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Maeve McWilliams MRTPI, PIEMA  
Associate Director  
Aldermay House  
10-15 Queen Street  
London  
wsp.com

07.05.2020

Dear Maeve McWilliams,

**Re: Proposed Development at Twickenham Riverside  
Request for EIA Screening Opinion under Regulation 6 of the Town and  
Country Planning (Environmental Impact Assessment) Regulation 2017 (As  
Amended) (EIA Regulations)**

Thank you for your letter dated 1<sup>st</sup> April 2020, and validated 14 April, requesting a Screening Opinion from the Local Planning Authority for the proposed development at Twickenham Riverside.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 7 May 2020, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with Regulations (5) and (6) of Part 2 of the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Angus', written over a light blue background.

Robert Angus  
Head of Development Management

## **LONDON BOROUGH OF RICHMOND UPON THAMES**

### **ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT – DEVELOPMENT MANAGEMENT (PLANNING)**

#### **FORMAL EIA SCREENING OPINION**

#### **SITE: TWICKENHAM RIVERSIDE**

#### **PROPOSED DEVELOPMENT: A DETAILED PLANNING APPLICATION FOR A MIXED- USE DEVELOPMENT AT TWICKENHAM RIVERSIDE (DEVELOPMENT)**

#### **PREAMBLE:**

##### **THE EIA Screening Approach:**

The project is proposed under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 regime.

##### **The EIA Regulations Threshold:**

A screening exercise has been undertaken in accordance with Regulation 5 and 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The Local Planning Authority (LPA) has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise.

The EIA Regulations define 'EIA Development' in Regulation 2(1) as either:

- Schedule 1 development; or
- Schedule 2 development likely to have a significant effect on the environment by virtue of its size, nature or location.

##### **The development is not a Schedule 1 development.**

If the project is listed in Schedule 2, the LPA should consider whether it is likely to have significant effects on the environment. "Schedule 2 development" means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

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

"sensitive area" means:

- (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- (c) the Broads;
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;

- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
- (g) a European site;

**The site is not located within a ‘sensitive area’.**

The LPA is of the view that the proposal would be an Urban Development Project (including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiples cinemas) as defined under Schedule 2, Part 10 (B) of the Regulations, which has a relevant threshold of:

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

The NPPG states, “*the criteria and thresholds in column 2 represent the ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area)*”.

The NPPG also set out an indicative threshold, advising:

1. EIAs are unlikely to be required for the redevelopment of land unless:
  - the new development is on a significantly greater scale than the previous use, or
  - the types of impact are of a markedly different nature or there is a high level of contamination.
2. Sites which have not previously been intensively developed:
  - area of the scheme is more than 5 hectares; or
  - it would provide a total of more than 10,000 m<sup>2</sup> of new commercial floorspace; or
  - the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

Again, the NPPG states “*when considering the thresholds, it is important to also consider the location of the proposed development. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely.*”

The proposed development has the following project quantities (Table 1), which confirms the **Development falls below the relevant threshold.**

**Table 1: Project quantities**

	<b>Schedule 2 thresholds</b>	<b>Indicative thresholds</b>	<b>Proposed scheme</b>
<b>Site area</b>	5ha	5ha	1.23ha
<b>Number of residential units</b>	150	1000	Approx. 54
<b>Retail area</b>			543m <sup>2</sup>
<b>Commercial area</b>			1027m <sup>2</sup>
<b>Other uses</b>			1000m <sup>2</sup>
<b>Total commercial floorspace</b>		10,000m <sup>2</sup>	2570m <sup>2</sup>

<b>Area of urban development not including dwellinghouse development.</b>  <b>(retail, commercial and other uses)</b>	1ha		0.25ha
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In addition to the above, and as outlined in the submission:

- The Site is currently developed and located within an urban area
- Whilst the Development would be on a greater scale than its existing use, the surrounding area includes built developments of a similar uses and scales.
- Given the surrounds, context and existing receptors, the type of impacts the Development will generate are not deemed markedly different in nature to those already in the area.
- It is not unusual for sites to have previous industrial land uses, with a contamination risk. However, such environmental effects can be adequately managed through typical best practice design measures and suitable conditions.

**In summary:**

- The development is not within a sensitive area
- The development does not exceed the Schedule 2 or indicative thresholds.
- The development is not Schedule 2 development.
- On review of the indicative thresholds and criteria, the specific nature and context of the Site, the existing development on the Site, the type and scale of Development, and the potential environmental effects, it is considered the Development does not represent EIA development.

Notwithstanding the above, the NPPG states, “*it should not be presumed that developments...falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits*”. Therefore, the submission has undertaken a high-level assessment to ensure that the site context and specific nature of the Development are given full consideration in reaching a final conclusion.

**National Planning Policy Guidance (NPPG):**

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

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

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

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

**Regulation 6 of the EIA Regulations**

Regulation 6 (2) sets out the necessary information the person making a Screening Opinion request must provide. Table 2 shows the conformity with these requirements.

**Table 2: Screening Opinion submission requirements**

Regulation 6 requirements	Conformity
(a) a plan sufficient to identify the land;	yes
(b) a description of the development, including in particular— i. a description of the physical characteristics of the development and, where relevant, of demolition works; ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;	yes
(c) a description of the aspects of the environment likely to be significantly affected by the development;	yes
(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from— i. the expected residues and emissions and the production of waste, where relevant; and ii. (ii) the use of natural resources, in particular soil, land, water and biodiversity; and	yes
(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.	yes <b>(EIA Screening Checklist)</b>

a) Identify the site.

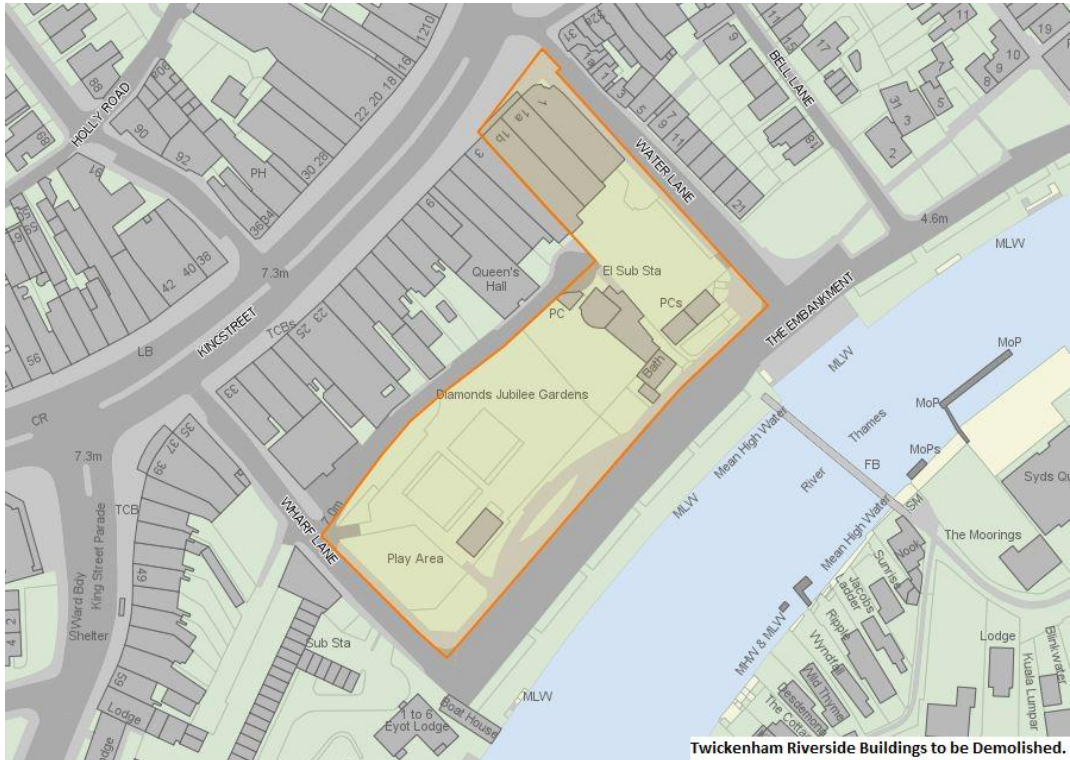
The Site (as shown in the below extracts) extends to approximately 1.23 ha and is centrally located within Twickenham Town Centre and encompasses the whole of the riverside area between Water and Wharf Lane. It is bounded to the north by the commercial units fronting King Street, to the south by the River Thames (with Eel Pie Island beyond), to the east by residential dwellings fronting onto Water Lane and to the west by the side elevation of a commercial unit, an existing car park and a boundary wall running adjacent to Wharf Lane (with residential beyond).

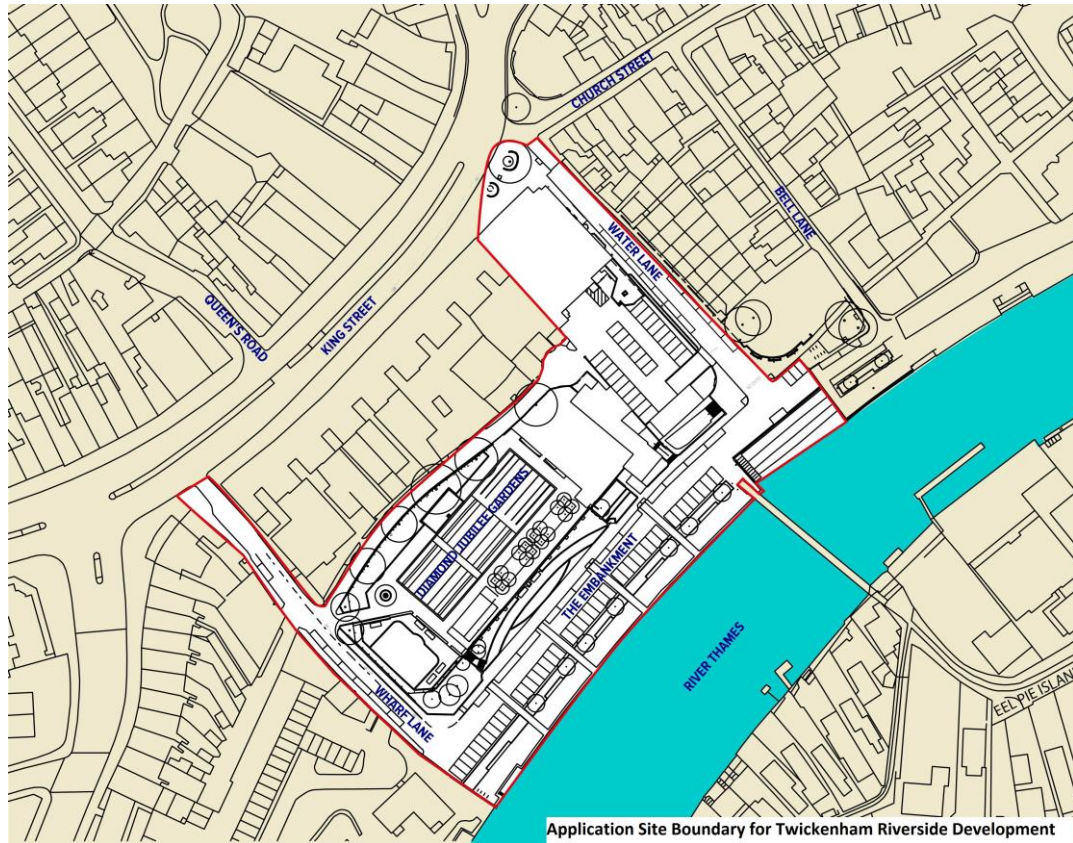
The only access to Eel Pie Island, other than by boat, is by foot-bridge, the northern end of which falls within the Site’s red line boundary.

The following uses currently occupy the site:

1. Diamond Jubilee Gardens. Hard and soft landscaped public open space which includes a play space and a small café centrally located within the Site;
2. Unit numbers 1, 1A, 1B and 1C King Street (currently retail and commercial uses). The pedestrian walkway directly in front of these buildings and the private car park to the rear.
3. A service road running to the rear of the commercial units on King Street, connecting Water and Wharf Lane;
4. The Embankment, which runs along the River Thames waterfront, between Wharf and Water Lane, providing parking and promenade for pedestrians and cyclists;
5. A one-storey pavilion building with a small publicly accessible terrace and benches that front onto the Embankment. To the west of this building and elevated above the

- road level is a two-storey property (Bath House) featuring flat roof and garage at roadside level. Access to the property is via a set of steps from the Embankment.
6. A red brick retaining wall forms the boundary to the built form and runs from the south of the King Street units along the eastern boundary of the car park on Water Lane. Here it wraps around to the south, in front of Bath House and the pavilion building and continues in south west direction along the entire stretch of the Embankment. It forms the southern boundary to the Diamond Jubilee Gardens;
  7. The Site includes a landscaped area of public realm to the south of Diamond Jubilee Gardens, which includes seating, raised planting beds and hard landscaping;
  8. One sub-station located within the Site boundary, which may be relocated as part of the Proposed Development.





b) a description of the development, including in particular (i) a description of the physical characteristics of the development and, where relevant, of demolition works;

Demolition: All existing buildings within the site boundary.

Proposed land uses:

- Approx. 54 residential units (ranging from studios to 3-bedroom apartments, with 50% affordable and disabled accommodation),
- Retail area extending to 543m<sup>2</sup>, commercial area extending to 1027m<sup>2</sup> and other uses (food, beverages and amenity) extending to 1000m<sup>2</sup>;
- A newly invigorated Diamond Jubilee Gardens.
- Approx. 23 car parking spaces.

Physical characteristics of the development:

- A revitalised Diamond Jubilee Gardens (Gardens) elevated above the flood plain with a new play space and views over the River Thames (River). The Gardens will extend southwards into the new Riverside Market square located in the southern part of the Site and running adjacent to the River. This area will be car-free and will accommodate approx. 1,000 people for large events;
- A new café in the Gardens, located in the vicinity of a proposed new play area;
- A three-storey building located on Water Lane which will comprise mainly of apartments above retail and commercial uses. It will extend southwards along Water Lane from its junction with King Street and Church Street. A new access road will connect Water and Wharf Lane;
- A four to five storey building on Wharf Lane will be partially built on stilts over the embankment. Residential uses will be provided over commercial/other uses which will be located on the ground floor. A sharing Winter Garden space is also proposed in this area. A boathouse and market storage area will sit under this building

enabling engagement with the riverfront, though the boathouse will not directly connect with the water itself. There is also some plant accommodation to be located within a basement proposed to be cut into the rising ground below the proposed building on Wharf Lane;

- Numerous external spaces for a range of uses throughout the Site, including play spaces, recreational areas etc; and
- Car-parking provision, (some re-provision and some new):
  - 7 pay & display car parking bays;
  - 6 business/resident permit car bays;
  - 6 accessible car parking bays;
  - 3 loading bays for Eel Pie Island; and
  - 1 motorcycle space.

b) a description of the development, including in particular (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

The submission describes the environmental sensitives of the geographical areas likely to be affected. This has been expanded upon with other available knowledge / sources. (Summarised in Table 3).

The site is located within Twickenham Town Centre and within the Twickenham Area Action Plan (TAAP). The frontage onto King Street is within the Key Shopping Frontage and adjacent to the Key Office Area. Whilst the area is predominately commercial, residential units occupy many of the floors above commercial properties within the area, and residential dwellings are opposite and adjacent the site in Water Lane, The Embankment, Cross Deep and Eel Pie Island in particular.

The site has good transport connectivity, with a PTAL rating of 5; and Twickenham Train Station is approx. 500m to the north of the Site, and numerous bus services on surrounding roads. The site is equally accessible for pedestrians and cyclists, with The Embankment forming part of a quiet cycle route. Within the site there is currently 80 car parking spaces.

Whilst there are no Listed Buildings or Buildings of Townscape Merit (BTMs) within the site boundary, the Site is within Twickenham Riverside conservation area; and Archaeological Priority Area; and adjacent to, Queens Road conservation area; BTMs in King Street, Water Lane and Eel Pie Island; and Listed Buildings at Thames Eyot, along The Embankment, King Street and Church Street.

There are no Grade I Listed Buildings or World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 100m of the Site boundary. However, York House Gardens, which is on the English Heritage register of historic parks and gardens, is to the east of the site (approx. 180m).

The site within Flood Zones 2, 3a and 3b, and has a flood defence extending across the Site.

**Table 3: Summary of site designations:**

Environmental sensitivity	Site	Within geographical area
<b>Heritage Assets</b>	<ul style="list-style-type: none"> <li>○ Twickenham Riverside Conservation Area</li> <li>○ Twickenham and Marble Hill</li> </ul>	<ul style="list-style-type: none"> <li>○ Grade II Listed Buildings within 100m of the Site and a number of Grade II* Listed Buildings within</li> </ul>



	<ul style="list-style-type: none"> <li>○ Archaeological Priority Area</li> <li>○ Sites lies across the river from Eel Pie Island, where significant prehistoric remains have been recorded.</li> </ul>	<ul style="list-style-type: none"> <li>○ the wider area.</li> <li>○ Adjacent to BTMs on Water Lane / King Street / Eel Pie Island</li> <li>○ Opposite Queen’s Road Conservation Area.</li> <li>○ Historic Park / Garden to east</li> </ul>
<b>Social economic</b>	<ul style="list-style-type: none"> <li>○ Article 4: Restricting A1 To A2</li> <li>○ 1-33 King Street – Key shopping frontage</li> <li>○ Brownfield Register</li> <li>○ TW7 site allocation (TAAP)</li> </ul>	<ul style="list-style-type: none"> <li>○ Adjacent to Key Office Area</li> </ul>
<b>Transport</b>	<ul style="list-style-type: none"> <li>○ PTAL 5</li> <li>○ Public highway – The Embankment and service road to the rear of King Street</li> <li>○ Off road and quiet cycle route – The Embankment.</li> </ul>	
<b>Ecology</b>		<ul style="list-style-type: none"> <li>○ One statutory designated site, seven non-statutory designated Sites of Importance for Nature Conservation and five lowland mixed deciduous woodland Habitats of Principal Importance within a 1km radius;</li> <li>○ Adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation / Other Site of Nature Importance.</li> </ul>
<b>Pollution</b>	<ul style="list-style-type: none"> <li>○ Air Quality Management Area</li> <li>○ King Street – Air Quality Focus Area</li> <li>○ Partly contaminated land</li> </ul>	
<b>Flooding</b>	<ul style="list-style-type: none"> <li>○ Flood Zone 2, 3a and 3b</li> <li>○ Flood defence</li> <li>○ Critical Drainage Area</li> <li>○ Area susceptible to Surface Water Flooding.</li> </ul>	
<b>Open Space / Townscape</b>	<ul style="list-style-type: none"> <li>○ Partly Metropolitan Open Land</li> <li>○ Thames Policy Area</li> <li>○ Public Park / Open Space</li> </ul>	Adjacent to the River Thames

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

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

i. the expected residues and emissions and the production of waste, where relevant; and

ii. the use of natural resources, in particular soil, land, water and biodiversity; and

**Summarised in Table 4: Environmental sensitivities and effects**

<b>The Site and its environmental sensitivity and aspects of the environment likely to be significantly affected</b>	<b>Description of Likely Environmental Effects</b>
<b>Air quality</b>	<ul style="list-style-type: none"> <li>• Demolition and construction</li> <li>• Dust particles</li> <li>• Emissions</li> <li>• Operational phase – traffic, emissions, mechanical plant</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>• New residential receptors and activities</li> <li>• Noise and vibration</li> <li>• Noise associated to construction and operational development.</li> </ul>
<b>Transport – cycle and pedestrian network; trains; car parking</b>	<ul style="list-style-type: none"> <li>• Impacts during demolition, construction and operation.</li> </ul>
<b>Ecology</b>	<ul style="list-style-type: none"> <li>• Birds</li> <li>• Bats</li> <li>• Aquatic</li> <li>• Ecological resource</li> </ul>
<b>Arboriculture</b>	<ul style="list-style-type: none"> <li>• Impact on trees during demolition, construction and operation.</li> </ul>
<b>Heritage - Archaeology, built heritage and conservation area</b>	<ul style="list-style-type: none"> <li>• Disturbance and visual impact during demolition and construction</li> <li>• Visual impact arising from finished development</li> </ul>
<b>Flood risk, drainage and water environment</b>	<ul style="list-style-type: none"> <li>• Impact upon flood defence</li> <li>• Increase in flooding</li> <li>• Runoff rates</li> </ul>
<b>Daylight / sunlight and overshadowing</b>	<ul style="list-style-type: none"> <li>• Impact on sensitive receptors</li> </ul>
<b>Ground conditions and contamination</b>	<ul style="list-style-type: none"> <li>• Pollutants released during demolition and construction</li> </ul>
<b>Materials and waste</b>	<ul style="list-style-type: none"> <li>• Waste production</li> <li>• Dust, noise and traffic associated to waste removal</li> </ul>
<b>Climate change / Greenhouse gas emissions</b>	<ul style="list-style-type: none"> <li>• Generation of greenhouse gases though construction and operation (heating and cooking)</li> <li>• Traffic associated to construction</li> </ul>
<b>People and communities</b>	<ul style="list-style-type: none"> <li>• Accidents during construction</li> <li>• Contamination</li> <li>• Employment, housing, community and open space facilities,</li> </ul>
<b>Major Accidents and disasters</b>	<ul style="list-style-type: none"> <li>• Flooding</li> <li>• Malicious attacks</li> <li>• Unexploded ordnance</li> </ul>

- e) Other information the person making the request may wish to provide; and features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

An EIA Screening Checklist accompanied the Request. This includes measures anticipated to mitigate likely significant environmental effects.

## **SCREENING OPINION**

Regulation 5(4) of the Regulations and NPPG require the LPA to consider the screening criteria set out in Schedule 3 of the Regulations:

1. *Characteristics of development*
2. *Location of development*
3. *Type and characteristics of the potential impact*

To aid LPA's to determine whether a project is likely to have significant environmental effects, the NPPG sets out an indication of the types of impact that are most likely to be significant for particular types of development. Of relevance to this Development are:

- Physical scale,
- Potential increase in traffic, emissions and noise.

Whilst any development will have an impact on the environment, which will be considered against the Development Plans and guidance as and when an application is submitted, for the purpose of this Screening Opinion, consideration is given to whether the development is likely to give rise to significant impacts in context of the EIA Regulations.

### **(1) Characteristics of the Development**

- a) The characteristics of development must be considered with particular regard to the size and design of the whole development**

Whilst there are open areas within the Site, namely to the south adjacent to the River and the existing Diamond Jubilee Gardens, the Site is predominantly hard surfaced with extensive parking, and where there are buildings, these are mostly 1-2 storeys.

The Development includes the demolition of all existing buildings and wholesale redevelopment:

- A revitalised Diamond Jubilee Gardens, which will remain elevated above the floodplain, and extend southwards
- A riverside market square in the southern part of the Site, adjacent to the River.
- Numerous external spaces for a range of uses throughout the Site
- Car parking provision (reprovision and new)
- New access road connecting Water and Wharf Lane
- New buildings:
  - A new café in the Gardens
  - A three-storey building located that will extend southwards along Water Lane from its junction with King Street and Church Street.
  - A four to five storey building on Wharf Lane, partially built on stilts over the embankment.

Whilst the Development will cause physical changes to the site and surrounds, the submission confirms sensitive design measures considering scale, massing and height in relation to existing setting will be inherent within the design. By reason of such, the sites location and when considering local context, is not deemed to cause significant effect, particularly given the following documents will be required upon submission, which will assist in demonstrating no significant effect:

- Design and Access Statement
- Photomontages
- Streetscape drawings
- Open Space Assessment
- Landscape Design Strategy
- Hard and Soft Landscaping

**b) The characteristics of development must be considered with particular regard to the cumulation with other developments**

Whilst there may be potential for cumulative effects during construction, especially given the current redevelopment of Twickenham Station and Richmond College, it is deemed this can be controlled through appropriate conditions / heads of terms, such as Construction Logistics Plan (of which a framework will be necessary at time of submission). Given the limited size and nature of the Development; its location and site allocation designation; the cumulative impacts of the Development are not deemed to give rise to significant environmental effects.

**c) The characteristics of development must be considered with particular regard to the use of natural resources, in particular land, soil, water and biodiversity**

Land and natural resources:

Whilst land and natural resources will inevitably be utilised, the impacts will not be significant. The Site represents a developed site located within an urban area, is on the Brownfield Register and also has a site allocation for redevelopment (TW7 TAAP). In addition, the submission confirms:

- the waste hierarchy will be applied;
- sustainable materials will be utilised during the construction stage;
- energy efficiency will be designed in to the proposed development;
- separate energy and sustainability statements will be prepared.

Geology and Hydrogeology

A Desk Study and Ground Investigation Report was prepared in 2017 which related to the eastern part of the Site. The British Geological Survey (BGS) map of the area indicates that the eastern part of the Site is underlain by Langley Silt over Kempton Park Gravel, which in turn is underlain by the London Clay Formation. The Kempton Park Gravel is classified by the Environment Agency as a Secondary 'A' Aquifer which is defined as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Groundwater is likely to be present at the base of the Kempton Park Gravel and flowing towards the River.

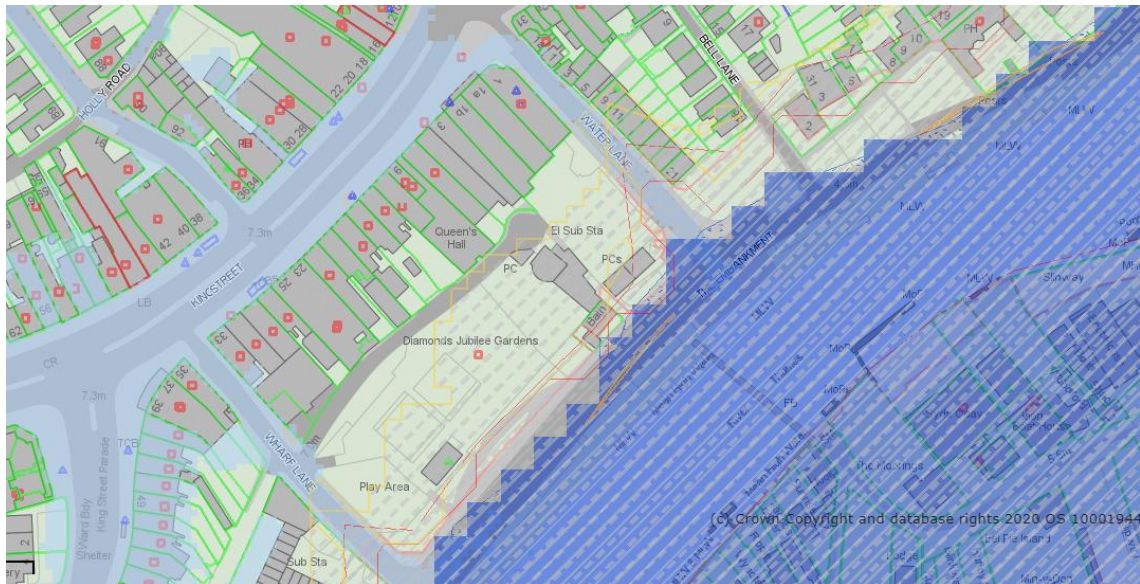
The Site has a designation of partially contaminated land. A former 2017 study identified that there were areas of contamination within the southern parts of the Site.

There is potential for pollutants to be released into the ground or into surface water, however, these are not deemed to be significant with the following mitigation:

- DCEMP to include the storage, use and handling of substances and materials, refuelling and fuel/oil storage and procedures for surface water management.
- Phase 1 Land Contamination Desk Study Report be prepared and submitted
- Preliminary risk assessment and where necessary include recommendations of further detailed site investigations.
- Remediation Method Statement
- Validation report submitted to and approved by LBRuT.

### Surface Water and Flooding

The roads surrounding and within the site suffer from surface water flooding (light blue); the south-eastern part of the site is flood zone 3b - functional floodplain (dark blue). The south-eastern half of the site is located within flood zones 2 and 3. The site has a flood defence running across the site (pink), and the existing development forms part of that flood defence. The site is also within a Critical Drainage Area.



Given the flood zone, critical drainage and surface water designations, and flood defence forming part of the existing site, there is risk of flooding both at construction and operational development.

The submission confirms, in line with NPPF requirements, the following documents will accompany a planning application / designed into the scheme:

- A Flood Risk Assessment (FRA): This will investigate the potential sources of flooding and demonstrate any flood risk relating to the Development or caused by the Development elsewhere is mitigated using appropriate design solutions and management procedures;
- Outline Drainage Strategy (incorporating a London Sustainable Drainage Proforma and Statement on Sustainable Drainage Systems)
- Suitable levels of attenuation will be incorporated into the Development.

During construction, the effects are unlikely to be significant if appropriate best practice demolition and construction techniques are adopted in accordance with a DCEMP. Further, with the aforementioned documents, design and mitigation measures (and measures outlined below), the operational Development is not deemed to give rise to significant risk of flooding, either on Site or in the surrounds:

- Incorporation of flood resilient design
- Constructed in accordance with the approved documents;
- Retention of the effectiveness, stability and integrity of flood defences and river banks;
- Retaining essential maintenance and upgrading to be carried out in the future on the existing flood defence;
- Taking account of the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme.

The Borough's Highway Asset Manager also makes the following recommendations:

- The functional floodplain should not be incorporated within the development nor should the development reduce the Flood Plain Area, which may affect local flood water levels. This is equally applicable both during Construction and Operational development.
- A safe Escape Route / Evacuation Plan must be devised, notified to all occupants and implemented at all times.
- Subscription to Environment Agency Flood Warning Service
- The Drainage Strategy should aim to discharge surface water to the River, subject to removal of contaminants by suitable SuDS measures.
- If works to the flood defence are made, temporary defences, to a standard approved by Environmental Agency, must be in place at all times.

The Environment Agency are not a statutory consultee for EIA Screening Opinions. However, they wish to offer pre-application advice – refer to Appendix 2.

Biodiversity: The site is not subject to any statutory or non-statutory nature conservation designations. However:

- There is one statutory designated site within a 1km radius: Ham Lands Local Nature Reserve.
- There are seven non-statutory designated Sites of Importance for Nature Conservation within a 1km radius.
- There are five lowland mixed deciduous woodland Habitats of Principal Importance within 1km of the Site;
- The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation;

A Preliminary Ecological Appraisal (PEA) was prepared in October 2017 which related to the majority of the Site except Wharf Lane and the Embankment. It comprised a Phase 1 habitat survey (undertaken in May 2016), a protected species assessment and an evaluation of the Site's importance for nature conservation. The key findings were:

- The main habitats present included hardstanding/buildings, amenity grassland, broadleaved woodland, species-poor non-native hedgerows, dense scrub, introduced shrub and scattered trees;
- Habitats present at that time (2016) were considered to be of local value and included lowland mixed deciduous woodland and a hedgerow. Hedgerows are a Priority Habitat in the LBRuT. In 2019 the updated LBRuT Biodiversity Action Plan included a Habitat Action Plan for Hedgerows;
- Several buildings and trees were identified as having the potential to support roosting bats. Further Bat surveys were recommended at that time to include internal building inspections and a preliminary ground level roost assessment of trees;
- Buildings and vegetation within the Site boundary were identified as having the potential to support breeding birds;

- Habitats suitable to support hedgehogs was identified. The report recommended that measures should be taken to continue accommodating this species on site post development.
- Deadwood suitable for stag beetles was identified and best practice should be followed during the removal of any trees/tree stumps; and
- The Site includes an area of self-seeded trees considered to be of only local value but is likely to be a stepping stone to other areas of woodland/habitat

A Preliminary Bat Roost Assessment was undertaken in July / August 2017:

- The four buildings which were inspected were assessed as having low potential to support roosting bats.
- All trees within and four mature trees immediately adjacent to the redline boundary were assessed as having negligible potential to support roosting bats.
- One dusk emergence survey was carried out on the four buildings in August 2017. No bats were recorded as emerging from, or suspected as having emerged from, any of the buildings within the Site. Limited commuting and foraging activity by three common species of bats was recorded on Site.

In terms of the potential impacts and necessary mitigation, the submission identifies:

- An updated PEA (including Phase 1 habitat mapping and any required protected species survey) is undertaken.
- Any recommendations set out in the PEA will be designed into the Development and secured by a planning condition.
- The potential effects on biodiversity arising from the demolition, construction or operation can be mitigated through:
  - Timing of works (such as vegetation clearance outside of bird nesting season (or under supervision or supervised demolition of structures outside of bat maternity season)
  - Provision of compensatory roosting/nesting features in new buildings and foraging habitats
  - New landscape strategy.
  - Appropriate licences with regard to any bat roosts are obtained to allow legal demolition of buildings/structures.
  - Improvement to London's urban ecological resource.

The Council agrees that with the above mitigation measures, in addition to those identified below, significant impacts on the biodiversity value of the site and those adjacent (including the river) can be avoided:

- PEAs are now superseded by Ecological Impact Assessment (EclA). Therefore, an EclA (including Phase 1 habitat mapping and any required protected species surveys) as per CIEEM 2019 guidance and BS 42020:2103 must be undertaken and submitted. And, any recommendations adopted and designed into the scheme.
- Demolition and Construction Environmental Management Plan (DCEMP)
- Drainage Construction Runoff Strategy
- Surface Water Strategy
- Contamination and remediation strategies

**d) The characteristics of development must be considered with particular regard to the production of waste**

Construction: The Development would by its very nature generate waste, associated with the construction, demolition of existing buildings and excavation of the basement area. This is not deemed to be significant and effects can be controlled / mitigated by:

- Pre-demolition audit – providing details on materials that can be reclaimed and recycled and assist in waste segregation recommendations.
- Effective water suppression during demolition
- Buildings soft stripped inside before the demolition process commences.
- Construction traffic route information / agreement
- Investigation to see if construction materials can be used efficiently on-site and that all re-useable wastes recovered, re-used or recycled wherever possible.
- Approval and implementation of a Waste Management Plan and Demolition and Construction Environmental Management Plan that follows the waste management hierarchy (reduce, reuse and recycle).

Operation: A Waste Management Strategy that deals with operational waste and informs the design process (to also include appropriate refuse and recycling facilities) will be submitted with the application.

**e) The characteristics of development must be considered with particular regard to pollution and nuisance**

Noise pollution:

- Construction: Noise and vibration generated during the demolition and construction phases could have some negative effects within the surrounding area / receptors. However, it is deemed typical industry standard noise mitigation measures set out in DCEMP and piling methodology, secured via condition, and implemented as approved will reduce and minimise potential effects.
- Operational: There is potential for a change in noise and vibration, both for existing and future receptors. The submission recommends baseline noise measurements at several locations are undertaken to establish the range in existing noise levels. The results of the noise survey and design recommendations will be contained within an Acoustic Assessment and/or Acoustic Design Statement which will be submitted with the planning application as a supporting planning document. The Council agrees with such and recommends this informs the design. Conditions can be imposed to ensure noise and vibration do not cause significant effects, for example: hours of uses; noise limits for mechanical plant; anti-vibration equipment, noise insulation etc. The above is supported by Environmental Health who deem noise and vibration during both construction and operation can be controlled by way of acoustic assessment and condition.

Light pollution:

The submission does not consider the effects on light pollution directly. Both construction and the Development have the potential to cause light pollution. During works, it is recommended a DCEMP is secured (either at time of submission or by condition) that addresses the impact of light pollution and how this will be minimised. For example,

- Keeping construction lighting (amount, level and hours) to an absolute minimum;
- Sensitive lighting design to prevent spillage onto features including the River / trees;
- Lighting strategy to ensure no negative effects on river navigation and river ecology

The submission confirms a Lighting Strategy will be submitted with the application. It is recommended this should inform the design, and safeguarding conditions can be secured to ensure there are no significant effects.

Land / soil contamination:



- Construction: There is a potential for pollutants to be released into the ground or into surface water during demolition and construction. However, it is deemed this could be suitably addressed through mitigation measures:
  - Demolition and Construction Environmental Management Plan (to include the storage, use and handling of substances and materials, refuelling and fuel/oil storage)
  - Procedures for surface water management.
- Operation: Any potential impacts on existing receptors surrounding the Site and future receptors, can be suitably controlled through an update Phase 1 Land Contamination Desk Study Report, including a preliminary risk assessment, and conditions to ensue any recommendations / further site investigations and remediation and validation reports are submitted, implemented and verified.

#### Climate Change and Greenhouse Gas Emissions

- Construction: During demolition and construction, different types of materials will be required, and the generation of greenhouse gases associated with the production of such materials is acknowledged, in addition to traffic movements that may generate greenhouse gas emissions. It is deemed these will not give rise to significant impacts, and conditions can secure appropriate mitigation, for example, a DCEMP (turning off/throttling down plant and equipment when not in use and minimising deliveries)
- During operation:
  - The Development will have significantly reduced car parking provision compared to the current situation.
  - Whilst the proposed uses will give rise to greenhouse gases through the use of natural resources and through the heating and cooling of buildings, there are policy requirements for standards, both carbon and air quality, which will aim to minimise the impact
  - Energy and sustainability statements will be prepared and submitted in support of the planning application and recommendations applied within the Development.

As such, appropriate mitigation measures will be secured either through the application of policy or conditions to ensure both construction and operation do not cause significant impacts.

**f) The characteristics of development must be considered with particular regard to the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;**

The nature of the Development is not deemed to result in the potential for major accidents and disaster events to occur, however for proportionality, the evaluation process of such major accidents and/or disasters has been considered:

- Flooding, in response to the sites location within flood zones and a flood defence running across the site, the submission confirms a FRA and Drainage Strategy will be provided, demonstrating any flood risk is mitigated using appropriate design solutions, drainage measures (including climate change allowances) and management procedures;
- Malicious Attacks (Terrorism). The current threat level for international terrorism in the UK is 'substantial'. The Development will incorporate Secure by Design principles to increase its resilience in the event of a malicious attack; and
- Unexploded Ordnance – A Desk Study and Ground Investigation Report was undertaken in 2017, which included a preliminary UXO Risk assessment. It recommended that due to the known falling of a V-1 bomb immediately south of the

Site a detailed risk assessment should be completed. An updated Preliminary UXO Risk Assessment, which will include an initial UXO search, will be undertaken and submitted with any forthcoming the planning application.

Whilst not referred to, there is the risk of marine / aquatic pollution from construction runoff. However, with the implementation of a DCEMP the risk associated with the impact of accidental pollution events is considered low and can be mitigated.

Port of London were notified of the Screening Opinion request. Given the location of the Development, and the potential for high numbers of people expected to visit the riverside area, the following mitigation measures are recommended:

- Provision of appropriate Riparian Life Saving Equipment (such as life buoys, escape ladders and grab chains) along the riverside,
- Introduction of suicide prevention measures, for example, CTV and appropriate signage.

Based on the above, it is deemed any risk to major accordance or disasters can be mitigated.

**g) The characteristics of development must be considered with particular regard to the risks to human health (for example, due to water contamination or air pollution).**

- Construction: As with any development there is the risk that accidents could occur. However, it is deemed that this can be controlled / mitigated through:
  - health and safety legislation
  - good site management procedures
  - construction management plans
  - DCEMP
  - remediation strategy
- Operation: The submission confirms a Health Impact Assessment will be submitted, and a remediation strategy would be a condition of any consent granted to ensure contamination does not risk existing and future residential receptors. In addition, the FRA and Drainage Strategy will investigate flooding and demonstrate flood risk is mitigated both on site and around.

The potential risk to human health, considering mitigation measures, is not deemed to be significant.

**Summary – On the basis of the information provided, by reason of the scale and nature of the Development, the temporary duration, reversibility and intensity of such impacts though construction, in addition to the environmental context of the site and potential mitigation measures, significant environmental effects are not considered likely.**

**(2) Location of Development**

The site is within a relatively densely populated area in Twickenham Town Centre and is considered to be highly visible from the nearby residential developments on Eel Pie Island, surrounding developments and river and riverside users. Whilst the Site does not lie within or adjacent to a 'sensitive area' as defined in the EIA Regulations, the Development is in an environmentally sensitive location, designated an Archaeological Priority Area, lying partly within the Thames Policy Area, Flood Zones and adjacent to the River Thames (designated Metropolitan Open Land and an Other Site of Nature Importance) and within the Twickenham Riverside Conservation Area, and adjacent to other Heritage Assets,

designated and non-designated. The proposal will need to be mindful of these important constraints and designations and potential impacts should be diminished through appropriate design and mitigation measures.

**a) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the existing and proposed land use**

The site is within an urbanised area within a town centre boundary and incorporates leisure, commercial and open space land uses. Surrounding the Site are similar uses, including residential. Whilst the Development would be on a greater scale than its existing use, given the proposed uses are similar to those already found either on site or in the surrounds, no significant effects on existing and proposed land uses are identified:

Transport: The Site is highly accessible:

- Within PTAL 5
- Located on a TfL Strategic Road Network
- Twickenham Railway station – approximately 5-10 minutes away, providing services to London Waterloo, Reading, Windsor and Eton Riverside and Wimbledon.
- Bus services - Accessed from Cross Deep, Heath and London Road and York Street
- The Embankment – Forms part of a cycle route and has a segregated promenade along the waterfront for pedestrians and cyclists.
- With respect to parking provision:
  - There is a private car park to the rear of King Street;
  - The on-street parking within the site boundary is controlled by Central Twickenham Car Parking Zone, that operates between Monday to Saturday 8.30am to 6.30pm (Bank and Public holidays free).

The Proposed Development will have a 'car lite' approach, replacing the 80 current spaces with approx. 23. The parking currently located on The Embankment (between Wharf Lane and Water Lane) will be relocated and or removed in line with LBRuT aspirations, and the proposed parking provision will include:

- 7 pay & display car parking bays;
- 6 business/resident permit car bays;
- 6 accessible car parking bays;
- 3 loading bays for Eel Pie Island; and
- 1 motorcycle space.

The following documents will accompany an application:

- Transport Assessment
- Construction and Logistics Plan;
- Delivery and Servicing Plan;
- Travel Plan;
- Active Travel Zone assessment; and
- Car and Cycle Parking Management Plan.

Construction: It is deemed the demolition, construction or operational effects of the proposed development will not be significant, subject to securing through conditions and Heads of Terms, and the implementation of approved plans and strategies:

- Construction Management and Logistics Plan.
- Compliance with Considerate Constructors Scheme
- Consideration given to the potential use of the River Thames for the transportation of construction materials and waste
- Diversions of any cycle / pedestrian routes, with clear signage

- Provision of details on how access to Eel Pie Island via the footbridge will be maintained.
- Communication strategy to local residents prior to and during demolition and construction to inform residents of any roads or transport networks being temporarily closed or diverted.

Operational: Given the limited scale of the development (in terms of land uses) and reduction on car parking on site, this is not deemed to cause significant trip generation effects on the highway network. Whilst the reduction of on street parking may impact the highway network, with the following measures secured through condition or Heads of Terms, the impact is not deemed to be significant:

- Transport Assessment – including survey work on existing parking on street and in surrounding car parks and details of location and hours of serving / loading bays
- Delivery and Servicing Plan;
- Travel Plan;
- Car and Cycle Parking Management Plan.
- CPZ permit restrictions
- Possible car park provision and / or membership
- Meeting minimum cycle parking provision
- Way finding signage

#### Navigation:

- The red line boundary extends into an area of the PLAs navigational jurisdiction to the east of the footbridge at the southern end of Water Lane including the river steps which lead down to the foreshore. The PLA must be contacted with regard to any proposals for this specific area. (Refer to Appendix 1 – Map of PLA's navigational jurisdiction).

#### Socio-economic and community:

- Residential, sport and leisure clubs / activities and businesses are located close to the site, including Eel Pie Island)
- There is a cycle route on The Embankment.
- Diamond Jubilee Gardens provides public open space, including a play space and a small café.
- There are commercial premises on King Street that form part of the Site, which will be demolished.
- The service road to the rear of King Street provides access to the commercial and residential units along King Street.

Whilst the construction has the potential to impact upon access to both Eel Pie Island and the rear of premises along King Street, it is deemed this can be adequately mitigated through, Construction Management Plans, Access Plan, and on street car parking / loading bay management plan. Similarly, any impact upon the cycle route can be mitigated through a diversion scheme with appropriate signage. For general riverside users, there should be clear communication and signage regarding construction programme, so they can be kept informed.

The operational development is not deemed to give rise to unacceptable impacts given the servicing access road; business / permit and loading bays, river access and a rejuvenated park will be incorporated into the scheme.

#### Future land uses:

The Site comprises one section of the Twickenham Riverside and Approaches (TW7) allocation within the adopted TAAP. In particular, the site forms part of proposal site

TW7, which sets out general principles, policy and guidance with respect to any future development. The proposed uses respond to the TAAP aspirational land uses for the Site.

Employment:

The site currently generates employment, primarily through the commercial premises facing King Street. Whilst these buildings will be demolished, the Development proposes approx. 2500m<sup>2</sup> of commercial / retail and other uses that will provide long term operational employment opportunities. This is in addition to the short term opportunities through construction. As such, the scheme is not deemed to give rise to significant effects.

Demographics:

By reason of the limited number of residential units proposed, the context and character of the surrounds, the Development is not deemed to significantly alter the demographics in the area.

Wind climate:

Wind and the impact of the construction and Development on such, has not been addressed within the submission. However, given the Sites location, surrounding pattern of development, existing buildings on site, and limited scale of the Development, this is not deemed to result significant effects.

Daylight, sunlight, overshadowing and solar glare

The development may change light conditions to receptors adjacent to the site. The submission confirms a Daylight, Sunlight and Overshadowing Study will be prepared in line with current guidance and submitted with the planning application, which will assess the impact of the Development on surrounding sensitive receptors and the outputs of the study will inform the iterative design process. This is deemed a reasonable approach.

- b) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard to the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground**  
**and**  
**c) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the absorption capacity of the natural environment, paying particular attention to the following areas**

Wetlands, riparian areas, river mouths and coastal zones and the marine environment

The Site falls within the Thames River Basin District – and Thames River Basin Management Plan. Given the site boundary, the Development has the potential to impact upon the River, bank and associated aquatic receptors. Whilst not included within the submission, it is recommended that any application is accompanied with the following to demonstrate the impact, and outline any recommendations / mitigation that may be necessary to avoid any significant impacts:

- Water Framework Directive Assessment:
- Aquatic Ecology Desktop Study: Impact from, for example, water contamination and disturbance.
- A DCEMP.

Riparian areas: A four to five story building will be built on stilts on Wharf Lane, and as part of this structure a boathouse and market storage area will sit under the building

enabling engagement with the waterfront. The PLA will need to review the detailed plans of this part of the development, and its interaction with the river environment. Any temporary or permanent works in or over the river will require a river works license with the PLA. For further information please visit <http://www.pla.co.uk/About-Us/River-Thames-Development-and-Works-Enquiries> or contact the PLA licensing team at [lic.app@pla.co.uk](mailto:lic.app@pla.co.uk)

Marine environment: The site is located on the Tidal Thames, that runs west to Teddington. Whilst adjacent to the River, it is deemed with appropriate mitigation, such as DCEMP, aquatic ecology study and implementation of appropriate recommendations; surface water drainage strategies, the marine environment will not be significantly impacted upon.

Wetlands / river mouths / coastal zones – no significant impact by reason of distance and scale and nature of the development.

- Mountain and forest areas – N/A.
- European sites and other areas classified or protected under national legislation; and nature reserves and parks

The submission identified the Site is not subject to any statutory or non-statutory nature conservation designations, however, there is one statutory designated site, seven non-statutory designated Sites of Importance for Nature Conservation and five lowland mixed deciduous woodland Habitats of Principal Importance within a 1km radius. The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation.

Site Name	Distance from site and orientation
River Thames and Tidal Tributaries	30m to the south.
Ham Lands	180m to the south.
Petersham Lodge Wood and Ham House Meadows	902m to the east.
River Crane at St Margaret's (Richmond side)	1000m to the north.
Marble Hill Park and Orleans House Gardens	850m to the north-east.
Twickenham Junction Rough	700m to the north-west.
Moor Mead Recreation Ground	600m to the north.

Given the separating distance between the site and the some of the above areas; the temporary nature of the construction, and applying mitigation measures, significant effects upon such areas is not envisaged.

- Areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;  
The whole Borough is within an Air Quality Management Area due to exceedances of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) annual mean objectives and the PM<sub>10</sub> 24-hour mean objective. The Site also fronts King Street, which is part of

Twickenham Air Quality Focus Area, where existing levels of pollutants are above EU limit values of 40 µg/m<sup>3</sup> for nitrogen dioxide.

The LBRuT operate three static automatic monitoring sites and one mobile automatic site which record concentrations of both NO<sub>2</sub> and PM<sub>10</sub>. LBRuT also operates an extensive network of diffusion tubes across the Borough measuring concentrations of NO<sub>2</sub>, including, 15 Richmond Road; 32 King Street and 65 York Street. The annual mean NO<sub>2</sub> concentrations are consistently above the 40 µg/m<sup>3</sup> objective limit at all three monitoring sites. The Site is located to the south of King Street and based on the data, 2 concentrations of NO<sub>2</sub> are expected to exceed the annual mean objective. The Council will be concerned at levels of NO<sub>2</sub> and PM's for all receptors both during the construction phase and once completed.

**Construction:** During the demolition and construction phase, dust and particulate matter are likely to be generated, which may result in localised and temporary adverse impacts to local receptors. Emissions associated with non-road mobile machinery and construction vehicles could also cause potential air quality impacts. It is deemed such impacts can be mitigated through, A DCEMP; Best practice construction techniques and Dust Management Plan – for example, procedures setting up barriers around dust generating activities; avoiding storing stockpiles of loose material on site; installing wheel washes and vehicle cleaning facilities; ensuring not-in-use vehicle engines and plant motors are switched off and ensuring all plant and vehicles are properly maintained.

**Operation:** The submission recognises local air quality has the potential to change in comparison to the current baseline, particularly for traffic related pollutants including NO<sub>2</sub>, PM<sub>10</sub> and fine particulate matter (PM<sub>2.5</sub>). However, the reduction in car parking within the site boundary will help to reduce vehicle traffic and improve air quality within this area. In addition to the measures outlined in the submission, the effects from air quality could be reduced through conditions / Heads of Terms, restricting CPZ permits; securing Electric Vehicle Charging Points; Travel Plans etc. An Air Quality Assessment will be submitted (with reference to both policy and SPD requirements). Pollutant concentrations will be predicted at relevant existing and proposed sensitive receptors to ascertain the impact. Predicted pollutant concentrations will be compared to the relevant air quality objectives and if necessary, appropriate mitigation / design measures will be recommended to reduce or remove any potentially adverse air quality impacts identified.

In summary, it is considered impacts on air quality both through construction and operational development can be mitigated through assessments (informing design), best practice and conditions / Heads of Terms. This is supported by the Air Quality officer.

#### Densely populated areas:

The Site is essentially an island, surrounded by residential, leisure and commercial population, and the Development has the potential to cause impacts on such receptors, particularly in terms of:

- Noise, vibration, emissions, dust during construction
- Noise and light pollution from proposed use
- Visual impacts through construction and the Development
- Pressure on local green space and parks through additional residential uses
- Changes in lighting conditions
- Flood risk and contamination
- Changes to parking conditions

The above matters have been discussed elsewhere in this report. Given the scale, siting, nature and temporary duration of the Works, the surrounding context and considering

measures and mitigation that could be applied and controlled through relevant Environmental and Health and Safety legislation and planning conditions (and information necessary for validation of any application), the development is not deemed to give rise to significant effects.

- Landscapes and sites of historical, cultural or archaeological significance:

Heritage Assets:

Archaeology: The site is within Twickenham and Marble Hill Archaeological Priority Area, which GLAAA has confirmed the potential for significant heritage assets of archaeological interest. Investigations nearby at King Street, Water Lane and Church Street uncovered medieval and post-medieval features surviving. The Site lies across the River from Eel Pie Island, where significant prehistoric remains have been recorded. A second Archaeological Priority Area, the Thames Foreshore and Bank (Site 22) extends immediately south of the Site along the channel of the Thames and its foreshore. GLAAS deem that the site is large and potentially significant. However, it is deemed the demolition, construction or operational effects of the Development can be mitigated through an updated Archaeological desk based Assessment, sensitive design informed by the Assessment, consultation with the GLAAS, archaeological evaluation and appropriate conditions / mitigation, for example, watching briefs and verification reports.

Conservation Areas, Listed buildings and Buildings of Townscape Merit:



The site is within Twickenham Riverside Conservation Area (Area 8) and sited opposite Queen’s Road Conservation Area. A key significance of Twickenham Riverside CA is its historic and architectural value of the original village core and river frontage. The conservation area, in so far as it relates to the site, can be divided into three main elements – the Village Core; The Embankment river frontage and Eel Pie Island. The townscape of the Village Core is characterised by two-three storey buildings and the narrowness of the streets, which have developed organically. Although some buildings, including the Barclays Bank, stand out as landmarks, its overall value is derived from its character as a tightly defined townscape, and the visual and physical links and access between the village core and the river. Eel Pie Island has its own distinct character, with a mixture of industry and residential development of mixed date, many of which are designated BTMs.



There are no Listed Buildings or BTMs on the site, however, a significant number in the surrounds, including those in Table 5 and Register of Historic Parks and Gardens to the east of the site.

**Table 5: Heritage Assets**

<b>Buildings of Townscape Merit (BTMs)</b>	<b>Listed Buildings</b>
<ul style="list-style-type: none"> <li>• Eel Pie Island, opposite the site</li> <li>• Water Lane, opposite to the Site</li> <li>• Queens Hall, on King Street, backs onto service road</li> <li>• King Street, opposite the Site</li> </ul>	<ul style="list-style-type: none"> <li>• King Street, opposite the site</li> <li>• The Embankment, to east of site</li> <li>• Bank, corner of Church and King Street</li> <li>• Boathouse – Cross Deep, adjoining west boundary</li> <li>• K6 telephone kiosk</li> </ul>

During construction, with good practice and site management (i.e. appropriate hoarding) will avoid significant effect. The submission states sensitive design measures will be inherent within the scheme, informed by the Heritage Assessment. As such, it is deemed the impact will not be significant.

Historic England were notified of the Screening Opinion request, and do not have any observations to make, confirming they would be a statutory consultee on any resulting planning application, and will comment at that stage.

Townscapes and landscapes:

- The Site is within the Thames Policy Area and Thames Landscape Strategy:
- Whilst there are no Tree Preservation Orders (TPOs) on the site, the Conservation Area Status offers them statutory protection. The last Arboricultural Impact Analysis (2017) identified 49 trees located within or adjacent to the site, including trees located on the Embankment (from review, whilst the site boundaries are different from the earlier scheme, this survey appears to encapsulate the trees within the proposed Site). These identified 1 Category A tree on King Street, mostly Category B within the site and some Category C.
- The River and parts of The Embankment are Metropolitan Open Land (MOL)

The submission recommends a fresh Arboricultural Impact Assessment is prepared and submitted with the planning application, including a Tree Survey and an Arboricultural Method Statement. It is inevitable that any scheme on this site is going to impact upon trees and the landscape in general. Regardless to the ‘value’ in the tree in the published 2017 report, the existing trees provide a green backdrop and contribute to the public visual amenity. The submission confirms the tree report will be used to inform the design process and set out mitigation measures and working practices if required to avoid or mitigate impacts to existing trees during demolition, construction and operational phases. The Council agrees that if the Tree Surveys inform the siting and design, and with appropriate mitigation measures in place, that can be secured by condition (or S106 if a CAVAT necessary), and with an appropriate landscape strategy, and the demolition, construction or operational effects of the Proposed Development on trees within the Site boundary will not cause significant effects.

The construction works will increase the physical presence of the construction and vehicles, within this high quality townscape and landscape. However, any visual effects are to be limited, localised and temporary.

The presence of the structure will have a visual impact upon the MOL, Thames Policy Area, and impact upon their setting and visual openness. However, with sensitive design and a Design and Access Statements, Open Space Assessments, Landscape

Strategy, CGIs that can inform the design, and in response to the urban context, it is deemed significant effects can be avoided.

**Summary – The Development would be an enlargement on an existing area of low intensity use and will inevitably comprise a physical change to the locality. However, given the scale, land use and nature of the Development and environmental context of the area, the magnitude, intensity and duration of any impacts on the environmental sensitivities of the area, are not deemed to be significant.**

**(3) Type and characteristics of the potential impact: The likely significant effects of the development on the environment must be considered in relation to**

- **criteria set out in points 1 and 2 (characteristics and location of the development)**
- **with regard to the impact of the development on the factors specified in Regulation 4(2),**
  - a) **population and human health;**
  - b) **biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(1) and 2009/147/EC(2);**
  - c) **land, soil, water, air and climate;**
  - d) **material assets, cultural heritage and the landscape;**
  - e) **the interaction between the factors referred to in sub-paragraphs (a) to (d)**
- **taking into account the**
  - a. **magnitude and spatial extent of the impact**
  - b. **nature of the impact;**
  - c. **transboundary nature of the impact;**
  - d. **intensity and complexity of the impact;**
  - e. **probability of the impact;**
  - f. **expected onset, duration, frequency and reversibility of the impact;**
  - g. **cumulation of the impact with the impact of other existing and/or approved development;**
  - h. **possibility of effectively reducing the impact.**

The criteria set out in Part 3 of Schedule 3 of the Regulations have been considered. The Development, both during construction and operation, will impact upon several areas of acknowledged interest within the London Borough of Richmond upon Thames. Given the location of the development and its scale, this is not deemed to cause transboundary effects.

Construction: Whilst the impacts through the works will be frequent, the impacts are not overly complex or uncommon for the Borough; temporary in nature and duration; a number being reversible (construction waste, air, noise, traffic, visual impact of associated construction equipment), with the mitigation measures put forward and recommended (to avoid significant effect), these are not deemed significant. It is probable the Works will generate short term employment opportunities:

- **Population and human health:** The works will impact upon population and human health, However, by reason of the temporary nature of the works and such impacts being typical to construction sites, these are not unusual or complex. Possibility of accidents can be reduced through DCEMP, FRA, appropriate survey / investigation / watching briefs, etc.
- **Biodiversity:** The site is not subject to any statutory or non-statutory nature conservation designations. Whilst the site is adjacent to a Site of Metropolitan Importance to Nature Conservation and within 1km of statutory and non-statutory designated sites, the

Development is not deemed to be particularly complex, and can be avoided through mitigation measures. Again, such effects are reversible.

- Land, soil, water, air and climate: With mitigation measures, the Works are not deemed to have a significant effect on high quality, or natural or scarce resource or land stability and climate. The Works will inevitably add to air pollution, however, given the limited duration, measures to control and measure this, it is not deemed to lead to significant effect.
- Material assets, cultural heritage and the landscape: The physical presence of vehicles machinery, structures, hoardings will impact upon the openness and setting of the MOL, heritage assets, the quality of the Thames Policy Area and the visual appearance of the site and area in general. However, this is not complex, uncommon, of any great magnitude, is temporary and reversible, and with further assessments and mitigation measures, the impacts can be reduced and not significant.

Completed Development: The development could have an impact upon a number of areas of acknowledged interest, including visual impact, traffic generation, wildlife corridor/habitats, local character and street scene, and some of these potential impacts would not be reversible. However, these would be limited to the immediate locality, can be mitigated against, and it is not deemed to be of such significance to warrant an EIA:

- Population and human health: The Development will have the potential to impact upon the population, by (for example) light conditions and pollution, flooding, navigation, travel and visual effect. However, with the recommended mitigation and reports as suggested, the nature, intensity complexity is not deemed of significance.
- Biodiversity: It is deemed effects will not be complex and can be avoided through sensitive design, appropriate retention of landscaping and mitigation measures (such as lighting strategies, surface water drainage plans, landscaping and ecological enhancement proposals).
- Land, soil, water, air and climate: Any impacts are not deemed complex or of magnitude and can be mitigated. The development has a site allocation proposal designations and is on the Brownfield Register. The Development will be subject to current planning policy and practice, such as Air Quality Neutral, Zero Carbon, and the need for developments to take into account climate change when designing against flood risk. The scheme is car lite, and measures can be incorporated to ensure sustainable travel.
- Material assets, cultural heritage and the landscape: The site is within and adjacent to Heritage Assets, both designated and non-designated, MOL and the Thames Policy Area. The development will cause physical changes to the site and surrounds. Given the local context, modest scale, sensitive design and through recommendations (archaeological, visual and Heritage Impact Assessments), and mitigation, this impact is not deemed complex, and can be reduced / mitigated.

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

### **Mitigation measures**

The EIA Regulations (5.5b) and NPPG state, “Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”. Further,

*“Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance”.*

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent adverse effects on the environment, the potential impacts are effectively reduced. The tables below summarise the mitigation measures (Table 6) put forward by the applicants (refer to submission, supporting checklist and this report for full details) or recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission (Table 7). In addition, measures could be applied and controlled through relevant Environmental and Health and Safety Legislation, to reduce the extent, duration, probability, frequency, magnitude, intensity of potential impacts.

**Table 6: Mitigation Measures**

Environmental Effect	Measures anticipated to mitigate likely significant environmental effects	Further mitigation measures recommended by LBRuT
<b>Natural Resources</b>	<ul style="list-style-type: none"> <li>• DCEMP be prepared and implemented or a Code of Construction Conduct to be secured by planning condition.</li> <li>• Sensitive design measures considering scale, massing and height in relation to existing setting will be inherent within the design, where possible</li> <li>• Use of sustainable materials, where feasible</li> <li>• An energy efficient development in line with planning policy requirements</li> <li>• Separate energy and sustainability statements</li> </ul>	
<b>Waste</b>	<ul style="list-style-type: none"> <li>• Waste Management Strategy considering demolition, construction and operational waste streams – follows the waste management principles – reduce, reuse and recycle.</li> <li>• Aggregate from demolition may be used in the construction of new buildings.</li> </ul>	
<b>Pollution</b>	<ul style="list-style-type: none"> <li>• DCEMP</li> <li>• Air quality assessment - Policy requirements in the Local Plan 2018 and relevant SPD.</li> <li>• Best practice construction techniques</li> <li>• Dust Management Plan</li> <li>• Separate energy and sustainability statements prepared and submitted</li> <li>• Noise survey and design recommendations relevant to the operational phase will be contained within an Acoustic Assessment and/or Acoustic Design Statement</li> <li>• Phase 1 Land Contamination Desk Study Report, to include a preliminary</li> </ul>	<p>Construction management measures and good practice, including</p> <ul style="list-style-type: none"> <li>• adherence to working hours,</li> <li>• use noise reducing techniques with low noise emission machinery,</li> <li>• ongoing noise monitoring</li> <li>• methodology for installing the piles</li> </ul> <p>Operation:</p> <ul style="list-style-type: none"> <li>• hours of uses;</li> <li>• noise limits for mechanical plant;</li> <li>• anti-vibration equipment, noise insulation etc</li> </ul>

	<p>risk assessment and recommendations of further detailed site investigations (and implementation of remediation strategy and verification reports)</p> <ul style="list-style-type: none"> <li>• Design measure to promote sustainable transport modes, including: <ul style="list-style-type: none"> <li>○ Transport Assessment;</li> <li>○ Construction and Logistics Plan;</li> <li>○ Delivery and Servicing Plan;</li> <li>○ Travel Plan;</li> <li>○ Active Travel Zone assessment;</li> <li>○ Car and Cycle Parking Management Plan.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CPZ permits;</li> <li>• Electric Vehicle Charging Points;</li> <li>• Travel Plans etc.</li> </ul>
<b>Population and human health</b>	<ul style="list-style-type: none"> <li>• DCEMP</li> <li>• Health and safety legislation</li> <li>• Good site management procedures</li> <li>• construction management plans</li>   <li>• Flood Risk Assessment</li> <li>• Drainage strategy</li>   <li>• Risk of Unexploded Ordnance (UXO): Appropriate survey / watching brief or specialist attendance during construction</li> <li>• Remediation strategy</li>   <li>• Health Impact Assessment</li> <li>• Design Out Crime / Secure by Design principles</li> <li>• Lighting strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Design criteria set by Environment Agency</li> <li>• Incorporation of flood resilient design</li> <li>• Retention of Flood Defence</li> <li>• Safe Escape Route / Evacuation Plan / signing up to EA Flood Warning Service</li>   <li>• Risk of marine pollution disaster: Implementation of a Construction Environmental Management Plan.</li>   <li>• Suitable lighting design</li> <li>• Prior notice of the works should be given to the local community,</li> <li>• Towpath diversions</li> <li>• Landscaping</li> <li>• Sunlight / Daylight and overshadowing assessment – and development to respond to results.</li>   <li>• Local Employment agreement – construction and operation (if over 20 employees)</li> <li>• Provision of appropriate Riparian Life Saving Equipment</li> <li>• Introduction of suicide prevention measures</li> </ul>
<b>Water resources</b>	<ul style="list-style-type: none"> <li>• Flood Risk Assessment</li> <li>• Drainage strategy</li> <li>• Appropriate attenuation</li> <li>• Implementation of a DCEMP</li> </ul>	<ul style="list-style-type: none"> <li>• Design criteria set by the Environment Agency</li> <li>• Retention of Flood Defence</li> <li>• Water Framework Directive Assessment:</li> </ul>
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>• EclA,</li> <li>• Phase 1 habitat survey</li> <li>• Any recommendations set out in the EclA implemented - For example, <ul style="list-style-type: none"> <li>○ Timing of works - outside of bird nesting season or supervised</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• DCEMP</li> <li>• Drainage Construction Runoff Strategy / surface water strategy</li> <li>• Contamination / Remediation strategies</li> <li>• Consultation with Natural</li> </ul>

	<p>demolition of structures outside of bat maternity season;</p> <ul style="list-style-type: none"> <li>○ Provision of compensatory roosting/nesting features</li> <li>○ landscape strategy.</li> <li>○ Appropriate licences sought</li> </ul> <ul style="list-style-type: none"> <li>● Arboricultural Impact Assessment</li> <li>● Tree Survey</li> <li>● Arboricultural Method Statement</li> </ul>	<p>England</p> <ul style="list-style-type: none"> <li>● Birds: <ul style="list-style-type: none"> <li>○ Ecological watching brief to ensure that the trees and shrubs are clear of nests.</li> <li>○ Nest boxes for breeding birds.</li> </ul> </li> <li>● Bats: <ul style="list-style-type: none"> <li>○ Bat surveys</li> <li>○ Retention of mature trees</li> <li>○ Avoidance of impacts to bat roost</li> <li>○ Climbing tree inspection</li> <li>○ Lighting kept to an absolute minimum and designed to prevent light spilling</li> </ul> </li> <li>● Potential for ecologist during vegetation clearance to move any individuals to alternative suitable habitat</li> <li>● Aquatic Ecology Desktop Study</li> </ul>
<p><b>Landscape and townscape</b></p>	<ul style="list-style-type: none"> <li>● Design and Access Statement</li> <li>● Sensitive design measures</li> <li>● Photomontages</li> <li>● Streetscape drawings</li> <li>● Open Space Assessment</li> <li>● Arboricultural Impact Assessment</li> <li>● Tree Survey</li> <li>● Arboricultural Method Statement</li> </ul>	<ul style="list-style-type: none"> <li>● Landscape Design Strategy</li> <li>● Replacement tree planting / landscaping</li> <li>● Site segregation for construction site activities</li> <li>● Maintenance of construction site hoarding.</li> <li>● CAVAT contribution for loss of trees</li> </ul>
<p><b>Cultural / Heritage and Archeology</b></p>	<ul style="list-style-type: none"> <li>● Design and Access Statement</li> <li>● Archaeology and Heritage Assessment</li> </ul>	<ul style="list-style-type: none"> <li>● Consultation with the GLAAS</li> <li>● Archaeological evaluation - watching briefs and verification reports.</li> <li>● Good practice during construction – hoarding etc.</li> </ul>
<p><b>Transport</b></p>	<ul style="list-style-type: none"> <li>● Transport Assessment</li> <li>● Construction and Logistics Plan;</li> <li>● Delivery and Servicing Plan;</li> <li>● Travel Plan;</li> <li>● Active Travel Zone assessment;</li> <li>● Car and Cycle Parking Management Plan.</li> <li>● Design process will take account of all transport-related constraints</li> <li>● Communication to residents prior to and during demolition and construction to inform of any roads or transport networks being temporarily closed or diverted.</li> </ul>	<ul style="list-style-type: none"> <li>● Compliance with Considerate Constructors Scheme</li> <li>● Consideration must be given to the potential use of the River Thames for the transportation of construction materials and waste</li> <li>● Diversions of any cycle / pedestrian routes, with clear signage</li> <li>● Provision of details on how access to Eel Pie Island via the footbridge will be maintained during the construction period.</li> <li>● Parking surveys - car parks and on street)</li> </ul>

		<ul style="list-style-type: none"> <li>• details of location and hours of servicing / loading bays</li> <li>• CPZ permit restrictions</li> <li>• Possible car club provision and / or membership</li> <li>• Meeting minimum cycle parking provision</li> <li>• Way finding signage</li> </ul>
<b>Land stability and climate</b>	<ul style="list-style-type: none"> <li>• Flood Risk Assessment</li> <li>• Drainage Strategy</li> <li>• Energy and Sustainability Statement, and recommendations applied to the development</li> <li>• DCEMP</li> </ul>	

**Table 7: Submission deliverables (refer to Local Validation Checklist)**

<b>Environmental Effect</b>	<b>Submission requirement</b>	<b>Recommended submission requirement</b>
<b>Socio-economic, Community and Transport</b>	<ul style="list-style-type: none"> <li>• Transport Statement:                             <ul style="list-style-type: none"> <li>○ Details of any stopping up orders / section 278 works</li> <li>○ Details of towpath / cycle diversions</li> </ul> </li> <li>• Highway and parking Layouts – existing and proposed (including turning circles for proposed)</li> <li>• Construction Management Statement / Logistics Plan</li> <li>• Travel Plan</li> <li>• Statement of Community Involvement</li> <li>• Daylight/sunlight/overshadowing assessment</li> <li>• Health Impact Assessment</li> <li>• Affordable housing statement and associated visibility report</li> <li>• Play and child occupancy assessment</li> <li>• Playing fields and sports facilities assessment</li> <li>• Residential standards statement</li> <li>• Inclusive access statement</li> <li>• Marketing reports for loss of commercial / employment or communities uses</li> <li>• Retail Impact Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Design Out Crime / Secure by Design consultation results</li> <li>• Phasing details</li> </ul>
<b>Surface Water and Flooding</b>	<ul style="list-style-type: none"> <li>• A Foul Water and Utilities Statement</li> <li>• Flood Risk Assessment (including impact on defences)</li> <li>• London Sustainable Drainage Proforma</li> <li>• Statement of SUDs</li> </ul>	
<b>Ecology;</b>	<ul style="list-style-type: none"> <li>• EclA</li> <li>• Mitigation and enhancement measures / plans</li> <li>• Demolition and Construction Environmental Management Plan (DCEMP)</li> <li>• Drainage Construction Runoff Strategy</li> </ul>	

	<ul style="list-style-type: none"> <li>• Arboricultural Survey Report</li> <li>• External lighting assessment</li> <li>• Green / brown roof details</li> </ul>	
<b>Archaeology and Heritage</b>	<ul style="list-style-type: none"> <li>• Heritage Statement (in conjunction with The Historic Environment Record)</li> <li>• Archaeological Statement</li> </ul>	
<b>Townscape and Landscape</b>	<ul style="list-style-type: none"> <li>• Design and Access Statement</li> <li>• Photomontages</li> <li>• Streetscape drawings</li> <li>• Open Space Assessment</li> <li>• Landscape Design Strategy</li> <li>• Tree Survey</li> <li>• Arboricultural Impact Assessment</li> <li>• Arboricultural Method Statement</li> <li>• Hard and Soft Landscaping (including tree planting and aftercare)</li> </ul>	
<b>Air Quality and Climate Change</b>	<ul style="list-style-type: none"> <li>• Air Quality Assessment</li> <li>• DCEMP</li> <li>• Sustainable Construction Checklist</li> <li>• BREEAM Pre-Assessment</li> <li>• Energy Report</li> <li>• National Water Standards Statement</li> <li>• Decentralised Energy Network Feasibility</li> </ul>	<ul style="list-style-type: none"> <li>• Dust Management Plan</li> <li>• NRMM compliance with Stage IIIB emission criteria of Directive 97/68/EC and its subsequent amendments</li> </ul>
<b>Noise and Vibration</b>	<ul style="list-style-type: none"> <li>• Acoustic Assessment</li> <li>• DCEMP</li> <li>• Odour Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Noise and Vibration Construction Method Statement</li> <li>• Piling and equipment method statement</li> </ul>
<b>Land Contamination</b>	<ul style="list-style-type: none"> <li>• Land Contamination Assessment</li> </ul>	
<b>Waste</b>	<ul style="list-style-type: none"> <li>• DCEMP</li> <li>• Waste Management Plan</li> </ul>	
<b>Major Accidents and/or disaster And risk to human health and safety</b>	<ul style="list-style-type: none"> <li>• DCEMP</li> <li>• Construction Management Plan</li> <li>• Flood Risk Assessment and drainage strategy</li> <li>• Contaminated Land report and remediation strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Site investigation scheme for potential unexploded ordnance</li> <li>• Lighting strategy</li> <li>• Secure by Design</li> </ul>

In addition to the above mitigation measures and necessary documents to accompany any application, the Development will need to take account of:

- NPPF and NPPG
- London Plan (Adopted and Draft)
- Local Plan
- Twickenham Area Action Plan
- SPD and SPGs



### **Conclusion**

The submission and accompanying checklist have provided details of the likely significant effects. The impact, both individual and cumulatively, with future and surrounding receptors and on the surrounding environment, whether it is on transport networks, green networks and space, local character and openness, flood risk, noise and air quality will all need to be evaluated at the time of submission. However, at this time, given the location, scale and nature of the Development, the measures proposed in the design process, the local context, and the ability to secure mitigation through conditions and legal agreements, the Development is not likely to result in significant effects on the environment by virtue of factors such as its nature, size or location, nor does the Council consider the proposed development will result in any usually complex, significant or potentially hazardous environmental effects. The potential effects of the proposal are considered likely to be of a more localised nature and not so significant in terms of their magnitude/extent or sensitivity to warrant a full assessment by way of an Environmental Statement.

The scheme does not trigger the relevant EIA thresholds for the type of development.

**In accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Richmond hereby determines the proposed development does not warrant the submission of an Environmental Impact Assessment / Environmental Statement, as set out in the meaning of the EIA Regulations 2017.**

**Decision: Negative Screening Opinion**

**Date of Opinion: 7 May 2020**

**Robert Angus**

A handwritten signature in black ink, appearing to read 'R. Angus', is written over a light blue rectangular background.

**Head of Development Management**

## **APPENDIX 1 – Port of London Authority - Navigational Jurisdiction**

## **APPENDIX 2 – Environment Agency (Extract from their letter)**

**Advice to the applicant** We would like to offer the applicant the following advice with respect to pre-application advice and flood risk:

### **Pre-application advice**

As highlighted in the EIA Screening Opinion Request letter by WSP (dated 1 April 2020), the site is highly sensitive to flood risk. The site is located adjacent to the River Thames and is partially within Flood Zone 3a and partially within Flood Zone 3b. Furthermore, the existing development forms part of the statutory flood defence line. We objected to a previous scheme due to it not adequately addressing these issues.

We are keen to work with the new applicants to ensure any revised scheme addresses these complex issues. We invite the applicant to contact us as early as possible. These pre-application discussions will ensure a robust flood risk assessment is carried out and used to influence the design of the development and avoid an objection.

Please email [ksplanning@environment-agency.gov.uk](mailto:ksplanning@environment-agency.gov.uk) and we can provide you with more details about our pre-application advice service and our cost recovery offer. As this service falls outside of our statutory remit, we charge for our advice. Our charges are currently £100 plus VAT per officer per hour.

### **Flood Risk**

Through our charged pre-application service we hope to work with you to address our concerns regarding flood risk. We have provided comments our initial thoughts below:

Any development must achieve appropriate set back from the flood defences. We would object to any building forming part of the defence line or buildings on stilts over the flood defence. This restricts access for maintenance, emergency works and inspections. Proposed development must not impact the structural integrity of any flood defence.

The flood defence line must be formed of permanent, fixed structures. We would not permit the use of moveable structures, such as flood barriers or gates. Flood defence heights must be maintained and raised in line with the Thames Estuary 2100 Plan. A continuous flood defence line must be maintained at all times.

Site users must be kept safe from flooding for the lifetime of the development. Finished floor levels must be set appropriately and we strongly advise incorporating additional resistance and resilience measures.

We strongly recommend addressing our Estuary Edges guidance to incorporate biodiversity enhancements into the management of the riverside and to address biodiversity net gain. Intertidal terracing, soft bank edges and bank landscaping could be explored and the flood defence line incorporated into this design. These enhancements must not conflict with the flood risk elements. We would not support any further encroachment of the flood defence line on the river.

We hope you find our response useful. Please contact us if you have any further questions.

Yours sincerely,

**Miss Rachel Holmes**  
**Planning Advisor**

Direct e-mail [rachel.holmes@environment-agency.gov.uk](mailto:rachel.holmes@environment-agency.gov.uk)