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Jon Turner
Associate Director
SPHERE 25

6 January 2022

Dear Jon Turner

**Re: Request for an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Ham Close redevelopment**

Thank you for your email dated 9 November 2021 and attached letter from James Bumphrey dated 4th November requesting a Scoping Opinion from the London Borough of Richmond Local Planning Authority (as responsible authority) for the proposed redevelopment of Ham Close to comprise:

The demolition of the existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys a Community/Leisure Facility (Class F2) of up to four storeys in height, a "Makers Lab" (sui generis) of up to two storeys together with basement car parking and site wide landscaping.

I hereby attach the Local Planning Authority's formal Scoping Opinion adopted on 6 January 2022.

Yours faithfully

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

Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

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

FORMAL EIA SCOPING OPINION IN CONNECTION WITH THE REDEVELOPMENT OF HAM CLOSE

PROPOSED DEVELOPMENT:

THE DEMOLITION OF THE EXISTING BUILDINGS ON-SITE AND PHASED MIXED-USE DEVELOPMENT COMPRISING 452 RESIDENTIAL HOMES (CLASS C3) UP TO SIX STOREYS, A COMMUNITY/LEISURE FACILITY (CLASS F2) OF UP TO FOUR STOREYS IN HEIGHT, A “MAKERS LAB” (SUI GENERIS) OF UP TO TWO STOREYS TOGETHER WITH BASEMENT CAR PARKING AND SITE WIDE LANDSCAPING.

SECTION 1 – INTRODUCTION

Hill Residential (the ‘applicant’) is preparing to submit a full detailed planning application in 2022 for a site at Ham Close, Ham, within the London Borough of Richmond upon Thames.

The proposed development is for the demolition of the existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys, a Community/Leisure Facility (Class F2) of up to four storeys in height, a “Makers Lab” (sui generis) of up to two storeys together with basement car parking and site wide landscaping.

EIA Development

There are two types of development that may be subject to an Environmental Impact Assessment (EIA) as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 Regulations):

- Schedule 1 Developments; and
- Schedule 2 Developments.

If the development is listed in Schedule 1, an Environmental Impact Assessment (EIA) is required in every case. However, it is not always mandatory for Schedule 2 Developments to be subject to an EIA. If the development is listed in [Schedule 2](#), the LPA should consider whether it is likely to have significant effects on the environment. The 2017 Regulations categorise types of developments and provide thresholds to assist in the identification of Schedule 2 Developments that may require an EIA.

Schedule 3 of the EIA Regulations describes the criteria that must be considered in determining whether a development, which falls within the size threshold applicable to Schedule 2 Development, is likely to have a significant impact and hence should be subject to an EIA. These include:

- The characteristics of the development
- The environmental sensitivity of the location
- The types and characteristics of the potential impact.

The proposed development falls within the description of sub-category 10b of Schedule 2 Development and exceeds the corresponding threshold of more than 150 dwellings:

‘Infrastructure projects’ – urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

Given the scale of the proposal and potential sensitive receptors, the applicants determined that the proposed development had potential for significant environmental effects and would thereby be considered as 'EIA Development'.

Scoping Opinion Request (SOR)

Consequently, a formal Scoping Opinion Request has been submitted, accompanied with an EIA Scoping Report (SOR Report), prepared by Greenage Environmental Ltd, to provide background information to assist the Local Planning Authority (LPA) to provide a Scoping Opinion under Regulation 15 of the 2017 Regulations.

As set out in National Guidance, *“An applicant is not required to consult anyone about the information to be included in an Environmental Statement. However, they may ask the LPA for its formal opinion on the information to be supplied in the Environmental Statement (a “scoping opinion”). This allows the LPA to clarify what it considers the main effects of the development are likely to be and, therefore, the aspects on which the applicant’s Environmental Statement should focus. There is no right to seek a formal scoping opinion once a planning application has been submitted”.*

The Scoping Opinion will consider:

- The environmental topics or areas of which there are likely to be potential impacts which will need to be addressed in the Environmental Statement (ES).
- The geographical area and timeframe over of the potential likely impacts.
- Methods to be used to determine the likely significant environmental effects that will arise as a result of the construction and operational phases and cumulative impacts.
- The potential impacts to be scoped out as not being likely to give rise to significant environmental effects.

The process governing Scoping Opinions is set out in Regulation 15 of the 2017 Regulations:

- *Regulation 15(2): A Scoping Opinion request made under 15(1)) must include in relation to an application for planning permission—
 - i. a plan sufficient to identify the land;
 - ii. a brief description of the nature and purpose of the development, including its location and technical capacity;
 - iii. an explanation of the likely significant effects of the development on the environment; and
 - iv. such other information or representations as the person making the request may wish to provide or make;*
- *Regulation 15(3): An authority receiving a request under Regulation 15 (1) must, if it considers that it has not been provided with sufficient information to adopt a scoping opinion, notify the person making the request of the points on which it requires additional information.*
- *Regulation 15(4): An authority must not adopt a scoping opinion in response to a request under paragraph (1) until it has consulted the consultation bodies, but must, subject to paragraph (5), within 5 weeks beginning with the date of receipt of that request for a scoping opinion, or such longer period as may be agreed in writing with the person making the request, adopt a scoping opinion and must send a copy to the person who made the request.*

The Interpretation of the EIA Regulations states, “the consultation bodies” means—

- a. *any body which the relevant planning authority is required to consult, or would, if an application for planning permission for the development in question were before them, be required to consult by virtue of article 18 (consultations before the grant of permission) of the Order or of any direction under that article;*
- b. *the Marine Management Organisation, in any case where the proposed development would affect, or would be likely to affect, any of the following areas—*
 - i. *waters in or adjacent to England up to the seaward limits of the territorial sea;*
 - ii. *an exclusive economic zone, except any part of an exclusive economic zone in relation to which the Scottish Ministers have functions;*
 - iii. *a Renewable Energy Zone, except any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions;*
 - iv. *an area designated under section 1(7) of the Continental Shelf Act 1964(7), except any part of that area which is within a part of an exclusive economic zone or Renewable Energy Zone in relation to which the Scottish Ministers have functions; and*
- c. *the following bodies if not referred to in paragraph (a) or (b)—*
 - i. *any principal council for the area where the land is situated, if not the relevant planning authority;*
 - ii. *Natural England;*
 - iii. *the Environment Agency;*
 - iv. *other bodies designated by statutory provision as having specific environmental responsibilities and which the relevant planning authority or the Secretary of State, as the case may be, considers are likely to have an interest in the application;*
- *Regulation 15(6): Before adopting a scoping opinion the authority must take into account—*
 - a) *any information provided by the applicant about the proposed development;*
 - b) *the specific characteristics of the particular development;*
 - c) *the specific characteristics of development of the type concerned; and*
 - d) *the environmental features likely to be significantly affected by the development.*
- *Regulation 15(9): An authority which has adopted a scoping opinion following a request under paragraph (1) shall not be precluded from requiring of the person who made the request additional information in connection with any statement that may be submitted by that person as an environmental statement in connection with an application for planning permission or a subsequent application for the same development.*
- *Regulation 28: Sets out the requirements for making the scoping requests and opinion available to the public.*
 - *Placed on Part 1 of the register*
 - *a copy of the opinion, request, or direction and any accompanying statement of reasons is made available for public inspection at all reasonable hours at the place where the appropriate register (or relevant*

part of that register) is kept, and copies of those documents must remain so available for a period of 2 years.

In line with Regulation 15(2) of the 2017 Regulations the following has been provided:

- i. A plan sufficient to identify the land (Figure 1.1 of the SOR Report)
- ii. A brief description of the nature and purpose of the development, including its location and technical capacity; (Section 2 of the SOR Report)
- iii. An explanation of the likely significant effects of the development on the environment (Section 6 of the SOR, which considers baseline conditions, potential effects, assessment methodology and mitigation); and
- iv. Such other information or representations as the person making the request may wish to provide or make;

In line with Regulation 15(4), the LPA has consulted the following bodies on the Scoping Opinion Request. Their responses are summarised in Appendix 1.

External consultees	<ul style="list-style-type: none">• Natural England• The Environment Agency• Transport for London• Greater London Authority• Marine Management Organisation• Historic England• GLAAS Historic England• Sport England• Royal Borough of Kingston upon Thames• Richmond Biodiversity Partnership• Southwest London Environment Network• Thames Water• Public Health• CCG• Crime Prevention Officer
London Borough of Richmond - Internal Consultees	<ul style="list-style-type: none">• Transport Planners• Ecology Officer• Arboricultural Officer• Urban Design and Consultation Team• Housing• Environmental Health – Air Quality• Environmental Health – Noise and Vibration• Environmental Health – Contaminated Land• Lead Local Flood Authority• Waste Management• Achieving for Children

In line with Regulation 28, the Scoping Opinion has been made available on the Council website - [Environmental Impact Assessment: Screening Directions and Scoping Opinions - London Borough of Richmond upon Thames](#)

Sections 2 - 5 of this Scoping Opinion takes into account the information provided by the applicant about the proposed development; the specific characteristics of the particular

development; the specific characteristics of development of the type concerned; and the environmental features likely to be significantly affected by the development, as required by Regulation 15(6).

SECTION 2 – THE SITE AND PROPOSAL

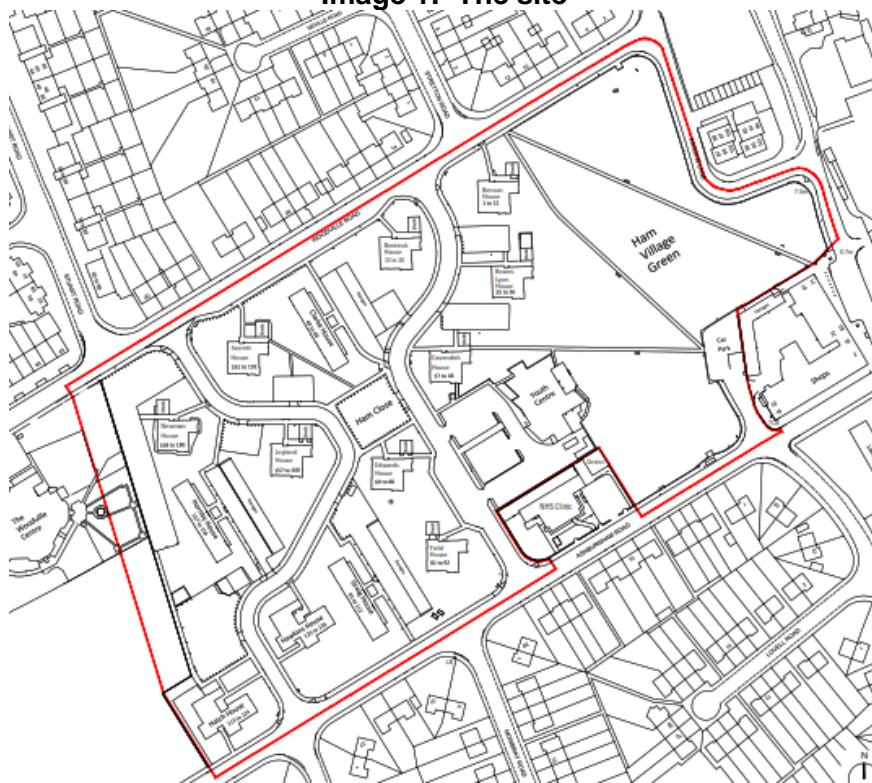
2.1 Site, location and setting

Section 2 of the SOR Report sets out the site, location and setting.

The site occupies approximately 4.660 hectares (ha) and is located within Ham, and comprises existing residential buildings arranged in five storey blocks, four storey deck access flats and three storey 'T' shaped blocks, a Youth Centre and garage blocks. The public realm consists of large areas of surface parking and amenity grassland with scattered trees.

The site is bound by Woodville Road to the north, Wiggins Lane, and Ham Street to the east, Ham Clinic and Ashburnham Road to the south, and St Richard's C of E Primary School playing fields and the children's garden pre-school and The Woodville Centre to the west.

Image 1: The site



Whilst the SOR Report does not explicitly state, the site also includes part of the playing fields of St Richard's CE Primary School and hard and soft land within the Woodville Centre (shown in Images 2 and 3) which appears to provide playspace, parking, recycling facilities and soft landscaping. This should be reflected in any ES.

Image 2: View from Woodville Road, looking into Woodville Centre



Image 3: View from Ashburnham Road looking into the playing fields of St Richard's CE Primary School



The ES should identify the sites designations, including:

- Archaeological Priority Area
- Ham and Petersham Neighbourhood Area
- Article 4 Direction – Basements
- Brownfield Land Register
- Area susceptible to groundwater flooding
- Other Open Land of Townscape Importance
- Public Open Space
- Takeaway Management Area
- Proposed Area for Tree Planting
- Site allocation in both the adopted Richmond Local Plan (SA15) and the Ham and Petersham Neighbourhood Plan (OS3)

SA 15 Ham Close, Ham

The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area. A comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.

- *Any redevelopment proposal has to respond positively to the unique and distinctive character of Ham Close and Ham, including the setting of the adjacent Ham House Conservation Area and the many listed buildings and Victorian properties that line the frontage.*
- *There is a need to retain, and where possible enhance, the landscape and existing green spaces, including the Green, which is designated Public Open Space and Other Open Land of Townscape Importance, as well as trees wherever possible.*
- *Optimising the use of the land by providing high quality living spaces for both existing as well as new residents of Ham Close.*
- *Servicing, car and cycle parking should be provided as part of the regeneration of the area and any development should enhance the quality of the local townscape, thereby creating a more cohesive sense of place.*
- *There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.*

Policy O3 - Ham Close

- A. *Any scheme for the redevelopment of all or part of Ham Close must have regard to the character of the surrounding area set out in the Ham Close Neighbourhood Character Study.*
- B. *Any scheme which includes the redevelopment of existing community facilities forming part of a Ham Close must make provision for their equivalent replacement.*

2.2 The surrounding area

The area of Ham and Petersham is defined by the wider setting on a bend in the River Thames, and broad belt of open land, including Ham Lands, designated an Other Site of Nature Importance, Metropolitan Open Land (MOL) and Public Open Space (POS). Ham House and Richmond Park are nearby landmarks and visitor attractions. Richmond Park has protected status as an important habitat for wildlife. It is an European Special Area of Conservation (SAC) and a National Nature Reserve as well as Site of Special Scientific Interest (SSSI). Ham Parade is identified as a local centre, and Ashburnham Road, Ham street and Back street are all Parades of Local Importance that exist along with other local clusters of shops, schools and local services across the area. In recognition to the areas poor transport linkages, the site and surrounds has a PTAL rating of 1b and 1a respectively.

The area surrounding the site has extensive designations, including:

- Heritage Assets:
 - Listed Buildings (pink hatched buildings in Image 4) within Ham Street; Ham Common, Wiggins Lane, include Grade I Ham House.
 - Conservation Areas:
 - Ham House Conservation 23 to the east and north east of the site
 - Ham Common Conservation 7 to the south east of the site
 - Historic Parks and Garden - Ham House and associated protected views (Grade II*) and Richmond Park (Grade I)
 - Archaeological Priority Areas

- Non designated heritage assets (orange hatched buildings) – Buildings of Townscape Merit (BTMs) in Ham Common, Wiggins Lane, Ham Street, Ashburnham Road, St Richards Court
- Metropolitan Open Land (light green shading):
 - East of the site – Grey Court School
 - North, west, and south west – Ham Lands and River Thames
 - North – Riverside Drive
 - South East and East – Ham Common and Richmond Park
- Public Open Space – Ham Lands, Ham Common, Richmond Park, Riverside Drive
- Site of Specific Scientific Interest – Richmond Park
- Other Site of Nature Importance – Ham Lands, Ham Common, Sudbrook Park Golf Club, River Thames
- Site of Metropolitan Importance – River Thames
- Other Open Land of Townscape Importance – St Richard and St Andrew Church of England Primary School (dark green shading)
- Key shopping frontage for the parade on the corner of Ashburnham Road and Ham Street (blue line).

Image 4: Map extract showing site designations



2.3 The development proposal

The SOR Report (para. 2.5) outlines the description of the nature and purpose of the development:

“The demolition of the existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys a Community/Leisure Facility (Class F2) of up to four storeys in height, a “Makers Lab” (sui generis) of up to two storeys together with basement car parking and site wide landscaping”.

The current indicative construction programme assumes commencement on site in Quarter 4 of 2022 with completion in Quarter 4 of 2029.

The ES should include a Description of Development in line with (Schedule 4) and Regulation 18(3) of the 2017 Regulations, and within such, include the following:

- a) The number of residential units to be demolished
- b) The demolition of the existing community hall
- c) The partial removal of the playing fields at St Richard’s CE Primary School (detail how much)
- d) Loss of open space / parking / recycling facilities at The Woodville Centre (detail how much)
- e) The removal of the existing recycling facilities and car park to the SE of Ham Village Green
- f) The total number of car parking spaces proposed
- g) Details of the phasing of the development, including but not limited to:
 - o Delivery of affordable housing
 - o Delivery of the community centre
 - o Delivery of the Makers Lab
 - o Necessary highway works
 - o Energy centres / sustainability credentials
- h) Description of the main characteristics of the operational phase of the Proposed Development (Schedule 4)
- i) An estimate, by type and quantity, of expected residues and emissions (Schedule 4)

2.4 Potential sensitive receptors

Section 3.1 of the SOR Report identifies, through a desk-based assessment, the sensitive receptors that will be considered as part of the technical assessments, which are summarised in the table below, and confirms that full details of the receptor sensitivities and locations will be provided within the ES. The LPA recommend the additional receptors (identified in red) are also considered.

Category	Potential Sensitive Receptors
Built Heritage, Townscape and Visual	<ul style="list-style-type: none"> • 27 heritage receptors within a radius of c. 500m from the site and potentially sensitive views from Richmond Park. <p style="color: red;">Refer to 5.5.1 which comments on existing and proposed receptors.</p>
Archaeology	<ul style="list-style-type: none"> • Ham Fields (DLO33496) Archaeological Priority Area - west of the site - Further occupation evidence and artefacts of Prehistoric material may survive. • The east area of the site falls within the APA of Ham (DLO33461) which is an early Medieval settlement mentioned in Domesday and includes Ham House and associated pleasure gardens dating from the 17th century. Evidence of Prehistoric occupation may also be present within this area.

<p>Air Quality</p> <p>The site is within an Air Quality Management Area</p>	<ul style="list-style-type: none"> • Several residential and education receptors • New residents within the development <p>Include</p> <ul style="list-style-type: none"> • Transport and construction workforce • Existing staff / users of adjacent health centre • Existing local businesses • Users of the public open space, public rights of way, cycle routes and footpaths • Users of the proposed community facility • Biodiversity and ecological receptors
<p>Noise and Vibration</p>	<ul style="list-style-type: none"> • Several residential and education receptors • New residents within the development <p>Include</p> <ul style="list-style-type: none"> • Temporary workforce • Existing staff / users of adjacent health centre • Existing local businesses • Users of the proposed community facility • Users of the public open space, public rights of way, cycle routes and footpaths • Ecological receptors • Heritage Assets
<p>Ecology</p> <p>From:</p> <ul style="list-style-type: none"> • Recreational pressure • Traffic <p>Consider impacts from:</p> <ul style="list-style-type: none"> • Loss of habitats (trees, landscaping, buildings) • Habitat fragmentation • Light spillage • Shading on open space • Dust • Air Quality • Water quality and runoff • Noise • Pollution 	<ul style="list-style-type: none"> • Richmond Park (National Nature Reserve; SSSI; SAC) • Roosting bats and nesting birds <p>Include:</p> <ul style="list-style-type: none"> • Surrounding Other Sites of Nature Importance and Site of Metropolitan Importance • Habitats onsite (and consideration to the wider context of the site in terms of habitat linkages): <ul style="list-style-type: none"> ○ Badgers ○ Birds ○ Bats ○ Invertebrates • Habitats within the Richmond and UK Biodiversity Action Plan
<p>Ground conditions and contamination</p> <p>From:</p> <ul style="list-style-type: none"> • Asbestos fibres within garden and landscaped areas • Low levels of heavy metals and Polycyclic Aromatic Hydrocarbons 	<ul style="list-style-type: none"> • Future occupiers <p>Include:</p> <ul style="list-style-type: none"> • Construction workers and drivers of waste • Surrounding residents • Existing businesses • Existing schools • Existing medical and community facilities - visitors and staff

<p>Include:</p> <ul style="list-style-type: none"> • Disturbance during demolition and ground works • Dusts / asbestos fibres during construction • Contamination to water • Infiltration 	<ul style="list-style-type: none"> • Ecological receptors • Water sources • Existing and future visitors and users of play areas / open space
<p>Socio economic</p>	<ul style="list-style-type: none"> • Population <p>Include:</p> <ul style="list-style-type: none"> • Existing and future: <ul style="list-style-type: none"> ○ Residents ○ Visitors of community space / facilities – centres, schools, medical ○ Users of public open space ○ Businesses
<p>Climate</p> <p>From</p> <ul style="list-style-type: none"> • Overheating & associated health implications • Soft landscaping failure • Water shortages for public use and for landscaping 	<ul style="list-style-type: none"> • Impacts for human and ecological receptors

The authority recommends under each chapter of key issues to be addressed; the relevant sensitive receptors are clearly identified. The LPA will continue to work with the Applicants to agree the relevant receptors.

SECTION 3 – CONSULTATIONS

The SOR Report (Section 4.0) recognises the process of consultation is critical to the development of a comprehensive and balanced ES, and to:

- determine those aspects that require detailed assessment,
- consider comments and positions of affected stakeholders.
- ensure all relevant environmental uses are identified, together with the likely significantly environmental effects.

The applicant's team have undertaken consultation as part of the design and EIA process, and will continue to do so, which the LPA welcomes. The SOR Report confirms they will include the following organisations in such future consultation:

- London Borough of Richmond upon Thames (including departments such as Housing, Environmental Health and Planning)
- Greater London Authority
- Transport for London
- Environment Agency
- Thames Water
- Natural England
- Heritage England and
- Important neighbouring occupiers including Community Groups operating within Ham Close and Community Groups within the local neighbourhood in addition to local businesses, educational and community facilities and residents.

The applicant is strongly recommended to consult with the above consultees as appropriate throughout the EIA process and as the development evolves, and for the following consultees / interest groups to be included (not exhaustive list):

- GLAAS Historic England
- Richmond Biodiversity Partnership
- Southwest London Environment Network
- Public Health
- The Royal Borough of Kingston upon Thames
- Southwest Trains
- Transport for London
- Sport England
- Network Rail
- Metropolitan Police and Crime Prevention Office
- Richmond CCG
- Consultees within the LBRuT:
 - Transport Planners;
 - Ecology Officer
 - Arboricultural Officer
 - Urban Design and Consultation Team
 - Environmental Health – Air Quality
 - Environmental Health – Noise and Vibration
 - Environmental Health – Contaminated Land
 - Lead Local Flood Authority
 - Waste Management
 - Achieving for Children
- Local Organisations - Ham and Petersham Neighbourhood Forum; Ham and Petersham Association & Amenities Group & Friends of Ham Library

SECTION 4 – INSIGNIFICANT ISSUES

The SOR Report (section 5.0) identifies the environmental topics that are not being assessed within the ES, and thereby 'scoped out' in that the potential for significant effects has been deemed unlikely. These have been identified following:

- A review of existing survey and baseline studies
- Exercise to identify potentially sensitive receptors

Whilst the following technical areas are scoped out, the SOR Report confirms these will be fully considered within other planning application documents and may be cross referenced within other chapters of the ES.

4.1 Transport

The site's Public Transport Access Level (PTAL) is 1b, on a scale of 0-6a, where 6a represents the greatest level of access to public transport services. The site is over 4km from the nearest point of the Transport for London (TfL) Road Network (TLRN).

Bus service 371 can be accessed from bus stops located on Ashburnham Road and Sandy Lane.

Due to the following reasons, the SOR Report deems the Development will not give rise to significant transport impacts on:

- a) Based on a net increase of 260 residential units the expected multimodal two-way vehicle trips and total daily trips are expected to be below the threshold requirements for assessment
- b) The net change in vehicle trips is less than 10% increase in peak hours and throughout the day
- c) There would only be a net change of 3.8% increase in the annual average daily traffic
- d) Lower car parking ratio
- e) Traffic flows on Petersham Road is predicted to be less than 10%
- f) The following standalone documents will accompany any forthcoming application
 - A Transport Assessment
 - Framework Travel Plan
 - Parking and Servicing Strategy
 - Sustainable transport measures will be embedded into the design

The LPA has the following comments:

- a) The SOR Report provides a multi-modal trip generation database for a net increase of 260 dwellings within Appendix 1 which shows that the number of vehicular trips generated will be less than the threshold at which a detailed assessment is required. Appendix A of the Government Guidance on Transport Assessment (Department for Transport, 2007) is not now government policy, but most of the technical information in it is still used by Transport for London in their own explanation of how to complete a transport assessment. This document defines the threshold at which detailed analysis of the vehicular traffic impacts on a particular road link or junction might be required as being 30 or more two-way vehicular trips in the AM or PM weekday peak hours of 08.00-09.00 and 17.00-18.00.

The SOR includes a multi modal trip generation analysis of both the current and proposed residential dwellings. However:

- this analysis does not actually explain how the number of trips was derived for each mode (i.e., does not give a trip-rate).

- It does not include details of the sites examined to arrive at the numbers of trips given. A standard TRICS analysis will need to include details of the site location, details of the PTAL, whether sites of particularly low or high car ownership have been included or excluded, the number of dwellings on each site, and whether the residential land use is the only one on the site or whether there are other land uses that might reduce the number of inter-site residential trips generated.

A TRICS trip generation assessment is required, and this should reflect the nature of the site and should get the total number of person trips generated. The assessment can then use Mid-Level Super Output Area (MSOA) level Travel to Work data from the Census of 2011 to identify the number percentage of trips per mode. The assessment could also use MSOA level Census data to get the likely location for residents who commute to work by each mode at [DataShine: Commute](https://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=undefined&zoom=12.0&lon=-0.1500&lat=51.5200)<https://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=undefined&zoom=12.0&lon=-0.1500&lat=51.5200> . They can cross-reference this with a TRICS multi-modal trip generation analysis.

- b) It is unclear how the SOR Report associates the lower parking ratio with a lower impact upon the highway network (para. 5.4).

The SOR Report does not state what the car parking ratio will be, and whether parking spaces provided on site will be for existing residents who will be decanted and then move into the new development, or whether they will be allocated for all dwellers.

- c) The proposed development will result in overspill vehicular parking on roads and streets within 200m walking distance of the site which might affect road safety and accessibility. Therefore, along with a transport assessment and travel plan, a vehicular parking stress survey is needed for which the parameters have been discussed between the LPA and the applicant.

In response to such shortcomings, particularly the lack of detail regarding - multi modal trip generation analysis; trip rates; sites examined; TRICS trip generation assessment; car parking ratios and arrangements; the LPA is not in a position to determine whether transport can be scoped out, or whether the development is likely to cause significant effect on the local environment? It is also unclear how it has been concluded that transport can be scoped out, however, air quality is scoped in based primarily in response to increased traffic volume. It is thereby recommended further engagement takes place with the LPA to consider such.

The applicants are also further advised:

- Given the sites low PTAL rating, and isolation in the context of Richmond and London, and services and facilities – the ES should assess any likely significant effects of the uplift in resident numbers against the availability of health, educational and retail & leisure facilities, and the transport implications of this.
- The need to consider the impact of residents needing / choosing to drive to nearby open spaces / places of interest
- To consider:
 - the links between air quality and transport.
 - Impacts on traffic flows
 - Impacts on public transport
 - Impact upon pedestrian and cyclists
 - Parking implications of the construction, operational development and cumulative impact of both.

- Implications on cycle and pedestrian routes of the construction, operational development and cumulative impact of both.
- To consider and evaluate the implications of the loss of hard standing (which appears to be a parking area) at The Woodville Centre – need to detail the loss of parking, implications on turning areas, and how the retained space meets the needs of the centre.
- Traffic Impact Assessment
Once a multi modal TRICS analysis has been compiled with vehicular trip rates at the AM and PM weekday peak hours, it will be necessary to assess the impact on the following junctions with the help of the trip distribution data from the Census of 2011 [DataShine: Commute](#)

Appendix A of the *Government Guidance on Transport Assessment* (Department for Transport, 2007) states, if a development creates a net increase of 30 or more two-way vehicular trips per hour in the AM and/or PM weekday [peak hours, detailed junction PICARDY junction modelling needs to take place at the junctions listed below in the following scenarios:

- Base year without development
- Base year with development traffic
- Opening year + background traffic growth without development
- Opening year + background traffic growth with development
- Final year with background traffic growth without development
- Final year with background traffic growth with development

This will inform as to whether any physical mitigation is required if any of the junctions assessed can no longer operate at safe capacity (usually 85% ratio of flow to capacity).

Regarding background traffic growth, there are no major committed developments within the Ham area. Therefore, TEMPRO should be used to get the level of forecast background traffic growth between the base year, the opening year, and the final year.

Initial assessments are required of the following junctions:

- The access junction north of Ashburton Road west of the clinic
- Ashburton Road/Ham Street
- Wiggins Lane/Ham Street
- Ham Common/Petersham Road

➤ Submission documents:

In addition to the documents identified by the applicant, the following documents will be required at point of submission, as required by both TfL and the Councils Transport Planners (refer to Appendix 1 for full details):

- A Healthy Streets Transport Assessment in accordance with TfL’s latest guidance.
- Active Travel Zone (ATZ) assessment (which demonstrates how the layout of the Development reflects pedestrian desire lines).
- Outline Construction Logistics Plan.
 - This must assess the impact of demolition and construction traffic on local roads and streets and must set out the mitigation required to allow other road users to use the road and footway network safely while the site is being demolished and rebuilt, and how the safe and expeditious movement of

traffic will be maintained throughout this period. Refer to following links that outline requirements of such documents:

- [Construction Logistics Plan Guidance \(tfl.gov.uk\)](https://www.tfl.gov.uk)
 - [Supplementary planning documents and guidance - London Borough of Richmond upon Thames](#)
- Delivery and Servicing Plan
 - Refuse and recycling collection and storage
 - Parking Design and Management Plan
 - Transport Assessment in line with [Transport Assessments - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk) to include:
 - The Scoping of the TA must be agreed with the LPA in advance
 - Trip generation – should include:
 - multi-modal trip generation assessment.
 - Survey data obtained for the existing use
 - trip generation analysis derived from TRICS and is advised to use Mid-Level Super Output Area (MSOA) data from the Census of 2011 to estimate the number of journeys to and from work by mode.
 - Phasing of the development – this will include the base year, opening year and final year vehicular traffic impact assessment
 - Impact upon local bus service capacities - there may be a significant impact on bus services in the final assessment year relative to current and bus forecast loadings at the AM and PM weekday peak hours. Any mitigation will need to be discussed and agreed with TfL.
 - Delivery and Servicing trips - A one-way route through the site for deliveries and servicing should be considered to reduce safety risks due to vehicles reversing
 - On street car park stress survey
 - Justification for the proposed level of parking
 - Disabled persons car parking in line with London Plan – these should be at-grade and close to accessible dwellings
 - Electric vehicle charging infrastructure in line with London Plan
 - Meet minimum cycle parking standards and London Cycling Design Standards (basement parking is not supported)
 - Tracking – refuse vehicles, emergency vehicles so they can enter, turn and exit in forward gear
 - Details of retained parking / turning areas at the adjacent Woodville Centre
 - Stopping Up Order under S247 of the Town and Country Planning Act (completed prior to construction [Apply to close or divert a highway - GOV.UK \(www.gov.uk\)](https://www.gov.uk)) - the existing highway is marked in yellow in Image 5

Image 5: Existing highway



- Adoption Plan – new road / footway layout scheme or private road network. If the latter, the public must have full rights of access over the road and footway network.
- Proposed Section 278 works of the Highways Act for necessary highway works.
- Confirmation of gradient of ramped access to basement – This must have a gradient of 1 in 20 for the first 5m, 1 in 10 for the duration, and 1 in 20 for the last 5m. There must be a clear headroom of 2.25m. The ramp will accommodate two-way vehicular traffic so the carriageway must be a minimum of 4.8m wide.
- Details how residents who need to access the car park in the basement but do not have lift access from their blocks do so.
- Potential need for £100,00 towards the cost of investigation the feasibility and implementing a CPZ to mitigate the impact of on-street overspill parking
- Footway crossings – refer to SPD – not more than 2 vehicles in a row.

4.2 Water Resources and Flood Risk

Flood risk: The site:

- Is approximately 0.7km east of the River Thames
- Is located within Flood Zone 1
- Should not be affected by a tidal reach flood event up to the year 2100.
- Has areas susceptible to surface water flooding
- Is highly susceptible to ground water flooding (75% or more) as it is an area underlain by the superficial geology of the Kempton Park Gravels Member comprising of sand and gravel, which is classified by the EA as a Secondary A Aquifer.

The site is not:

- located within an area at risk of flooding from sewers or reservoirs
- Within a critical drainage area.
- Within a source protection zone of a borehole abstraction point

With respect to the surrounding area:

- Flood Zone 2 is located west (0.35km) and north of the site.
- Flood Zone 3 is located northwest of the site (0.35km) and benefits from a flood defence.

Taking into account the above flood designations, the SOR Report outlines the rationale for scoping flood risk out of the ES, which is accepted:

- The basement will not inhibit water supply to ground water abstractions
- Control of surface water runoff will be addressed within the Construction Environmental Management Plan (CEMP) during the construction and any necessary mitigation will be applied.
- The Flood Risk Assessment for the operational phase will include:
 - Assessment of the level of flood risk
 - Details of historic flooding events
 - Demonstrate the land use is suitable and will not increase flood risk, from all sources, on or off site
 - Effects to / benefits of existing flood defences
 - Climate change effects to ensure the developments safe for its operational lifetime
 - Access / egress arrangements
 - Mitigation measures, where necessary
 - Residual flood risk

- Surface water drainage strategy to ensure compliance with the target discharge rates
- Implementation of Sustainable Drainage Systems will be incorporated to ensure runoff is controlled and appropriate water treatment is applied
- The design will incorporate water efficiency measures and energy-saving devices to reduce water demand.

Water Resource:

For the following reasons, water resource has been scoped out, which is accepted:

- Sustainable design measures will be embedded into the design to minimise the water demand of the proposed development.
- Consultation will be undertaken with Thames Water and, if necessary, infrastructure improvement may be required.
- Further consultation and water efficiency measures to reduce water usage will be proposed.
- A foul drainage strategy will be prepared (and submitted with the application) in consultation with Thames Water, to determine capacity and if mitigation and infrastructure improvements are required.

Whilst the above is accepted, at submission, the LPA advise the following reports will be required:

- Sequential test within the FRA unless the Site Allocation is complied with (LP21 and SFRA)
- Basement Screening Assessment - [user guide basement assessment.pdf \(richmond.gov.uk\)](#) (SFRA) and potentially a Basement Impact Assessment (SFRA)
- Flood Emergency Plan (LP21 and SFRA)
- London Sustainable Drainage Proforma (Local Validation Checklist)
- Evidence in the form of written confirmation that capacity exists in the public sewerage and water supply network to serve the development. (LP23)
- Confirmation that any new water supply, sewerage or wastewater treatment infrastructure must be in place prior to occupation of the development. If necessary (financial contributions towards the provision or, or improvements to, such infrastructure. (LP23)
- Land Contamination Assessment / Preliminary Risk Assessment
- Water efficient assessment to demonstrate the minimum mandatory targets for water consumption are met.

All documents must adhere to NPPF, NPPG, Defra's Non-Statutory Technical Standards for SuDS; London Plan; Richmond's Local Plan and Richmond's Level 2 Strategic Flood Risk Assessment.

Reference should be made to the Environment Agency's comments (Appendix 1), which provides further guidance and advice, which the development will be expected to comply with:

- Site specific FRAs
- Safe access
- Climate change allowances
- Contamination
- Surface water drainage systems
- Pollution

Thames Water are the statutory water and sewerage undertaker for the area and advise the following water and wastewater issues will need to be considered within the planning application submission (refer to Appendix A for full comments):

- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
- The developments demand for water supply and network infrastructure both on and off site and can it be met.
- Build – out / phasing details to ensure infrastructure can be delivered ahead of occupation.
- Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development&data=04%7C01%7CRebecca.shilstone%40richmondandwandsworth.gov.uk%7C75ab970e12d34dcc9e1608d9a82e6d05%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637725739619764555%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000&sdata=EMN3YJLqtijZvtFN0z3T3oYwqQdfensOBthAT69tRxQ%3D&reserved=0>

The Lead Local Flood Authority’s comments are outlined in Appendix 1.

4.3 Wind microclimate

This has been scoped out given the height and scale of the proposed development; the landscaping proposed and the existing surrounding land uses.

Whilst this may be acceptable, the Scoping Report does not explain the reasoning for scoping out such matters, which needs further attention and discussions with the LPA. Notwithstanding such, any application should be accompanied with a Wind Microclimate Assessment to identify the pedestrian level microclimate at and surrounding the site to be quantified and classified. This should include an assessment of:

- Thoroughfares throughout the site
- Entrances
- Amenity space
- Outdoor seating and play areas
- Open space within the site
- Offsite areas – footpaths, adjacent playing fields, and open space
- Cyclists environment

The submission should detail which criteria for wind comfort and wind safety will be used, and how will these criteria be interpreted with regards to seasonality. This should be agreed with the LPA prior to submission.

4.4 Daylight, Sunlight and Overshadowing

Given the limited height of the development, separating distances within, and adjoining the site with sensitive receptors, daylight, sunlight, and overshadowing has been scoped out. However, a standalone Daylight and Sunlight Report will be prepared in addition to shadowing to shared amenity space.

This is accepted by the LPA, who also recommends the Daylight and Sunlight Report:

- Must have regard to the most recent Building Research Establishment guidance for both new development and proposed effects of new development with respect to sunlight, daylight, and overshadowing.
- To take into consideration shading on the adjacent Ham Green

4.5 Waste

For demolition and construction, the applicants propose to follow Best Practice measures for managing materials and waste, and these will be set out in the Circular Economy Statement, Whole Life Carbon Assessment and Sustainability Statement. Further a Waste Management Plan for the demolition and construction and CEMP will be provided in accordance with best practice and setting out how waste arisen should be managed in line with the waste hierarchy. Operationally, an Operational Waste Management Strategy will be prepared to ensure once complete, waste will be handled in an appropriate manner.

In response to the above, the SOR Report concludes waste effects will be insignificant. Whilst this is accepted by the LPA, the following is advised:

- The West London Waste Plan was adopted in 2015, and will need to be taken into account when assessing the impacts of waste and producing the Waste Management strategy.
- It is recommended a Construction Waste Management Plan be prepared that ensures good site management practice that will lead to a minimisation of waste creation and reuse or recycling of waste materials that arise from the works where practicable.
- An Operational Waste Management Strategy must be submitted with the application.
- The Sustainability Statement must set out clearly how waste will be managed during the demolition and construction phase and once the development is completed and operational.
- The scheme will result in the permanent removal of the public recycling site located in the Car Park on Ashburnham Road, which is used by the local community and provides the flats above shops (on the corner of Ashburnham Road and Ham Street) with their primary means to recycle and appears to result in the loss of recycling facilities at the adjacent Woodville Centre. Details must be provided over how this loss will be mitigated and where and when replacement facilities will be provided.
- Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible.
- In terms of contamination, as required by Environmental Health and Environment Agency (full details within Appendix 1)
 - A land contamination assessment will be required, with any further investigations and remedial actions conditioned.
 - Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment, and disposal are subject to and must comply to waste management legislation.
 - It will be necessary to ensure all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN

14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. The EA provides links to guidance on such.

4.6 Human Health

A human health chapter is not proposed within the ES given the potential health impacts associated with the development are proposed to be assessed through the Socio-economic, Air-Quality, Noise and Vibration ES Chapters and a Health Impact Assessment. Any mitigation measures identified within these chapters will be embedded into the design of the scheme or incorporated into a CEMP.

Whilst this is accepted:

- Human health impacts should also be considered within the Ground Conditions and Contamination and Climate Change chapters
- Any mitigation deemed necessary can be secured via conditions and Heads of Terms within the Section 106.

4.7 Risk

Risk assessment (major accidents / disasters) has been scoped out as the relevant risks will be covered in areas such as the Flood Risk Assessment report and through Construction (Design and Management) Regulations. Further mitigation measures to avoid potential risks will be incorporated into the CEMP.

This is accepted. However, it is recommended risk is also covered within the Ground Conditions and Contamination chapter.

SECTION 5 – KEY ISSUES TO BE ADDRESSED IN THE EIA

Note – comments and recommendations made by the LPA in this section are identified in red for ease of identifying such feedback.

5.1 Scope of the Environmental Statement (ES)

The SOR proposes the following scope of the technical assessments:

1. Built Heritage, Townscape and Visual
2. Archaeology
3. Air Quality
4. Noise and Vibration
5. Ground Conditions and Contamination
6. Ecology
7. Climate Change
8. Socio-economic.

The SOR Report confirms the ES will be undertaken in accordance with the 2017 Regulations and with reference to the following good practice guidance:

- EIA Planning Practice Guidance;
- Preparation of Environmental Statements for Planning Projects That Require Environmental Assessment - A Good Practice Guide
- Guidelines for Environmental Impact Assessment
- Environmental Impact Assessment: A Guide to Procedures
- The Note on Environmental Impact Assessment Directive for Local Planning Authorities

5.2 Means of Assessment

For each of the topic areas, the ES will:

1. **Establish baseline condition** (Q3/4 2021 or Q1 2022), based on a combination of desktop studies (databases, maps, reports, survey techniques and monitoring) and survey to provide context and benchmark for impact prediction.

The SOR Report states under para. 5.52, “*the approach to be taken to establish the condition of particular baselines will be agreed through consultation with relevant consultees*”. This should be set out for consideration within the SOR Report for each environmental topic scoped in, which is currently absent. Under each topic, this should include

- Criteria for determining the value of the receptors
- List of all sources that will be used to establish baseline
- List of modelling techniques

2. **Impact prediction and significance criteria:**

For each of the environmental topic areas assessed, an assessment will be made in relation to the relative significance of the likely environmental effects identified. These will be carried out with reference to definitive standards and legislation where available, and quality assessments based on knowledge and professional judgement.

Recommendation:

- Under each topic, the ES should set out the significance criteria - how ‘significant’ effects in the context of the EIA Regulations are to be determined, measured and

described in the ES. It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification.

- The criteria should be clearly defined against which the significance of effect will be evaluated.

The significance of predicted effects will be determined with reference to assessment criteria for each topic, including:

- Performance against environmental quality standards
- Relationship with international, national, and local planning policy
- Sensitivity of receptors
- Reversibility and duration (short, medium, long-term) of the impact
- Nature of the impact (direct / indirect, positive / negative)
- Permeance of effect (temporary or permanent)
- Extent of influence and magnitude of the impact; and
- Inter-relationships between impacts.

The effects will be considered to be significant prior to and following mitigation. The significance of residual impacts following mitigation will reflect judgement as to the importance or sensitivity of the identified receptor(s) and the nature and magnitude of the predicted changes. The following terms will be used throughout the ES to **define the significance of impacts** (positive or negative):

Major Positive or Negative Impact	significant effect on the environment
Moderate Positive or Negative Impact	moderate effect on the environment
Minor Positive or Negative Impact	Minor effect on the environment
Negligible Impact	No discernible effect on the environment.

Where significant environmental effects are identified, mitigation measures will be set out and the significance of the residual effect will be stated.

Recommendation

- Mitigation should be considered on minor, moderate and major negative impacts, not just where the effects are significant.
- It is recommended that mitigation includes measures to avoid, prevent, reduce, or offset any effects, and proposed monitoring arrangements.

The ES will clarify the **duration of the impacts**:

Temporary	The period over which the impact is experienced lasts for the period of construction or less
Permanent	Impacts that are experienced without reduction or removal over time
Short term	Less than 5 years (but longer than the full period of construction)
Medium term	5-10 years
Long term	The impact remains for a substantial time, for the duration of the operation of the development.

Recommendation:

- The SOR Report indicates the construction will take place between Quarter 4 of 2022 and Quarter 4 of 2029 –7 years. Therefore, the ‘short-term duration’ definition is not appropriate in this case given the construction phase is 7 years. In response to the length of the construction phase, is a different ‘medium term’ definition required?
- Further clarity and distinction is needed between the difference of ‘permanent’ and long-term’

The following terms will be used to define the **nature of the impacts**. If any of the terms cannot be used, this will be stated with reasons within the relevant chapter.

Direct	effects as a result of the development construction or operation activities
Indirect	Impacts which are not a direct result of the project, often produced away from or as a result of a complex pathway. Sometimes referred to as second or third level impacts, or secondary impacts;
Cumulative	Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project;
Primary	Impacts that result upon a receptor as a direct environmental change or disturbance to a specific element;
Secondary	The result of primary impacts on the first receptor having a knock-on impact upon secondary receptors

Recommendation:

- Further clarity to differentiate between ‘direct’ and ‘primary’
- Further clarity to differentiate between ‘indirect’ and ‘secondary’
- Cumulative impacts should not consider just the cumulative impacts arising from other actions and the construction and operation, but also other actions together with the cumulative impacts from construction and operational development together, which will overlap.

The ES will distinguish the **geographical extent** of the impacts:

Local	The site and its immediate surrounds
Borough	The wider area of Richmond upon Thames
Regional	London
National	UK
International	Europe and beyond

It is recommended a sub-regional extent is included, to consider the effects on Boroughs adjacent to LBRuT.

5.3 Cumulative Effects

Schedule 4 of the 2017 Regulations requires ESs to describe the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.

The ES will consider two types of cumulative effects:

- Type 1 – the combined effects of individual effects arising from the Development construction
- Type 2 – the combined effects arising from the development together with other schemes that are within 2.5km radius of the site and have been lodged at the date the applicant submits the planning application.

Screening criteria for the inclusion of developments within the Cumulative Impact Assessment have been detailed - those that generate residual impacts; are constructed / operational over similar time periods; spatially linked; and consented or subject to applications. This has identified the following schemes:

- 1-1C King Street, 2-4 Water Lane, The Embankment and River Wall (21/2758/FUL)
- Old Station Forecourt Railway Approach, Twickenham (19/3616/FUL)
- St Johns and Amyand House, Strafford Road, Twickenham (18/4266/FUL)
- Ryde House, 391 Richmond Road
- Lockcorp House, 75 Norcutt Road, Twickenham
- Land at the junction of A316 and Langhorn Drive and Richmond College Site (including Craneford way East Playing Fields and March Farm Lane), Egerton Road, Twickenham (15/3038/OUT).

It is recommended the following are also included:

- The development is a 7-year construction programme, and therefore Construction and Operations will overlap, and therefore cumulative effects arising from both construction and operational phases should be included and measured through a series of time slices to ensure worst case scenario is measured.
- Applications that remain extant at point of submission
- Site Allocations within the adopted Local Plan and Ham and Petersham Neighbourhood Plan – Cassell Hospital to the south
- Developments within the Royal Borough of Kingston upon Thames (applying the same screening criteria).
- Natural England would expect the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.
- Screening Criteria needs to be more specific with reference to 'residual impacts of at least minor significance' - suggest this is lowered to all major schemes.

5.4 Alternatives

The 2017 Regulations require ESs (under Reg 18(3) and Schedule 4) to describe reasonable alternative development options, as well as their respective environmental, social, and economic implications, before a final design freeze is fixed. The ES should therefore provide an outline of the main alternatives studied with an indication of the reasons for the choices made, taking into account the environmental effects.

It is recommended the 'Do Nothing Scenario' includes a description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed.

5.5 Technical Chapters of the ES – what is scoped in

5.5.1 Built Heritage, Townscape and Visual

Introduction

- The SOR Report confirms the Heritage, Townscape and a Visual Impact Assessment (HTVIA) will identify the likely significant effects on built heritage, townscape, and visual receptors, and will be undertaken by Savills Heritage & Townscape.
- The assessment will be informed by Accurate Visual Representations (ACRs) – verified views.
- The assessment will be based on Savills methodology, informed by policy and guidance at national, rational, and local levels, including:
 - Department of the Environment, Preparation of Environmental Statements for Planning Projects that Require Environmental Assessment, Good Practice Guide 1995;
 - EU Directive 85/387/EEC as amended by Directives 97/11/EC, 2003/35/EC, 2011/92/EU, and 2014/52/EU;
 - Town and Country Planning (Environmental Impact Assessments) Regulations,
 - The Landscape Institute and Institute of Environmental Management and Assessment, Guidance for Landscape and Visual Impact Assessment (GLVIA) Third Edition, 2013;
 - NPPF
 - Planning Practice Guidance
 - Planning (Listed Buildings and Conservation Areas) Act, 1990;
 - Historic England, Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment
 - Historic England, Advice Note 3 (2nd Ed.) – The Setting of Heritage Assets
 - Historic England, Advice Note 4 – Tall Buildings
 - The London Plan
 - London View Management Framework SPG (LVMF),
 - London Borough of Richmond Local Plan
 - London Borough of Richmond Draft Local Plan 2024
 - London Borough of Richmond, Supplementary Planning Documents - Design Quality, Building of Townscape Merit, Public Space Design Guide
 - London Borough of Richmond conservation areas appraisals and statements;
 - London Borough of Richmond full List of locally listed buildings.

Recommendations and comments:

- Take into account [Ham and Petersham Neighbourhood Plan](#) and [Urban Design Study](#)
- Development affecting the setting of a heritage asset is a direct environmental effect in terms of EIA definitions and may constitute a significant effect. It is strongly recommended that the involvement of professional historic environment and landscape advice/consultancy is sought from the outset of the EIA and application process.
- The assessment should refer to the relevant National Character Areas which can be found on Natural England's website
 - [Natural England - National Character Area Profiles - Natural England \(nationalcharacterareas.co.uk\)](#)
 - [NCA Profile:115 Thames Valley - NE379 \(naturalengland.org.uk\)](#)

- [National Character Area profiles: data for local decision making - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Baselines conditions:

Current understanding of the site:

- Not located in a conservation area
- Does not contain any statutory or non-statutory listed buildings.
- Does lie within two Local Views, Richmond Hill view (Ham Open Spaces Act (1902)); and Richmond Park view from King Henry VIII's Mound).
- The site comprises 14 residential blocks of up to five storeys in height.
- The existing buildings are of low architectural and urban design quality and do not contribute to the local townscape quality.

Surrounding area:

- Within 300m of two conservation areas
- Characterised by low to medium-rise residential developments primarily dating from the mid-20th century, with some 18th and 19th century buildings dispersed, particularly to the east.
- The area around the site is characterised by the large number of mature trees,
- The baseline will be gathered through desk studies, consultation, and site visits.
- Desk study:
 - To determine the built heritage assets – examination of documentary and cartographic sources and historic environment datasets to determine the likely nature, extent preservation and significance of any known or possible heritage assets within or adjacent to the site.
 - understand the character and context of the site in relation to national, regional, and local policy and guidance
- Site visits:
 - To confirm the topography and existing land use,
 - identify any built heritage assets and assess factors which may have affected the survival or condition of any known or potential assets.
 - aid to determine the townscape resource, character, condition, and to identify visual receptors.

Potential effects:

- Changes to the character, context and quality of the site and local townscape
 - Effect on the townscape character of the site
 - Character and quality of townscape in vicinity and its visual amenity from visual receptors
 - The development within its context – buildings and relationship between them.
 - Different types of urban open spaces
- Changes to townscape views
 - Impact on visual receptors
 - How people will be affected by changes in views and visual amenity
- Changes to setting of above ground building heritage assets - Those within 500m of the site are identified as potentially sensitive heritage receptors.
 - Ham House and Ham Common Conservation Area,
 - Grade II listed Buildings
 - Newman House; Boundary Wall to Beaufort House; Beaufort House; Beaufort Cottages; Stables to Manor House; Selby House; Ensleigh Lodge; The Little House; Gordon House; Langham House; Avenue Cottage; Avenue Lodge Cottage; Orford Hall St Michaels Convent; The Cottage;

- Hardwick House; South Lodge; Stafford Cottages; The New Inn Public House; Cottage to Sudbrook Lodge
 - Grade II* listed buildings
 - Manor House; 1-18 Langham Ham Close; Sudbrook Lodge; Registered Park and Garden Ham House
- Locally listed buildings in close proximity to the site will be also considered.

Comments / recommendations

- Ham House, Grade I Listed, is not included in para. 6.16, which it should be
- Paragraph 6.16 and Appendix 2 Paragraph 14 read differently when referring to heritage receptors.
 - Inconsistent heritage assets listed
 - Inconsistent approach to assessing impact – para. 6.16 proposes they are not individually assessed and instead included for review as part of the conservation area, and para. 14 states Grade I or II* will be individually assessed, and Ham House Registered Park and Garden and Ham House will be groups together and assessed as one. This can be resolved by noting the need to assess the impact on individual listed buildings and their settings in the areas around the site, and in particular Beaufort House and Newman House which are the closest to the site.
- Disagree with last sentence of para 6.16 – *“It is proposed that where any designated and non-designated heritage assets are located within Ham House or Ham Common Conservation Area, they are not individually assessed, but are instead included for review as part of the conservation”*. Heritage assets (designated and non-designated), including their setting and significance, within the CAs should be assessed separately to CAs, in particular Beaufort House and Newman House, which are the closest to the site. It is important to understand the form, materials and history of any designated and non-designated heritage assets, and this will for example differ for LBs and CAs. This differentiation is important to understand the impact of the proposed EIA development on the relevant significance of the identified heritage assets, especially as it is expected that the proposed EIA development will be visible from the setting of, or in conjunction with, a range of heritage receptors. In turn this will then assist the applicant in avoiding, minimising and mitigating any potential negative impacts on the identified heritage assets, including providing an opportunity to identify ways of better revealing or enhancing their significance.
- The potential impacts and likely significant effects on Ham House CA should be carefully considered, and indeed this CA may warrant greater attention compared to the others due to its proximity to the site.
- The two Other Open Land of Townscape Importance should be included for Visual Impact Assessment
- Natural England expects consideration to the landscape and visual effects on Open Access land, whether direct or indirect, to be included.
- Additional viewpoints recommended:
 - Viewpoint from the cluster of LBs around the Manor House & stables a little further up Ham Street.
 - From the school OOLTI to the west of the site; and representative view from Woodville & Ashburnham Roads.
 - Couple of additional ones which may be beneficial in terms of assessing impact on heritage assets – to be agreed with LPA – Beaufort House and the Algernon Tollemache Almshouses
 - From the road adjacent to the Palm Centre and Ham House stables.
 - A number of key view corridors are defined both close into the site and from further afield. It may be worth checking to ensure these are comprehensive and sufficiently account for vistas around the site (e.g. it might be appropriate to seek an additional view assessment further north on Ham Street, the northern equivalent of the long view denoted by the View 1 arrow in Appendix 2).

- Metropolitan Open Land at Grey Court
- From Ham House vista
- Back Lane – looking towards the community centre

The effects will be assessed through the study of AVRs, to be produced by a visualisation specialist. The Council advocates 3D modelling is used (such as VUCITY) for the visualisations of the impact on views of the proposed EIA development.

Assessment methodology

1. Demolition and construction:
 - Same as Completed and operational
 - Based on worst-case scenarios
 - Applicable to heritage, townscape, and visual receptors.
2. Operation:
 - Consider the impacts on heritage, townscape, and visual receptors as a result in the change in character, massing, and height of development on site.
 - Methodology will be informed by policy and guidance at national, regional, and local levels with regards to EIA, heritage, urban design, townscape, and visual impacts.
 - Will consider close, medium, and long-distance views – on townscape, townscape character areas, heritage assets within study area, via AVRs (wireline or rendered) produced by a visualisation specialist. This will consider cumulative developments on top of the baseline.
 - Visual assessment will be carried out on longer views where necessary.
 - Map and list of viewpoints for assessments is provided, and this will be agreed with the council prior to submission.

Comments:

1. Para. 6.21 states the views will only be undertaken for operational effects – however, paragraph 6.18 states the impacts arising from demolition and construction will be assessed as the same as operational – clarity is required.
2. The LPA advise that agreement should be reached between parties on what views are to be assessed and those that are to be wireline or rendered.
3. Natural England advise the consideration of landscape impacts should reflect the approach set out in:
 - the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition),
 - the Landscape Character Assessment Guidance for England and Scotland (Scottish Natural Heritage and The Countryside Agency, 2002) and
 - good practice.
4. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area.

Effect prediction and assessment of effect significance:

1. The methodology is based on the best practice set out in the relevant policy and guidance, including the GLVIA3 (3rd Edition).
2. An assessment of the effect will be made on the basis of quantitative and qualitative information collated as part of the assessment:
 - Identification and description of townscape character areas, including consideration of their sensitivity.
 - The study area for the character areas will extend to 500m from the site.
 - Consideration of the design in detail, including its performance in terms of mitigation and enhancement; and

- Assessment of the effects of the proposed development during its demolition and construction, and operational phases, by way of considering:
 - the sensitivity of the receptor, which will be assessed as very high (only applicable to heritage receptors), high, moderate, low, or negligible, depending on the importance, value and quality of the receptor, and the visual amenity of the viewer; and
 - the magnitude of the change resulting from proposed development, which will be assessed as large, medium, small, or negligible, depending on the change to the townscape or view.
 - These two measures are combined to establish the scale of the effect on a receptor, whether major, moderate, minor, or negligible/no change.
 - The nature of the effect, on balance, will be assessed. The nature of the effect may be assessed as beneficial, adverse, or neutral.
 - Establishing whether the effect is significant. (Only major and moderate effects are considered significant).
 - A cumulative assessment will be undertaken to determine the potential for likely significant cumulative effects.

Comments / recommendations:

- How will townscape features be evaluated – what is the criteria for determining the value of the receptor
- What is the criteria for significance?
- What is the criteria for determining the magnitude of change?
- Need to include the identification and description of the significance of identified designated and non designated heritage assets when assessing the likely significant effects (para. 6.22), which should be done in addition to the identification and description of the townscape character areas. (para. 6.22). Only through an understanding of the significance can the impact of the EIA proposal on that significance be assessed and understood.

Mitigation:

- Will be embedded in the designs
- Deemed unlikely further or 'supplementary mitigation' will be needed.

5.5.2 Archaeology

GLAAS Historic England have been consulted as part of the SOR and agree with the conclusions that Archaeology should be scoped in.

The SOR Report sets out the **known baseline**, which GLAAS supports.

- The site spans two Archaeological Priority Areas and has potential for buried remains dating to the prehistoric, medieval, and post-medieval periods, as well as a lot of social history associated with the people who have lived and worked here throughout the 19th and 20th centuries.
- The site is considered to have moderate potential for Prehistoric finds or features
- Study area has now potential for significant Roman archaeology
- The site has low potential for the presence of Saxon / early medieval finds or features
- The site has potential for post medieval remains.

Potential Impacts are identified as:

- Demolition and construction effects from foundations, landscaping, hydrological conditions, trenches for utilities.
- Physical impacts to potential below ground non designated archaeological remains.

Operational effects to archaeology are proposed to be scoped out based on results of a historic Environment Desk Based Assessment where no designated archaeological assets were identified with settings sensitive to significant impact.

Assessment methodology: The ES sets out the following methodology, which is not objected to, subject to comments in red:

1. A Desk Based Assessment Report will be produced and used to assess the construction and operational effects.
 - The study area will be 1km
 - The following resources will be considered:
 - Greater London Historic Environment Record, including Historic Landscape Characterisation, for the proposed sites and for a 1km search radius;
 - Map regression based on Ordnance Survey maps and tithe/enclosure maps and apportionments held at the local studies library;
 - National Heritage List for England;
 - Historic England Archive;
 - Pastscape;
 - Environment Agency Lidar Data;
 - Online Aerial Imagery;
 - Site inspection;
 - Geophysical survey.
 - **Include a review of any geotechnical site investigations**
 - The results will be submitted and discussed with the Archaeological Advisor at the Council in relation to need / timing of intrusive evaluation – **note:**
 - **Early consultation and engagement with the appropriate specialist bodies, including Historic England as well as the Greater London Archaeological Advisory Service (GLAAS), who are the borough's archaeological advisers, should be consulted.**
 - **Details of any additional pre-submission work should be agreed with GLAAS.**
2. The assessment of likely significant effects, will follow latest and most comprehensive guidance –
 - Scheduled Monuments – Identifying, protecting, conserving and investigating nationally important archaeological sites under the Ancient Monuments and Archaeological Areas Act 1979 (DCMS 2010)
 - Scheduled Monuments & nationally important but non-scheduled monuments (DCMS 2013)
 - Design Manual for Roads and Bridges Volume 11; Section 3; Part 2 'Cultural Heritage' (DMRB) (Highways Agency 2019)
 - Historic Environment Good Practice Advice in Planning Note Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)
 - Standards and Guidance for Historic Environment Desk-based Assessments (Institute for Archaeologists 2014) (updated in January 2017)
 - Management of Recording Projects in the Historic Environment: MORPHE (Historic England 2015); and
 - Code of Conduct (Chartered Institute for Archaeologists [CIfA] [revised edition] 2014)
3. The magnitude of change will be assessed in accordance with best practice.

4. The significance of an archaeological asset will be assessed in terms of national, regional or local statutory or non statutory protection and grading. For non designated assets, the SoS non statutory criteria and professional judgement will be applied. Table 6.2 shows how the significance of a heritage asset will be determined.
5. The magnitude of direct and indirect impacts will be rated:
 - High, medium and low adverse
 - Negligible / Neutral
 - High, medium and low beneficial.
6. The significance of the impact will be determined by the significance of the asset and magnitude of the impact, and a table has been provided to identify what is deemed substantial, major moderate, minor or negligible. 'Substantial', 'Major' and 'Moderate' levels of effect are 'significant' for the purpose of the Archaeology ES Chapter and 'Minor' and 'Negligible' are not significant.

Mitigation:

If required, the applicants propose a programme of archaeological investigation be undertaken to record archaeological remains that may be present within the site that would be impacted by the proposed development, which the need and scope to be agreed with GLAAS. No objection is raised to this.

The development provides a good opportunity to offset environmental harm through public benefit and outreach. Policy HC1 of the 2021 London Plan encourages interpretation of heritage assets and this site offers a good opportunity to provide enhanced public benefit and demonstrate local distinctiveness. This should be considered at an early state in the design process and be fully integrated with the archaeological research and fieldwork to maximise the potential benefits. GLAAS advise, the public benefit could involve activities such as:

- using heritage cues to influence place making
- the installation of an exhibition on the history of the area within the new Makers Hub
- community excavations on Ham Village Green to investigate the remains of Manor Farm and the earlier 20th century housing in this area
- an oral history and recollections project to interview the long-standing residents of the estate.

Details of appropriate public benefit should be included within the Heritage ES Chapter

Points of clarification:

- Paragraph 6.34 and 6.39 refer to effects on 'both sites' – why is this plural?
- Paragraph 6.35 refers to operations effects being scoped out, however, para. 6.37 states operational effects will be assessed.

5.5.3 Air Quality

Baseline: The SOR Report identifies the whole Borough as an Air Quality Management Area (AQMA) and concludes the main pollution sources in the vicinity of the site as vehicles.

Natural England adds:

- Air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011 - [pb13583-biodiversity-strategy-2020-111111.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/111111/england-biodiversity-strategy-2020-111111.pdf)).

- A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.
- The ES need to set out how the baseline conditions will be established

Potential Impacts: These are identified as:

- Generation of dust and PM10 during the construction phase and the potential to cause a nuisance.
- Impact on local air quality arising from the emissions of pollutants from the exhausts of road vehicles during the construction phase; and
- Impacts on local air quality arising from the emissions of pollutants from the exhausts of road vehicles and any energy generating plant (if included in the proposals) during the operational phase.

The SOR Report does not:

- Identify the sensitive receptors to be considered or how they will be valued – these should include existing and future receptors including, but not limited to:
 - Transport and Construction workforce
 - Existing residents, businesses, and pupils (and staff) of local schools
 - Existing staff / users of nearby medical centre
 - Visitors of existing open space and public realm
 - Future residents, employees, visitors
 - Biodiversity and ecological receptors.

The LPA recommend the following potential impacts are also recognised: Asbestos; Waste handling and storage and PM2.5 and neo particle

The impacts on sensitive receptors should be considered:

- During the construction
- The completed operational development
- The cumulative impact – whilst construction is taking place with operational development.

The Assessment Methodology includes

- Detailed dispersion modelling (ADMS Roads) for road traffic emissions, taking account of national and local policies and relevant Defra technical guidance relating to air quality –
 - Include Regional policies and all relevant guidance
 - Locations need to be agreed with the LPA
- The road traffic assessment will focus on NO₂ and fine particles matter (PM10 and PM2.5)
- A comparison of predicted concentrations with statutory air quality standards and objections will be undertaken.
- The significance will be determined in accordance with the Environmental Protection UK (EPUK) and IAQM Planning Guidance.
- The extent of the assessment of the traffic related air quality impacts will be determined by the extent of the Transport Assessment as agreed with the relevant bodies
 - The scoping of the TA must be agreed with the LPA and it is encouraged agreement from TfL is also sought. The site is within an area with a low PTAL and much traffic to/from this development (during construction and operation) will come via Richmond, an Air Quality focus Area, where biased adjusted annual emissions of NO₂ have exceeded the UK/EU limit value of 40 µg/m³ for nitrogen dioxide for

- the last 19 years. Any assessment should identify routing of construction and operational traffic and take account of the impact.
- The ADMS Roads modelling will be verified against existing monitoring data for the area (where relevant data exists). It is not intended at this stage to carry out additional air quality monitoring.
 - What data points are proposed to be used? – these must be agreed with the LPA. What is proposed if there is no existing monitoring data?
 - An Air Quality Neutral Assessment will also be undertaken in accordance with the requirements of the London Plan
 - This must also comply with Local Plan and SPD referenced in Section 6, and it is recommended its scoping is agreed with the LPA in advance. This must include and assessment of impact arising from:
 - works
 - operational development
 - cumulative impact of both during phasing of the development
 - Construction related impacts will also be examined. This will involve a review of the proposed works and related traffic data during the various phases of the development to identify any potentially adverse effects at nearby sensitive receptors. The construction assessment will be carried out in-line with IAQM guidance.
 - The cumulative impacts arising from construction and partial operation needs to be considered.
 - Need to consider – in-combination air pollution effect on natural assets.

The Scoping Report does not:

- Also set out the significance criteria for dust impacts for the sensitive receptors – including population and ecological value
- Detail how the dust impacts will be measured and where from (on site, distance from site, transport routes for Works and operation)
- What the qualitative assessment will include

Mitigation

- During the construction phase, mitigation measures will be recommended in-line with the Institute of Air Quality Management (IAQM) guidance to be incorporated into the Dust Management Plan (DMP) or CEMP.
- Mitigation during the operation phase will be based on the results of modelling assessment.

Recommendation – when considering necessary mitigation, take account of:

- London Borough of Richmond Air Quality SPD
- London Borough of Richmond Air Quality Action Plan 2019-2024
- The control of dust and emissions during construction and demolition SPG
- Travel Plans
- Car Clubs
- Cycle storage provision – long and short stay and for disabled persons (refer to Ham and Petersham Neighbourhood Plan that has higher minimum standards)
- Electric vehicle charging points
- Registration of all NPMM
- Carbon offset contribution

5.5.4 Noise and Vibration

The ES will consider construction phase and operational effects. It is recommended that the cumulative effects of both (and other developments) are considered on existing and future residents and other receptors.

Known baseline:

- The SOR Report deems the current ambient noise environment to be road traffic – It is recommended consideration also be given to aviation movements in terms of noise sources.
- Baseline noise levels will be obtained by unattended noise surveys, which will be undertaken during daytime and night-time periods and in accordance with the principles of BS 7445:2003. It is recommended the locations be agreed with the LPA in advance.

Potential Impacts: The SOR Report recognises existing residential receptors may be subject to impacts from construction noise levels and increased road traffic, and identifies the following impacts that will be addressed:

- Changes in noise levels at existing sensitive receptors as a result in changes in local traffic flows
- Noise generated by the proposed development during construction activities
- Suitability of the site uses in relation to the noise environment.
- The potential impacts do not list the sensitive receptors. When considering the noise and vibration effects (whether temporary during construction or when the development is operational), the sensitive receptors should include (but not be limited to)
 - Temporary workforce
 - Existing residents, schools, businesses, and occupiers surrounding the site
 - Future residents, employees, visitors, students – depending on the phasing of the development
 - Existing staff / users of adjacent health centre
 - Users of the public open space, rights of way, cycle routes, footpaths
 - Ecology and biodiversity
 - Heritage assets
- It is recommended the following also be considered:
 1. During Construction (demolition, excavation, earthworks, construction, waste handling and storage and traffic):
 - Temporary vibration effects
 - Temporary vibration effects on nearby heritage assets
 - Impact from construction (activities and road traffic flows) on existing residents, businesses, schools, open space, and ecology
 2. During Operation:
 - Impact from community hall on existing and future residents and businesses
 - Use of public open space / play spaces on nearby sensitive receptors

The impacts should consider the cumulative noise impacts of the demolition / construction and operational development, through each phase of the development on sensitive receptors.

Assessment methodology:

1. The Scoping Report does not set out the baseline conditions, which is essential including:
 - How sensitive receptors will be valued
 - The assessment methodology and criteria
 - The significance criteria for:
 - Noise arising from construction (including traffic), operations and cumulative.
 - Vibration.

2. Undertake noise monitoring to form a basis to assess likely impact:
 - Establish existing background noise levels by measurement. This will be carried out at locations representative of the proposed development, over both the day and night-time periods.
 - Such locations must be agreed in advance with Environmental Health Colleagues (and following TA to identify potential locations for traffic noise arising from construction)
 - Ambient noise conditions will be considered using a combination of unattended measurements and computer noise modelling. Noise parameters, such as LAeq,T, LA90,T, LA10,T and LAmx,F will be monitored and the relevant values obtained for the standard measurement periods.
3. Likely impacts from the construction phase will be calculated based on noise levels pertaining to typical construction activities and the likely distances between these activities and the nearby existing residential receptors. Construction noise levels will be considered against the target construction noise criterion of 75 dB LAeq,16hr, provided within BS 5228.
 - This will also need to consider impacts on future residents and existing and proposed adjacent commercial and community uses (schools, churches, medical facilities, public open space).
4. The likelihood of impacts from construction vibration will be considered against typical distances at which vibration from construction activities may be perceptible.
 - Such locations are agreed in advance with Environmental Health Colleagues.
5. Ambient noise levels will be calculated across the site by use of a computer noise model, which will be calibrated against the obtained ambient noise data. The proposed development will be modelled in order to understand the propagation across the proposed residential dwellings. Locations must be agreed with the LPA in advance.
 - The calculated ambient noise levels will be assessed in accordance with the guidance provided by BS 8233 and other relevant standards. Maximum noise levels overlooking road sources will be considered using the measured noise data and assessed against the guideline value provided by the World Health Organisation (WHO) Guidelines for Community Noise.
6. The change in road traffic noise levels on the surrounding road network will be assessed based on the baseline and proposed 18-hour AAWT road traffic data. The noise change, in dB, will be calculated using the procedure set out in Calculation of Road Traffic Noise (CRTN) and the magnitude of impact assessed using the methodology provided in Volume 11 of the Design Manual for Roads and Bridges (DMRB).
7. The potential cumulative effects of the proposed development when considered in combination with any nearby schemes with planning permission will be assessed.
 - Refer to previous comments on cumulative effects. This will need to consider construction, operational activities, and combination of both (due to phasing)
8. Legislation and guidance documents to be used in the assessment will include:
 - BS 8233:2014: Sound Insulation and Noise Reduction for Buildings - Code of Practice
 - BS 5288-1:2009+A1:2014, Code of Practice for noise & vibration control on construction & open sites
 - WHO- Guidelines for Community Noise 2000, and subsequent WHO guidance
 - CRTN and DMRB and
 - The IEMA Guidelines for Environmental Noise Impact Assessment (2014)

This should also include reference to the Council's own SPD on Noise Control SPD 'Development Control for Noise Generating and Noise Sensitive Development'

Mitigation

- Best Practice will be employed during construction phases to control impact, through the CEMP.

- A framework CEMP will be required at point of submission. It is recommended the locations of monitoring stations are agreed with the LPA (Environmental Health colleagues) and baseline levels.
- Computer modelling will be used to determine necessary glazing and ventilation choices
- External ambient noise levels at amenity areas will be mitigated as far as practicable, in accordance with BS 8233
- Sound proofing should be considered
- Recommend the adopted SPD 'Development Control for Noise Generating and Noise Sensitive Development' is followed when considering mitigation.

5.5.6 Ground Conditions and Contamination

Known baseline

This has been informed by a Desk Study and ground investigation, comprising boreholes and monitoring of groundwater and land gas.

- Geology is reported to comprise Made Ground (0.4-1.2m thickness); underlain by Kempton Park Gravels (3.8-6m), and London Clay (>20m).
- Groundwater was encountered within the Kempton Park Gravels and representative of the Secondary A Aquifer.
- No significant land gas was measured and was assessed as Characteristic Situation 1 (no as protection measures required to buildings).
- Potential sources of contamination have been revised and there are not considered to be any significant sources of contamination associated with the current use.
- Made Ground samples identifies asbestos fibres samples and slightly elevated heavy metal and Polycyclic Aromatic Hydrocarbons (PAHs)

Recommendation - Check if the site is within a Source Protection Zone – where it may be inappropriate for development to discharge foul or surface water into the ground - Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk)

Potential Impacts

- During construction:
 - Control of emissions during disturbance of the ground
 - Direct contact by groundworkers with potentially contaminated Made Ground
 - Release of dusts and asbestos fibres which may migrate off-site to surrounding residents.
- Negligible impact from future residential development to ground quality
- Limited risk from existing contamination to future occupiers
- Potential for asbestos fibres within garden and landscape areas and low levels of hereby metals and PAHs may present an increase risk from any contact with the Made Ground recorded across the site.

Recommendations

- The SOR Report does not list the sensitive receptors, which should include, but not be limited to:
 - Existing residents, businesses, schools, users of community / medical centres and open space (not just from ground contamination but also from dusts / asbestos fibres)
 - Construction workforce (onsite and during and after waste transportation)
 - Future residents
 - Biodiversity and water sources
- The Scoping Report does not set out how sensitive receptors will be valued

- Need to consider potential contamination to water quality in surface water or groundwater bodies during construction
- Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil / made ground which could ultimately cause pollution of underlying groundwater resources. Need to consider surface drainage pollution – it may be necessary for this to go through treatment systems or to foul main, for instance from vehicle parking. It will be necessary to demonstrate no resultant unacceptable risk to Controlled waters.

Assessment:

- The potential for ground contamination on site will be assessed in accordance with the Environmental Agency's Land Contamination Risk Management (LCRM) and its technical framework, methodology and terminology. This will consider a contaminant source, receptors, pathways and Contaminant Linkage.
 - Local policies and plans will be reviewed.
 - Desk based review for Unexploded Ordnance by an explosive ordnance expert, which will be incorporated into the Geotechnical Reports for the application.
- The Scoping Report does not set out the significance criteria for determining the impact on sensitive receptors, which is required.

Mitigation:

- A CEMP will be required
- Import of clean soils to create garden / landscaped areas to provide a clean cap of material.
- Strategy will be put in place if contamination during construction was found – for example asbestos during earth works.
- Potential remediation of any impacted areas
- Licensed removal of asbestos
- Materials Management Plan

It is recommended the mitigation includes and complies with:

- A land contamination assessment – desk top study will be required at submission. The Environment Agency also states a remediation strategy report may be required at submission.
- A condition will be imposed on any successful application to minimise impact and secure appropriate mitigation, including a remediation strategy.
- The handling, transport, treatment, and disposal of contaminated soil must comply with:
 - Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2016
 - The Waste (England and Wales) Regulations 2011
- Ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays and recommend the following guidance:
 - [Waste classification technical guidance WM3.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/41424/waste_classification_technical_guidance_WM3.pdf)
 - [Environmental management : Waste - detailed information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/41424/environmental_management_-_waste_-_detailed_information_-_gov.uk)
 - [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](https://www.nationalarchives.gov.uk/ukiafrica/)
- The risk management framework provided in the Land Contamination Risk Management Principles; Model Procedures for the Management of Land Contamination should be followed - <https://www.gov.uk/government/publications/managing-land-contamination>

- The EA does not generally support deep borehole soakaways. These could offer direct conduit of the rapid transportation of contaminants to groundwater. Group of shallow soakaways are preferable to one to two deep boreholes.
- The EA advises applicants to following their ground water protection guidance
- It is recommended surface water drainage is considered and discussed with the Lead Local Flood Authority and Environmental Health contaminated land officer
- SUDs must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination – refer to the following guidance
 - Pollution prevention for businesses - GOV.UK (www.gov.uk)
 - Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)
 - [Withdrawn] Pollution prevention guidance (PPG) - GOV.UK (www.gov.uk)
 - Oil storage regulations for businesses - GOV.UK (www.gov.uk)
 - Storing oil at your home or business - GOV.UK (www.gov.uk)
- The design of drainage systems should be in line with G1, G9, G12 and G13 position statements - Groundwater Protection Position Statements

5.5.7 **Ecology**

Refer to Natural England's advice within Appendix 1.

Known baseline

- The ES identifies the site 1.3m from Richmond Park (National Nature Reserve, SSSI and SAC).
- Potential for increased recreation pressure and traffic to impact upon this European designated site.

Comments / recommendations:

- Sensitive receptors
 - It is unknown how the conclusion *"the site is of limited value for the majority of ecological receptors with the potential presence on site limited to roosting bats and nesting birds"* (para. 6.91) has been reached given the lack of any ecological surveys to date.
 - Sensitive receptors need to be expanded to include:
 - Surrounding Other Sites of Nature Importance and Site of Metropolitan Importance
 - Habitats onsite (and consideration to the wider context of the site in terms of habitat linkages):
 - Badgers
 - Birds
 - Bats
 - Invertebrates
 - Habitats within the Richmond and UK Biodiversity Action Plan
- Potential impact: The SOR Report does not fully outline potential impacts. This should include, but not be limited to:
 - Loss and disturbance to habitats
 - Habitat fragmentation
 - Disturbance to bat commuter routes during construction and from the layout and height of the proposed Development.
 - Impact on the movement of species / population as a result of the construction and Development.

- The long-term change and impact on protected species, habitat type, ecological value on site and adjacent to the site – during construction, operational development and cumulatively through the phases of development.
- Impact on ecological value of site as a result of:
 - Loss of landscaping / trees
 - Dust
 - Air quality
 - Lighting
 - Water quality and run off
 - Works
 - Increased recreational pressure
 - Noise
- Consideration must also be given to badgers, not because there is a sett within the development area but because they are very likely to cross the site and wildlife corridors will need to be provided and maintained to allow them to continue to cross the area.
- Consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.
- The ES should assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP) and Richmond Biodiversity Action Plan, this will include surveys, impact assessment and mitigation proposals
 - UK BAP | JNCC - Adviser to Government on Nature Conservation - These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' and Section 40 of the Natural Environment and Rural communities Act 2006 places a general duty on authorities to conserve and enhance biodiversity - Biodiversity duty: public authority duty to have regard to conserving biodiversity - GOV.UK (www.gov.uk)
 - Richmond upon Thames (habitatsandheritage.org.uk)
- The ES should thoroughly assess whether the scheme will have an impact, and what this would be, on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS).
- Natural England advise the ES should assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the LPA may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.
- Natural England have decided not to comment on the detail in the SOR report given the proposal does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha. The site falls outside the buffer area of internally and nationally designated sites and therefore appears unlikely to affect such.

Assessment methodology

- Ecological site walkover to establish baseline on the site and undertake further Phase 2 surveys
 - How will baseline conditions be established?

- The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results detailed.
- A qualitative and quantitative ecological impact assessment (EcIA) will be undertaken, following the principles set out in the CIEEM publication Guidelines for Ecological Impact Assessment (updated in January 2019), and will include consideration and assessment of potential for impacts arising from the proposals on ecological receptors, including loss or damage to habitats (permanent or temporary), effects on protected, or other notable species of nature conservation value, potential for indirect impacts such as disturbance and any cumulative impacts.
- Mitigation measures, ecological enhancement measures, and any residual effects on ecological receptors (should any exist following mitigation) will be detailed.
- A Biodiversity Impact Assessment (BIA) utilising Defra's 3.0 metric.

Recommendation and comments:

- Records should be sought from the local authority, appropriate local biological record centres, nature conservation organisations, groups, RIGS and individuals;
- The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - Criteria for determining the value of the receptors
 - Significance criteria and how will this be measured
 - How will the indirect impacts upon nearby receptors will be assessed?
- The ES should assess the impact of all phases of the development on protected species.
- The ES should assess the impact of the proposals on habitats in line with the UK Biodiversity Action Plan (BAP) and Richmond Biodiversity Action Plan,
- Consider paragraphs 170-171 and 174-177 of the NPPF that sets out guidance on how to take account of biodiversity interests.
- Refer to Natural England's standing advice - [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Mitigation

- The SOR Report deems mitigation will be likely to be limited to roosting bats or nesting birds.
- Opportunities for ecological enhancements is recognised –biodiverse roofs, trellis based green walls, street trees, bird and bat boxes and invertebrate's features.
- Mitigation measures will be set out within the Ecological Impact Assessment, along with details of proposed ecological enhancement measures, and any residual effects on ecological receptors (should any exist following mitigation)
- Proposal will seek to exceed the 10% net gain target set out in emerging legislation.

Recommendations

- Mitigation for the loss of trees and landscaping may also require green / brown roofs, green walls, additional soft landscaping, bird and bat boxes and invertebrate features.
- An Ecological demolition / construction method statement will be required.
- Sensitive lighting strategy is required – details required at point of submission
- Refer to the UK and Richmond Biodiversity Action Plan for mitigation measures
- Achieve the necessary Urban Greening Factor, as identified within the London Plan
- When considering opportunities for habitat creation / enhancement, reference should be made to Guidelines for Ecological Impact Assessment (EcIA) developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5.5.8 Climate Change

Known baseline

The SOR report adopts the United Kingdom's Climate Impact Programme (UKCIP) climate projections for the new 80+ years:

- Summers will become hotter and drier;
- Winters will become milder and wetter;
- Soils will become drier on average;
- Snowfall and the number of very cold days will decrease;
- Sea levels will rise; and
- Storms, heavy and extreme rainfall, and heatwaves will become more frequent.

The ES will establish climatic data (temperatures and precipitation) from the Met Office. Baseline climate change data will be obtained for the 2030s, 2060s and 2090s.

Potential Effects:

Potential impacts on human receptors and the proposed development.

During construction:

Release of additional greenhouse gases through:

- Construction
- Construction transport
- Embodied carbon of materials and waste

During operation:

- Overheating and associated health implications
- Soft landscaping failure - from extreme weather events and summer temperatures
- Water shortage for public use and landscaping
- Energy emissions
- Transport

The impact of climate change on the construction of infrastructure and pedestrian comfort of construction workers are predicted to be not significant.

Comments:

- The SOR Report does not identify the sensitive receptors, nor the criteria for determining their value.

Approach and methodology

1. The Met Office data will be used to analyse the current climate and compare these findings, in relation to the proposed development, to the high emission (RCP 8.5) climate change projections identified in the UK Climate Change Projections 2018 (UKCP18)
2. The assessment will follow guidance within the:
 - IEMA EIA Guide to Climate Change Resilience and Adaptation (2020)
 - IEMA EIA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2017)
3. The assessment will include:
 - An assessment of the climate change resilience of the proposed development.
 - An assessment of the greenhouse gas impacts of the proposed development; and
 - A summary of the in-combination climate impacts of the proposed development.
 - The greenhouse gas emissions of the proposed development will be quantified based on the Energy Statement and Whole Life Carbon Assessment.

Comments:

- What are the significance criteria for measuring the impact?
- The scheme should:

- Undertake an energy assessment to demonstrate:
 - Meet the energy Hierarchy - Be lean, clean, green, and seen
 - Net zero carbon standards
 - A minimum on-site reduction of at least 35% beyond Building Regulations is met, with the residential development achieving 10%, and non-residential development achieving 15% through energy efficiency measures.
 - National water standards – 110 l/p/d
 - Sustainable Construction Checklist is passed
 - BREEAM Excellent is met
 - Whole Life Cycle Carbon Assessment to demonstrate actions to reduce life-cycle carbon emissions
- The England Biodiversity Strategy establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained.

Mitigation measures:

- Mitigation measures to increase climate change resilience and reduce greenhouse gas emissions will be embedded into the design
- Mitigation measures to reduce greenhouse gas emissions from construction will be embedded into the construction management procedures.
- The Climate Change ES Chapter will outline these measures.

Comments

- The requirements of the adopted London Plan and Local Plan in relation to on-site decentralised energy (zero or low emission) will need to be met.
- Contribution towards the Carbon offset fund
- Meet the cooling hierarchy - Orientation, shading, high albedo materials, fenestration, insulation, provision of green infrastructures, energy efficient design, exposed internal thermal mass and high ceilings, passive ventilation, mechanical ventilation, active cooling systems.

5.5.9 Socio-economic

Known baseline

- Site is located within the LB Richmond upon Thames
- The SOR report outlines:
 - Median age: 38 years for whole Borough, and within Ham, Petersham and Richmond Riverside Ward, 40 years.
 - Ethnicity within the Ward: 94.1% of residents are white; 7.4% are Asian / Asian British; 3.8% mixed / multiple ethnic groups and 2.1% have Black / African / Caribbean / Black British ethnicity.
 - Health data from census, and comparisons with rest of Borough
 - Employment and unemployment figures
- Deprivation data – west of the site is within 30% and 20% of the most deprived neighbourhoods in the country, according to the Indices of Multiple Deprivation (2019) and Income Deprivation Domain and Employment Deprivation Domain, respectively.

Recommendations / comments

- The SOR Report comments on population in general when considering baseline. Need greater detail on sensitive receptors, including existing and future:
 - Residents
 - Visitors of community space / facilities – centres, schools, medical

- Users of public open space
- Businesses
- The scoping report does not indicate how the baseline (for all potential effects) will be identified and valued - Need to detail
- Outline employment figures for Ward
- All three-local state-funded primary schools have space for expansion, temporary or permanent, from one to two forms of entry should additional places be required. However, at present, there is some spare capacity which would first need to be filled before expansion - either temporary or permanent - of any of the three schools could be justified.
- The EIA should include a baseline assessment of the current provision of recreational facilities (including the playing fields) within the local area, along with any deficiencies or surplus capacity in such provision. The Council's Playing Pitch Strategy and the accompanying assessment report can be used as a starting point in this regard.

Potential Impacts:

- Effects on employment provision (construction and operation) and spending by new local residents (during operation)
- Delivery of housing and affordability
- Demand for childcare, primary schools and secondary schools
- Demand for primary health facilities, including GP surgeries and dentists
- Effects on community services and open space
- Effects on crime at site level

The LPA recommends the following potential impacts are also considered:

- Economy - Spending from construction employees
- Housing - Impact during the phasing of Works.
- Health:
 - Whilst the ES will identify the baseline and potential impact of the development on primary healthcare facilities including GP surgeries and dentists, the impact of the development will extend beyond these services to include wider primary care and community services. The closest GP surgery to Ham Close is Lock Road Surgery, a branch of Seymour House Surgery in Richmond. Seymour House is part of the Richmond Partners Primary Care Network and there is the expectation that the network of practices will accommodate a wider range of services in addition to core GP services.
 - Impacts on well-being, physical and mental health as a result of loss of and / or provision of open space, children's playspace, soft landscaping.
 - The value and role of the Village Green, also for mental health and wellbeing, within the neighbourhood seems to have been overlooked. It should be noted that the adopted Ham and Petersham Neighbourhood Plan seeks an appropriate range of community facilities which will promote the health, education, physical, mental and spiritual development of all residents, particularly the young and elderly.
 - The proposed site boundary excludes Ham Clinic. Hounslow and Richmond Community Healthcare NHS Trust provide services from the clinic. The Trust and CCG would need to be assured that services delivered from the clinic would not be disrupted during the construction stages
- Schools:
 - Primary Education: Impact on schools within Ham and Petersham and the state-funded primary schools in North Kingston.
 - Secondary Education: Impact on Grey Court School, and potential knock-on adverse impact on the likelihood of children living further afield within the borough (and in RB Kingston upon Thames) being able to access places at the school.
- Community facilities:
 - Potential individual and cumulative impacts on local services and amenities, such as the provision of, and public access to, community facilities within and outside

the Site, including community centre, local playgrounds, sport facilities, playing fields, and allotments.

- Open space:
 - Impact arising from loss of adjacent school playing field and Woodville Centre open space.
 - Impact of the development through the phases of Works
 - the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation.
 - Impacts upon playspace

Assessment methodology

Undertake a policy review and desktop review to provide:

1. Information on current socio-economic conditions using relevant local, regional, and national data:
 - Population demographics,
 - Levels of deprivation
 - Local social infrastructure – schools and GPs
2. Assess how the new uses of the site will impact upon the existing conditions – child yield; school place provision, economic impacts including direct and indirect employment generation and additional local spend.
3. Present quantitative and qualitative evaluations
4. Identify mitigation measures both through the condition and operational phases

Recommendation / comments:

- The SOR Report does not detail the evaluations, and there is a lack of detail of the significance criteria, both of which is require.
- As part of the policy / desk top review examine:
 1. Local Housing Needs Assessment and Appendix
 2. School Place Planning Strategy
 3. Playing Pitch Strategy Assessment Report
 4. Playing Pitch Strategy
 5. Indoor Sports Facility Needs Assessment
 6. Open Space Assessment Report
 7. Population Yield Calculator for play
 8. Play and Informal Recreation SPG
 9. Reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced Highway land searches - London Borough of Richmond upon Thames
 10. Obtain crime analysis of the local area
 11. Demonstrate the scheme meets Secured by Design
- It is recommended to assess and deal with socio-economics chapter within the ES in four parts:
 1. Socio-economics in relation to housing
 - a) Should address the impact through the phasing
 - b) This should addresses how the provision of new homes, including in particular affordable homes, will address local priority needs as set out in the adopted Local Plan - these must be genuinely affordable in relation to the Council's Tenancy Strategy and Intermediate Housing Policy Statement, and comply with the Local Plan's tenure split for affordable rent and intermediate.
 - c) The socio-economic assessment should include an assessment of the range of housing choices being offered, in terms of the mix of housing sizes, types, taking account of needs of different groups, and this includes affordable housing. Any scheme is expected to provide for inclusive, mixed and balanced

communities, in terms of tenure and household income, and this should foster social diversity which will help to create successful and integrated neighbourhoods.

2. Socio-economic impacts in relation to health and wellbeing including community infrastructure,
 - i. The scoping report does not indicate how the healthcare baseline will be identified or how the impact will be assessed. This must be agreed in advance of the ES being prepared and NHS South West London CCG and the Council's Public Health Team welcome the opportunity to discuss the use of NHS data, agree the data sources and assumptions to be used, and scope of the assessment and methodology.
 - ii. It is recommended that in addition to the GLA population yield calculator, which is designed for education purposes, the HUDU Planning Contributions Tool (HUDU Model) is used to estimate the population yield, the healthcare impact and necessary mitigation.
 - iii. The HIA will be a standalone document, and the scoping of this should be agreed in advance with the LPA, Public Health and CCG. Whilst there is an overlap between health and socio-economic impacts (healthcare, education, and employment) the determinants of health also include environmental and wider social impacts. Therefore, it is important that the HIA brings together the effects and recommended mitigation identified in other chapters and addresses other issues and impacts not covered by the EIA, such as housing quality and design and access to healthy food.
 - iv. It is noted that there are references to health and the IMD (para 6.100 – 6.102), the assessment will consider the effects on crime, which presumably will cover both actual crime and the perceived threat of crime.
 - v. It will be important to ensure adequate re-provision of existing community facilities and community use to be secured. (The quality, quantity, and availability of the on-site facilities to the community needs to be clearly explained, including broad terms and conditions of use, to enable the LPA to understand the actual contribution and benefit the new development will deliver to the local community.)

3. Socio-economics in relation to open space and play space.
 - i. Open space:
 1. The assessment of open space provision in the local area should be based on actual walking distances rather than as the crow flies. The methodology should follow the public open space categorisation as set out in the London Plan relevant Local Plan policy.
 2. When considering the impact of the development arising from the loss of open space, the assessment should follow para. 99 of the NPPF, taking into account the Council's – Playing Pitch Strategy Assessment Report; Playing Pitch Strategy and Open Space Assessment Report
 - an assessment has been undertaken which has clearly shown the open space / land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
 3. The EIA should detail the assessment of the existing and wider green infrastructure network, including how the proposed development could

- impact on it. Particularly attention needs to be brought to any effects on the designated OOLTI/POS.
4. Natural England and the NPPF (paragraph 100) expects developments to protect and enhance public rights of way and access. Therefore the ES should include an assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. This should include pedestrian comfort values.
 5. When considering the impact on open space, it is expected the proposals are required to meet the Public Open Space (POS) needs arising out of the development. The Local Plan requires larger developments to provide on-site public open space within the scheme, with the aim to strike a balance between private, semi-private and public open space provision.
- ii. Play space:
 1. Detail any loss of play space
 2. Detail the child occupancy assessment to determine the estimated child yield arising from residential development. This calculation should be made based on the formula provided in the Mayor's SPG – population yield calculator
 3. Detail the play space needs assessments – area, proposed location, breakdown for the different age groups. This should follow the Mayor's Play and Informal Recreation SPG
 4. Detail the new dedicated on-site play space would be made publicly accessible to ensure integration within the existing area.
 5. Detail any necessary offsite contributions for improvements
 - iii. Playing fields – as advised by Sport England (who will be a statutory consultee), the NPPF and Local Plan:
 1. Detail any loss of playing fields.
 2. The implications for sport should be considered in the context of NPPF Para's 99, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application:
 - an assessment has been undertaken which has clearly shown the open space / land to be surplus to requirements; or
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
 3. General guidance on assessing the need to protect, enhance and provide sports facilities can be found in the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications
4. Socio-economics in terms of economy
- Given that the overall development will be phased over many years, a mechanism to monitor and evaluate the construction and operational impacts and mitigation measures is recommended.

Likely form of mitigation

Impacts upon local healthcare facilities and local schools – if these cannot be covered through CIL payments, mitigation will be addressed through Section 106 financial contributions.

Recommendations and comments:

1. Health: The NHS South West London CCG comment, *“it is noted that paragraph 6.107 refers to the expected adverse impact on local healthcare and the possible requirement for developer contributions to mitigate the impact. Whilst there is no requirement for primary care services to be relocated within the Ham Close redevelopment, the impact of the additional demand on the Lock Road Surgery site may necessitate the need for a s106 financial contribution”*.
2. Community facilities: Ensuring adequate re-provision of existing community facilities and community use are secured.
3. Playspace: Contributions for improvements elsewhere to offset the impact from any potential uplift as a result of the development.
4. Playing fields: Contributions for improvements elsewhere
5. Openspace: Natural England expects to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation.

SECTION 6 – PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT

The SOR is proposed to have the following structure:

Volume 1: Main Text and Figures. It is proposed for this to include an introduction, brief summary, policy, and legislative context for each topic / chapter; methodology; study area; significance criteria; basement line conditions; impact prediction; mitigation measures and conclusion.

















Volume 2: Technical Appendices, including full text of any report's references within technical chapters.

Volume 3: Built Heritage, Townscape and Visual. This will include the same content as Volume 1 relevant to the subject, presented in A3 format so visualisations can be read alongside the assessment.

Volume 4: Non-Technical Summary, presented using non-technical language, to understand the site context, development, issues arising and proposed mitigation.

Comments and recommendations:

1. Whilst no objection is raised to the proposed structure, within the ES, it must:
 - Be able to be read as a standalone document with no significant reliance on external documents.
 - Contain the information specified within the 2017 Regulations, including:
 - Information identified with Regulation 18(3)
 - The requirements of Regulation 18(4); and
 - Any additional information specified in Schedule 4 to the 2017 Regulations which is relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected. However, as the national guidance states, these should be proportionate and not be any longer than is necessary to assess properly those effects.
2. It is recommended the impacts arising, proposed 'mitigation' (or measures to avoid, prevent, reduce, or offset) and final impact for each topic is summarised within a table within Volume 4.
3. The planning policies and legislative context referred to within the individual technical chapters includes those outlined in Section 2 of the SOR and:
 - National Planning Policy Framework
 - Chapter 10 Supporting high quality communications
 - Chapter 11 Making effective use of land
 - Chapter 13 Protecting Green Belt land (MOL context)
 - Chapter 15 Conserving and enhancing the natural environment
 - Chapter 16 Conserving and enhancing the historic environment.
 - London Plan
 - Local Policy - Supplementary Planning Documents and Guidance:

- [Draft Supplementary Planning Documents](#)
- [Sustainable Construction Checklist](#)
- [Public Space Design Guide](#)
- [Affordable Housing](#)
- [Design Quality](#)  (pdf, 2021KB)
- [Planning Obligations](#)  (pdf, 400 KB) (adopted 2 June 2020  (pdf, 72 KB))
- [Refuse and Recycling Storage Requirements](#)  (pdf, 134KB) (adopted 8 May 2015  (pdf, 85KB))
- [Residential Development Standards](#)  (pdf, 1311KB) and [Housing Optional Technical Standards update](#)  (pdf, 32KB)
- [Small and Medium Housing Sites](#)  (pdf, 1579KB)
- [Sustainable Construction Checklist](#) (adopted 12 January 2016  (pdf, 80KB))
- [Telecommunications Equipment](#)  (pdf, 174KB) (adopted June 2006)
- [Transport](#)  (pdf, 865 KB) (adopted 2 June 2020  (pdf, 78 KB)) - questions or queries relating to the application of transport strategy and this SPD should be made to transportation@richmond.gov.uk
- [Conservation Areas](#)  (pdf, 3.88MB)
- [Contaminated Land](#)  (pdf, 64KB)
- [Design for maximum access](#)  (pdf, 3984KB) (1991) and [Housing Optional Technical Standards update](#)  (pdf, 32KB)
- [Listed Buildings](#)  (pdf, 619KB)
- [Nature Conservation and Development](#)  (pdf, 1230KB)
- [Security by Design](#)  (pdf, 108KB) (2002) - Please refer to new technical mandatory requirements as set out in [Part Q Building Regulations](#) from 1 October 2015 (e.g. secure door sets and windows); other elements of the SPG related to design remain relevant to the assessment of a planning application. Contact police Design Out Crime Officers for advice regarding [Secured by Design](#) 020 8247 5834.
- [Trees: Landscape Design, Planting & Care](#)  (pdf, 797KB)
- [Trees: Legislation and Procedure](#)  (pdf, 980KB)
- [Basement development - Planning Advice Note](#)
- [Guidance on producing a Flood Emergency Plan](#)  (pdf, 1466KB) - Planning Advice Note
- [Public Space Design Guide](#)
- [Sustainable Drainage Systems - Planning Guidance](#)  (pdf, 1364KB)
- [Construction Management Plan - Guidance notes and template](#)  (pdf, 159 KB)

It is worth noting the Council is currently in the process of reviewing the Local Plan, with the new emerging Local Plan (regulation 18) version out for consultation, which commenced on 10 December. This takes forward the site allocation for Ham Close. Whilst this emerging Plan is still at a stage where it is not considered to be a material planning consideration, it should be noted that a number of evidence base studies and supporting documents have also been published, which are now of relevance. This includes the Urban Design Study (2021), which provides a boroughwide townscape character assessment, with a deep understanding of the values, character and sensitivity of the different parts of the borough, combined with the reality of future development pressures to assess capacity. This Study identifies Ham Close as a mid-rise building zone (5-6 storeys), with the opportunity for any new development to respond appropriately to the surrounding landscape and scale. The weight to be given to this document will increase as it progresses through the review process- [Draft Local Plan - London Borough of Richmond upon Thames](#)

The Council has published a number of the research and studies forming the evidence base for the new Draft Local Plan, which should be taken considered.

- [Open Land Review \(Green Belt, MOL, LGS and OOLTI\) \(2021\)](#)
- [Review of Sites of Importance for Nature Conservation \(2021\)](#)
- [Urban Design Study \(2021\)](#)
- [Employment Land and Premises Needs Assessment \(December 2021\)](#)
- [Local Housing Needs Assessment \(stage 1\) \(July 2021\)](#)
- [Retail and Leisure Needs Study \(phase 1\) \(July 2021\)](#)
- [Strategic Flood Risk Assessment and groundwater investigation](#)

More information on the new Draft Local Plan, supporting documents and timetable can be found on the Council's website - [Draft Local Plan - London Borough of Richmond upon Thames](#)

4. The SOR Report (section 7.0) confirms the additional material that will be submitted. The following additional documents are also recommended:

- Heritage Statement
- Photomontage
- Upload scheme onto V2 city
- Streetscape drawings
- Parking surveys, parking layouts, and turning cycles within the Transport Assessment
- SUDs report to include the London Sustainable Drainage Proforma and Statement on Sustainable Drainage systems
- Foul sewage and utilises statement
- Sustainability Statement to include the Sustainable Construction Checklist
- Energy Statement to include:
 - 'Be Seen' monitoring
 - Decentralised Energy Network feasibility
- National Water Standards Statement
- Open Space Assessment
- Play and Child Occupancy Assessment
- Public Open Space Assessment
- Playing fields and sports facilities Assessment
- Landscaping Scheme
- Arboricultural Impact Assessment
- Arboricultural Method Statement
- Ecology Report to include:
 - External lighting plans and specification details, including spectrum and spillage details
 - Mitigation and enhancement measures
 - Net gain assessment
- Urban Greening Factor
- Green / brown roof details
- Acoustic Reports
- Air Quality Assessment including, Air Quality Impact Assessment; demonstrating emissions neutral and mitigation measures
- Inclusive Access Statement
- Wheelchair Housing Statement

SECTION 7 – OVERALL SUMMARY

This opinion has been prepared by the LBRuT as LPA with all reasonable skill, care, and diligence. It is based on the information contained in SOR Report provided to LBRuT on behalf of the Applicant by Greengage Environmental Ltd on 9 November 2021, and the comments and opinions resulting from consultation with consultees prior to adopting this opinion.

Whilst the SOR Report was accompanied with the information required under Regulation 15 (2a) (i) -(iv), the LBRuT has a number of comments and concerns, which include:

- Greater explanation needed on the description of the development
- Greater detail required of the construction and phasing of the development
- Lack of detail and vagueness of the sensitive receptors and factors likely to be significantly affected. Further receptors are recommended, and the full details should be agreed with the LPA prior to preparation of the ES.
- Lack of detail on all baseline surveys and establishing / evaluating baseline conditions
- Lack of detail of the assessment methodology
- Lack of detail how the criteria against which the significance of effect will be evaluated - It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification
- Further 'likely significant effects' are suggested
- Recommendations for the topics to be scoped out
- The LPA is unable to determine whether Transport can be scoped out
- Lack of clarity regarding the reasoning for wind to be scoped out
- Lack of detail on reasonable alternatives
- Further mitigation measures are suggested

On the basis of the above, it is recommended that the LPA and the Applicant continue to work in consultation to address outstanding issues contained in this opinion. Finally:

- The Authority would expect the final Environmental Statement (ES) to include all necessary information as outlined in Regulations 18 (3-5) and Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017.
- The fact that LBRuT has given this opinion, in line with Regulation 16 of the 2017 Regulations, the Authority shall not be precluded from requiring additional information to supplement the Environmental Statement, where it is necessary to reach a reasoned conclusion on the likely significant effects of the development, in connection with an application for planning permission for the same development.

APPENDIX 1

Consultees contacted by LBRuT during the EIA Scoping Process and their response

EXTERNAL CONSULTTEES

1. NATURAL ENGLAND

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:
 - a. a description of the location of the development;
 - b. a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
 - c. a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
 - d. an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with

reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:
 - a) the construction and existence of the development, including, where relevant, demolition works;
 - b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
 - c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
 - d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
 - e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
 - f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
 - g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b)
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

IF THE SCOPING REPORT CONCERNS ONSHORE OIL AND GAS EXTRACTION PLEASE ADD A BULLET POINT 9. TEXT TO INSERT CAN BE FOUND ON THE AREA TEAM TOOLKIT SEE LINK BELOW. INSERT THE GENERAL PRINCIPLES PARAGRAPH http://neintranettechnical/content/technical/topics/document_details.asp?DC=2209

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework (NPPF) sets out guidance in paragraphs 170-171 and 174- 177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement.

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process. Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the Natural England website - [Natural England - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

2.3 Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System. The area likely to be affected by the proposal

should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Natural England has adopted standing advice([Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](#)) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4 Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5 Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently published ([UK BAP | JNCC - Adviser to Government on Nature Conservation](#)) under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'. - [\[Withdrawn\] Guidance for Local Authorities on implementing the biodiversity duty - GOV.UK \(www.gov.uk\)](#)

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. Landscape, Access and Recreation

3.1 Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the Landscape Character Assessment Guidance for England and Scotland (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page [National Character Area profiles: data for local decision making - GOV.UK \(www.gov.uk\)](#)

3.2 Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced

4. Land use and soils

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution. Defra published a Construction Code of Practice for the sustainable use of soils on construction sites (2009) ([Code of practice for the sustainable use of soils on construction sites - GOV.UK \(www.gov.uk\)](#)). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra Guidance for successful reclamation of mineral and waste sites. [\[ARCHIVED CONTENT\] UK Government Web Archive - The National Archives](#)

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011 - [pb13583-biodiversity-strategy-2020-111111.pdf](#))

(publishing.service.gov.uk). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The England Biodiversity Strategy ([untitled \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" ([National Planning Policy Framework \(publishing.service.gov.uk\)](http://publishing.service.gov.uk) Paras 170 and 174), which should be demonstrated through the ES.

2. THE ENVIRONMENT AGENCY

This document sets out the key environmental issues and sources of information which should be considered to determine the effects of a proposal, when preparing an Environmental Impact Assessment, within the remit of the Environment Agency. Proposals should be designed to avoid or minimise negative environmental impacts, and incorporate positive environmental enhancements.

Due to the high volume of work we are unable to provide comments on Environmental Impact Assessment Scoping Reports at the present time, with the exception of:

- proposals within 20 metres of a main river and
- those under the Nationally Significant Infrastructure Project; Highways Act and Transport and Works regimes.

A handbook for Scoping Projects can be accessed on the following weblink:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296952/geho0411btrf-e-e.pdf

Further pre-application options: We are able to provide detailed and bespoke advice and answer technical questions for a charged fee which equates to £100 per hour plus VAT. If you are interested in finding out more about this service, please email: kslplanning@environment-agency.gov.uk. We can explain this service and provide you with a bespoke quote for further pre-application advice that you may require

Flood risk (Tidal/ Fluvial)

Development must be safe and should not increase the risk of flooding. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If your proposed development is located within flood zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG) <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Here you can determine whether the flood risk vulnerability of your proposed development and the flood zone are compatible. You can also establish if there are flood risk sequential test and exception test requirements for your proposed development.

If your proposed development is located within flood zone 2 or 3 and its vulnerability and flood zone are considered acceptable under the NPPG then a site specific Flood Risk Assessment (FRA) is required to support any subsequent planning application. This is required by paragraph 103 of the National Planning Policy Framework (NPPF) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Guidance on the content of a site specific FRA can be found on the NPPG and at: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at kslenquiries@environment-agency.gov.uk for further details.

Finished floor levels

We request that for any new developments within Flood Zones 2 and 3, finished floor levels are set no lower than 300 millimetres above the 1 in 100 chance in any year including an allowance for climate change flood level, to protect people and property from flooding. Where this cannot be achieved due to other planning constraints, we request that floor levels are set as high as possible (for extensions to existing buildings, no lower than the existing floor levels) and that flood resilience/resistance measures are considered, where appropriate, up to the design flood level. Information on preparing property for flooding can be found on the Gov.UK website in the documents 'Improving the Flood performance of new buildings' and 'Prepare your property for flooding'. [Flood resilient construction of new buildings - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and [Check for flooding - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Increase in built footprint

Your proposal will need to demonstrate that any increase in built footprint within the 1 in 100 chance in any year flood extent including an allowance for climate change can be directly compensated for, on a volume-for-volume and level-for-level basis to prevent a loss of floodplain storage. If it is not possible to provide level for level flood plain compensation then other forms of mitigation may be considered if agreed with the Local Planning Authority (LPA) or there should be no increase in built footprint. It will need to be demonstrated that the proposed development does not impact the flow and conveyance of water. Please note the use of voids, stilts or undercroft parking as mitigation for a loss in floodplain storage should be avoided, as they may become blocked over time by debris or domestic effects. We would not recommend these methods to the LPA as an acceptable means of compensation.

Proximity to watercourse

We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall.

Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with

them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Flood Risk Activity Permit

Under the Environmental Permitting (England and Wales) Regulations 2016, you must submit plans to the Environment Agency and apply for a Flood Risk Activity Permit if you want to do work:

- In, over or under a main river
- Within 8m of the bank of a main river, or 16m if it is a tidal main river
- Within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river

Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment.

Further guidance on applying for flood risk activity permits can be found at <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Flood risk activity permits are required irrespective of any planning permission and are not guaranteed.

Safe Access

During a flood, the journey to safe, dry areas completely outside the 1 in 100 chance in any year plus including an allowance for climate change floodplain would involve crossing areas of potentially fast flowing water. Those evacuating on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including for example unmarked drops, or access chambers where the cover has been swept away.

Safe access and egress routes should be assessed in accordance with the guidance document 'FD2320 (Flood Risk Assessment Guidance for New Developments)'. Where safe access cannot be achieved, an emergency flood plan that deals with matters of evacuation and refuge to demonstrate that people will not be exposed to flood hazards should be submitted to and agreed with the local planning authority.

We recommend that you also discuss safe access and egress routes with the local authority emergency planners as they will be responsible for agreeing to any emergency plan submitted with your application.

The Environment Agency can provide any flooding information which we have available – such as predicted flood levels and historical flood data – for use in FRAs. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at kslenquiries@environment-agency.gov.uk for further details.

Climate Change Allowances

On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances in a site-specific FRA: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

If you have any questions regarding this guidance, please contact our Customers and Engagement Team at kslenquiries@environment-agency.gov.uk

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 ([Thames Estuary 2100 \(TE2100\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484442/Thames_Estuary_2100_TE2100_-_GOV.UK_www.gov.uk.pdf)) plan, any application in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

Chapter 9 of the TE2100 Plan outlines four generic estuary-wide options to deliver our strategic vision for flood risk management in the Thames Estuary. Where relevant these should be taken into account as part of the Environmental Impact Assessment.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use in designing your scheme. To request these you should contact our Customers and Engagement Team at kslenquiries@environment-agency.gov.uk.

Ecology

If your proposed development is located on or within 8 metres of a main river or 16 metres of a tidal main river, an ecological survey is required to establish whether development is likely to have a detrimental impact on the biodiversity of the watercourse. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment. In accordance with the National Planning Policy Framework (NPPF), any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it. Opportunities to incorporate biodiversity in and around the development will be encouraged.

Your scheme should be designed with a naturalised buffer zone of at least 8 metres from the main river or 16 metres from the tidal main river to protect and enhance the conservation value of the watercourse and ensure access for flood defence maintenance.

This buffer zone should be managed for the benefit of biodiversity for example by the planting of locally appropriate, UK native species. The buffer zone should be undisturbed by development with no fencing, footpaths or other structures.

This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements. To identify any Main Rivers in proximity to your proposed development please see our Main Rivers Consultation Map: <http://apps.environment-agency.gov.uk/wiyby/151293.aspx>

Water Framework Directive (WFD)

With any development alongside watercourses, consideration should be given to the requirements of the Water Framework Directive (WFD) <http://ec.europa.eu/environment/water/water-framework/>. This includes preventing overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan <https://www.gov.uk/search?q=River+Basin+Management+Plans>.

Where appropriate, a WFD Assessment (<http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/>) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. In some cases the requirements of a WFD assessment can be incorporated into an Environmental Impact Assessment (EIA). Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.

Groundwater Quality

Development must not cause pollution to the water environment.

Source Protection Zones

These zones indicate that an area is very sensitive to pollution risks due to the proximity of drinking water sources and the way groundwater flows. In these areas we may consider it inappropriate for development to discharge foul or surface water into the ground.

To see if your proposed development is located within a Source Protection Zone, please use our online map: <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

Land affected by contamination

The NPPF takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of remediation.

Where contamination is known or suspected, you will need to demonstrate how the proposed development both during construction and after the construction phase will not negatively affect water quality in surface water or groundwater bodies. As part of your planning application, we would expect to see as a minimum, a Preliminary Risk Assessment (PRA), such as a site walkover or conceptual model. Where contamination may have a pollution risk to controlled waters, site investigation and remediation strategy reports may be required. Where these reports are missing or where they fail to demonstrate that there will be no adverse impact of the environment, we are likely to raise an objection to the planning application.

Site investigation and remediation strategy reports may be required for submission with a planning application for sensitive land use types or where significant contamination, or uncertainty, is found. When dealing with land affected by contamination, developers should follow the risk management framework provided in the Land Contamination Risk Management Principles, Model Procedures for the Management of Land Contamination: <https://www.gov.uk/government/publications/managing-land-contamination>

Surface water drainage

We recommend the use of Sustainable Drainage Systems (SuDs). The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

Generally, we do not support the use of deep borehole soakaways. We are concerned that boreholes, wells and deep soakaways designed for water disposal at depth could bypass any potential attenuation layers and offer a direct conduit for the rapid transport of contaminants to groundwater. Where necessary, we will seek to control the depths of these soakaway systems by recommending maximum penetration depths and a requirement that the water table shall not be intersected. In general, groups of shallow soakaways are preferable to one or two deep boreholes.

Though generally no permit would be required, this is dependent on the perceived risk and the quality of any pollution prevention measures proposed to mitigate the risk.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to

act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Surface water drainage should always be carefully considered in discussions with the Lead Local Flood Authority, who are responsible for providing advice on the management of surface water from new larger developments. Please consult them for their comments on your proposal.

Pollution

Please also note that any surface water drainage system must not pose a risk to groundwater quality and must not be constructed in ground affected by contamination. Further guidance is available at the following links:

- [Pollution prevention for businesses - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/pollution-prevention-for-businesses)
- [Discharges to surface water and groundwater: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/discharges-to-surface-water-and-groundwater-environmental-permits)
- [\[Withdrawn\] Pollution prevention guidance \(PPG\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/withdrawn-pollution-prevention-guidance)
- [Oil storage regulations for businesses - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/oil-storage-regulations-for-businesses)
- [Storing oil at your home or business - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/storing-oil-at-your-home-or-business)

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Waste Waste management

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste.

Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. We recommends that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice - [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](https://www.nationalarchives.gov.uk/ukiair/definition-of-waste)
- [Environmental management : Waste - detailed information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-management-waste-detailed-information)

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Guidance on the classification and assessment of waste can be found in the Technical Guidance WM3 on the gov.uk website. - [Waste classification technical guidance WM3.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/guidance/waste-classification-technical-guidance-wm3)

Environmental Permitting Regulations

To see if your proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website:

<https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit>

From 6 April 2016 an Environmental Permit is required for any proposed works or structures, in, under, over or within 8m metres of the top of the bank of designated Main Rivers or 16 metres from a tidal main river. Please contact enquiries@environment-agency.gov.uk for more information.

Please note

This document is a response to a request for our EIA scoping opinion only and does not represent our final view in relation to any future planning application made in relation to any site.

You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.

If you have any questions please contact the Kent and South London Sustainable Places team: kslplanning@environment-agency.gov.uk

3. TRANSPORT FOR LONDON

TfL offers the following pre-application advice:

1. The site is over 4km from the nearest point of the Transport for London Road Network (TLRN). The Public Transport Access Level (PTAL) is 1b, on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport services. Bus service number 371 can be accessed from bus stops located on Ashburnham Road.
2. A Healthy Streets Transport Assessment (TA) should be prepared to support the application, in accordance with TfL's latest guidance. This should include an Active Travel Zone (ATZ) assessment. The layout of the proposed development should reflect pedestrian desire lines, which should be demonstrated in the ATZ assessment.
3. It is understood that a total of 300 car parking spaces are proposed, which equates to around 0.7 spaces per dwelling. This is compliant with the maximum parking standards set out in table 10.3 of the London Plan. Justification to support the proposed amount of car parking should be included in the TA, and it is expected that a Parking Design and Management Plan would be secured by condition. Disabled persons' car parking and the provision of electric vehicle charging infrastructure should be confirmed in accordance with the London Plan.

4. The proposed amount of car parking should meet the minimum standards set out in table 10.2 of the London Plan. The design of the cycle parking should reflect the London Cycling Design Standards (LCDS). It should be noted that basement level cycle parking is generally not supported due to concerns for user safety and amenity.
5. The TA should include a multi-modal trip generation assessment. Survey data should be obtained for the existing use to establish existing travel pattern where possible. Due to the location, further strategic highway assessment is not likely to be required, however the impact to local bus service capacities should be considered, and mitigation will be requested where required.
6. Delivery and servicing trips should be considered in the TA. A one-way route through the site for deliveries and servicing should be considered to reduce safety risks due to vehicles reversing. A detailed Delivery and Servicing Plan (DSP) should be secured by condition.
7. An outline Construction Logistics Plan (CLP) should be prepared to support the application, and a detailed CLP secured by condition.
8. Mayoral CIL is payable at a rate of £80 per square metre in the London Borough of Richmond upon Thames.

4. GREATER LONDON AUTHORITY

No comments received.

5. MARINE MANAGEMENT ORGANISATION

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs

mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process please follow the link <https://www.gov.uk/topic/planning-development/marine-licences>

6. HISTORIC ENGLAND

We have reviewed the Scoping Opinion submission available on your website. Whilst we do not have any observations to make in relation to the Scoping Opinion submission, we can confirm that Historic England would be a statutory consultee on any resulting planning application. We may provide comments once we have been consulted on the full application.

7. GLAAS HISTORIC ENGLAND

I have reviewed the EIA scoping report and agree with the conclusions that Archaeology should be **scoped in** to the Environmental Statement. This large site spans two Archaeological Priority Areas and has potential for buried remains dating to the prehistoric, medieval and post-medieval periods, as well as a lot of social history associated with the people who have lived and worked here throughout the 19th and 20th centuries.

The development provides a good opportunity to offset some of the environmental harm through public benefit and outreach. Policy HC1 of the 2021 London Plan encourages interpretation of heritage assets and this site offers a good opportunity to provide enhanced public benefit and demonstrate local distinctiveness. This should be considered at an early state in the design process and be fully integrated with the archaeological research and fieldwork to maximise the potential benefits. The public benefit could involve activities such as:

- using heritage cues to influence place making
- the installation of an exhibition on the history of the area within the new Makers Hub
- community excavations on Ham Village Green to investigate the remains of Manor Farm and the earlier 20th century housing in this area
- an oral history and recollections project to interview the long-standing residents of the estate.

Details of appropriate public benefit should be included within the Cultural Heritage ES Chapter; along with an up to date Archaeological desk-based assessment, a review of any geotechnical site investigations, and details of any additional pre-submission work (to be agreed with GLAAS).

8. SPORT ENGLAND

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

If you need any further advice please do not hesitate to contact Sport England using the contact details below (Planning.south@sportengland.org)

9. ROYAL BOROUGH OF KINGSTON UPON THAMES

No comments received.

10. RICHMOND BIODIVERSITY PARTNERSHIP

No comments received.

11. SOUTHWEST LONDON ENVIRONMENT NETWORK

No comments received.

12. THAMES WATER

Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments:

The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development&data=04%7C01%7Cbecca.shilstone%40richmondandwandsworth.gov.uk%7C75ab970e12d34dcc9e1608d9a82e6d05%7Cd9d3f5acf80349be949f14a7074d74a7%7C0%7C0%7C637725739619764555%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000&data=EMN3YJLqtijZvtFN0z3T3oYwqQdfensOBthAT69tRxQ%3D&reserved=0>

13. PUBLIC HEALTH

No comments received.

14. NHS SOUTH WEST LONDON CCG

We note that the proposed development comprises a phased mixed-use development of 452 residential homes, a community/leisure facility (Use Class F2) and a "Makers Lab" (sui generis). It should be noted that Ham Close comprises 192 existing homes and as such the proposed development will result in a net increase of 260 homes.

The proposed development site boundary (red line) excludes Ham Clinic. Hounslow and Richmond Community Healthcare NHS Trust provide services from the clinic. The Trust and CCG would need to be assured that services delivered from the clinic would not be disrupted during the construction stages. The current indicative construction programme assumes commencement on site in the fourth quarter of 2022 with completion in the fourth quarter of 2029.

We note that the socio-economic chapter will identify the baseline and potential impact of the development on primary healthcare facilities including GP surgeries and dentists. However,

the impact of the development will extend beyond these services to include wider primary care and community services.

The closest GP surgery to Ham Close is Lock Road Surgery, a branch of Seymour House Surgery in Richmond. Seymour House is part of the Richmond Partners Primary Care Network and there is the expectation that the network of practices will accommodate a wider range of services in addition to core GP services.

The scoping report does not indicate how the healthcare baseline will be identified or how the impact will be assessed. We would welcome the opportunity to discuss the use of NHS data and agree the data sources and assumptions to be used. We suggest that in addition to the GLA population yield calculator, which is designed for education purposes, the HUDU Planning Contributions Tool (HUDU Model) is used to estimate the population yield, the healthcare impact and necessary mitigation.

We note that paragraph 6.107 refers to the expected adverse impact on local healthcare and the possible requirement for developer contributions to mitigate the impact. Whilst there is no requirement for primary care services to be relocated within the Ham Close redevelopment, the impact of the additional demand on the Lock Road Surgery site may necessitate the need for a s106 financial contribution.

We note that paragraph 5.36 refers to a Health Impact Assessment will be provided as an appendix to the socio-economic chapter. No further details are provided. Whilst there is an overlap between health and socio-economic impacts (healthcare, education and employment) the determinants of health also include environmental and wider social impacts. Therefore, it is important that the HIA brings together the effects and recommended mitigation identified in other chapters and addresses other issues and impacts not covered by the EIA, such as housing quality and design and access to healthy food.

We suggest that advice is sought from the Council's public health team to discuss the scope of the assessment and the methodology. Given that the overall development will be phased over many years, we suggest that there should be a mechanism to monitor and evaluate the construction and operational impacts and mitigation measures.

15. CRIME PREVENTION OFFICER:

No comments received.

LONDON BOROUGH OF RICHMOND - INTERNAL CONSULTEES

16. TRANSPORT PLANNERS

Trip Generation and vehicular Traffic Impact

The applicant says that:

“Based on the trip generation assessment for a net increase of 260 residential units the expected multimodal two-way vehicle trips and total daily trips are expected below the threshold requirements for assessment.”

And therefore:

The net change in vehicle trips is less than 10% increase in the peak hours and throughout the day. In terms of annual average daily traffic (AADT), the net change would result in a 3.8% increase. This is shown in the multimodal trip generation tables in Appendix 1.

They have provided a multi-modal trip generation database for a net increase of 260 dwellings in Appendix 1 which shows that the number of vehicular trips generated will be less than the threshold at which detailed assessment is required. Appendix A of the Government Guidance on Transport Assessment (Department for Transport, 2007) is not now government policy, but most of the technical information in it is still used by Transport for London in their own explanation of how to complete a transport assessment. This document defines the threshold at which detailed analysis of the vehicular traffic impacts on a particular road link or junction might be required as being 30 or more two-way vehicular trips in the AM or PM weekday peak hours of 08.00-09.00 and 17.00-18.00.

The applicant has included a multi modal trip generation analysis of both the current and proposed residential dwellings. However, this analysis does not actually explain how the number of trips was derived for each mode (i.e., does not give a trip-rate). It also does not include details of the sites examined to arrive at the numbers of trips given. A standard TRICS analysis will need to include details of the site location, details of the PTAL, whether sites of particularly low or high car ownership have been included or excluded, the number of dwellings on each site, and whether the residential land use is the only one on the site or whether there are other land uses that might reduce the number of inter-site residential trips generated.

The applicant says:

Due to the lower car parking ratio the impact on the highway network is expected to be minimal and accommodated without perceptible impact to other road users. The change in traffic flows on Petersham Road is less than 10%.

The applicant needs to produce a TRICS trip generation assessment. They should make sure the assessment reflects the nature of the site and should get the total number of person trips generated. They can then use Mid-Level Super Output Area (MSOA) level Travel to Work data from the Census of 2011 to get the number percentage of trips per mode. They can also use MSA level Census data to get the likely location for residents who commute to work by each mode at: <https://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=undefined&zoom=12.0&lon=-0.1500&lat=51.5200> They can cross-reference this with a TRICS multi-modal trip generation analysis.

The applicant does not state what the car parking ratio will be, and whether parking spaces provided on site will be for existing residents who will be decanted and then move into the new development, or whether they will be allocated for all dwellers. The proposed development will result in overspill vehicular parking on roads and streets within 200m walking distance of the site which might affect road safety and accessibility. Therefore, along with a transport assessment and travel plan, a vehicular parking stress survey is needed for which the parameters have been discussed between the Planning Authority and the applicant.

I agree that, in addition to a full transport assessment, a parking stress survey, and a framework travel plan, a delivery and servicing management plan needs to be provided. In addition to this, the applicant needs to submit a construction management plan, which must assess the impact of demolition and construction traffic on local roads and streets and must set out the mitigation required to allow other road users to use the road and footway network safely while the site is being demolished and rebuilt, and how the safe and expeditious movement of traffic will be maintained throughout this period. Please see the following links which set out what is required in this document: https://www.richmond.gov.uk/services/planning/planning_policy/supplementary_planning_documents_and_guidance and <https://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

I set out what I think the parameters of any transport assessment should be, as well as other factors the applicant needs to be aware of in my written response to pre-application advice request 21/P0184/PREAPP on 8 June 2021. The applicant must read this.

Pre-application comments –

Transport Assessment and Travel Plan

The applicant must submit a transport assessment and travel plan completed in accordance with the guidance set out in the link below: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments?intcmp=10094>

The applicant must assess the impact of the net increase in dwellings. The applicant does not appear to have included the number of dwellings to be demolished in their presentation.

The applicant must include trip generation analysis derived from TRICS and is advised to use Mid-Level Super Output Area (MSOA) data from the Census of 2011 to estimate the number of journeys to and from work by mode.

Traffic Impact Assessment

The applicant proposes to develop the site in three phases. The applicant must clarify, as far as they can, when these phases will be built out. This will inform the base year, opening year, and final year vehicular traffic impact assessment.

Once they have compiled the multi modal TRICS analysis and got the vehicular trip rate at the AM and PM weekday peak hours, the applicant will need to assess the impact on the following junctions with the help of the trip distribution data from the Census of 2011 which can be accessed at: <https://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=E02000800&zoom=13.0&lon=-0.2968&lat=51.4561>

As Appendix A of the *Government Guidance on Transport Assessment* (Department for Transport, 2007) states, if a development creates a net increase of 30 or more two-way vehicular trips per hour in the AM and/or PM weekday [peak hours, detailed junction PICARDY junction modelling needs to take place at the junctions listed below in the following scenarios:

- Base year without development
- Base year with development traffic
- Opening year + background traffic growth without development
- Opening year + background traffic growth with development
- Final year with background traffic growth without development
- Final year with background traffic growth with development

This will inform us as to whether any physical mitigation is required if any of the junctions assessed can no longer operate at safe capacity (usually 85% ratio of flow to capacity).

Regarding background traffic growth, there are no major committed developments within the Ham area. Therefore, the applicant should use TEMPRO to get the level of forecast background traffic growth between the base year, the opening year, and the final year.

I advise the applicant to complete initial assessments of the following junctions:

- The access junction north of Ashburton Road west of the clinic
- Ashburton Road/Ham Street
- Wiggins Lane/Ham Street

- Ham Common/Petersham Road

Impact on other Parts of the Transport Network

Because of the size of the proposed development site, Transport for London (TfL) will need to comment on any application or request for pre-application advice. Depending on the trip generation forecasts, there may be a significant impact on bus services in the final assessment year relative to current and bus forecast loadings at the AM and PM weekday peak hours. Any mitigation will need to be discussed and agreed with TfL.

Vehicular Access/Highway Works

Based on the masterplan drawing in the presentation and the existing highway layout, the applicant appears to want to create a new simple priority bell-mouth access junction on the northern side of Ashburnham Road between Block G and K and appears to want to redesign the junction on the northern side of Ashburnham Road between Block A and G. They also appear to want to relocate the two existing priority bell-mouth access junctions on the southern side of Woodville Road. The applicant will need to enter into an agreement under S278 of the Highways Act 1980 to build this junction subject to getting the prior technical approval for the detailed design of it from the Borough Engineer.

The applicant intends to provide a ramped access to a basement car park. This must have a gradient of 1 in 20 for the first 5m, 1 in 10 for the duration, and 1 in 20 for the last 5m. There must be a clear headroom of 2.25m. The ramp will accommodate two-way vehicular traffic so the carriageway must be a minimum of 4.8m wide. The applicant must clarify how residents who need to access the car park in the basement but do not have lift access from their blocks do so.

Stopping Up order

I have included a drawing of the current highway boundary throughout the site. The highway is marked in yellow.



From the drawings provided, the applicant wishes to stop up and divert the two existing roads through the site so that they cross over the proposed green link and become car free around this point. If the applicant intends to do this the Council will need to make an order to stop up the highway under S247 of the Town and Country Planning Act 1990. This process must be completed before construction works start. For more information please see the link below: <https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways>

Once the highway is stopped up, the applicant can either build the new road/footway layout as shown on the drawings and offer it for adoption as highway maintainable at public expense, or can choose to maintain it as a private road network. If the latter, the public must have full rights of access over the road and footway network.

Vehicular Parking

The site has a public transport accessibility level (PTAL) of 1b and is not in a controlled parking zone (CPZ). Local Plan Policy LP45 states that:

The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:

1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.

The maximum off-street vehicular parking standard for a residential development, as set out in Appendix 3 of the Local Plan is one space per 1-2 bed dwelling and 2 spaces for every other dwelling. Therefore, the applicant would need to provide up to 525 off-street vehicular parking spaces to meet the maximum standard which Para. 11.2.3 of the Local Plan says should be met in this instance.

The applicant says they can provide a total of 304 spaces of which 226 will be in a basement car park and 78 will be at grade. The applicant should note that 14 of the at-grade spaces are on the adopted highway on the southern side of Woodville Road. These could not be allocated to the development because you cannot have private parking bays on the adopted highway. This gives a total of 290 spaces for 452 dwellings, a shortfall of 235 spaces against the maximum standards set out in the Appendix 3 of the Local Plan and 388 spaces against the maximum standard set out in Table 10.3 of the London Plan (2021).

I have investigated household car ownership data in the Mid-Level Super Output Area (MSOA) of Richmond 017 and have found that occupants of 1-bed flats tend to own 0.44 vehicles per dwelling, occupants of 2 or more bed flats tend to own 1.02 cars per dwelling, that occupants of houses tend to own 1.3 vehicles per dwelling. Were these figures used to assess the impact of overspill parking on local highways, I estimate that the development could lead to 365 cars needing to be parked, giving an overspill of 75 vehicles against the number of off-street parking spaces proposed.

It is for this reason that the applicant must complete an overnight on-street vehicular parking stress survey in accordance with the attached guidance.

Because of the amount of likely overspill parking on surrounding streets, the Borough might have to implement a controlled parking zone in the local area, subject to consultation with residents. All new occupants of the proposed development would be excluded from this.

In addition, the Borough's Parking Policy team will ask for a contribution of £100,000.00 towards the cost of investigating the feasibility of and implementing a controlled parking zone in the local area. This is to mitigate the impact of on-street overspill parking leading to unsafe parking and preventing safe use of the highways by other road users in accordance with Para. 108b and 108c of the National Planning policy Framework (NPPF).

The applicant has demonstrated that 3% of the dwellings will be fully accessible for disabled occupants from the onset of the development and that these occupants will be allocated 1 x

disabled parking bay each. The applicant must demonstrate, as part of their parking management plan, that they will be able to provide the remaining 31 spaces throughout the lifespan of the development subject to occupant demand in accordance with standards set out in the London Plan (2021). Where possible, these spaces should be provided at-grade and as close as possible to the block in which fully accessible dwellings are located.

The applicant proposes five new vehicular crossover accesses to perpendicular parking courts north of Ashburnham Road. These will need the technical approval of the Borough Engineer. The applicant should note Para. 5.17 of the Borough's Transport Supplementary Planning Guidance which states that:

5.17. Footway crossovers grouped together for more than 2 vehicles in a row, will not be permitted on publicly maintained highways. Please note that this applies to applications to amend crossovers at existing properties and applications to build them as part of new developments. Sightlines from these spaces are diminished and they present a large area of crossover for pedestrians to negotiate, as well as removing on street community parking.

Cycle Parking

The applicant will need to provide cycle parking in accordance with the minimum standard set out in the London Plan (2021) and London Cycle Design Standards.

Servicing and Refuse Collection

The applicant will need to provide details of servicing and refuse collection and storage. These details will need to meet the standards set out in the Borough's supplementary planning guidance on the subject which can be seen at: https://www.richmond.gov.uk/media/7627/refuse_and_recycling_storage_requirements_spd.pdf

The applicant will need to provide vehicle tracking drawing which must demonstrate that a refuse vehicle of 10.4m x 2.5m, an ambulance, and a fire tender can enter, turn in, and exit the development in forward gear.

Construction Logistics Plan

The applicant will need to provide a construction management plan. Details of the transport information needed can be found at: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

17. ECOLOGY OFFICER

I agree with Greengages assessment that an ECiA will be required looking specifically at bats and nesting birds but I would also request badgers are also considered, not because there is a sett within the development area but because they are very likely to cross the site and wildlife corridors will need to be provided and maintained to allow them to continue to cross the area. An Ecological demolition/construction method statements should be provided.

18. ARBORICULTURAL OFFICER – no comments received.

19. PLANNING POLICY INCLUDING URBAN DESIGN AND CONSULTATION TEAM

Introduction and background

The proposed development – the demolition of the existing buildings on-site and phased mixed use development, comprising 452 residential homes (Class C3) up to six storeys, a Community/Leisure Facility (Class F2) of up to four storeys in height, a “Makers Lab” (sui generis) of up to two storeys together with basement car parking and site wide landscaping at Ham Close – would be an Urban Development Project as defined in part 10(b) of Schedule 2 of the Regulations, by virtue of the number of dwellings proposed exceeding the 150 dwelling threshold.

The area of Ham and Petersham is defined by the wider setting on a bend in the River Thames, and broad belt of open land, including Petersham and Ham Commons. Ham House and Richmond Park are nearby landmarks and visitor attractions. Richmond Park has protected status as an important habitat for wildlife; it is a European Special Area of Conservation and a National Nature Reserve as well as London's largest Site of Special Scientific Interest. Some parts of Ham are not well-served in terms of local shopping facilities and have been amongst the most relatively disadvantaged in the borough. Ham Parade is identified as a local centre and exists along with other local clusters of shops, schools and local services across the area. The majority of residents work outside of the area. The adopted Ham & Petersham Neighbourhood Plan (2019) recognises the area as quite isolated, with few vehicular access points and limited bus routes, with more options to access on foot or by cycle.

The existing site comprises a series of mid-rise residential blocks set in a parkland environment, alongside other community facilities. The redevelopment of the site is acknowledged through a site allocation in both the adopted Richmond Local Plan (SA15) and the Ham and Petersham Neighbourhood Plan (OS3). The proposed development would significantly increase the number of dwellings on the site, thereby contributing to the borough's housing need, and re-providing some community and leisure facilities. The Neighbourhood Plan also identifies the key opportunity for redevelopment at Ham Close, to provide modern housing and community facilities in keeping with the character of the area.

Note that on 10 December 2021 the Council has published its first draft of the new emerging Local Plan (Regulation 18) version for public consultation, which takes forward the site allocation for Ham Close. Whilst this emerging Plan is still at a stage where it is not considered to be a material planning consideration, it should be noted that a number of evidence base studies and supporting documents have also been published, which are now of relevance. This includes the Urban Design Study (2021), which provides a boroughwide townscape character assessment, with a deep understanding of the values, character and sensitivity of the different parts of the borough, combined with the reality of future development pressures to assess capacity. This Study identifies Ham Close as a mid-rise building zone (5-6 storeys), with the opportunity for any new development to respond appropriately to the surrounding landscape and scale.

Scoping

Greengage, on behalf of the applicant, Hill, has requested from the local planning authority a formal scoping opinion on what information needs to be included in the Environmental Impact Assessment (EIA). The applicant must compile information to assess the likely significant environmental effects of the development, and include these in the assessment and report the information in their Environmental Statement (ES). The information for inclusion in the ES is set out in Part 18(3) of the Regulations and expanded upon at Schedule 4.

Potential Impacts and Objectives set out in Policy Context

The redevelopment of the site is promoted through the Local Plan because of the acknowledged deficiencies in the current housing stock, some of which have social impacts upon the residents. An emphasis is placed in the policy on the unique and distinctive

townscape – particularly nearby conservation area designations and listed buildings – and the quality of the open spaces and landscape surrounding. Many of the open spaces are protected as Metropolitan Open Land, open space and (as is the case with the Village Green) Other Open Land of Townscape Importance (OOLTI). The Local Plan also identifies this general area, including the allocation site, as an area for tree planting.

Given the policy context, and the locational context, the principle of development is accepted and the issues that may be relevant to the planning proposal for the site are well understood. The proposal looks to improve the social well-being of the neighbourhood through the provision of required homes and services and contribute to the overall vision; the Ham Close allocation has a significant impact on the role of Ham Village Green. The area's green spaces are important in the overall context of Ham and will need to be managed sensitively.

A number of matters are uncertain and dependent on any final scheme. This includes impacts upon open space, heritage assets and character as well as the effect of introducing higher buildings. Given the area's relative isolation, the absence of public transport options and the need to travel to work outside of the area, addressing active travel is a particular challenge and breaking down established patterns and providing a convincing alternative to the car is a significant challenge. This could, alternatively, be addressed through increasing work and community services within the Ham area rather than needing to travel beyond it.

Scoping Checklist

Greengage have, in the submitted EIA Scoping Report, set out the sensitive receptors they see as relevant for the ES. These are:

- Built Heritage, Townscape and Visual
- Archaeology
- Air Quality
- Noise and Vibration
- Ecology
- Ground Conditions and Contamination
- Socio-economic
- Climate

In doing this exercise, Greengage have scoped out of the ES the following receptors:

- Transport (owing to additional trip generation being considered as 'negligible')
- Water Resources and Flood Risk (on the basis of a low flood risk, incorporation of SuDS into the development, and the future submission of a separate Flood Risk Assessment)
- Wind Micro-climate (on the basis that the height of buildings and the landscape will not lead to significant wind effects)
- Daylight, Sunlight, Over-shadowing (on the basis of impacts upon receptors being limited, and future submission of a separate Daylight and Sunlight Report)
- Waste (on the basis that waste issues will not be significant and can be dealt with through a separate report)
- Human Health (on the basis that this can be addressed through receptors that will be included within the ES, listed above)
- Risk (on the basis that any risk can be addressed through receptors that will be included within the ES or as a separate report)

Spatial Planning and Design Team's comments on the Scoping Checklist

The Greengate Report appears to have largely addressed the issues that are of greatest

importance to the consideration of the site's development; the reports shows a good degree of understanding of those issues in context.

- Built Heritage, Townscape and Visual:

In terms of the built environment, a number of nearby listed buildings are identified, along with the presence of the conservation areas (CA) nearby. Development affecting the setting of a heritage asset is a direct environmental effect in terms of EIA definitions and may constitute a significant effect. It is strongly recommended that the involvement of professional historic environment and landscape advice/consultancy is sought from the outset of the EIA process.

It is noted that Ham House CA is approximately 240m to the north-east of the site, and therefore in relatively close proximity. The potential impacts and likely significant effects on this CA should be carefully considered, and indeed this CA may warrant greater attention compared to the others due to its proximity to the site.

It is noted that Ham House itself is not included within the list at para 6.16; this should be included.

It is also noted that para 6.16 proposes that where any designated and non-designated heritage assets are located within Ham House or Ham Common Conservation Area, they are not individually assessed, but are instead included for review as part of the CA. We request that designated heritage assets within the CAs are assessed separately. Listed Buildings (LB) in particular, including their setting and significance, should be assessed separately to CAs. It is important to understand the form, materials and history of any designated and non-designated heritage assets, and this will for example differ for LBs and CAs. This differentiation is important to understand the impact of the proposed EIA development on the relevant significance of the identified heritage assets, especially as it is expected that the proposed EIA development will be visible from the setting of, or in conjunction with, a range of heritage receptors. In turn this will then assist the applicant in avoiding, minimising and mitigating any potential negative impacts on the identified heritage assets, including providing an opportunity to identify ways of better revealing or enhancing their significance.

Given the above, it is important to include the identification and description of the significance of the various identified designated and non-designated heritage assets when assessing the likely significant effects (para 6.22). This should be done in addition to the identification and description of townscape character areas (first bullet point of para 6.22). Only through an understanding of the significance can the impact of the EIA proposal on that significance be assessed and understood.

Also, point 6.16 in the main body of the report and point 14 of Built Heritage App 2 scoping note need to read consistently in relation to the treatment of listed buildings as they don't at the moment. This can be resolved by noting the need to assess the impact on individual listed buildings and their settings in the areas around the site, and in particular Beaufort House and Newman House which are the closest to the site.

Viewpoints: these are similar to what was requested previously. I think that a viewpoint from the cluster of LBs around the Manor House & stables a little further up Ham Street would be useful. Also noticed one or two omissions from our previous suggestions: from the school OOLTI to the west of the site; and representative view from Woodville & Ashburnham Roads. A Re views, I think we should have a couple of additional ones which may be beneficial in terms of assessing impact on heritage assets.

Also suggest from the road adjacent to the Palm Centre and Ham House stables.

Visual impact assessment: I think that the 2 areas of OOLTI should be included for visual impact assessment.

A number of key view corridors are defined both close into the site and from further afield. It may be worth checking to ensure these are comprehensive and sufficiently account for vistas around the site (e.g. it might be appropriate to seek an additional view assessment further north on Ham Street, the northern equivalent of the long view denoted by the View 1 arrow in Appendix 2). It is noted that the effects will be assessed through the study of AVRs, to be produced by a visualisation specialist. We advocated that 3D modelling (such as VUCITY) is used for the visualisations of the impact on views of the proposed EIA development.

- Archaeology:

Early consultation and engagement with the appropriate specialist bodies, including Historic England as well as the Greater London Archaeological Advisory Service (GLAAS), who are the borough's archaeological advisers, is strongly recommended.

- Air Quality (and Transport, which is proposed to be scoped out by the applicant):

In terms of air quality, it is noted that the main pollution sources in the vicinity are vehicles travelling on the local road network (para 6.49). Although the impacts of transport are excluded from the ES, it is difficult to understand how air quality and transport issues can be separated. Even whilst increases in road transport may be considered 'negligible', we are not sure how the applicant can rule out at this stage – without further assessment – that this increase will not have any likely significant effect on the local environment.

Whilst vehicle emissions may be improving year on year, irrespective of any traffic growth, and that all new vehicles will have no exhaust emissions from 2030, there will still be polluting vehicles, including HGVs, although they may be cleaner. There could also be other impacts from more traffic – not just on air quality, even if this may be considered 'negligible' by the applicant. It is noted that this will be covered in a separate Transport Assessment and Framework Travel Plan, but the impacts of travel upon other factors including air quality and noise are noted.

Additionally, the area is acknowledged as being particularly isolated in the context of Richmond and London, and contains very few services and facilities given the number of people present. It could therefore be argued that the ES should also be assessing any likely significant effects of the uplift in resident numbers against the availability of health, educational and retail & leisure facilities, and the transport implications of this. It is likely that people will have to travel for work (and whilst currently remote working is in place for many, the medium- and long-term trends as a result of the pandemic are not clear) and services, and the choices available to current and future residents in the locality are relatively limited. It is possible that people may also need and/or choose to drive to nearby open spaces and places of interest, given the availability of car parks around the River Thames and the major parks in the borough. It is noted that the Greengage EIA scoping report associates the lower parking ratio with a lower impact upon the highway network (para 5.4), and whilst the Spatial Planning and Design Team are not the specialists in this policy area, it is not clear whether this also follows in areas with limited public transport choices.

Also, recent experience suggests that in-combination air pollution effect may require greater scrutiny in future, particularly in respect of their impact on natural assets. In terms of the inclusion of developments within the cumulative impact assessment, it may be beneficial to be mindful of the proposed allocation at Cassel Hospital to the south (though this would not meet the criteria (table 5.1) for inclusion at this time).

For the reasons set out above, and given the linkages with air quality, we would recommend that Transport should be scoped in, which will allow the issues to be fully explored and understood, and any potential likely significant effects to be assessed.

In line with the adopted Local Plan, one of the policy objectives for the area is the planting of trees. It may be possible to address the impact of fulfilling this policy objective as part of the ES, and consider the impact of this across a number of topics, including air quality, ecology and socio-economic impacts.

Also note that in relation to transport that the adopted Ham and Petersham Neighbourhood Plan sets out higher minimum standards for cycle storage, particularly due to the limited public transport options within the area.

Specific advice and comments on Air Quality and Transport of the EIA scoping report should be sought from colleagues in Environmental Health and Transport respectively.

- Noise and Vibration: not reviewed by the Spatial Planning and Design Team; colleagues/specialists in the Council should be consulted.
- Ecology: not reviewed by the Spatial Planning and Design Team; colleagues/specialists in the Council should be consulted.
- Ground Conditions and Contamination: not reviewed by the Spatial Planning and Design Team; colleagues/specialists in the Council should be consulted.
- Socio-economic:

It is recommended to assess and deal with this in the ES in three parts, i.e. socio-economics in relation to housing, socio-economic impacts in relation to health and wellbeing including community infrastructure, and socio-economics in relation to open space and play space.

In relation to housing, this should address how the provision of new homes, including in particular affordable homes, will address local priority needs as set out in the adopted Local Plan. In relation to the affordable element(s), these must be genuinely affordable in relation to the Council's Tenancy Strategy and Intermediate Housing Policy Statement, and comply with the Local Plan's tenure split for affordable rent and intermediate. The socio-economic assessment should include an assessment of the range of housing choices being offered, in terms of the mix of housing sizes, types, taking account of needs of different groups, and this includes affordable housing. Any scheme is expected to provide for inclusive, mixed and balanced communities, in terms of tenure and household income, and this should foster social diversity which will help to create successful and integrated neighbourhoods.

Note that alongside the draft Local Plan consultation, the Council has published a Local Housing Needs Assessment (2021): www.richmond.gov.uk/housing_research/local_housing_assessment

In terms of health and community infrastructure, it will be important to ensure adequate re-provision of existing community facilities and community use to be secured. It is noted that there are references to health and the IMD (para 6.100 – 6.102), and the assessment will consider the effects on crime, which presumably will cover both actual crime and the perceived threat of crime. There is however an absence of reference to mental health and well-being, which can also be impacted upon by environmental factors (such as the availability of accessible and functional open spaces) which ought to be included within this topic. More generally, the value and role of the Village Green, also for mental health and wellbeing, within the neighbourhood seems to have been overlooked. It should be noted that the adopted Ham

and Petersham Neighbourhood Plan seeks an appropriate range of community facilities which will promote the health, education, physical, mental and spiritual development of all residents, particularly the young and elderly.

With regard to open space, it should be noted that the Council requires all major development proposals in the borough to meet the Public Open Space (POS) needs arising out of the development. The Local Plan requires larger developments to provide on-site public open space within the scheme, with the aim to strike a balance between private, semi-private and public open space provision. The EIA should also include an assessment of open space provision in the local area. This should be based on actual walking distances rather than as the crow flies. The methodology should follow the public open space categorisation as set out in the London Plan relevant Local Plan policy. The EIA should also include an assessment of the existing and wider green infrastructure network, including how the proposed development could impact on it. Particularly attention needs to be brought to any effects on the designated OOLTI/POS.

In relation to play space, major new developments must assess the play space needs arising out of the scheme. To do so, developers for major applications are required to submit a child occupancy assessment to determine the estimated child yield arising from residential development. This calculation should be made based on the formula provided in the Mayor's SPG, which can be found on the London Datastore: <https://data.london.gov.uk/dataset/population-yield-calculator>.

All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. The EIA will therefore need to provide an assessment of needs arising from the new development. It is expected that the EIA will incorporate a child yield/occupancy and play space needs assessments (including with a breakdown for the different age groups). Any new dedicated on-site play space should be made publicly accessible to ensure integration within the existing area.

- Climate:

No specific comments to make other than to note the requirements of the adopted new London Plan as well as the existing Local Plan in relation to on-site decentralised energy (zero or low emission).

- Wind microclimate:

In terms of wind microclimate, whilst not an area of expertise in the Spatial Planning and Design Team, the reasons for excluding this element may be based on experience or evidence, but this is not well explained within the submitted Greengage scoping report.

- Daylight, sunlight and overshadowing

Whilst this has not been reviewed in detail by the Spatial Planning and Design team, any future planning application will also need to address light pollution in line with the adopted Local Plan.

- Waste:

It is noted that waste has been scoped out on the basis that waste issues will not be significant and can be dealt with through a separate report. The London Plan's requirements in relation to the circular economy should be followed. Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates

and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible. It is noted that a Circular Economy Statement will be submitted with any future planning application (para 7.1).

- Water resources and flood risk:

We agree that flood risk and drainage can be scoped out, subject to the Environment Agency's comments. It should be noted that in relation to foul sewerage in particular, it needs to be established that there is sufficient capacity in the public sewerage network. In line with the adopted Local Plan, the applicant is required to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. The developer will be required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation from Thames Water.

It should also be noted that the development will need to comply with the minimum mandatory targets for water consumption.

In conclusion, the main points are as follows:

- The Greengate Report appears to have largely addressed the key issues that are of greatest importance to the consideration of the site's development.
- Concerns have been raised about the proposal not to assess designated and non-designated heritage assets within Conservation Areas individually as this will not allow an appreciation and ability to understand the impacts of the proposed EIA development on the relevant significance of the identified heritage assets.
- It may be worth checking to ensure that local views to / from the site are comprehensive and sufficiently account for vistas around the site.
- It is questioned why Transport has been scoped out; the reasons for scoping it out are not always clear, given the area's acknowledged (and relative) isolation and the clear links between transport, air quality and noise.
- Recommendations have been set out for the socio-economic factors, paying particular attention to housing, health and well-being including community infrastructure as well as the role of local open spaces, and assessing open and play space needs.

20. HOUSING

No comments from the Housing Enabling Team on the EIA Scoping Opinion Request.

21. ENVIRONMENTAL HEALTH – AIR QUALITY

Reference has been made to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') "Requests for screening opinions of the relevant planning authority".

Consideration has been given to the likely significant effects for Air Quality of this development. Upon review of materials in association with this screening opinion, the London Borough of Richmond Upon Thames considers the impact on the environment will not be such as to require an Environmental Impact Assessment.

The development is within an Air Quality Management Area and there are several residential and education receptors within close proximity to the site in addition to new residents from the proposed development. Emissions to both existing and new receptors will need to be assessed. Additional transport emissions created by the development will also be of concern. This is an area with a low PTAL. Much traffic to/from this development will come via Richmond,

an Air Quality Focus Area, where biased adjusted annual emissions of NO₂ have exceeded the UK/EU limit value of 40 µg/m³ for nitrogen dioxide for the last 19 years.

However, the Council considers that all concerns for air quality can be adequately addressed through an Air Quality Assessment. As such it will not require an EIA to be undertaken to accompany any planning application for this development.

22. ENVIRONMENTAL HEALTH – NOISE AND VIBRATION

In respect of Noise and Vibration I generally have no adverse comment in respect of the EIA Scoping Document. However, I would highlight the following:

- i. Para 6.60 reference should also be made to aviation movements in terms of noise sources.
- ii. Para 6.74 should also make reference to Development Control for Noise Generating and Noise Sensitive Development
- iii. Supplementary Planning Document (2018)

23. ENVIRONMENTAL HEALTH – CONTAMINATED LAND

Routinely because a demolition is proposed, the applicant can expect us recommend conditions to mitigate potential risks from contaminated-land.

24. LEAD LOCAL FLOOD AUTHORITY

The LLFA have reviewed the EIA consultation materials presented. They propose to provide a Flood Risk Assessment and surface water drainage strategy for review with their planning application. Therefore, we have no objections provided that these documents adhere to the following standards and guidance:

- National Planning Policy Framework
- National Planning Practice Guidance
- Defra's Non-Statutory Technical Standards for SuDS
- London Plan
- Richmond's Local Plan
- Richmond's Level 2 Strategic Flood Risk Assessment

The attached SuDS proforma should be filled out at application stage.

Also, if any basements are proposed, please reference the Basement User Guide. [user_guide_basement_assessment.pdf \(richmond.gov.uk\)](https://www.richmond.gov.uk/user_guide_basement_assessment.pdf)

25. WASTE MANAGEMENT

The report states that “Waste” will be scoped out of the EIA, I think this is fine as long as we get the opportunity to review and comment on the ‘Operational Waste Management Strategy’ mentioned in Section 5.31 as part of the consultation on any relevant planning application in due course.

It's worth highlighting that we have been contacted separately by Hakim Miro and informed that this development will result in the permanent removal of the public recycling site located in the Car Park on Ashburnham Road (pictured below). The site is used by the local

community and provides the flats above shops forming the corner of Ashburnham Road and Ham Street with their primary means to recycle. I wonder whether it would be appropriate for the EIA to cover the impact of this as it will likely not be covered by the operational waste strategy?

26. ACHIEVING FOR CHILDREN

- A net increase of 260 units - from 192 to 452 - will clearly have a significant impact on demand for primary and secondary school places within the local area.
- All three local state-funded primary schools have space for expansion, temporary or permanent, from one to two forms of entry should additional places be required.
- However, at present, there is some spare capacity which would first need to be filled before expansion - either temporary or permanent - of any of the three schools could be justified.
- Once further details of the phasing and tenure/bedroom-size mix of the proposed redevelopment of Ham Close are available, further assessment will be undertaken to gauge the likely 'pupil yield', i.e. the numbers of children who would need a new school place within Ham and Petersham. That assessment will also consider the forecast availability of places in state-funded primary schools in North Kingston.
- For secondary phase education, all children living in the Ham Close development would be within the catchment of Grey Court School, but that would have a knock-on adverse impact on the likelihood of children living further afield within the borough (and in RB Kingston upon Thames) being able to access places at the school. The school would not have space for permanent expansion due to Metropolitan Open Land constraints.