

## **FORMAL SCOPING OPINION FOR THE EIA PROPOSED DEVELOPMENT FOR IMPROVED RAILWAY STATION FACILITIES, RETAIL AND LEISURE AND APPROXIMATELY 170 RESIDENTIAL UNITS. (REG 10(1))**

A scoping exercise was initiated following a request received on 27 April 2010 under regulation 10 as described above from Maddox Associates to the London Borough of Richmond upon Thames. This Scoping Opinion has been prepared on the basis of the information contained within the accompanying Scoping Report.

The scoping report provides a written outline of the quantum of development that will be applied for in a subsequent planning application. The report states that the developable area will comprise 0.6ha. The development proposed is summarised as follows:

- Up to 170 residential units
- A new station ticket office and concourse
- Elements of retail at ground floor
- Improved public realm
- Open space provision
- Improved cycle parking facilities
- Taxi rank
- Car parking (48 commuter spaces and car club spaces)
- New pedestrian footpath along the River Crane linking to the River Crane Walk

The development will comprise three blocks ranging in height from 5 to 10 storeys with the highest element to the south-west of the site on London Road

### **General Comment**

The redevelopment of Twickenham Train Station Site will be the subject of intense scrutiny from the residents and businesses in Twickenham, and of course the Council. The preparation of the EIA is obviously a key component in ensuring the sustainable development of the site, and the best outcomes for the development. In accordance with best practice it is expected that the EIA will be an extensive study of the relevant issues specific to this site. Although Schedule 4 of the EIA Regulations provides general guidance on this, the specific environmental impacts identified as likely to arise from this development will dictate the form and scope of the EIA, together with the issues that arise through consultation.

In addition to Circular 2/99, the EIA regulations, and best practice, there is a range of relevant case law, and examples of best practice the Council expects from the EIA process. The Council anticipates that Maddox's will undertake extensive consultation with the relevant authorities and various local groups and individuals through the planning process, particularly where this input would add value to the assessment of likely environmental impacts. The purpose of the Environmental Impact Assessment should not be about justifying a preconceived development proposal, but rather an iterative process to encourage public participation throughout the process to ensure the most suitable and sustainable development of the site. From the discussions so far, and other correspondence, it would seem that Maddox intend to engage all relevant stakeholders and

interested people such that the procedures of the EIA phase, and the overall finalised scheme, has community and local residents involvement, and all other stakeholders. The Council clearly expects to be involved throughout, particularly given the importance of this project for Twickenham and the wide range of issues to be considered.

## **Consultations**

During the scoping process, formal consultation occurred with the relevant statutory agencies and authorities and other relevant parties seen to have an interest in the future planning of the site and with relevant expertise and/or local knowledge in the environmental issue relevant to this site. A list of the consultees contacted and a summary of the responses to the EIA Scoping Report are detailed below. Copies of the most important comments have already been forwarded by e-mail, however in addition to those there has been further scrutiny of the scoping report that has raised additional points that should be considered.

### Natural England

Natural England is generally satisfied with the proposed scope of the EIA and has the following specific comments:

Paragraph 3.30 states that 'Subsequently proposed mitigation strategies to deal with these potential impacts will be outlined'. Before considering mitigation the application should consider whether adverse impacts can be avoided. Mitigation should only be considered after avoidance.

Overall we would expect the development to enhance the ecological value of the site. Opportunities to incorporate Biodiversity Action Plan habitat should be maximised.

Finally, the River Crane SINC is located adjacent (or within) the development boundary. You should therefore be aware of London Plan policy 3D.14 which states that *'where development is proposed which would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site, and if that is not possible, to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought.'*

### Environment Agency

The key environmental issues and opportunities at this site are:

- Impact of development on river Crane and flood defences
- Maximising environmental improvements to the River Crane
- Ecological impacts and habitat improvement
- Managing flood risk to people and property, including surface water flood risk
- Land contamination and pollution prevention
- Sustainable design and construction

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

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

#### Greater London Authority

No written reply to the scoping opinion has been received however at a pre-application meeting with the GLA; the following comments/concerns were identified:

- taxi parking and access for people with disabilities;
- pavement width along London Road
- waiting facilities for buses
- access and egress for residents to rear on match days, including people with disabilities
- level of parking for wheelchair housing
- energy strategy is aiming for code level 4 including CHP to provide hot water and heating. GLA raised need for CHP to serve other uses as well as homes, be available to link to other sites (e.g. hotel and Royal Mail) and the need for a cooling strategy
- crowd control – crowd movement throughout the site needs careful assessment
- concerned over massing and overhang along the river and personal safety issues
- Riverside access to Moormead Park –wanted to understand whether this could be agreed with Network Rail
- concerned over the design of single aspect units particularly housing units at rear with outlooks onto railway platforms
- station entrance needs clear identification and signage
- proportion of affordable housing non compliant with policy - requires viability study to demonstrate level

- housing mix – do not favour bedsits, generally supportive of family affordable housing and 1 bed units in private sector
- Play areas – need to take into account GLA Supplementary Planning Guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ dated March 2008
- Green roofs./SUDs welcomed

### London Borough of Richmond upon Thames Trees

With the current information submitted it is not possible to determine the Arboricultural impact of the proposed development on trees within and adjacent to the site.

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

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

All documents must be prepared in accordance with the current British Standard 5837: 2005 Trees in Relation to Construction - Recommendations.

### Ecology

No specific comment to make at this stage however a phase 1 habitat survey is required

### Urban Design

Section 3.37 Sunlight -There is a concern about a considerable amount of public space being in shade and this issue has been raised by CABI. The 'amenity areas' referred to should include all public spaces.

Section 3.44 Visual analysis - 3.46: extent of area to be agreed? Key views to be agreed in 3rd bullet point so further agreement needed on this. There has been discussion on this previously, should include those views in the Development Brief plus views more immediately surrounding the site. 6th bullet point- visualisations showing effect on the existing townscape- should add 'landscape'- e.g. view from Richmond Hill is critical.

Section 3.48 Alternatives & Design Evolution - it would be helpful to include a version with lower key massing than the current proposal, reinforced by CABI's comments received by letter dated 24 May 2010 which has been previously sent to David Maddox.

### Planning Policy

Housing and affordable housing is included under Socio-Economic Issues which seems appropriate. The proposed mix may need to be identified to fully understand the impacts e.g. on amenity space required.

Inclusive access is not mentioned and should be addressed, in terms of the station and proposed retail and residential uses including the incorporation of Lifetime Homes and Wheelchair Housing. Otherwise, it may be considered appropriate to deal with this through documentation accompanying the planning application.

Note that paragraph 5.7 refers to the Code for Sustainable Homes and BREEAM methodologies and it is assumed sustainability issues will be comprehensively addressed in the Sustainability Statement.

The proposal to deal with the non significant issues of waste and infrastructure integrated through other assessments is considered appropriate.

### Ground Contamination

No comments to make at this stage.

### Environmental Health

There is potential for loss of amenity to new residents and existing residents due the following pollution issues

1. Noise impact from external traffic sources such as aircraft, road traffic and rail
2. Vibration impact from rail traffic on the proposed development.
3. Noise from air handling plant serving the proposed development
4. Odour from kitchen extraction systems effecting new and existing residents in the vicinity
5. Noise transmission between commercial and residential units in proposed development.
6. Entertainment noise from commercial use.

The Council has prepared draft guidance which details the acoustic design specification requirements for noise generating and noise sensitive development. A copy of the guidance has already been emailed and it is recommended that the above issues and corresponding design criteria are applied in the Environmental Impact Assessment.

### Transport

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

### Air Quality

It is considered that reference to The Department of Transport Design Manual for Roads and Bridges, Volume 11: Environmental Assessment. (Section 3 includes air quality) is appropriate for the proposed development.

One of the Council's main concerns is the taxi rank which when busy with slowly moving traffic, i.e. basically idling, will be a source of increased traffic pollution which could impact on residential open windows and in the open space. The proposed tall buildings will create a 'canyon' concentration of pollution. A good wind will help

disperse the pollution (wind assessment) but will conflict with the needs of pedestrians for less wind. The proposed emissions need to be assessed and extra taxi traffic at this vibrant transport interchange quantified.

### Friends of the River Crane Environment

- Welcome the principle of a new pedestrian footpath proposed along the River Crane linking to the River Crane walk (section 2.6)
- Need to take this unique opportunity to provide pedestrian and cycle links upstream - and under London Road – and downstream to Moormead Park
- Pleased to note that both the biodiversity on site and the River Crane corridor are listed in section 2.7 among the sensitive site receptors
- That FORCE be included as part of the consultation to take place with local community groups – section 3.6
- Section 3.8 does not appear to address directly local road and traffic issues
- Welcome the proposal in section 3.30 to assess opportunities to provide new habitats as part of the proposals and would welcome early discussions with the developers regarding opportunities both within and adjacent to the site along the Crane corridor
- Expect a comprehensive approach to managing the control and removal of Japanese Knotweed from the site and that there is no risk of downstream transfer along the corridor
- The Crane Corridor is well used by bats. FORCE are pleased to note that this was recognised in the phase 1 survey (section 3.31) and we hope and anticipate that measures will be put in place to minimise light spillage and other disturbance to bats – and potentially provide enhanced habitat – as part of the project
- Section 3.36 discusses light issues with respect to neighbours. There are 2 issues in respect to the river corridor that need to be mentioned here. Firstly that the spillage of artificial lighting into the corridor at night where we hope that opportunities are taken to reduce and minimise this spillage, for the benefit of wildlife and specifically bats. Secondly, the impact of shadowing within the corridor during the daytime by the proposed building mass and this impact on both the existing ecology within and around the river as well as its future potential. These need to be incorporated into the EIA.
- Section 3.44 needs to make direct reference to enhancement of the river corridor, both as a new pedestrian link and as an environment corridor, as part to the improved landscape character for the site and surroundings

### Cole Park Residents Association

Overall, the scoping report is detailed to cover a wide range of issues with this proposed development apart from the items listed below:

(i) the development proposals laid out in section 2.0 are light on detail. While we appreciate where design development is proposed, we feel that insufficient information has been provided, to enable a fully rounded view of the impact of the development and what considerations the EIA must cover. For example, our members are not property professionals and find it difficult to relate the plans to what is being proposed in the report..... a "picture paints a thousand words", if you like.

(ii) within the scoping report we see no mention of the list of statutory consultees or any other organisations that will be contacted in relation to the EIA. It is hence difficult for us to assess how expert advice, opinion, guidance and challenge will be

obtained in relation to Section 2, the nature of the proposals; Section 3, 'Environmental Issues'; Section 4, 'Key Issues' and Section 5, 'Non- Significant Issues'.

In relation to the above points, members are surprised that the developments proximity to conservation areas is NOT STRESSED more heavily, particularly in Section 2.7.

(iii) Section 3.49 of the scoping assessment seems to make no reference to specific PPS's or PPG's, that the EIA will need to take heed.

(iv) should a significant multi-use development such as this, address the health impact it will bring or could effect? i.e. is a HIA applicable?  
Also, should a significant multi-use development such as this, mention the relevant use classes that it will embrace?

(v) Sections 3.36 to 3.38 make no mention of solar glare that could have a significant impact, given the type of development proposed, with elevations containing significant amounts of glazing.

#### Other Consultees

No replies have been received from the following consultees: English Heritage, Greater London Authority, Transport for London, Heatham Residents Association, Network Rail, South West trains, Twickenham Town Centre Manager and Board, Rugby Football Union, Harlequins RFC, Richmond Tertiary College, Richmond Adult Community College, Royal Mail, Travel Lodge and the Crime Prevention Officer.

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

The proposed scoping that you outline would appear to cover the majority of the issues that the Council would require to be included within an Environmental Statement (ES) with the exception of Sustainability, Energy & Climate Change issues which require a specific chapter with that title. Climate change and its potential impacts and adaptation measures should be considered as an overarching theme of the assessment. Other issues needing to be more fully addressed have also been identified and specific comments are detailed below. These are grouped by topic.

#### **Topic Specific Comments:**

##### Broad Site Description

Council officers would anticipate the description of existing and surrounding development to be more detailed in the ES. This will need to be a comprehensive description of the existing buildings, railway track, platforms and other facilities as well as other site features, trees, landscaping and car/cycle parking facilities. The changing levels across the site and beyond need to be highlighted while details of site usage need further explanation. In particular, this section needs to include an explanation of the existing arrangements regarding the station's operation on RFU event days for both matches and concerts, provide details of the Royal Mail site and approved hotel extension to Regal House

The EIA will be expected to pay special attention to any cumulative impacts of development in the vicinity. Discussions with the Royal Mail are encouraged to ensure any development on land in their ownership is given consideration in designing this development. This will be beneficial to the development of the site and ascertaining the likely impacts, and benefits, of this development, along with potential for other future developments, such as pedestrian and cycle links, wildlife corridors and the like. This information can be gathered with the help of council officers.

Figure 1 should be supplemented with a clear drawing/illustration of the location of existing buildings on site.

### Development Proposals

The description of development is noted. The specifics of the project obviously have yet to be finalised and need to be discussed further and agreed through pre-application discussions. A comprehensive description of the proposed buildings, uses, station improvements, public spaces, landscaping, parking, taxi rank and servicing facilities will be expected to be provided in the ES. It is noted that no mention has been made of the café and bar facilities which had been understood to comprise part of the development.

A description of temporary station buildings, parking and access facilities to be provided during the construction stage need to be outlined. Changes to the station facilities, passenger handling capacity and secondary impacts on the public transport service need to be clearly outlined.

The evolution of the development and layout needs to be explained in the ES, along with the design and access statement and other documents. The Council will be preparing design guidance for the Train Station and Royal Mail sites and this project will need to be developed alongside this process and accord with that guidance.

### Potential Sensitive Receptors

The receptors listed should be supplemented with the following sensitive receptors:

- Queens Road Conservation Area
- Amyand Park Road Conservation Area
- Heatham House, grade II listed
- Protected views from Richmond Hill
- Biodiversity and habitat currently found off-site
- Twickenham Town Centre
- RFU and Harlequins Stadiums

### Socio-Economic Issues

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

### Transport



Twickenham Station acts as an important transport hub not only for Twickenham Town Centre and the RFU Stadium, but also for Twickenham Stoop (Harlequins RFC) and Richmond Tertiary College. Twickenham Stoop has recently expanded to a 14000 stadium. The Transport Assessment needs to undertake surveys (subject to agreement with the highway authority as to their scope), of parking in surrounding streets, usage of the train station and pedestrian and traffic flows on roads, including the A316, on event days, match days and non-match days at either stadium, unless it can be demonstrated that they are not needed. A full explanation of the impacts on the surrounding highways during demolition, construction and operation of the proposed development needs to be provided through the EIA.

Substantial improvements to the pedestrian environment are expected from the redevelopment of the site along with improving pedestrian/cycle access to the station from the Harlequins Stadium, Richmond Tertiary College and any future development of the Royal Mail site. To ensure that this is achieved, the scheme needs to provide pedestrian/cycle links into the Royal Mail site.

The Council encourages early discussions with the Metropolitan Police and Transport for London to identify concerns regarding pedestrian movement and crowd control (including pedestrian safety and security) at the station, on London Road, A316 and streets leading to the RFU Stadium on match days during the demolition, construction and post development stages of the project.

Consideration of the potential impacts for the A316 and local parking from the disruption of public transport services on event/match days at either the RFU or Harlequins need to be properly reviewed through the Transport Assessment and included in the EIA.

Pedestrian access and egress from the 'residential' elements of the scheme on match days needs full consideration.

The safety and security of users of the proposed riverside route to and along the River Crane needs to be assessed.

### Air Quality

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

The potential for the generation of dust (and therefore particulates) is noted but details of how these issues will be considered and the actions that will be taken in the event that the required level of air quality improvements cannot be achieved should be noted in the ES. It is important to make clear at the earliest stage of the development that details provided should outline all measures (such as site management activities and the use of low-emission plant) that will be undertaken over the course of the development to reduce the environmental impacts of the development. Reference should be made to all relevant guidance and legislation and should include potential for inclusion of measures to comply with new EU limit values as they are likely to be finalised prior to the implementation of the development.

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

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

The impact of railway emissions must be assessed in relation to future owners/occupiers of the new flats.

### Noise

One of the Council's key concerns is the potential for increases in background noise levels and vibration during demolition, construction and post development. This would not only result from the processes involved in developing the area but also from the additional residents in the area. The commitment to undertake a baseline noise survey is supported by the council but this must be continually updated. This will allow the continual assessment of the impact of the development on existing residents and the River Crane NICS, in particular bat and birdlife

The Council is particularly concerned with the potential impact of rail noise and vibration on future residents of the development and would expect any assessment of noise associated with the development to include appropriate consideration of this and how it might be addressed as well as noise impacts from discrete sources.

Monitoring should not be just for the sake of monitoring, so where potential impacts are identified practicable solutions to mitigate these impacts should be considered and implemented.

In addition to this it should be noted that the council will seek the level of noise transmission between units to exceed part E of the building regulations. The impact of railway noise must be assessed in relation to future owners/occupiers of the new residential units.

To assist in good management of construction noise, vibration, dust and other emissions, we suggest that a construction method statement is developed. Guidance on control measures for dust and other emissions is given in 'The Control of dust and emissions from construction and demolition: Best Practice Guidelines', Greater London Authority, November 2006. A low vibration method of piling must be employed with visual alarms set at vibration levels detailed with the new Bs5288 guidance. If the piling is due to be carried out for some time, the amount of hours per day may be restricted. The E.S needs to clarify piling methods and times. The types of piling most suitable will be hydraulic piling methods, auger piling methods and diaphragm walling.

### Ground Conditions (including Soil Contamination and Geology Report)

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

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

#### Water Resources Including Flood Risk Assessment

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

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

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

#### Ecology

The project site appears to have limited ecological or habitat potential, with the exception of bat roosts, therefore the approach outlined in the scoping report is thought to be appropriate. Special consideration of the potential for improving the ecological value of the site, such as new habitat creation, green walls and landscaping should form part of the proposals. The Council is pleased to note the inclusion of a new pedestrian footpath proposed along the River Crane linking to the River Crane walk.

It is encouraging to see the spatial scope for the EIA will incorporate the surrounding areas. Ecological impacts are expected to focus on the adjacent River Crane NICS which is a known bat and bird corridor.

There is a range of stakeholders in addition to Natural England that can also provide useful information on the River Crane, such as Friends of the River Crane Environment (FORCE) and others, and their advice should be sought as part of the EIA process as the project develops.

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

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

The amenities of the future occupants of the flats also needs assessment and in this regard the quality of the residential accommodation e.g. entrances, corridors, single aspect flats, outlooks towards the hotel extension, overshadowing needs full assessment.

### Wind Analysis

This section should also address the potential impacts of the new development on the dispersal of pollutants in the AQMA as well as impact on the local microclimate – there is the issue of winds between and around the blocks.

### Landscape and Visual Impact

The visual impact of the development upon some of the long distance views of the site should be analysed, in particular the view from the Richmond Hill and nearby conservation areas. Other key views should be agreed with Council officers. The proposals map to the UDP: First Review should be consulted when considering which views to include in the visual assessment.

Site topography and survey of levels of surrounding streets, river and other adjacent sites need to form part of the baseline study of townscape/landscape character and visual quality of the site/surroundings

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

An urban context analysis and landscape strategy are required as part of EIA process.

### Other Elements of the ES

The assessment of planning context, demolition and construction and cumulative impact are considered appropriate. No reference to an assessment of the environmental impact of the proposals on electrical interference and solar glare are mentioned. These issues need to form part of the EIA.

### Alternatives

Versions with lower key massing than the current proposal and/or alternative massing arrangements should be illustrated and discussed as part of the EIA process. There will also be a need to demonstrate the relationship between developments on the Twickenham Station and Royal Mail sites as part of any planning submission for Twickenham Station.

### Summary of Key Issues

Whilst the role of the EIA is to examine the 'main' or 'significant' effects of a development, the council would like to ensure that all impacts, both positive and negative, are fully considered, to ensure the best possible form of development. In addition to the summary in 4.0 of the scoping report, it is considered that this should be expanded to incorporate sections on 'Cumulative Impact', 'Sustainability, Energy & Climate Change' (including issues of solar glare and waste), 'Electro Magnetic Force – TV Reception', Public Participation including input from key stakeholders.

### Non-Significant Issues

Archaeological Assessment

The report states that the site lies within an 'Archaeological Priority Zone' as defined by the London Borough of Richmond but this is not the case. Given the low potential for archaeological deposits at the site and the previous development of the site, further archaeological assessment need not form a chapter of the E.S.

#### Waste

Household waste, construction waste and commercial waste will all be produced in the project environment at a significant level. Subject to these issues being assessed as part of the chapters on 'Demolition and Construction' and 'Sustainability, Energy and Climate Change', it is considered a specific E.S chapter need not be proposed. A site waste plan can be submitted as a separate document to the ES.

#### Infrastructure services

The Council encourages early discussions with relevant statutory undertakers to ensure that infrastructure is adequate. If concerns are not expressed regarding water, sewerage (foul water and surface water drainage), electricity, gas and telecommunications infrastructure, an E.S chapter need not be proposed.

Responses from consultees and a copy of the checklist the Council has produced for this project are enclosed for your information.

Date of Opinion: 10/06/10

Jon Freer

Assistant Director of the Environment (Development and Street Scene)

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