AVISON YOUNG

EIA Screening Report

Former Homebase Site, Manor Road, North Sheen

July 2025

Contents

Appendices

Figures

Report title: EIA Screening Report
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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1.1 Avison Young have been appointed by Avanton Richmond Developments Ltd (the 'Applicant') to request an Environmental Impact Assessment (EIA) Screening Opinion in relation to a full planning application (the 'Application') submitted to London Borough of Richmond upon Thames (LBRuT) for the redevelopment of the former Homebase site at Manor Road, North Sheen (the 'Site') into a mixed-use residential-led development (the 'Development').

1.1.2 This EIA Screening Report summarises the findings of the research and analysis undertaken by Avison Young and the Applicant's technical team in relation to the baseline conditions and the potential environmental effects of the Development. This report determines whether there is a likelihood of significant environmental effects to enable an informed decision on the need for EIA to be made by the Local Planning Authority (LPA), LBRuT.

1.1.3 The conclusions of this report have been supported by a range of technical studies undertaken for the Development including those currently available on LBRuT's online planning portal under the planning application reference 19/0510/FUL.

1.1.4 Provision for the request of an EIA Screening Opinion from LBRuT is made within Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[1] subsequently referred to as the 'EIA Regulations', which states:

(1) "A person who is minded to carry out development may request the relevant planning authority to adopt a Screening Opinion.

(2) A person making a request for a screening opinion in relation to a development where an application for planning permission has been or is proposed to be submitted must provide the following:

(a) A plan sufficient to identify the land;

(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;

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations (England) (SI571/ 2017), DCLG, London

(c) A description of the aspects of the environment likely to be significantly affected by the development;

(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;

(ii) The use of natural resources, in particular soil, land, water and biodiversity; and

(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."

1.1.5 As required by the EIA Regulations, the request for a Screening Opinion is accompanied by a plan sufficient to identify the land, a description of the Development, a description of the aspects of the environment likely to be significantly affected by the development and a description of any likely significant effects of the Development on the environment. Additional information is provided in accordance with guidance presented in the Planning Practice Guidance[2] (PPG).

1.1.6 In relation to the obligations on LPAs, the EIA Regulations state within Regulation 6 that a Screening Opinion should be adopted within 3 weeks of receiving a request.

1.1.7 Regulation 5 (5) of the EIA Regulations states:

"Where a relevant planning authority adopts a screening opinion under regulation 6(6), or the Secretary of State makes a screening direction under regulation 7(5), the authority or the Secretary of State, as the case may be, must-

(a) State the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;

(b) If it is determined that proposed development is not EIA development, state any features of the proposed development and measure envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and

[2] Department for Housing, Communities and Local Government (2024) Planning Practice Guidance. Available at: http://planningguidance.planningportal.gov.uk

(c) Send a copy of the opinion or direction to the person who proposes to carry out, or who has carried out, the development in question."

1.1.8 Accordingly, we request that LBRuT provides a Screening Opinion with details of the reason for their decision within three weeks of receipt of this report.

2. Background to the Site

2.1 Overview of the Site

2.1.1 The Site is located within the administrative area of LBRuT, within the ward of North Richmond.

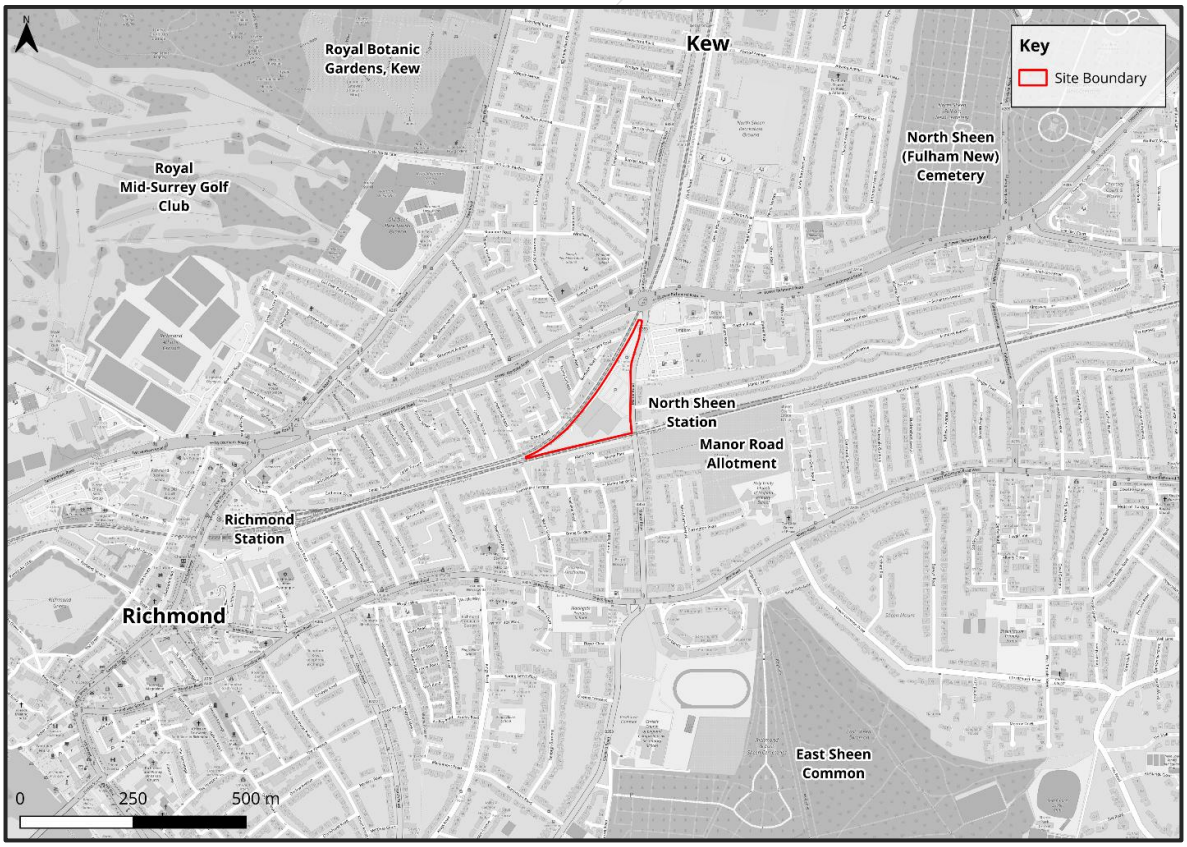
2.1.2 The Site is identified at **Figure 2.1**, while **Figure 2.2** shows the Site's location within its surrounding context.

2.1.3 The Site is approximately 1.5 hectares (ha) in size and currently comprises a low-rise retail building formerly occupied by Homebase, Pets at Home and Pets4Vets in the centre of the Site. To the north-east, east, south and south-west of the retail store is hardstanding which comprises an access road to / from the B353 Manor Road, surface carparking and servicing areas. There are a number of trees within the surface car parking area and along the Site's perimeter.

2.1.4 To the north, the Site is bound by the Manor Circus roundabout (connecting the A316 Lower Mortlake Road, Lower Richmond Road and the B353 Manor Road / Sandycombe Road). To the east, the Site is bound by the B535 Manor Road. To the south, the Site is bound by overland rail lines serving the Southwest Trains route to / from London Waterloo. To the west, the Site is bound by London Underground Ltd (LUL) overland rail lines serving the District Line.

Figure 2.1: Site Boundary Plan (Source: Google Earth)

Figure 2.2: Site Location Plan (Source: OpenStreetMaps)



2.2 Planning History

The Development (LBRuT Reference: 19/0510/FUL) and EIA Screening

2.2.1 In February 2019, the Applicant submitted a detailed planning application (Planning Application Reference: 19/0510/FUL) to LBRuT for the demolition of the existing buildings and structures and the comprehensive residential-led redevelopment of a single storey pavilion, basements and four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail / community / office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works.

2.2.2 During the pre-application stage of the Development, the Applicant commissioned Avison Young to prepare an EIA Screening Report (dated 12 November 2018). The purpose of the EIA Screening Report was to inform a formal request for an EIA Screening Opinion under Regulation 6 of the EIA Regulations. The EIA Screening Report and formal request for an EIA Screening Opinion was submitted to LBRuT (as the relevant determining authority) on 12 November 2018. This documentation can be seen by reference to **Appendix I**.

2.2.3 Informed by the evidence presented in the EIA Screening Report (refer to **Appendix I**), LBRuT issued an EIA Screening Opinion on 14 December 2018. The EIA Screening Opinion, which can be found in **Appendix II** concluded that the Development was not classified as 'EIA development'.

The Development as Amended 2019 (LBRuT Reference: 19/0510/FUL; GLA Reference: 4795) and EIA Screening

2.2.4 In July 2019, LBRuT resolved to refuse planning permission for the Development. As the proposal met the Mayor of London Order (2008) criteria, it was referred to the Mayor of London. As such, the Greater London Authority (GLA) became the determining authority for the Development.

2.2.5 Further to the above, the Applicant wished to make amendments to the Development (the 'Development as Amended 2019'). In general terms, when compared to the Development, the Development as Amended 2019 provided:

- Optimised internal layouts and massing within three of the four buildings proposed.
- An additional storey to Block B.

- An additional building located above the North Sheen Bus Terminus (Block E). This accommodated a bus layover facility (with parking for up to 5 buses) and four levels of residential use above.
- An additional 54 homes.
- An increase of affordable housing from 35% to 40% by habitable room.

2.2.6 During the pre-application stage of the Development as Amended 2019, the Applicant commissioned Avison Young to prepare another EIA Screening Report (dated 04 October 2019) with the purpose of submitting the EIA Screening Report to the GLA with a formal request for an EIA Screening Opinion under Regulation 6 of the EIA Regulations. The EIA Screening Report and formal request for an EIA Screening Opinion was submitted to the GLA (as the relevant determining authority) on 4 October 2019. This documentation can be seen by reference to **Appendix III**.

2.2.7 Informed by the evidence presented in the EIA Screening Report (refer to Appendix III), the GLA issued an EIA Screening Opinion on 8th November 2019. Once again, as per the Development, the EIA Screening Opinion, which can be found in **Appendix IV**, concluded that the Development as Amended 2019 was not classified as 'EIA development'.

2.2.8 A detailed planning application for the Development as Amended 2019 was submitted on the 22 November 2019 (LBRuT reference: 19/0510/FUL; GLA reference: 4795). The detailed planning application for the Development as Amended 2019 was formally consulted on by the GLA, however due to consultation responses received from Transport for London (TfL) regarding the proposed bus layover facility, it was agreed that Block E should be removed from the Development as Amended 2019.

The Development as Amended 2020 (LBRuT Reference: 19/0510/FUL; GLA Reference: 4795) and EIA Screening

2.2.9 A revised application for the Development was submitted on 31 July 2020 (LBRuT reference: 19/0510/FUL; GLA reference: 4795) (the 'Development as Amended 2020') which included:

- The removal of Block E with no inclusion of any bus layover facilities associated with the North Sheen Bus Terminus.
- An increase of 21 residential units, to provide a total of 454 residential units across the Development as Amended 2020. The Development as Amended 2020 will still provide 1-bed, 2-bed and 3-bed units with a 40% affordable housing provision.

- An increase of two parking spaces, to provide a total of 14 across the Development as Amended 2020.
- A decrease in the maximum height of Block A by 1.1 m Above Ordnance Datum (AOD). Block A is therefore proposed to reach a maximum height of 35.0 m AOD.
- An increase in the maximum height of Block B by 1.8 m AOD. Block A is therefore proposed to reach a maximum height of 43.7 m AOD.
- An increase in the maximum height of Block C by 5.2 m AOD. Block C is therefore proposed to reach a maximum height of 40.2 m AOD.
- A decrease in the maximum height of Block D by 1.0 m AOD. Block D is therefore proposed to reach a maximum height of 34.3 m AOD.

2.2.10 Once again, during the pre-application stage of the Development as Amended 2020, the Applicant commissioned Avison Young to submit a formal request for an EIA Screening Opinion to GLA (as the relevant determining authority) under Regulation 6 of the EIA Regulations. The EIA Screening Opinion Request was submitted 13 July 2020, concluding that the results and conclusions contained within the previous EIA Screening Reports remain applicable and valid. This documentation can be seen by reference to **Appendix III**.

2.2.11 Informed by the evidence presented in the EIA Screening Report (refer to **Appendix III**), the GLA issued an EIA Screening Opinion on 8 November 2019. Once again, as per the Development, the EIA Screening Opinion, which can be found in **Appendix IV**, concluded that the Development as Amended 2019 was not classified as 'EIA development'.

The Development as Amended 2023 (LBRuT Reference: 19/0510/FUL; GLA Reference: 4795)

2.2.12 A revised planning application for the Development was submitted on 28 September 2023 (LBRuT reference: 19/0510/FUL; GLA reference: 4795) (the 'Development as Amended 2023') in light of various changes to the development plan, planning guidance and other material considerations. The description of the Development as Amended 2023 remained unchanged from the Development as Amended 2020. The Development as Amended 2023 included the following amendments:

- The introduction of a second staircase in all cores with a height of over 18 metres and associated alternations, including minor reductions in the internal areas of the homes and / or minor

increases in the building envelope in inward courtyard facing facades; however, no net loss of units or changes to unit types.

- Minor changes to internal ground floor layouts across all of blocks to respond to updated Fire Safety regulations.
- Minor changes to Site levels to ensure that the Development does not lead to detrimental impacts off-Site in regard to surface water flooding by revisiting surface water flow routes through the site and incorporating flood resilience measures across the Site.
- Subsequent minor reductions to the maximum AOD heights of two of the proposed buildings, in part achieved through reductions to the floor to ceiling heights within the buildings to address the Site level changes.
- Associated revisions to the landscaping to accommodate the proposed surface water drainage strategy.
- Minor changes to internal flat layouts across all blocks to respond to the Housing Design Standards LPG.
- Rationalisation of plant at roof levels and associated amendments to roof terraces.
- An updated Energy Strategy for the Site with minor revisions to plant area sizes and roof top layouts.

2.2.13 The Development as Amended 2023 (hereafter referred to as the 'Permitted Scheme') was permitted by the GLA on 23 May 2024.

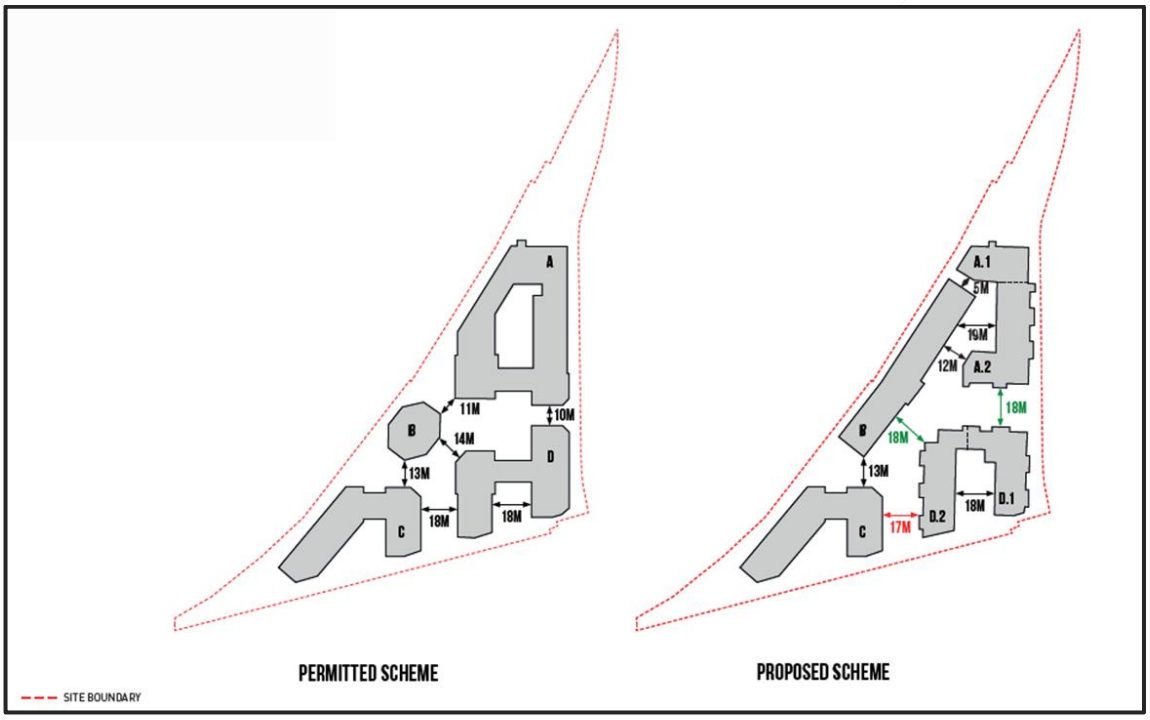
The Development as Amended 2025 (LBRuT Reference: 19/0510/FUL; GLA Reference: 4795)

2.2.14 The Applicant is now seeking to implement a number of design amendments to the Permitted Scheme which would include the provision of purpose-built shared living (PBSL) units within the Development and amendments to the Development's layout and massing. This includes:

- The reduction in the overall building height on the Site and removal of the tower building.
- The site massing strategy introduces greater variation in both height and massing with setbacks incorporated along Manor Road. Rooflines and façades have been articulated to break up the building forms and improve streetscape. Height is lowest on the eastern edge.

- The massing of Blocks B, A2, D1 and D2 has been adjusted to better relate to the Site context.
- Revised site massing with the lowest building heights at the eastern edge, adjacent to Manor Road, to better relate to the surrounding context. Overall, the revised massing steps up towards the centre of the site, respecting the scale of the neighbouring area by minimizing visual impact
- The allocated retail area and community spaces for Blocks A2 and D1 and the shared amenity areas for Block B (PBSL), have been relocated towards the centre of the Site.
- A large central landscaped plaza central to the development is proposed surrounded by these co-living, amenity, retail and community facilities and primary building frontages.
- Additional routes through the buildings have made to increase the permeability of the Site.

Figure 2.3: Layout Comparison between the Development as Amended 2023 (Permitted Scheme) and the Emerging Proposed Scheme Layout 2025



2.2.15 The design amendments described above constitute the 'Development as Amended 2025' that is the subject of this report.

3. The Development

3.1 Description of Development

3.1.1 Whilst the design of the Development is not yet fixed for the purposes of the Applicant's forthcoming planning application, the information provided to Avison Young by the Applicant in respect of the Development (and summarised here) is considered adequate to establish the likely environmental effects of the Development and to advise on EIA Screening matters.

3.1.2 The Development will necessitate the demolition of all existing buildings and structures on the Site.

3.1.3 The Development comprises of five new buildings ranging from 1 storey to 10 storeys in height. Residential land uses will be present in all buildings and will provide a total of 408 studio 1-,2- and 3-bedroom homes (a reduction of 45 compared with the Permitted Scheme) along with 340 purpose-built shared living (PBSL) studios. Commercial floorspace will be concentrated in Block A and D, either side of the access from Manor Road and will provide approximately 458m^2 of commercial floorspace which is a reduction of 36m^2 compared with the Permitted Scheme.

3.1.4 Vehicular access and egress to / from the Site will be provided in the north-east of the Site via the existing access and egress to Manor Road. Vehicular circulation will be limited along an access road provided within the east of the Site, adjacent to the off-Site rail lines. Further vehicular circulation will be afforded within the centre of the Site, around the perimeter of the new central public space to provide emergency vehicular access will be provided to all buildings.

3.1.5 Car parking will be kept to a minimum, with an anticipated 14 spaces provided for the mobility impaired. It is envisaged such parking will be provided on-street within the west of the Site. Servicing will occur at street level, predominantly along the eastern boundary of the Site. Sufficient storage for both refuse and cycle parking will be provided for each block.

3.1.6 The proposed energy strategy will comprise an Air Source Heat Pump solution on a block-by-block basis.

3.1.7 The standard working hours for all construction activity are to comply with those defined by the planning permission. It is anticipated that this would be 08:00 to 18:00, Mondays to Fridays, and 08:00 to 13:00 on Saturdays, with no construction activity on Sundays or Bank Holidays. During the demolition phase, working hours will be 08:00 to 17:00pm with no demolition activity on Bank Holidays or Weekends. No continuous 24-hour activities are envisaged.

4. The Environmental Context and Site Sensitivity

4.1 Predominant Existing Land Uses

4.1.1 As noted in **Section 2**, the existing 1.9ha Site currently comprises a vacant low-rise retail store with associated hardstanding and trees.

4.1.2 Adjacent to and beyond the Site (to a distance of approximately 1km from the centre of the Site) are a range of land uses predominantly comprising:

- **To the north** - A bus terminus, residential uses and transport infrastructure including Sandycombe Road and the LUL District Line.
- **To the north-east** - Residential land uses, transport infrastructure including the A316 Lower Richmond Road, North Sheen Recreation Ground, and the south-western extent of Fulham (North Sheen) Cemetery.
- **To the east** - a large Sainsbury's store and associated parking areas, residential land uses and transport infrastructure including North Sheen Station and its associated rail lines, and the A205 South Circular.
- **To the south-east** - Allotments, residential land uses, transport infrastructure including the A305 Upper Richmond Road West, the northern extent of Sheen Common, and East Sheen Cemetery.
- **To the south** - Residential land uses and transport infrastructure including A305 Sheen Road and the B353 Queen's Road.
- **To the south-west** - Residential land uses, transport infrastructure including A305 Sheen Road, the LUL District Line and Southwest Trains overland rail lines, and the north-eastern extent of Richmond town centre including Richmond Station.
- **To the west** - Light industrial, other commercial and residential land uses, transport infrastructure including Lower Mortlake Road, Kew Road and Twickenham Road, and the eastern extent of Richmond Athletic Ground.
- **To the north-west** - Light industrial, other commercial and residential land uses, transport infrastructure including the A316 Lower Mortlake Road and A307 Kew Road, Richmond Lawn Tennis Club, Richmond Cricket Club, the eastern extent of the Royal Mid-Surrey Golf Club, and the south-eastern extent of the Royal Botanic Gardens at Kew.

4.2 Historic Land Uses

4.2.1 Historic maps for the area[3] show the Site to be farmland in the 1850s. However, today's major roads of the area are evidenced surrounding the Site, including the line of Manor Road and Queen's Road, Lower Richmond Road, Upper Richmond Road and Kew Road. The London and South-Western Railway is also present. By the mid-1860s a second rail line is present (that which currently borders the east of the Site).

4.2.2 An 1871 - 1874 map shows a Gas Works adjacent to the north-east of the Site. By 1874 an increase in residential development occurs within the areas surrounding the Site. This continues through to the early 1900s and beyond. However, a 1913 map shows the Site to contain a timber yard and other industrial uses.

4.2.3 The Site's industrial uses appear to be a constant feature until the present-day retail accommodation was erected, circa the 1980s.

4.3 Transportation

4.3.1 As noted within **Section 2**, existing vehicular access / egress to / from the Site is afforded by the A353 Manor Road. This provides direct access to the A316 Lower Richmond Road, A316 Lower Mortlake Road (the A316), A305 Upper Richmond Road West and A305 Sheen Road. As such, access to the wider strategic road network in all directions is possible.

4.3.2 Baseline traffic surveys were undertaken by the Applicant's Transport Consultant (Sanderson Associates) in October 2018. Such surveys revealed 79 existing AM peak hour (08:30 - 09:30) two-way light vehicle traffic movements to / from the Site and 107 PM peak hour (17:00 - 18:00) two-way light vehicle traffic movements to / from the Site which were associated with the then-open Homebase and Pets at Home.

4.3.3 The majority of the Site has a Public Transport Accessibility Level (PTAL) rating of 5, with the south-west extent of the Site having a PTAL rating of 4 (with 0 being the lowest rating and 6b being the highest rating). As previously noted, 2 stations are located within approximately 1km of the centre of the Site. These include:

- North Sheen station, approximately 200m east of the centre of the Site.

[3] National Library of Scotland (2025) OS Six Inch Maps. Available at: https://maps.nls.uk/os/6inch-england-and-wales/

- Richmond station (served by Southwest Trains and the LUL District Line), approximately 900m south-west of the centre of the Site.

4.3.4 A number of bus stops are located within 200m of the centre of the Site to the north, north-east and north-west of the Site, offering a range of bus routes to destinations including Richmond Town Centre, Kingston, Twickenham, Barnes, Chiswick and Kew.

4.4 Air Quality

4.4.1 The Site is located within the borough-wide Richmond Air Quality Management Area (AQMA)[4]. The AQMA was declared by LBRuT on 31 December 2000 for nitrogen dioxide (NO_2) (annual mean) and Particulate Matter PM_{10} (annual mean and 24-hour mean) with the principal pollutant source stated as 'road transport unspecified'.

4.5 Noise and Vibration

4.5.1 The main sources of noise at the Site are likely to arise from road traffic, servicing of the existing on-Site retail land uses, noise associated with the operation of the adjacent rail lines and noise from air traffic associated with Heathrow Airport.

4.5.2 There is a potential for vibration at the Site due to the operation of the adjacent rail lines.

Ecology and Nature Conservation

4.5.3 There are no statutory or non-statutory sites designated for nature conservation within the Site.

4.5.4 Owing to the built-up context of the Site and the surrounding area, with little ecological connectivity to the wider environment, it is considered appropriate to consider designated nature conservation sites within approximately 500m of the Site.

4.5.5 There are no statutory nature conservation designations within approximately 500m of the Site. The nearest is 'Richmond Park', located approximately 1.1km south of the Site, which is designated as a Special Area of Conservation (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI).

4.5.6 There are three non-statutory nature conservation designations within approximately 500m of the Site, these are:

[4] Defra (2025) AQMAs Interactive Map. Available at: https://uk-air.defra.gov.uk/aqma/maps/

- 'Royal Botanic Gardens, Kew' Site of Importance for Nature Conservation (SINC)[5] (Metropolitan). Located 500m north-west of the Site.
- 'East Sheen and Richmond Cemeteries and Pesthouse Common' SINC (Local). Located 500m south of the Site.
- 'Richmond Park and associated areas' SINC (Metropolitan). Located 500m south of the Site.

4.5.7 A Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) for the Site was undertaken by the Applicant's Ecologist (Tyler Grange) in February 2019. This was followed by an Ecological Impact Assessment (EcIA) and Biodiversity Net Gain Report in May 2023 which confirmed that there was no change in terms of the location, condition and extent of the habitats identified on-Site, the species that are likely to use and be found on-Site, and entry points or potential bat roost features on-Site.

4.5.8 To summarise the PEA, PBRA and EcIA, the Site comprises predominantly buildings and hardstanding, with areas of scrub, amenity grassland, trees and hedge / flower beds along the Site boundaries and within the parking areas. None of these habitats are considered to be habitats of principal importance. Indeed, such habitats are considered to be of limited ecological importance, although the trees may offer limited opportunities for nesting birds and one area of grass within the south-west corner of the Site has the potential to be used by hibernating hedgehogs. The Site yields negligible potential for roosting bats.

4.5.9 Trees and shrubs associated with the overland rail lines adjacent to the south and west of the Site comprises semi-mature vegetation. There is a potential for such habitat to be used by foraging and commuting bats. However, the level of importance of this habitat to any bat population is likely to be limited by the maturity of the vegetation.

4.5.10 The Site is located within multiple SSSI Impact Risk Zones (IRZ). According to the Natural England guidance[6], the Development does not fall into any of stated proposal categories listed on the IRZ in which the LPA should consult Natural England on the likely risks.

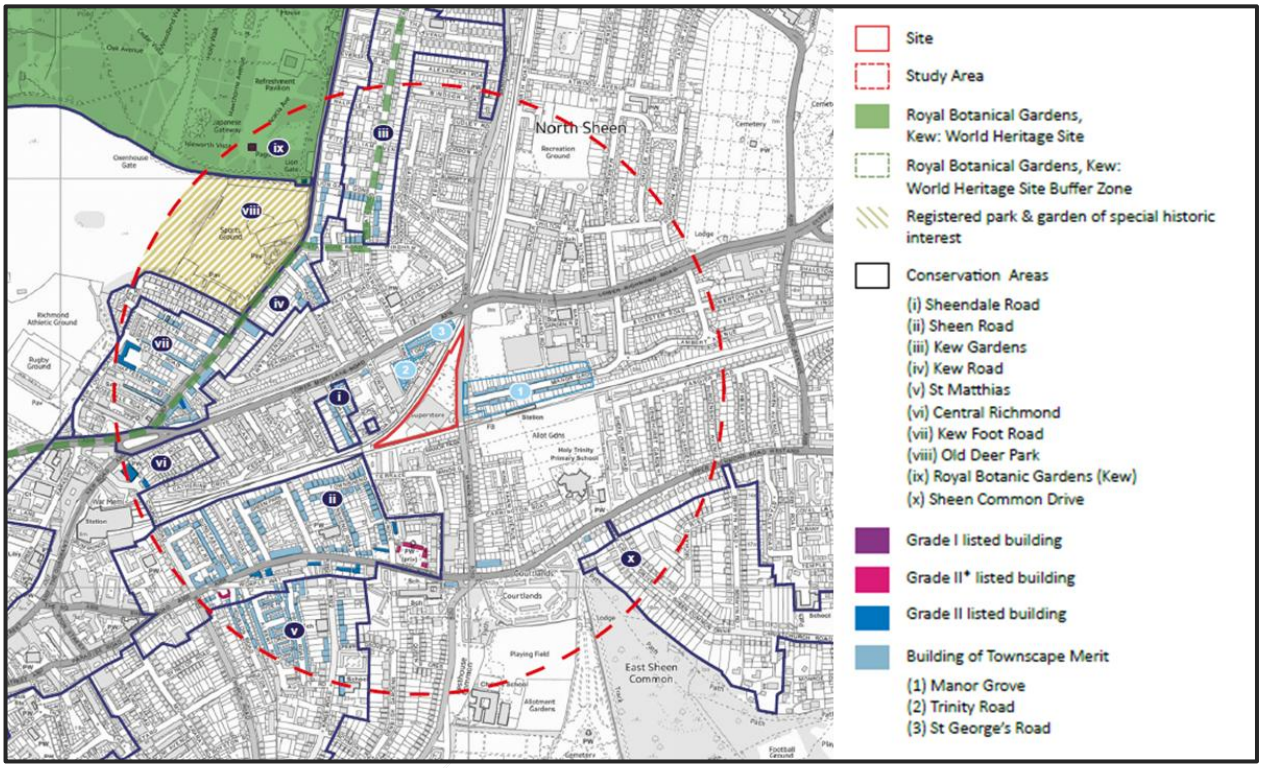
4.6 Cultural Heritage

4.6.1 The Site is not subject to any statutory or non-statutory heritage designations. As such, the Site is not located in a World Heritage Site (WHS) or Conservation Area and does not contain any Scheduled

[5] Also known nationally as Local Wildlife Sites (LWS)
[6] Natural England (2024) Impact Risk Zones for Sites of Special Scientific Interest. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields or buildings and structures of local heritage value. Furthermore The Site is not located within an Area of Archaeological Importance (AAI) as defined under the Archaeological Monuments and Archaeological Areas Act 1979 nor is it within an Area of Archaeological Priority Area (APA).

Figure 4.1: Above Ground Heritage Assets within the ZTV (Source: Arc Landscape Design and Planning)



4.6.2 There are 10 Conservation Areas within the ZTV[7], the closest being Sheen Road Conservation Area (20m south of the Site) and Sheendale Road Conservation Area (25m west of the Site)[8]. In addition, there are approximately 20 listed buildings within the ZTV[9].

4.6.3 In respect of non-statutory heritage designations within the ZTV, there are various Buildings of Townscape Merit (BTM), predominantly located to the west of the Site.

4.7 Townscape and Visual Amenity

4.7.1 The Site and its immediate environs are characterised by built urban form which varies in scale, footprint and height, comprising residential, retail, light-industrial and transport infrastructure.

[7] LBRuT (2025) Conservation Areas. Available at: https://www.richmond.gov.uk/services/planning/conservation_areas
[8] LBRuT (2025) Conservation Area Statements. Available at: https://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_statements
[9] Historic England (2025) National Heritage List for England. Available at: https://historicengland.org.uk/listing/the-list/

Buildings and structures within and surrounding the Site are generally low - medium rise, ranging from 2 - 6-storeys. Exceptions to the low-rise building heights include a 1960s 12-storey block of flats located to the north-west of the Site and, to the south, a housing estate comprising 2 9-storey blocks. The spire of the Church of St Matthias (Grade II Listed) and the Pagoda (Grade I Listed) located within the Royal Botanic Gardens at Kew are local landmarks. However, following site visits undertaken by the Applicant's Townscape and Visual Consultants (Arc) it was confirmed that these landmarks are not visible from the Site.

4.7.2 The Site is not covered by any planning policy designations relating to townscape value. However, the LBRuT Richmond and Richmond Hill Village Planning Guidance Supplementary Planning Document (SPD)[10] identifies the Site as being located in 'Character Area 6: Old Gas Works'. This character area is described as occupying *"…the angle of 2 busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past".*

4.7.3 The Applicant's Townscape and Visual Consultants (Arc) have undertaken a study to identify the likely Zone of Theoretical Visibility (ZTV) of the Site and the Townscape Character Areas relevant to the Site and its ZTV. The study set a ZTV extending to a radius of 750m from the centre of the Site.

4.7.4 The Site is located within Townscape Character Area (TCA) 1: North Sheen Mixed Use. This is considered to be of 'medium to low' value. However, 4 of the 8 TCAs identified within the ZTV are considered to be of 'high to exceptional' value. These relate to:

- TCA 4: East Sheen Open Space.
- TCA 5: Richmond Hill and East Sheen Residential.
- TCA 6: Richmond Residential Fringe.
- TCA 7: Kew Gardens and Old Deer Park.
- TCA 8: Kew Gardens Residential Fringe.

4.7.5 Several non-statutorily designated Other Open Land of Townscape Importance (OOLTI) are located within approximately 750m of the centre of the Site. All are separated from the Site by significant road or rail infrastructure. The closest OOLTI's to the Site are located approximately 130m north-east and

[10] LBRuT (June 2016) Richmond and Richmond Hill Village Planning Guidance SPD

130m south-east of the centre of the Site, adjacent to the east of the A355 Manor Road and adjacent to the south-east of North Sheen Station respectively.

4.7.6 The Site is not subject to any statutorily protected view. Furthermore, none of the strategic and local views identified within the LBRuT's Local Plan are orientated towards the Site.

4.7.7 In consultation with the LBRuT, 13 views of importance to the Site have been identified. These comprise the following:

- View 1: View looking west along Manor Grove.
- View 2: View from Manor Road opposite Townsend Terrace.
- View 3: View looking north from Sheen Road, over Hickey's Almshouses.
- View 4: View looking east along Dee Road.
- View 5: View looking east on Church Road, over the railway line.
- View 6: View looking south on Trinity Road.
- View 7: View looking south from Lower Richmond Road / Manor Road roundabout.
- View 8: View looking south on Sandycombe Road, close to junction with Dudley Road.
- View 9: View looking south from viewing platform at the top of the Pagoda at Kew Gardens.
- View 10: View looking south-west across Manor Road at the entrance to Sainsbury's.
- View 11: View looking north-west across Manor Road at the west end of Manor Grove.
- View 12: View looking east along Dee Road from the south end of Crown Terrace and Victoria Villages.
- View 13: View from Manor Park.

4.8 Geology, Ground Conditions and Contamination

4.8.1 The bedrock geology of the Site and the majority of its environs is that of the London Clay Formation. This is overlain by sand and gravel of the Kempton Park Gravel Member.[11]

[11] British Geological Survey (2025) GeoIndex. Available at: https://www.bgs.ac.uk/map-viewers/geoindex-onshore/

4.8.2 The Site is not located within a Minerals Safeguarding Area, a Coal Mining Reporting Area or a Development High Risk Area.[12]

4.9 Soil and Agricultural Land

4.9.1 The Site therefore does not contain any Best and Most Versatile (BMV) land for agricultural use. Under the Agricultural Land Classification (ALC) system the Site is graded as 'Urban' and under the post-1988 ALC system the Site is not graded.

4.10 Water Resources, Flood Risk and Drainage

4.10.1 At its closest points, the River Thames is located approximately 1.5 km north-east, south-west and north-west of the Site.[13]

4.10.2 The Site is located in Flood Zone 1[14] (land assessed by the Environment Agency as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)). The land in the south of the Site is identified as being at High (>3.3% chance each year) to Medium (between 1% and 3.3% chance each year) risk of surface water flooding, while the land in the north of Site is identified as being at Low (between 0.1% and 1% chance) to no risk[15]. The Site does not contain any surface water features.

4.10.3 A Secondary A Aquifer is known to exist beneath the Site.

4.11 Socioeconomics and Health

4.11.1 There are 9 open primary schools within approximately 1 mile of the centre of the Site (deemed to be an appropriate distance for primary school children to commute to school). These primary schools have surplus capacity of 550 primary places[16].

4.11.2 There are 8 open secondary schools within approximately 2 miles of the centre of the Site (deemed to be an appropriate distance for secondary school children to commute to school). Together, these have a surplus capacity of 1016 secondary places. Of these places, 90 relate to all girls' secondary schools, 113 relate to a Convent secondary school, the Church of England secondary school is currently

[12] Mining Remediation Authority (2025) Interactive Map Viewer. Available at: https://datamine-cauk.hub.arcgis.com/
[13] Environment Agency (2025) Main River Map. Available at: https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386
[14] Environment Agency (2025) Flood Map for Planning. Available at: https://flood-map-for-planning.service.gov.uk/
[15] Environment Agency (2025) Check Long Term Flood Risk. Available at: https://check-long-term-flood-risk.service.gov.uk/map
[16] GOV.UK (2025) Get Information about Schools. Available at: https://get-information-schools.service.gov.uk

oversubscribed. As such, there are 813 existing mixed-gender and multi-faith secondary school places within 2 miles of the centre of the Site.

4.11.3 There are 8 open GP surgeries within approximately 1 mile of the centre of the Site. All 8 GP surgeries are currently accepting new patients.

4.11.4 There are 9 public parks / significant public opens spaces and recreational grounds within 1km of the centre Site:

- North Sheen Recreational Ground, approximately 700m north-east of the centre of the Site (at its nearest point).
- Green space surrounding Penfold Tennis Club, approximately 94 m north-east of the centre of the Site (at its nearest point).
- Fulham (North Sheen) Cemetery, approximately 760m north-east of the centre of the Site (at its nearest point).
- Tangier Green, approximately 880m east of the centre of the Site (at its nearest point).
- Pesthouse Common, approximately 480m south of the centre of the Site (at its nearest point).
- East Sheen Common, approximately 570m south-east of the centre of the Site (at its nearest point).
- East Sheen Cemetery, approximately 590m south-east of the centre of the Site (at its nearest point).
- Richmond Athletic Ground, approximately 890m west of the Site (at its nearest point).
- The north-eastern extent of the Royal Botanic Gardens at Kew, approximately 680m north-west of the Site.

4.12 Waste

4.12.1 The Site is not located on, or in proximity to, any historic[17] or permitted (current)[18] landfill sites.

[17] Environment Agency (2025) Historic Landfill Sites. Available at: https://www.data.gov.uk/dataset/17edf94f-6de3-4034-b66b-004ebd0dd010/historic-landfill-sites
[18] Environment Agency (2025) Permitted Landfill Sites. Available at: https://www.data.gov.uk/dataset/ad695596-d71d-4cbb-8e32-99108371c0ee/permitted-waste-sites-authorised-landfill-site-boundaries

4.13 Risk of Major Accidents and Disasters

4.13.1 The Site is located 3km east of Mogden Sewage Treatment Works, a Lower Tier establishment subject to the Control of Major Accident Hazards (COMAH) Regulations 2015 and which is operated by Thames Water Utilities Ltd[19]. The Site is not located in proximity to any geological hazards, safeguarded aviation zones or high-pressure gas pipelines. Whilst the area surrounding the Site experienced bombing in the 1940s, there is no evidence of the Site being subject to any direct bombing. The Site is also not located in an area of significant radon potential or risk[20].

4.14 Sensitivity of the Site

4.14.1 With reference to all of the information provide above, it can be demonstrated that the Site is not located within a 'sensitive area' as defined by the EIA Regulations; that is, a site within one or more of the following:

- SSSI;
- Land to which Nature Conservation Orders apply;
- International conservation sites;
- National Parks;
- Areas of Outstanding Natural Beauty (now known as National Landscapes);
- World Heritage Sites; and / or
- Scheduled Monuments.

[19] Health and Safety Executive (2025) COMAH 2015 Public Information Search. Available at: https://notifications.hse.gov.uk/COMAH2015/Search.aspx
[20] UK Health Security Agency (2024) Radon Map. Available at: https://www.ukradon.org/information/ukmaps

5. EIA Screening Analysis

5.1.1 When assessing whether an EIA is required, Avison Young have followed the guidance published in the PPG, taking into account the requirements of Schedules 1, 2 and 3 of the EIA Regulations. The analysis is presented below.

5.2 Is the Proposal Schedule 1 Development?

5.2.1 According to the EIA Regulations and guidance, the Development is not of a type that would constitute Schedule 1 development.

5.3 Is the Proposal Schedule 2 Development?

5.3.1 The Development has been categorised under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. For such a development, an EIA may be required if:

- The development includes more than 1 hectare of urban development which is not dwelling house development;
- The development includes more than 150 dwellings;
- The overall area of the development exceeds 5 hectares; or
- The development is located within a sensitive area as defined by the EIA Regulations.

5.3.2 It is evident from the description of the Site and its setting in **Sections 2 - 4** that the Site is not located within a sensitive area as defined by the EIA Regulations.

5.3.3 Although not within a sensitive area, the Development does exceed the dwelling number threshold and as such, it is 'Schedule 2' development. It is therefore necessary to consider the criteria as set out in Schedule 3 of the EIA Regulations to determine whether significant environmental effects are likely to occur as a result of the Development. A request for an EIA Screening Opinion is made on this basis.

5.4 Consideration of Schedule 3 Criteria: The Likelihood of Significant Environmental Effects

Approach

5.4.1 In screening the Development, the factors set out in Schedule 3 of the EIA Regulations need to be carefully considered to determine whether significant effects are likely, and EIA is needed. The relevant factors comprise:

- The characteristics of the Development (refer to **Section 3**) with particular regard to: (a) the size and design of the whole development; (b) cumulation with other existing development and/or approved development; (c) the use of natural resources, in particular land, soil, water and biodiversity; (d) the production of waste; (e) pollution and nuisances; (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; and (g) the risks to human health (for example, due to water contamination or air pollution).

- The location of the Development (refer to **Section 2**) and the environmental sensitivity of the geographical areas likely to be affected by the Development (refer to **Section 4**).

- The types and characteristics of the potential environmental effects of the factors specified in Regulation 4(2) namely: (a) population and human health; (b) biodiversity; (c) land, soil, water, air and climate; (d) material assets, cultural heritage and the landscape; and (e) the interaction between the factors referred to in sub-paragraphs (a) to (d) (refer to **this Section**).

Cumulative Schemes

5.4.2 The PPG states that in judging whether the effects of a development are likely to be significant, local planning authorities should have regard to the possible cumulative effects with any approved development. Approved development within 1km of the Site was considered appropriate given the surrounding urban context and included those projects with:

- A resolution to grant planning permission;

- A valid planning permission and yet to start on-site; and

- A valid planning permission and under construction.

5.4.3 A search of LBRuT's planning portal[21] was carried out by Avison Young based on the above parameters. No approved developments were identified that would be of sufficient scale and proximity to warrant consideration with the Development due to their potential to result in significant cumulative effects.

5.4.4 The Development has been appraised, having regard to all of the above factors as listed in Schedule 3 of the EIA Regulations, together with the information provided within **Sections 2 - 4** of this report and discussion of the results and conclusions of this appraisal is presented below. For each environmental topic area considered, environmental effects are considered for:

- The construction of the Development (The Works); and
- The Development once completed and operational (the Completed Development).

5.5 Transportation

The Works

5.5.1 Inevitably, the Works will give rise to some disruption to the normal operation and functioning of the local road network. However, the Works will be rigorously planned and programmed to minimise such disruption and allow for continued access to surrounding land uses. In this respect, a Construction Traffic Logistics Plan (CTLP) will set out all traffic and transport related management methods and controls to ensure minimal disruption to the surrounding road network. For example, designated vehicular access and egress to the Site will be stipulated and vehicular traffic arising from construction site deliveries and pick-ups will follow pre-agreed designated routes and be timed to avoid peak traffic hours. Accordingly, while the Works may temporarily increase vehicular traffic generation associated with the Site, the traffic increase is not envisaged to be significant.

5.5.2 Similarly, the CTLP will also deal with the appropriate management of the pedestrian realm surrounding the Site. For example, should any public footway closures be required, these will be clearly advertised. Additional signposting will be erected to inform and guide pedestrians to nearby alternative routes. It therefore follows that temporary pedestrian realm disruptions and diversions will be managed so as to avoid significant effects.

The Completed Development

[21] LBRuT (2025) Online Planning Portal. Available at: https://planning.richmond.gov.uk/richmond/search-applications/

5.5.3 With reference to **Section 2**, with the exception of 14 accessible car-parking spaces and two electric car club spaces, the Development will be car-free. Space is also to be provided for servicing and delivery vehicles which are expected to visit the Site on a daily basis.

5.5.4 The Development will, therefore, reduce the number of car-trips when compared to the existing situation. This is demonstrated by **Table 5.1** which has been informed by work undertaken by the Applicant's Transport Consultant (Sanderson Associates).

Table 5.1: Existing and With-Development Two-Way Movements to / from the Site

Peak Period	Baseline	With-Development (453 units)	With-Development (629 Units)	Change
AM 08:30 – 09:00	79	62	82	3
PM 17:00 – 16:00	107	56	72	-35

5.5.5 **Table 5.1** shows that with the Development in place, there would be no material change in two-way traffic movements to / from the Site in the AM peak and a reduction in the PM peak based on the flows generated by the previous use. This assumes a worst-case scenario that the co-living units generate the ratio of trips as other units on the Site based on data in the 2023 Transport Assessment Addendum, this is likely to be an overestimation. When distributed to the wider road network, the overall traffic volumes and flows resulting from the Development are unlikely to be materially different to that of the existing situation. As such, the Development is unlikely to give rise to significant vehicular traffic effects. This will be further avoided by the implementation of a Travel Plan and Delivery Servicing Plan. The former will advocate and encourage occupiers of the Development to use non-car modes of transport. The latter will ensure effective, efficient and minimally disruptive delivery and servicing trips to and from the Development.

5.5.6 As noted in **Section 2**, the Development will provide a new pedestrian realm which will increase connectivity to the wider area and provide a direct pedestrian access to North Sheen station, located approximately 200m east of the centre of the Site and the local bus network. Furthermore, the provision of approximately 590 cycle parking spaces for residents of the Development will further encourage the use of non-car modes of transport.

5.5.7 Additionally, as the North Sheen Bus Terminus would be re-provided as part of the Development, this would negate likely significant effects associated with either decreasing or increasing the operations of the on-Site terminus.

5.6 Air Quality

The Works

5.6.1 The Works have the potential to give rise to the following air quality effects:

- Dust emissions and associated nuisance generated by the physical components of the Works.
- Additional emissions to the atmosphere from the operation of construction plant and machinery.
- Additional emissions to the atmosphere from construction related traffic generation.

5.6.2 With regard to dust emissions and nuisance, this can be effectively managed by standard construction environmental management techniques, all to be included in the Construction Environmental Management Plan (CEMP). These will include:

- Adherence to reasonable construction site working hours which will avoid early mornings, night-time and weekend working (unless required for an emergency situation).
- Damping down of dusty surfaces and processes where dust may be generated.
- Appropriate covering of potentially dust generating stockpiled materials on the construction site.
- Avoiding the occurrence of dust generating activities during dry and windy weather conditions.
- Dust monitoring to assess the effectiveness of dust management controls and to indicate if any when additional measures may be required.

5.6.3 With the above measures in place, dust generation and nuisance will be reduced as far as practically possible. In addition, dust tends to settle within 200m of its source, thereby limiting the geographical extent of its potential effect.

5.6.4 Potential emissions arising from the operation of construction site plant and machinery will also be minimised via the CEMP which will specify the use of modern, low emission plant and machinery and that plant and machinery must be turned off when not in use.

5.6.5 With regard to emissions from construction related traffic, as noted in a previous sub-section (Transportation) the temporary increase in traffic generation associated with the Works is not envisaged to be significant. It therefore follows that road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

5.6.6 Considering all of the above, the Works are not anticipated to generate significant air quality effects.

The Completed Development

5.6.7 Potential air quality effects of the completed and operational Development could arise from:

- Additional emissions to the atmosphere from traffic generated by the completed and operational Development.
- Additional emissions to the atmosphere from the operation of building plant, particularly any heating and power plant.

5.6.8 As noted in a previous sub-section of **Section 5** (Transportation) with the Development in place, the overall traffic volumes and flows on the local road network are unlikely to be materially different to that of the existing situation. As such, the Development is unlikely to give rise to significant changes to vehicular traffic emissions and associated effects to ambient air quality.

5.6.9 With regard to building heating and power plant, as noted in **Section 3**, the Development will incorporate an Air Source Heat Pump solution on a block-by-block basis. This all-electric solution will ensure no emissions to the atmosphere.

5.6.10 In view of the above, the operation of the completed Development is not anticipated to generate significant air quality effects.

5.7 Noise and Vibration

The Works

5.7.1 In common with all active construction sites the Works have the potential to give rise to the following noise and vibration effects:

- Increased ambient noise and vibration and associated nuisance generated by the physical component of the Works.

- Increased ambient noise and vibration resulting from the operation of construction plant and machinery.
- Increased road traffic noise from construction related traffic generation.

5.7.2 Standard construction environmental management techniques, all to be included in the CEMP will be effective in reducing all above potential effects. These will include but not be exclusive to:

- Adherence to reasonable construction site working hours which will avoid early mornings, night-time and weekend working (unless required for an emergency situation).
- The use of construction techniques known to reduce the incidence of noise and vibration.
- The use of modern, low noise emission plant and machinery.
- Switching off plant and machinery when not in use.
- Noise and vibration monitoring to assess the effectiveness of the management controls and to indicate if any when additional measures may be required.

5.7.3 With regard to noise generated from construction related traffic, as noted in a previous sub-section of **Section 5** (Transportation) the temporary increase in traffic generation associated with the Works is not envisaged to be of a scale that it would make a significant change to the background noise levels around the Site.

5.7.4 Considering all of the above, the Works are not anticipated to generate significant noise and vibration effects.

The Completed Development

5.7.5 Potential noise and vibration effects of the completed and operational Development could arise from:

- Additional noise from traffic generated by the completed and operational Development.
- Additional noise generated from the operation of building plant.

5.7.6 As noted in a previous sub-section of **Section 5** (Transportation) the overall traffic volumes and flows on the local road network are unlikely to be materially changed by the proposed development and certainly not to an extent that would materially affect existing noise levels. Furthermore vehicular servicing of the Development will be designed so as to minimise noise impact to existing and future residents both on and off the Site. In this respect, a Delivery and Servicing Plan will be implemented.

5.7.7 With regard to potential noise emanating from the operation of building plant, the design of such Development infrastructure is being informed by the Applicant's Services Engineer and Acoustician (Hoare Lea). This will ensure that in line with relevant stringent policy requirements and industry standard guidelines, the Development will incorporate low noise emission plant, with additional acoustic screening, as necessary. This will ensure the operation of plant will not breach existing ambient background noise levels and this can be controlled by a standard planning condition. Similarly, the Development will also be designed to ensure future residents experience a suitable internal noise and vibration environment as required by planning policy and relevant industry standard guidelines. This will account for the consideration of acoustic design to mitigate any noise and vibration generated from the operational use of the railway lines adjacent to the Site.

5.7.8 In view of the above, the operation of the completed Development is not anticipated to generate significant noise and vibration effects.

5.8 Ecology and Nature Conservation

The Works

5.8.1 With reference to **Section 4**, the Site does not contain any statutory or non-statutory ecological sites and there are no statutory nature conservation designations within approximately 500m of the Site. However, the 'Royal Botanic Gardens, Kew', 'East Sheen and Richmond Cemeteries and Pesthouse Common' and 'Richmond Park and associated areas' SINCs are all located within 500m of the Site.

5.8.2 The location of these SINCs is considered to be adequately geographically removed from the Site so that they will not be directly or indirectly affected by the Works. Furthermore, there is no ecological connectivity between the Site and the non-statutory SINCs. It is therefore concluded that even in the absence of any standard construction site mitigation, the Works will not lead to any effect upon these areas.

5.8.3 Owing to the limited ecological importance of existing habitats on the Site, their loss as a result of the Works will not give rise to significant ecological impacts. Any potential for conflict with bird nesting or hedgehog hibernation during the Works can be avoided by the removal of any vegetation outside of the bird nesting period (i.e. between the beginning of September and the end of February) or the hedgehog hibernation period (i.e. October - April inclusive). Alternatively, vegetation could be removed during the bird nesting and hedgehog hibernations seasons, but only following a survey by a suitable qualified ecologist to confirm that active nests and hibernating hedgehogs are not present.

5.8.4 In respect of impacts to surrounding habitats and species, particularly those which may be associated with the vegetated overland rail lines to the south and west of the Site, the aforementioned CEMP will include for best practice environmental management controls during the Works. These will include measures to reduce noise, dust emissions, night-time light emissions and avoid the incidence of contaminated run-off. As such, the CEMP will ensure the environmental protection of surrounding areas, including ecological resources. This will ensure that no ecological resource is significantly adversely affected by the Works.

The Completed Development

5.8.5 For the reasons previously stated, and considering the Development will not contain any contaminative or hazardous land uses, the completed Development will not affect non-statutory ecological sites.

5.8.6 The Development brings about the potential to increase the biodiversity / ecological value of the Site via the provision of a greater quantum of soft landscaping when compared to the existing situation. This has the potential to be realised via the landscaping strategy which may include tree planting, grassed areas, green roofs and other ecological enhancement measures, all to be informed by the Applicant's Ecologist (Tyler Grange).

5.8.7 With regard to foraging and commuting bats which may make use of the vegetation associated with the adjacent overland rail lines, it is considered that any bat species using these corridors are highly adapted to well-lit and noisy urban environments. Furthermore, and taking a precautionary approach, an appropriate lighting strategy can be devised with input from the Applicant's Ecologist (Tyler Grange) so as to ensure no additional lighting impacts to any foraging bats. As such, the presence of the completed and operational Development is unlikely to significantly affect this habitat or its associated bat population.

5.9 Townscape and Visual Amenity

The Works

5.9.1 The physical presence of a construction site will give rise to the visual appearance of hoardings, on-site plant and machinery and other activities associated with the Works. However, any townscape ad visual effects associated with the Works are anticipated to be limited, localised and temporary. Furthermore, a CEMP for the Works will set out a range of good construction site housekeeping initiatives with the aim of reducing townscape and visual effects. These will include, but not be limited to:

- The maintenance of adequate construction site hoarding.

- The orderly segregation of particular construction site activities, for example, the clear delineation of construction site offices and staff facilities, material storage areas, plant and machinery storage areas.

5.9.2 The implementation and monitoring of the CEMP will ensure any temporary townscape and visual effects are unlikely to be significant.

5.9.3 As the Works proceed and the Development emerges, the townscape and visual characteristic of the Site will adjust to those that will be generated by the presence of the completed and operational Development. However, for the reasons stated below, the physical presence of the completed and operational Development is unlikely to have significant adverse effects upon the prevailing townscape or views.

The Completed Development

5.9.4 The scale of the completed and operational Development will not be disproportionate to the surrounding townscape and has the potential to enhance the townscape character of the Site and its setting due to the replacement of an isolated retail 'island' with a well-design residential community with significant public realm and increased ground floor activity. While proposed development amends the built form of the permitted scheme the general arrangement of development in the areas of Blocks A, C and D remains and the maximum building heights are the same towards the centre of the site. Block B replaces the Octagonal shaped building of the permitted scheme with a linear block located parallel with the railway line and largely industrial buildings immediately beyond.

5.9.5 The Applicant's Townscape and Visual Consultant are closely working with (and will continue to work with) the Applicant's Architects (PLP) to ensure potential significant adverse effects of the surrounding townscape and views arising as a result of the Development are avoided. In this respect, the design principles devised aim to ensure the Development form, massing, materials, landscaping and other design features are complementary to the existing townscape whilst creating the potential to enhance the existing views of the Site. Such work has formed part of an iterative design process, including detailed consultation with LBRuT.

5.9.6 Considering all of the above, the physical presence of the completed and operational Development is unlikely to have effects materially different to those of the permitted scheme and so significant adverse effects upon townscape or views are unlikely.

5.10 Cultural Heritage

The Works

5.10.1 As identified in **Section 4,** the Site is not located in a Conservation Area and there are no above ground heritage assets within its boundary. As such, the Works will not result in any direct effects to above ground heritage assets.

5.10.2 The appearance of a construction Site could have the potential to give rise to indirect setting effects to Conservation Areas, Listed Buildings and BTMs. However, all Conservation Areas, Listed Buildings and BTMs within the ZTV are considered to be located at a sufficient distance from the Site, and separated from the Site by intervening built form (including significant rail and LUL infrastructure) that their localised settings will not be significantly affected. This being the case, the implementation of a CEMP to ensure good construction site housekeeping will further reduce the likelihood of significant effects.

5.10.3 **Section 4** identifies that the Site is not located with an APA or AAI; neither are there any within 500m of the Site. As such, the Site and its surrounds are not recognised to be of any particular archaeological significance. The Archaeological Desk-based Assessment (CGMS Heritage, January 2019) has identified the Site as being of low archaeological potential for all pre-Modern periods of past human activity. Due to the Site's limited archaeological potential, extent if past ground disturbance and the limited below ground extent of the Development, the Archaeological Desk-based Assessment concluded that the Development is unlikely to have a significant below ground archaeological impact and that no further archaeological mitigation measures are required.

The Completed Development

5.10.4 As noted previously, all above ground heritage assets within the ZTV are sufficiently geographically removed from the Site or are separated from the Site by intervening built form that their localised settings are unlikely to be affected by the presence of the completed and operational Development. No significant effects were considered likely within the previous EIA Screening Reports or the Heritage Statement and its subsequent addendums. As the Development is not materially different it its overall massing and height, significant effects on heritage features are not considered likely.

5.10.5 In addition to the fact that the Site is not considered to be archaeologically sensitive, the completed and operational Development will not give rise to any activities that necessitate intrusive ground works. Consequently, there will therefore be no potential for any below ground heritage asset (archaeological) effects once the Development is completed and operational.

5.11 Geology, Ground Conditions and Contamination

The Works

5.11.1 As noted in **Section 4**, the Site is not designated for any geological interest or importance and does not yield any significant geological resource. As such, the Works will not give rise to any effect upon geological resources.

5.11.2 **Section 4** recognises that due to previous industrial land uses on and in proximity to the Site, the Site could yield potential sources of ground contamination. Furthermore, such contamination could be encountered and / or mobilised during the intrusive ground works required to facilitate the Development. It therefore follows that the Works could give rise to the risk of contamination exposure to humans (for example construction site workers) and the wider environment.

5.11.3 Owing to the potential for contamination to be present beneath the Site, legislative requirements necessitate the Site must be investigated prior to implementation of the Works to accurately determine the actual potential for contamination, and if present, the type and quantum of contamination beneath the Site. Such legislation also dictates that a site must be suitable for its intended end-use and must not cause harm to human health or the environment. To this end, should the Site Investigation (SI) reveal contamination to be present, a suitable remediation strategy will be devised and implemented to ensure the Site does not give rise to significant ground contamination risks and associated effects.

5.11.4 In addition to the above, standard and best practice environmental management controls will be implemented during the Works to safeguard against the risks (and associated effects) of unforeseen and unexpected potential contamination events such as accidental spills of construction related materials brought to and stored on the Site during the Works. Such environmental management controls will include:

- The use of Personal Protective Equipment (PPE) by all construction site workers.
- Procedures for the safe and contained storage of construction materials on-Site.
- Procedures for dealing with accidental material spills (for example, the deployment of emergency containment, bunding and surface water drainage filtration equipment).

5.11.5 All such measures will be set out in the aforementioned CEMP.

5.11.6 With respect to the risk of UXO, all intrusive ground works will be subject to a UXO Watching Brief. This precautionary measure will ensure that should UXO be encountered, appropriate steps can be taken

to immediately de-risk the situation. Again, it is envisaged that the CEMP will set out the correct process and procedures to follow should UXO be encountered.

5.11.7 The above legislative requirements and best practice measures mean that significant environmental effects as a result of Works are unlikely. The implementation of these measures is typically controlled through Environment Agency standard planning conditions.

The Completed Development

5.11.8 For the reasons previously stated, the completed Development will not affect any designated site of geological interest or importance; neither will the Development give rise to any effect upon geological resources.

5.11.9 The completed and operational Development will not give rise to any activities that necessitate intrusive ground works. In addition, the Development does not propose any land uses that will be of a contaminative nature. Consequently, there will be no potential for any contamination risks (and associated effects) or UXO risks once the Development is complete and operational.

5.12 Soil and Agricultural Land

5.12.1 The re-development of the Site would not result in the loss of any agricultural land and would therefore not generate significant adverse effects in regard to soil and agricultural land during the Works or the Completed Development.

5.13 Water Resources, Flood Risk and Drainage

The Works

5.13.1 As identified within **Section 4**, the Site does not contain any surface water features. In addition, the closest water feature to the Site is that of the River Thames. This is located approximately 1.5km north-east, south-west and north-west of the Site.

5.13.2 **Section 4** notes that the Site is located in Flood Zone 1. Consequently, the Site is in an area of low flood risk with the probability of river or sea flooding being less than 0.1 % in any year. Furthermore, as per standard practice, the CEMP will ensure appropriate surface water drainage of the construction site, thereby ensuring no occurrence of significant localised surface water flooding.

The Completed Development

5.13.3 As the Site is in an area of low flood risk, the completed and operational Development will not be subject to any significant risk and effects associated with fluvial or tidal flood risk.

5.13.4 The Development intends to replace existing hard-standing and impermeable areas with a similar type of land cover. However, climate change considerations require that the completed and operational Development must be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events. Similarly, the Development must be designed to ensure surface water flooding is not increased at the Site, or elsewhere, accounting for climate change.

5.13.5 In view of the above, the design of the Development is being informed by an appropriately qualified and experienced surface water drainage engineer. This will ensure inherent design measures of the Development will safeguard against surface water flooding risks and effects at the Site and elsewhere, even accounting for climate change. Similarly, the design of the Development is being informed by the Applicant's Services Engineer (Hoare Lea) so that any additional demand for foul water drainage associated with a new resident population at the Site will be provided, thereby avoiding incidences of foul water flooding.

5.14 Socio-economics

The Works

5.14.1 The Works will have no direct or indirect effect upon core social infrastructure in the area including primary school, secondary school and healthcare provision.

The Completed Development

5.14.2 The Development will give rise to a new on-Site resident population which may place additional demand upon core social infrastructure. However, with reference to **Section 4**:

- A surplus capacity of 550 primary school places is reported within the 8 existing primary schools within 1 mile of the Site.
- A surplus capacity of 1,016 secondary school places is reported within the 9 existing secondary schools within 2 miles of the Site. Of the 1,016 spaces, 813 are for mixed-gender, multi-faith secondary schools.

5.14.3 While the Development is envisaged to provide 753 units which is 300 more than the permitted scheme 340 of these units will be single bedroom co-living units. As such, the child yield of this component of the Development is expected to be negligible. In addition 57% of the residential units provided in addition to the co-living space will be studio and 1-bedroom units, again expected to have a low child yet. A total of 39% of units would be 2-bedroom units. As a result the Development is unlikely to generate a child yield in-excess of existing primary school and secondary school capacity. Consequently, it is unlikely the Development will generate any significant demand and 'over-capacity' issues at local primary and secondary schools.

5.14.4 With regards to local healthcare, as noted in **Section 4**, all 8 GPs within 1 mile of the Site are accepting new patients. It is therefore reasonable to assume adequate GP services exist to serve the resident population of the Development.

5.14.5 As noted in **Section 2**, the Development will provide generous hard and soft landscaped areas for public and private use. In addition, with reference to **Section 4**, there are 9 public parks / significant public open spaces within 1km of the Site. The new resident population will therefore have adequate access to public open and recreational space within reasonable walking distance from the Site. For those where it is unfeasible to walk such distances to open spaces (for example young children below the age of 12) an appropriate quantum of play space will be provided within the Site.

5.15 Wind Microclimate

The Works

5.15.1 The Site is not located in a particularly exposed or windy area which, as previously noted in **Section 4**, contains a relatively uniform massing, generally comprising low - medium rise buildings and structures. In conclusion, the existing Site is unlikely to be subject to any uncomfortably windy and potentially unsafe wind conditions.

5.15.2 Due to the low-rise nature of the existing retail unit from the Site, its removal during the Works to create a clear Site is unlikely to give rise to any significant changes to the prevailing wind conditions either on or surrounding the Site.

5.15.3 As the Works proceed and the Development emerges, wind conditions in and around the Site will adjust to those that will be generated by the presence of the completed and operational Development. However, for the reasons stated below, these are unlikely to be significantly different to the existing prevailing wind conditions and / or give rise to uncomfortable or un-safe wind conditions.

5.15.4 It should be noted that the important factor for assessing wind microclimate effects is not whether there is a change in wind conditions, but whether the wind conditions are suitable (comfortable) and safe for the intended pedestrian or occupant use at a particular location.

The Completed Development

5.15.5 As noted previously, the Site is not located in a particularly exposed or windy area. Furthermore, the Development will be relatively modest in scale comprising buildings ranging from 2 – 10 storeys with taller elements towards the centre of the site with heights stepping down to the edges of the Site. As such prevailing winds from the south-west would be likely to be diverted along the railway line corridor and be deflected away from residential development to the east of the Site. It is therefore judged that the completed and operational Development will not create significantly different wind conditions to those prevailing within and surrounding the Site.

5.15.6 Despite the above, the design of the Development is being informed by an appropriately qualified and experienced wind microclimate expert so that the physical presence of the completed and operational Development will not create any uncomfortable or un-safe wind conditions either within or surrounding the Site.

5.16 Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

The Works

5.16.1 The removal of the existing the low-rise built form of the Site is unlikely to give rise to significant changes (increases) to the availability of daylight and sunlight within surrounding residential units or decreases in the incidence of overshadowing to nearly amenity open spaces.

5.16.2 As the Works proceed and the Development emerges, daylight, sunlight and overshadowing conditions around the Site will adjust to those that will be generated by the presence of the completed and operational Development. However, for the reasons stated below, these are unlikely to be unacceptable.

5.16.3 Similar to the assessment of wind microclimate and given the dense urban setting of the Site, it should be noted that the important factor for assessing daylight, sunlight and overshadowing effects is not whether there is a change in daylight, sunlight and overshadowing conditions, but whether the daylight, sunlight and overshadowing conditions are acceptable for the use of a particular habitable room or amenity space.

5.16.4 With regard to light pollution, the Site is located in a well-lit area. However, the CEMP will set out measures to ensure the use of any dawn, dusk or night-time lighting required in the winter months is limited and directional so that artificial light is directed into and not out of the Site.

5.16.5 Incidences of solar glare are not anticipated to arise for the reasons set out below.

The Completed Development

5.16.6 Although the Development is of a modest scale, it will bring about an increase to the physical massing to the Site. There is therefore a potential for surrounding existing habitable rooms to experience decreases in daylight and sunlight and surrounding amenity spaces to experience increases in the incidence of overshadowing.

5.16.7 In view of the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant is informing the design of the Development to ensure any such changes to surrounding habitable rooms and amenity spaces are minimised and where changes do occur, are not unacceptable in the context of the dense urban setting of the Site. Furthermore, owing to the significant physical separation of existing surrounding residential receptors from the Site (a result of the Site being bound to the east by Manor Road and the south and west by overland rail lines) and the modest proposed massing of the Development, any daylight, sunlight and overshadowing effects to surrounding residential receptors are likely to be insignificant.

5.16.8 With regard to daylight, sunlight and overshadowing experienced by occupants, visitors and users of the Development itself, similar to the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant is informing the design of the Development to ensure acceptable standards will be met. This can be achieved by appropriate building massing, siting and orientation, the arrangement of living spaces and amenity spaces, and fenestration design.

5.16.9 A lighting strategy for the Development will ensure that artificial light emanating from the Development does not exceed the existing ambient artificial light levels already existing in the area. Given the urban and well-lit nature of the Site and its surrounds, this is not considered to be an onerous task.

5.16.10 Although the Development will propose glazed areas, these will be broken up by brickwork, reconstituted stone and other non-reflective building materials. Owing to this and the overall likely proportion of glazed to non-glazed façade treatments associated with the Development, significant incidents of solar glare are not anticipated.

5.17 Climate Change and Greenhouse Gases

The Works

5.17.1 Climate change is global in cause and effect. It therefore follows that by virtue of the scale of the construction site and the Development, the Works are unlikely to significantly contribute to global climate.

5.17.2 In relation to the emission of greenhouse gases, previous sub-sections of **Section 5** (Transportation and Air Quality) demonstrate that expected construction vehicular traffic volumes and flows (and therefore emissions which will include greenhouse gasses) are unlikely to be significant when considering the quanta of existing background traffic and associated emissions. It is also demonstrated that modern, efficient and low carbon emitting construction plant and machinery will be used throughout the Works.

The Completed Development

5.17.3 As previously noted, climate change is global in cause and effect. It therefore follows that by virtue of the scale and nature of the Development, its operation will not significantly contribute to global climate change. However, the Development will be designed to minimise greenhouse gas emissions and to ensure resilience to climate change.

5.17.4 With reference to previous sub-sections in **Section 5** (Transportation and Air Quality) the Development will be car free, with the exception of accessible car-parking spaces. When considering servicing of the Development the overall vehicular trip generation from the Development is unlikely to be materially different to that of the existing situation. As such, the Development is unlikely to give rise to significant vehicular traffic effects. It therefore follows that the Development is unlikely to give rise to significant changes to vehicular traffic emissions which will include for greenhouse gases.

5.17.5 The design of the Development is being informed by the Applicant's Sustainability and Building Services Engineer (Hoare Lea). This will ensure that in line with relevant policy requirements and industry standard guidelines, the Development will incorporate many inherent sustainability design features which will minimise the overall carbon footprint and greenhouse emissions arising from the Development. Such measures will include, but not be exclusive to:

- The selection and use of building materials from sustainable sources and with low embodied carbon.

- The incorporation of appropriately designed façades to balance solar gain against daylight availability.
- The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand.
- The use of thermally efficient windows to reduce heat demand.
- The achievement of good levels of air tightness.
- Mechanical ventilation with heat recovery.
- The use of energy efficient lighting.
- All electrical heating systems to take advantage of decreasing UK grid electricity carbon factor.
- The use of photovoltaic panels mounted at roof level.

5.17.6 With regard to climate change resilience, as noted in a previous sub-section of **Section 5** (Water Resources and Flood Risk) the Site is located in an area of low flood risk. However, the design of the Development is being informed by an appropriately qualified and experienced surface water drainage engineer. This will ensure inherent design measures of the Development will safeguard against surface water flooding risks and effects at the Site and elsewhere, even accounting for climate change.

5.18 Health and Wellbeing

The Works

5.18.1 Previous sub-sections (Geology, Ground Conditions and Contamination, Noise, Air Quality, Wind Microclimate, Daylight, Sunlight, Overshadowing and Lighting, Water Resources, Flood Risk and Drainage and Socioeconomics) have demonstrated that the Works are not anticipated to give rise to any significant contamination, air quality, noise, microclimate, flood risk and / or socioeconomic effects, all of which have the potential to affect human health and wellbeing.

5.18.2 The likelihood of insignificant effects for all relevant topics is by virtue of the nature and location of the Development, together with the implementation of a broad range of standard, tried and tested construction related best practice environmental management controls.

5.18.3 Consequently, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly adversely affected by the Works.

The Completed Development

5.18.4 Similar to the above, previous sub-sections (Geology, Ground Conditions and Contamination, Noise, Air Quality, Wind Microclimate, Daylight, Sunlight, Overshadowing and Lighting, Water Resources, Flood Risk and Drainage and Socioeconomics) demonstrate that the Completed Development is unlikely to give rise to significant effects in regard to contamination, air quality, noise, pedestrian comfort and safety, flood risk and / or socio-economic effects. As such, with the Development in place, these environmental factors are unlikely to significantly affect the health and wellbeing of local residents, local workers, users and visitors of the Development and the surrounding locality.

5.19 Waste

The Works

5.19.1 It is inevitable that waste will be generated from the Works. However, this is the case for any redevelopment project. As such, the emphasis should be placed upon how this waste is managed. For this reason, the CEMP will set out legal and best practice measures and protocols to ensure good construction site management practices lead to minimal waste creation and maximal re-use and recycling of waste materials arising from the Works.

5.19.2 In view of the above, the Works associated with the Development are unlikely to give rise to significant waste effects.

The Completed Development

5.19.3 The completed and operational Development will not include for any land uses or activities that will give rise to particularly hazardous waste materials. However, once operational, a quantity of domestic waste will arise from the Development. Again, the critical aspect is how this waste is managed. In this respect, and in line with policy requirements, the Development will be designed to ensure sufficient space and facilities are provided for the storage of segregated general and recyclable waste. In addition, it will be ensured that the servicing of the Development allows for adequate waste collection and disposal, as necessary.

5.19.4 Again, in view of the above, the operation of the completed Development is unlikely to give rise to significant waste effects.

5.20 Risk of Major Accidents and Disasters

The Works

5.20.1 All the Works would be managed in accordance with best practice environmental management controls and relevant regulations. Furthermore, with standard, tried and tested construction related best practice environmental management controls in place, previous subsections (Geology, Ground Conditions and Contamination and Water Resources, Flood Risk and Drainage) demonstrate that the Works is unlikely to give rise to significant risks associated with contamination and surface water flooding.

5.20.2 As such, significant adverse effects in regard to the Risk of Major Accidents and Disasters during the Works would not be considered likely.

The Completed Development

5.20.3 The Completed Development does not propose any land uses that would increase the risk of major accidents and disasters by virtue of being hazardous or operating complex processes. Furthermore, previous sub-sections (Geology, Ground Conditions and Contamination and Water Resources, Flood Risk and Drainage) demonstrate that the Completed Development would be unlikely to give rise to any significant contamination or flood risk and would not be susceptible to increased future flood risk.

5.20.4 In view of all of the above, significant effects associated with the Risk of Major Accidents and Disasters as a result of the completed Development would not be considered likely.

5.21 Cumulative Effects

5.21.1 As previously explained, the Development will not give rise to cumulative effects resulting from the Development with other Cumulative Schemes. However, the consideration of cumulative effects should also consider the potential for the cumulative interactions of the Development in isolation upon a particular receptor or set of receptors. For example, the cumulative interaction of noise, air quality and townscape effects resulting from the Development only on a receptor or set of receptors.

5.21.2 Considering that it is unlikely significant environmental effects will result from the implementation of the Development, or from the operation of the completed Development, it is unlikely that there will be any potential for significant cumulative interactions to occur.

6. Summary and Conclusions

6.1.1 The Development has been screened under Schedule 2, Class 10 'Infrastructure Project' Subsection (b) 'Urban development projects'. The screening criteria for this type of development is if:

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

6.1.2 The Development, providing 748 new residential units and PBSL studios exceeds the second threshold and has therefore been categorised as Schedule 2 development. As such, this report has been prepared to screen the Development against the criteria provided in Schedule 3 (see **Section 5**).

6.1.3 The report has identified the following key points:

- The Site is not located in a 'sensitive area' as defined by the EIA Regulations. Accordingly, the absorption capacity of the natural environment in and surrounding the Site is judged to be high; the Site and its immediate surrounds are resilient to change.
- The Development is considered to be consistent in scale and type with the existing context surrounding the Site.
- The effects associated with this type of development are not of a level of magnitude, complexity or significance such that an EIA would be required to evaluate them.
- The potential for significant effects is low and can be adequately dealt with via the standard legislative requirements and the implementation of best practice environmental management controls out-with the EIA regime.

6.1.4 As such, the Development is not considered to constitute EIA development.

6.1.5 In order to confirm this, we kindly request a formal EIA Screening Opinion on the requirement for EIA and would be grateful if LBRuT would respond by way of a formal EIA Screening Opinion within three weeks.

Appendix I

EIA Screening Report (GVA, 12 November 2018)

Appendix II

EIA Screening Opinion (LBRuT, 14 December 2018)

Appendix III

EIA Screening Report (Avison Young, 04 October 2019)

Appendix IV

EIA Screening Opinion (GLA, 08 November 2019)

Appendix V

EIA Screening Opinion Request (Avison Young, 13 July 2020)

Appendix VI

EIA Screening Opinion (GLA, 24 August 2020)

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