I am satisfied with the general detail outlined in the scoping document and I do not have any in principal objections to the proposed development. However the following points need further clarification.

#### Noise & Vibration NPPF/PPG24

The report proposed to use the guidance detailed in PPG24 in the absence of detailed guidance supporting the NPPF. We welcome this approach and would be flexible in the application of the old NEC tables, however we would want to ensure that the main objectives in NPPF relating to noise are achieved. i.e. avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;

#### Potential Environmental Impacts

- Noise impact from existing external traffic sources such as aircraft, rail and road traffic on new sensitive receptors
- Noise from increase in vehicles accessing the proposed development site effecting new and existing sensitive receptors.
- Noise from HVAC & kitchen extraction plant serving the proposed development on new tenants and existing residents.
- Odour from kitchen extraction system effecting new and existing residents in the vicinity
- Noise from A3 and D2 use, effecting new tenants and existing residents in the vicinity.
- Noise and Vibration from Construction activities on existing residents

- Dust from construction activities effecting existing residents.

The following example proposed conditions re noise, vibration and air quality are likely to be recommended should this application proceed.

#### Example Proposed Conditions

##### 1. Noise Insulation Scheme

Prior to the commencement of work on site, a scheme, including roof and facade specification schedule, providing for the insulation & associated ventilation of the proposed development against the transmission of externally generated road, rail and aircraft noise shall be submitted to and approved by the Council. The scheme shall demonstrate compliance with the "good to reasonable " criteria detailed in 7.6.1 of BS8233: 1999 Any works which form part of the scheme shall be completed in accordance with the approved details before the dwellings are occupied" BS8233:1999 Guidance on suitable internal noise levels can be found in BS8233:1999: Sound insulation and noise reduction for buildings. Section 7.6.1 of BS8233: 1999 suggest indoor ambient noise criterion for reasonable resting and sleeping conditions in bedrooms and living rooms. In respect of residential dwellings the following criterion is presented:

Table1 – BS8233 Internal Target Noise Criteria

Criterion	Typical Situations	Design Range LAeq,TdB	
		Good	Reasonable
Reasonable resting/ sleeping conditions	Bedrooms	30	35
	Living Rooms	30	40
	Utility Rooms Kitchen/Bathrooms	NA	45

BS8233 also recommends that "for a reasonable standard in bedrooms at night, individual noise events (measured with F time-weighting should not normally exceed 45dB LAmax"

Acoustic ventilators, which can be passive ventilators, should meet the minimum background ventilation requirements of the Building Regulations 2000 Approved Document F "Ventilation". Standard trickle ventilators are not adequate since they allow noise intrusion and reduce sound insulation.

##### 2. HVAC/ Plant & Equipment Noise Control

Before any mechanical services plant including, air handling, Combined Heat & Power system, kitchen extraction system etc, to which the application refers are used at the premises, a scheme shall be submitted to and approved in writing by the local planning authority which demonstrates that the following noise criteria can be complied with and shall thereafter be retained as approved

The cumulative measured or calculated rating level of noise emitted from the mechanical services plant including, air handling, Combined Heat & Power system, and the kitchen extraction system etc, to which the application refers, shall be lower than the existing background noise level by 5dB(A) or 10dB(A) below if there is a particular tonal or discrete component to the noise, at all times that the mechanical system etc operates. The measured or calculated noise levels shall be determined at

the boundary of the nearest ground floor noise sensitive premises or 1 meter from the facade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest British Standard 4142; An alternative position for assessment /measurement may be used to allow ease of access, this must be shown on a map and noise propagation calculations detailed to show how the design criteria is achieved.

In addition the noise from the kitchen extraction system must achieve the "good standard" for internal noise levels detailed in Section 7.6.1 of BS8233: 1999 which suggests indoor ambient noise criterion for reasonable resting and sleeping conditions in bedrooms and living rooms.

**BS8233 Internal Target Noise Criteria**

Criterion	Typical Situations	Design Range LAeq, TdB	
		Good	Reasonable
Reasonable resting/ sleeping conditions	Bedrooms	30	35
	Living Rooms	30	40
	Utility Rooms Kitchen/Bathrooms	NA	45

The plant shall be supported on adequate proprietary anti-vibration mounts as necessary to prevent the structural transmission of vibration and regenerated noise within adjacent or adjoining premises, and these shall be so maintained thereafter

**3. Sound Insulation between Commercial and Residential Units**

Development shall not begin until a scheme for the sound insulation of the floor/ceiling/walls to the proposed development to reduce the transmission of noise from commercial A3 & D2 units to residential units within the proposed development. The scheme approved by the local planning authority shall be fully implemented in accordance with the approved details before the use, hereby permitted, commences and demonstrate compliance with the design criteria below.

The works and scheme shall thereafter be retained in accordance with the approved details. No alteration to the structure, roof, doors, windows or external facades shall be undertaken without the grant of further specific consent of the local planning authority.

**Design Criteria**

Mixed Use Commercial (A3,A4,A5) / Residential Units - performance standards for separating walls, separating floors, and stairs that have a separating function.

In to that	Airborne sound insulation DnT,w + Ctr dB (Minimum values)		order show the
	Purpose built Mixed Use Development		
	Ceilings , Floors and stairs	53-55	

above sound insulation requirements have been satisfied post- completion testing

should be undertaken in accordance with the guidance set out in Approved Document E: Resistance to the passage of sound, Building regulations 2000 or the provision of Robust Drawings which meet the robust details guidance [www.robustdetails.com](http://www.robustdetails.com)

#### 4. Vibration

Prior to the commencement of work on site, a vibration impact assessment shall be submitted and approved in writing by the Local Planning Authority. The Vibration Dose Values (VDV) should be calculated and assessed from the measured acceleration levels in accordance with BS6472-1:2008. For residential development, the VDV values (m/s<sup>1.75</sup>) after mitigation if required should not exceed those in the Table below, abstracted from Table 1 of BS 6472-1:2008.

The assessment shall include details of recommended remedial measures, should vibration levels be found to be unacceptable.

#### Indication of response to vibration in terms of VDV (m/s 1.75)- Low probability of adverse comment

07:00 – 23:00 16 hour day	23:00-07:00 8 hour night
0.0.2 to 0.4	0.1 to 0.2

Re-radiated noise, as a result of vibration from adjacent railways and other sources, shall not exceed 40dB<sub>L</sub>A<sub>max</sub>(s) within habitable residential rooms. Where it is predicted that noise from this source will exceed 40dB<sub>L</sub>A<sub>max</sub>(s), proposals to mitigate re-radiated noise to acceptable levels shall be submitted to and approved in writing by the Planning Authority

#### Construction Noise & Vibration

##### 5. Construction Method Statement (CMS)

Prior to commencement of the development, a construction method statement (CMS) for the ground works, demolition and construction phases of the development site shall be submitted to and approved in writing by the Council.

Details shall include control measures for noise and vibration, including working hours. Approved details shall be implemented throughout the project period.

#### Noise & Vibration

The CMS shall mirror the details required under section 61 of the Control of Pollution Act 1974 and follow the Best Practice detailed within BS5288: 2009 Code of Practice for noise and Vibration Control on construction and open sites. The commercial environmental health department has produced draft guidance relating to this which I attach. As this is a large scale construction project which could have significant impact upon local residents and businesses this information, where possible, should be made available at the planning application stage.

The CMS should include an acoustic report undertaken by a suitably qualified and experienced consultant and include all the information below;

The following information must be supplied as part of the CMS

- Baseline Noise Assessment – undertaken for a least 24-72hours under typical conditions. The survey should avoid times when rail track or station works are due to be undertaken. (section4.4 of LBRuT guidance). If weekend

/evening working is required the background survey must contain relevant data for these times.

- Piling- Where piling forms part of the construction process, a low vibration method must be utilised wherever possible. Predictions for vibrations levels at sensitive receptors must be included and demonstrate that target levels detailed in BS5288 for prevention of cosmetic structural damage can be achieved. (Annex B BS5288 2009 Part 2).
- Vibration Monitoring - All Piling activities undertaken near sensitive receptors must include continuous vibration monitoring (see 5.) and must include audible and visual alarms.
- Noise Predictions- Predictions should be included for each phase of the demolition, and construction, vehicle movements and an assessment of the significance effect must be included (Annex E BS5288 2009 Part 1). Where predictions indicate that the significance effect will be triggered, mitigation in the form of sound insulation grants or equivalent must be indicated. Where appropriate noise modelling should be undertaken to enable predictions to be undertaken for each phase and to illustrate the noise contour
- Noise Monitoring – Continuous noise and vibration monitoring must be undertaken for the duration of the demolition and construction phases which may result in a significant impact. In order to reduce the resource burden on the local authority and provide it and residents with measurement data, a web enabled system such as the B&K Sentinel System or equivalent must be employed. The location, number of monitoring stations and the measurement data must be agreed with the Local Planning Authority prior to the start of construction.

#### Air Quality

##### Construction/Demolition /Ground works – Dust Control

The Construction Management Statement (CMS) shall include a dust management strategy which will demonstrate compliance with the guidance found in The control of dust and emissions from construction and demolition Best Practice produced by the Greater London Authority (GLA)[http://static.london.gov.uk/mayor/environment/air\\_quality/docs/construction-dust-pg.pdf](http://static.london.gov.uk/mayor/environment/air_quality/docs/construction-dust-pg.pdf)

The dust management strategy must include a risk assessment of dust generation for each phase of the demolition and construction. The assessment and identified controls must include the principles of prevention, suppression and containment and follow the format detailed in the guidance above. The outcome of the assessment must be fully implemented for the duration of the construction and demolition phase of the proposed development and include dust monitoring where appropriate.

##### Odour Control – Kitchen Extraction System

Prior to the first use of the premises details of a scheme for the extraction and treatment of fumes and odours generated from cooking or any other activity undertaken on the premises shall be submitted to and approved in writing by the local planning authority. Any equipment, plant or process approved pursuant to such details shall be installed prior to the first use of the premises and shall be operated and retained in accordance with the approved details and operated in accordance with manufacturer's instructions.

The scheme must demonstrate compliance with the Guidance produced by DEFRA: Control of Odour and Noise from Commercial Kitchen Systems 2004. see attached

summary for further details. The document can be downloaded from the DEFRA website

<http://www.defra.gov.uk/environment/noise/research/kitchenexhaust/pdf/kitchenreport.pdf>

#### Environmental Health (Air Quality)

The main concern will be the impacts of the proposed development on the air quality of the surrounding area and of the existing pollution on the development as identified in 7.7.1. The Air Quality proposals in section 7.7. are considered to be sufficiently comprehensive to address these issues

#### Transport

The Scoping Report fails to mention the commercial and community elements of the proposal (other than servicing) being taken into account in the trip generation figures. If no on-site parking for these elements then the case needs to be made. Community use outside of CPZ hours will also require assessment particularly where parking could occur (if not on site) and what effect this will have on local residents.

Other than the above, the Transport section does not have any specific comments to make at this stage however they will need to be involved through the preparation of the Transport Assessment (TA), Framework Travel Plan and other aspects. Early discussion of the TA is strongly recommended.

#### Other Consultees

No replies have been received from the following consultees: Natural England, English Heritage (Archaeology and Listed Building Sections), Greater London Authority, Friends of the River Crane Environment, Cole Park Residents Association, Heatham Residents Association, London Buses, Network Rail, South West trains, Rugby Football Union, Harlequins RFC, Richmond Tertiary College, Richmond Adult Community College, Twickenham Town Centre Manager and Board, Twickenham Town Business Association.

#### **Scope of the EIA**

The proposed scoping report would appear to cover the majority of the issues that the Council would require to be included within an Environmental Statement (ES) with the exception of 'Alternatives and Design Evolution' and 'Utilities' which require a specific chapter with that title. Other issues needing to be more fully addressed have also been identified and specific comments are detailed below. These are grouped by topic.

#### Topic Specific Comments:

##### Broad Site Description

Council officers would anticipate the description of existing and surrounding development to be wider and more detailed in the ES. A comprehensive description of the existing buildings, car/cycle parking facilities, internal access road as well as other site features such as trees, landscaping. The changing levels across the site and in relation to London Road bridge, the River Crane and neighbouring buildings need to be highlighted with the aid of illustrative material while details of previous site usage need further explanation. In particular, 2.2.3 and/or 2.2.7 need to mention the existing subway to Twickenham Station

underneath the London Road bridge and its potential future use, in association with the adjacent ramp, as an access/egress point by rail commuters.

Proximity to nearby conservation areas, listed buildings and buildings of townscape merit need to be mentioned.

The traffic impacts on the local area, including restrictions to access/egress from the project site, caused by crowd congestion at the station on RFU event days should be recognised and a more detailed explanation of the station's operation including queuing arrangements and road closures need to be outlined.

The EIA will be expected to pay special attention to any cumulative impacts of development in the vicinity. Discussions with Network Rail are encouraged to ensure any development on land in their ownership is given consideration in designing this development. This will be beneficial to the development of the site and ascertaining the likely impacts, and delivery of benefits, from this development such as pedestrian and cycle links, new parkland, wildlife habitats and the like.

Amended Appendix A outlines the application site. It is required that the ES supplements Appendix A with a further drawing/illustration with more detail of the location of existing buildings and site/boundaries with adjacent open land/railway land.

#### Development Proposals

The specifics of the project have been only recently finalised as reflected in the Addendum. The application site has now been limited to the previously developed land in the eastern half of the site. The Council wish to ensure comprehensive development of the western and eastern halves of the site.

A comprehensive description of the proposed buildings, land uses, roads, riverside towpath, parking and servicing facilities, cycle lanes, public spaces, landscaping and children's play facilities will be expected to be provided in the ES.

As regards 3.1.6, other application documents listed should also include an Affordable Housing Statement with accompanying financial viability appraisal plus Heads of Terms.

#### Proposed Scope of the EIA

The new parkland, footpath (pedestrian and cycle link), lighting and footbridge (if necessary) on the undeveloped part of the site are not currently proposed to be included within the final planning application for redevelopment. Should this not be so, these elements of the proposed scheme should be included in the scope of the EIA and in the description of the Development Proposals above. The environmental effects linked to the pre, during and post construction work and public usage of the land should form part of any assessment undertaken and documented within the final Environmental Statement. For the purposes of this scoping opinion, the issues to be considered in this eventuality are detailed in their relevant sections.

The aspects of the environment (sensitive receptors) listed in 6.1.1 could be more detailed in the ES, for instance assets of the historic environment to reference conservation areas, buildings of townscape merit, listed buildings and protected views from Richmond Hill and Richmond Park (King Henry's Mound).

Information in ES to include a non-technical summary in compliance with Sch 4 of 1999 Regulations

### Socio-Economic Issues

The scope of the EA and the full socio-economic assessment outlined is considered to be appropriate for this project. Particular attention should be paid to the potential individual and cumulative impacts on local services and amenities, such as school places, healthcare and community facilities including local playgrounds, sports facilities, playing fields and allotments as these issues have been raised as of particular concern to borough residents.

Assessment to include Economic and Community consequences of development for Twickenham Town Centre, the RFU and Harlequins Stadia and Richmond Tertiary College.

An assessment of the requirement for housing in the area, including affordable housing needs, is necessary

### Hydrology and Flood Risk

The key environmental issues and opportunities at this site are:

- Impact of development on river Crane and flood defences
- Managing flood risk to people and property, including surface water flood risk
- Sustainable design and construction (including SUDS and water efficiency measures to reduce piped water demand)
- Impact of foundations upon ground water flow

This development is adjacent to the river Crane, and it is important that impacts on the river are considered within the EIA and appropriately mitigated for. This proposal offers an opportunity for enhancements to the river, which we would like to be considered at this early stage.

The development should be set back from the river to avoid a negative impact on biodiversity and flood risk. Furthermore, there is scope to improve the river Crane, for example by taking the concrete wall out and either creating a vegetated natural bank, or by setting the wall back so that a marginal fringe of reeds could be established in-channel. There is also scope to improve the bed of the channel to a more natural substrate. Improvement options such as these should be incorporated into the development. We think this would accord with your Core Strategy policies CP12 River Crane Corridor and CP4 Biodiversity, as well as the London Plan Blue Ribbon Network policies and London Rivers Action Plan. We would be happy to discuss this further.

The Council has completed a Strategic Flood Risk Assessment (SFRA) for the borough; this should be considered when undertaking the Flood Risk Assessment.

The surface water run-off should be controlled as near to its source as possible through a sustainable drainage (SUDS) approach to surface water management. Therefore consideration of appropriate SUDS techniques should be included in the assessment and a surface water strategy prepared.

In terms of water resources the scoping report does not mention the potential impact of the proposals upon the water supply in the area. The Council would encourage early discussions with Thames Water to ensure that infrastructure is adequate. If concerns are expressed regarding water supply then this should be factored into the assessment.

### Land and Water Quality

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, Thomas Hindley, and not an Environmental Health Officer.

### Transport and Access

The project site is located opposite to Twickenham Station which acts as an important transport hub not only for Twickenham Town Centre but for the RFU Stadium, Twickenham Stoop (Harlequins RFC) and Richmond Tertiary College. Twickenham Stoop has recently expanded to a 14000 stadium. Access to the project site will be clearly curtailed on RFU event days when crowd congestion at the station requires road closures. The Transport Assessment needs to fully consider the proposed development's impacts for all users of the local footpath and highway conditions as experienced, especially on London Road and Whitton Road, on both 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.

The EIA for the scheme proposals should address the following issues in relation to transport:

- Effects on local pedestrians, buses, trains, cyclists, cars and other vehicles (to include Network Rail service vehicles and cars belong in to occupants of Railway Cottages) 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 around the completed development
- Effects on walking and cycling accessibility through the Proposed Development area and on the public highway in the adjacent area

The above effects to be considered on match days at the local rugby stadia as well as normal days

Improvements to the pedestrian environment are expected from the redevelopment of the site and subject to a comprehensive development approach being adopted, improved access to the Harlequins Stadium and Richmond Tertiary College. To ensure that this is achieved, the scheme needs to provide pedestrian/cycle links across the project site and a new footbridge or other access point at the western end of the site. Clarity is still needed on this aspect of the proposal however should this involve a new bridge into the proposed park from the Craneford Way Playing Fields, an assessment of any related impacts should be included in the relevant chapter of the ES e.g. ecological on River Crane.

The design of any new parkland, public piazzas and pedestrian/cycle access routes should be assessed in terms of general safety and usage by all people, including those with a mobility impairment.

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 London Road, Whitton Road, the A316 and other streets leading to the RFU 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 needs full consideration.

Servicing and parking impacts linked to commercial units and community building require assessment on normal and event days.

The safety and security of users of and neighbours to the proposed riverside route to and along the River Crane and through the new park need to be assessed.

The future use of the subway underneath London Road bridge by passengers wanting to access/egress Twickenham Station by this route should this redevelopment proposal be executed needs to be assessed to demonstrate that this route would be largely unhindered and safe during the demolition, construction and operation of this development.

Access impacts for occupants of Railway Cottages during construction to be fully considered.

Access of service vehicles to any new parkland/childrens play facilities needs assessment.

### 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. This would not only result from the processes involved in developing the area but also from the additional residents in the area. The use of a 2011 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, in particular occupants of Railway Cottages, and the River Crane NICS including its bat and birdlife.

The Council is also concerned with the potential impact of noise and vibration from the rail line and noise from the adjacent sports pitches at the Heatham House on future residents of the development and users of the community building. The Council would expect any assessment of noise associated with the development to include appropriate consideration of these impacts and how they might be addressed as well as noise impacts from discrete sources. New development cannot prejudice the continued operation of the Heatham House facilities and suitable acoustic insulation measures are required to be fitted to proposed residential units.

Noise impacts to residents of Heatham Park from public use of the new park and towpath should be assessed and mitigation proposed if necessary

Monitoring should not be just for the sake of monitoring, so where potential impacts are identified practicable solutions to mitigate these impacts should be considered and implemented – for instance improved soundproofing to Railway Cottage properties to be considered 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.

Noise generated by the proposed community building, the A3 units and any outside eating areas and the impact on future residents of the apartments above should be assessed

#### Air Quality

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 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 noted 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 and workers in the area, pre-, post- and during the development.

Any mitigation measures or consideration of particulates should also include the impacts of CHP and biomass on air quality if these technologies are proposed. It should be noted that biomass boilers are generally not encouraged in AQMAs.

It should be considered if the impact of railway emissions requires assessment in relation to future owners/occupiers of the new flats and houses.

Cooking odours linked to the proposed A3 units and their impact on future residents of the apartments above should be assessed

### Ecology and Nature Conservation

The key environmental issues and opportunities at this site are:

- Impact of development on river Crane
- Maximising environmental improvements to the River Crane
- Ecological impacts and habitat improvement

The front half of the project site appears to have limited ecological or habitat potential, with the exception of bat roosts, 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 and landscaping should form part of the proposals. The Council is pleased to note the inclusion of a new pedestrian footpath proposed along the River Crane linking to the River Crane walk.

Para 7.8.3 is not accepted. The back half of the project site, and the adjacent River Crane NICS which is a known bat (brown long eared – all bats are European protected species) and bird corridor, is of significant ecological interest with the potential to offer new habitat creation and other ecological enhancements. There is a range of stakeholders in addition to Environment Agency and Natural England that can also provide useful information on the River Crane, such as Friends of the River Crane Environment (FORCE) and others, and their advice should be sought as part of the EIA process as the project develops.

It is correct that the spatial scope for the EIA has been set to include surrounding areas. The Protected Species Surveys were undertaken in 2010 and should be redone every 2 breeding seasons.

It is expected that mitigation measures will be required to minimise the spillage of artificial lighting into the river corridor at night and other disturbances to bats.

The impact of shadowing within the corridor during the daytime by the proposed building mass and this impact on both the existing ecology within and around the river as well as its future potential should be incorporated into the EIA process.

A comprehensive approach to managing the control and removal of Japanese Knotweed from the site will be required to ensure that there is no risk of downstream transfer along the corridor

Trees on site may collectively have a high conservation value due to their ability to support breeding birds and/or bat roosts – this requires assessment

Other ecological impacts requiring assessment relate to the formation and public use of the new parkland and in particular the following elements should these be proposed as part of the final design:

- a new footbridge across the River Crane
- the river towpath
- street lighting

### Townscape and Visual

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

#### Receptors

- Residents
- Users of local facilities, rail station, heatham house, college, public house,
- Users of allotments, playing fields, public open spaces
- People using public rights of way, footbridges, cycle routes
- Pedestrians generally
- Passing traffic, trains
- Statutory designations – LBs, Protected Views
- Local designations – CAs, BTM, River Crane Corridor

#### Viewpoints

- London Road – in front of Regal House opposite junction with Railway Approach.
- Junction of Whitton Road and London Road
- Footbridge connecting Beauchamp Road with Cole Park Road
- Terrace Walk, Richmond Hill (long distance).
- Richmond Park (long distance).
- Crane Valley – playing fields off Craneford Way
- Marsh Farm Road – Pedestrian footbridge over the railway line
- London Road – view from in front of station ticket office
- Junction of March Road and London Road
- In front of The Albany public house, Queens Road
- Railway Approach, rear of Bridge House
- Marys Terrace – corner with Beauchamp Road
- Station Road – in front of Richmond Adult Community College's northern site boundary
- Craneford Close – view between Nos 13 and 14
- Cole Park Road – view between Nos 2A and 2B
- Heatham House – view from grounds

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 London Road, Whitton Road, Station Road need a full photo montage.

The townscape impact of this development alone and the cumulative impact taking account of the approved scheme at Twickenham Station must be assessed and presented in these visualisations

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

The scope of the visual and townscape assessment proposed in the report appears to be largely satisfactory. The historical analysis of the site and surroundings should include the grade II listed Heatham House, locally listed buildings (Buildings of Townscape Merit) and the identified conservation areas.

The methodology is noted to conform to the Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Management and Assessment (2002), adapted for townscape analysis.

Tree surveys and Arboricultural impact assessments are required to underpin the landscape assessment.

Apart from an urban context analysis, the TVIA should include a landscape strategy and lighting strategy. The landscape strategy should include a masterplan which introduces a series of new landscape features and elements that address the loss of any existing ones, and where possible develop and enhance a strong green infrastructure network and the existing landscape character. This should be underpinned by a full assessment of the landscape resources, landscape character and visual amenity.

Where necessary, the identification of mitigation measures to address any adverse impacts are required.

#### Rights of Light, Daylight and Sunlight and Overshadowing

The light assessment methodology is largely acceptable in terms of impact on local residents but makes no reference to the potential overshadowing effect on the adjacent River Crane NICS, in particular with regard to flora and fauna. This also needs to be part of the EIA.

The amenities of the future occupants of the flats also needs assessment and in this regard the quality of the residential accommodation e.g. entrances, corridors, single aspect flats. Any mutual overshadowing between proposed buildings, including the community building, and the floodlighting impact on proposed residential accommodation from the adjacent sports pitches at Heatham House needs full assessment

A daylight and sunlight study will need to be undertaken to assess the effect on the amenities of occupants of Railway Cottages and should include:-

- Impact on daylight to main habitable rooms
- Impact on sunlight to main habitable rooms that face within 90° of due south
- Shadow assessment to determine permanent shadow on 21 March to garden and amenity areas. As this is the spring equinox, the area in permanent shadow on 21 March will be in permanent shadow all winter
- Shadow assessment to amenity areas to be constructed within the new development

- Daylight assessment to identify that the new dwellings within the development will have adequate internal illuminates

#### Cultural Heritage

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

#### Waste

The proposed methodology and scope of assessment is considered satisfactory.

#### Cumulative Effects and Impact Interactions

Assessment to include the potential cumulative impact of demolition and construction activities in connection with the redevelopments of the Former Royal Mail Sorting Office site and Twickenham Railway Station. All elements of the Sorting Office proposal to be included

#### Topics Not Included in EIA Scope

##### Sustainability

It is accepted that Sustainability need not be further assessed with the ES subject to a Sustainability and Energy Statement, including the Council's Sustainable Construction Checklist, being submitted as part of the planning application documents.

#### Other Elements of the ES

Additional chapters are considered to be necessary on the following matters

- Alternatives and Design Evolution
- Utilities

#### Alternatives

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 describe those alternatives, which were considered by the Applicant and design team, including:

- '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

The alternative layout and massing arrangements should be illustrated. The relationship between these alternatives and the approved development on Twickenham Station need to be shown and their influence on the final design explained.

Should the comprehensive development of the Sorting Office site and surrounding land within the Applicant's and Network Rail's ownership not be proposed in the final

application or combined applications, this will be required to be explained and justified within this section.

#### Utilities

The Council encourages early 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 concerns are not expressed regarding electricity, gas, rail and telecommunications infrastructure, an E.S chapter need not be proposed.

#### Other Matters

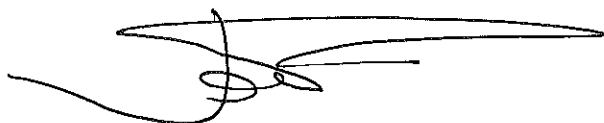
It is considered that the assessment would benefit from providing details of the proposed programme together with specific demolition and construction activities and methods. The Council would strongly recommend a stand alone chapter describing the likely content of the Demolition and Construction Method 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

#### Summary

Whilst the role of the EIA is to examine the 'main' or 'significant' effects of a development, the council would like to ensure that all impacts, both positive and negative, are fully considered, to ensure the best possible form of development. In addition to the topics set out in 7.0 of the scoping report, it is considered that this should be expanded to incorporate sections on 'Utilities', 'Alternatives'

Date of Opinion: 22/08/12



Jon Freer  
Assistant Director of the Environment (Development and Street Scene)

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

