

CONSULTATION REVIEW

Environmental Impact Assessment Scoping Report for the Richmond upon Thames College site, Twickenham

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Introduction

This document summarises the response by Heatham Alliance to version 2.0 of the scoping report produced by Cascade Consulting in July 2014.

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

The aims of Heatham Alliance are to minimise the impact of the proposed redevelopment on the community, to maintain and encourage free public access to the sports and recreation fields in Craneford Way and to improve the safety of pupils, students and the public along routes to and from the proposed campus.

Constraints on Responding to this Consultation

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

On initial reading of a selection of pages, it became evident that certain important aspects appeared not to be included in the report, such as playgrounds on the campus and the sports provision on Craneford Way East Field. A version of this 120-page report was requested in Word format to provide efficient and appropriate search functions but this was refused at the end of August.

There may be further queries and responses in relation to this report that will arise in the coming weeks and will be addressed by Heatham Alliance in due course or in the planning process.

General Comments

This response focuses on factual information given in this report.

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

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

Definitions

The report must make clear that 'vehicles' and 'traffic' include cycles and, when appropriate, motor vehicles and cycles must be differentiated.

Similarly, 'traffic' includes pedestrian traffic, unless vehicle traffic is stipulated.

1 INTRODUCTION

1.1 'Upgrade the sports field' might be misleading. The college has two fields used for sports at present. The report should refer to upgrading the Craneford Way East Field for sports to compensate for loss of the main playing field next to the A316 when the campus buildings are erected there and to accommodate sports activities for the secondary and special needs schools in addition.

- This has an important bearing on the operational noise assessment. (See below.)

Add: Extension of the planned River Crane footpath and cycleway with a bridge across to the East Field on the north side of the river.

- This has an important bearing on the potential risks to the River Crane habitat and wildlife.

1.2 The intended reference is probably to the RFU's Twickenham Stadium. (Twickenham Rugby Club is based in Hampton.)

The unnamed tarmac path is indicated by signs as 'Marsh Farm Lane', which is a public right of way forming the western boundary of Craneford Way East Field. The southern boundary is a fence next to land owned (I believe) by LBRUT which runs along the bank of the River Crane.

1.3 ['OPA' should be LPA or something else? Please advise.]

1.4 [NB This is not the main purpose of the Local Community Forum.]

2 THE EIA PROCESS

2.4 APPROACH TO EIA

2.4.4 Note: Completion of construction of secondary school and special needs school planned by late 2017.

- This has a bearing on the sensitive receptors during the construction phase.

Table 2.2 - Twickenham Rough: delete associated landscaping and fencing

Add: Harlequins North Stand and later expansion to 20,000 capacity.

3 SCHEME DESCRIPTION

3.2 THE PROPOSED DEVELOPMENT

The location of any of the buildings is undefined so the impact cannot be properly assessed for the purpose of this scoping report. See also appendix 1.1 below.

The 20,000 sq m GEA of the replacement college appears small in relation to the 30,000 to 35,000 sq m described in previous planning documents.

Query 'Full Time Equivalent' - According to official documents, 3,000 is the number of full-time or daytime students - not an FTE figure, but the number enrolled; the total number of enrolled students (i.e. on a per capita basis) would be approximately 3,350.

(FTE is an artificial figure and must not be used for assessing the volume of journeys/traffic to and from the campus.)

The 6,000 sq m GEA of the new secondary school seems very small in relation to the GEA of the replacement college and the GEA of the special needs school. The GEA of the special needs school appears entirely disproportionate to the others after allowing for its special requirements.

The report should show the expected future numbers of staff at the college and schools, again on a per capita basis, and the number of SEN pupils.

Possible alterations to existing means of vehicular access to Langhorn Drive should be clarified as meaning access from the college site, not the A316.

Upgrading the Craneford Way East Field is also for its use by pupils of the secondary and special needs schools.

3.3 DEMOLITION AND CONSTRUCTION

The timescales are not consistent with those in 2.4.4

3.4 POTENTIALLY SENSITIVE RECEPTORS

Residents in the immediate vicinity of the site must include those living near the Craneford Way East Field, including residents in Heatham Park.

Add: School pupils who move into temporary or permanent classrooms on the site while construction works are in progress.

B361 Whitton Road must be included.

Residential receptors for daylight and sunlight - receptors of artificial light must be added, e.g. if street lighting and floodlighting are to be incorporated in the designs, particularly for the all-weather pitches and MUGA. (See RUT College Planning Brief.)

5 TRANSPORT

5.4 SENSITIVE RECEPTORS AND POTENTIAL ENVIRONMENTAL EFFECTS

Add: Receptors living in homes along the north side of the River Crane opposite the planned footpath and cycleway, due to impact from large numbers of students, pupils and staff journeying to/from the proposed campus on foot and cycle at peak times.

Add: Receptors living in homes along the roads between Twickenham Station and Whitton Road and the college, especially after dusk when the River Crane footpath and cycleway will be closed

(see planning conditions), due to impact from large numbers of students, pupils and staff journeying to/from the proposed campus on foot and cycle at peak times.

- All Scoped In.

Safety of pedestrians and residents is an issue locally from several perspectives and should be included in the scope of the EIA. Nuisance should be included as well. One aspect is mixing secondary pupils from age 11 with college students on the same routes to and from the campus.

- To be Scoped In.

6 NOISE AND VIBRATION

6.1 INTRODUCTION AND KEY ISSUES

Noise is assumed to be an environmental impact mainly during demolition and construction. The report ignores operational noise from playgrounds and open spaces on the main campus and from the sports activities on the Craneford Way East Field, which would a potential impact especially after dusk.

- See Sports Provision, RUT College Planning Brief

There may be other omissions apparent when appropriate site plans are available.

6.3 EXISTING ENVIRONMENT

The operational noise factors above will affect the Baseline Noise Monitoring Locations in Figure 6.1.

6.4 SENSITIVE RECEPTORS AND POTENTIAL ENVIRONMENTAL EFFECTS

The report says the sensitive receptors that will need to be considered have been identified during the baseline survey and that it is not envisaged that there will be any significant effects, as any external plant or machinery noise would be controlled at source, but these assessments do not include operational noise factors identified above.

Add: Residents in Challenge Court on Langhorn Drive.

Table 6.1 to be amended.

6.5 ASSESSMENT METHODOLOGY

6.5.3 states that operational effects associated with the proposed development are likely to be negligible. This needs to be amended in respect of the additional noise factors identified above.

6.6 POTENTIAL MITIGATION

6.6.2 Add: Mitigation in respect of operational noise factors identified above, including those in relation to sports activities on the Craneford Way East Field.

12 ECOLOGY

The impact of constructing the bridge and extension of the River Crane footpath and cycleway along the north bank must be included.

- The bridge and extension are shown in Appendix 1.1, Proposed Site Plan.

Craneford Way East Field is a special and particularly sensitive area and the reasons for this must be recognised and properly understood. See also 13 Townscape and Visual Amenity and 15 Socio-Economics (below).

Positive impacts through this redevelopment scheme on the ecology of the River Crane, the West London Green Chain and Metropolitan Open Land in particular are not apparent in this report.

Benefits required by Richmond Council's environmental / planning policies cover protection and improvements for:

- nature conservation, biodiversity and open spaces, Metropolitan Open Land, the River Crane and the West London Green Chain and the environmental value of habitats and diversity in the area
- public access to Craneford Way East Field, the Duke of Northumberland's River and linkages between the main sites in the Crane Valley.

These must be addressed in the proposals of the scheme for the RUT College site and in the EIA.

12.3 EXISTING ENVIRONMENT

Note that deer have been observed in the River Crane, close to Heatham House and Twickenham Rough.

12.4.2 - Recreational and commuter traffic along the River Crane footpath and cycleway must be scoped in.

13 TOWNSCAPE AND VISUAL AMENITY

13.4 SENSITIVE RECEPTORS AND POTENTIAL ENVIRONMENTAL EFFECTS

These must take account of sports and recreational users of the Craneford Way East Field and leisure users of the River Crane footpath and cycleway.

Craneford Way East Field is a special and particularly important area and the reasons for this must be recognised and properly understood. See also 12 Ecology (above) and 15 Socio-Economics (below).

Table 13.1 River Crane Corridor - to be amended to take account of the nature of the proposals affecting the Craneford Way East Field including artificial-surface pitches, fencing and floodlighting if any.

15 SOCIO-ECONOMICS

15.1 INTRODUCTION AND KEY ISSUES

Community facilities include Metropolitan Open Land, areas of the West London Green Chain, the River Crane Corridor and the Crane Riverside Park Project; these must be included in the scope of the EIA.

CraneFord Way East Field is a special and particularly important area and the reasons for this must be recognised and properly understood. See also 12 Ecology and 13 Townscape and Visual Amenity (above).

The report must include consideration of the impact of the proposed campus and the new residential estate on the provision of utilities, schooling and local services to support the activities and accommodate the large population living, learning and working on the site, in a relatively small area bordering an established residential part of Twickenham.

Safety of pedestrians and residents - see 5 Transport (above).

16 SUMMARY OF KEY ISSUES

Table 16.1 to be amended to reflect the points above.

17 PROPOSED STRUCTURE OF THE ES

It would be helpful for the wider audience if the Environmental Statement were structured according to the physical features of the proposed development, e.g. buildings, on-site open spaces, sports and recreation field, River Crane footpath and cycleway, etc. and their relevant impact factors.

Also include a glossary of definitions / technical terms and list of abbreviations.

Please also provide a non-technical summary - see Crane Valley Planning Guidelines, April 2005 and the EIA regulations.

APPENDIX 1.1

An indication of the zoning of the education, office, sports and residential elements on site is shown on the Indicative Site Division drawing SK-039F but this is far too vague to inform the assessment of potential environmental risks factors and design of baseline measurements etc.