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Our Ref: Ref 200713 Manor Road - Formal Request for an EIA Screening Opinion (Issue)
Your Ref: Ref

13th July 2020

Mr. Richard Green
Greater London Authority (GLA)
City Hall
More London Riverside
London
SE1 2AA

Dear Mr. Green

Redevelopment at Manor Road, North Sheen - Request for an Environmental Impact Assessment (EIA) Screening Opinion

Avison Young write on behalf of our client (Avanton Richmond Development Ltd (the Applicant)) to seek a formal Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicant's forthcoming detailed planning application for the residential-led redevelopment at Manor Road, North Sheen.

To assist the Greater London Authority (GLA) in reaching its EIA Screening Opinion, we have prepared this letter and its accompanying Appendices for consideration.

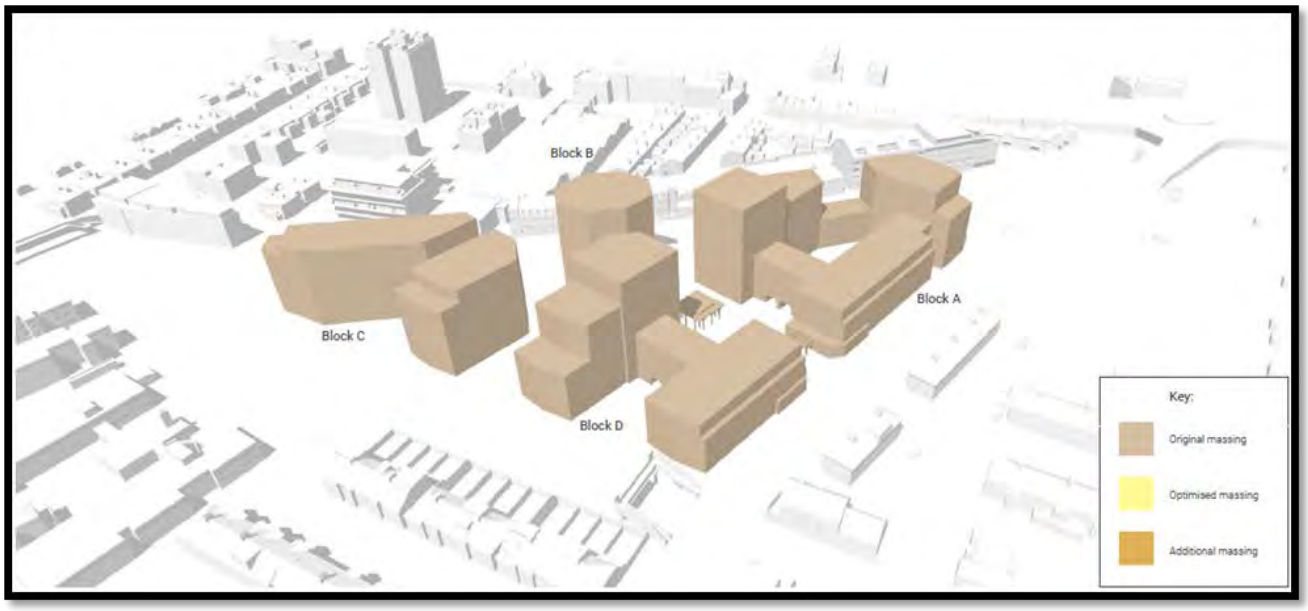
In accordance with the EIA Regulations the GLA have three weeks in which to provide their formal EIA Screening Opinion from the date of receipt of this request, unless otherwise agreed with the Applicant (to a maximum of 90 days).

1. Background to the Project

a. The Development (Planning Application Reference: 19/0510/FUL) and EIA Screening

In February 2019, the Applicant submitted a detailed planning application (Planning Application Reference: 19/0510/FUL) for the residential-led mixed-use redevelopment of land at Manor Road, North Sheen (the 'Development'). In brief, the Development comprised demolition of existing buildings and structures and comprehensive residential-led redevelopment of a single storey pavilion, basements and four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works. The general layout and massing of the Development is shown in **Figure 1**.

Figure 1: The General Layout and Massing of the Development (Planning Application Reference: 19/0510/FUL) (Source: Assael)



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

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

b. The Development as Amended 2019 (Planning Application Reference: 19/0510/FUL) and EIA Screening

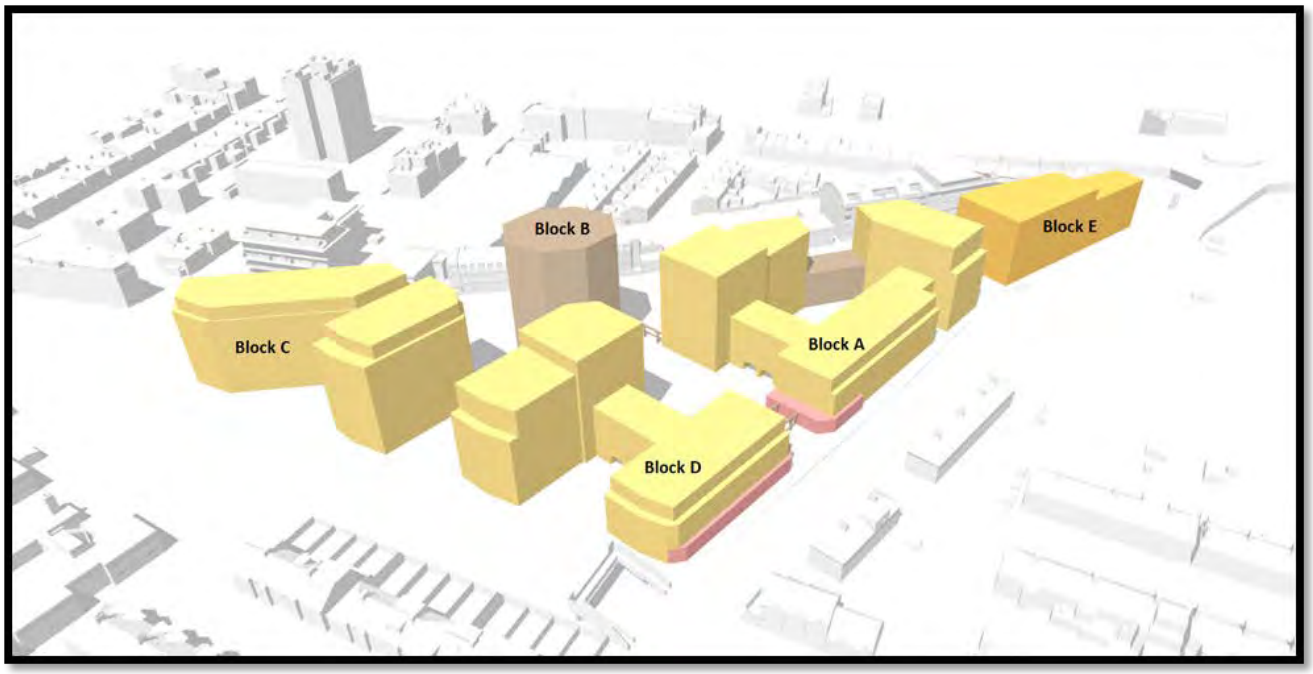
In July 2019, LBRuT resolved to refuse planning permission for the Development. The Development was therefore referred to the Mayor of London. As such, the Greater London Authority (GLA) became the determining authority for the Development.

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

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

The general layout and massing of the Development as Amended 2019 is shown in **Figure 2**.

Figure 2: The General Layout and Massing of the Development as Amended 2019 (Planning Application Reference: 19/0510/FUL) (Source: Assael)



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

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

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

c. The Development as Amended 2020

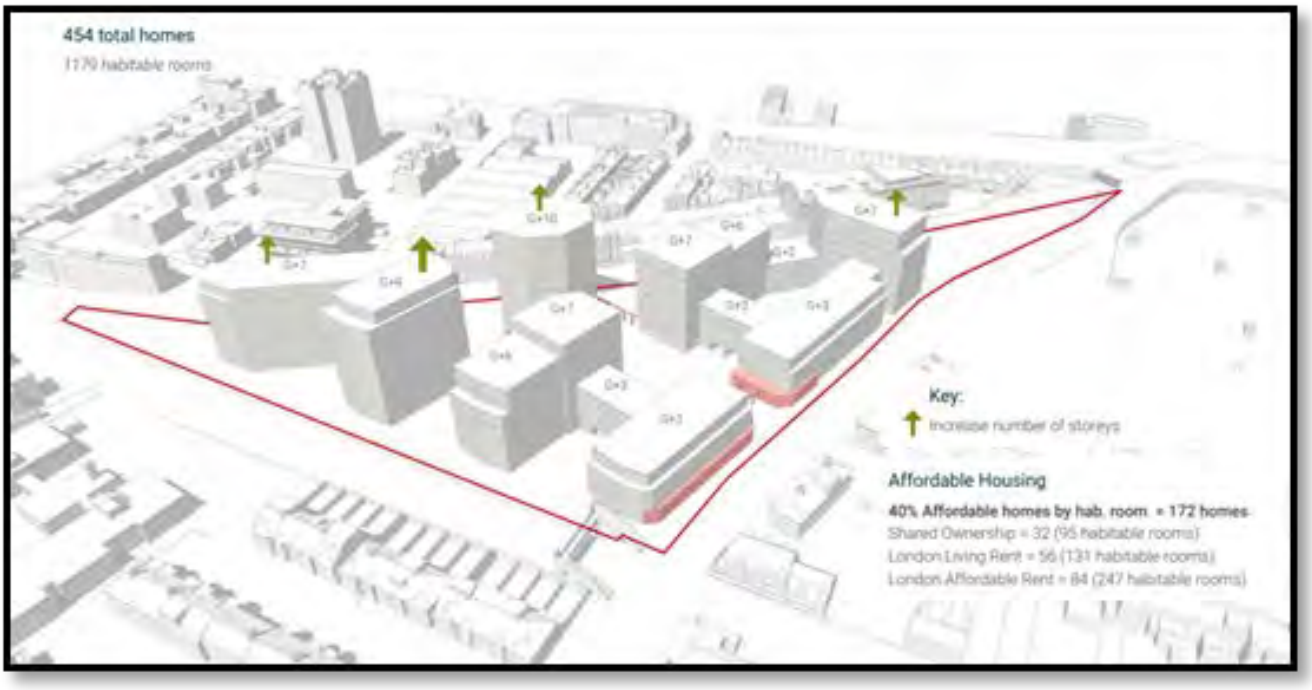
Cognisant of the above, the Applicant is pursuing further design amendments with a view to submitting a fresh new detailed planning application in due course. At the current time, the likely design amendments (in comparison to the Development as Amended 2019) can be summarised as follows:

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

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

Accordingly, the general layout and massing of the Development as Amended 2020 is illustrated within **Figure 3**.

Figure 3: The General Layout and Massing of the Development as Amended 2020 (Source: Assael)



For clarity, **Table 1** presents a comparison of the key differences between the Development (Planning Application Reference: 19/0510/FUL), the Development as Amended 2019 (Planning Application Reference: **19/0510/FUL**) and the Development as Amended 2020.

Table 1: Key Differences Between the Development (Planning Application Reference: 19/0510/FUL), the Development as Amended 2019 (Planning Application Reference: 19/0510/FUL) and the Development as Amended 2020.

		The Development	The Development as Amended 2019	The Development as Amended 2020
Block A	Maximum height (m AOD)	37.2	36.1	35.0
	Maximum storey (including ground)	9	8	8
Block B	Maximum height (m AOD)	37.8	41.9	43.7
	Maximum storey (including ground)	9	10	11

		The Development	The Development as Amended 2019	The Development as Amended 2020
Block C	Maximum height (m AOD)	31.4	35.0	40.2
	Maximum storey (including ground)	7	8	10
Block D	Maximum height (m AOD)	39.7	35.3	34.3
	Maximum storey (including ground)	9	8	8
Block E	Maximum height (m AOD)	Not applicable	27.9	Not applicable
	Maximum storey (including ground)	Not applicable	5	Not applicable
Total Number of Residential Units		385	433	454
Total Number of Car Parking Spaces		14	12*	14

Note: * The detailed planning application for the Development as Amended 2019 included for 14 car parking spaces. 3

2. EIA Screening for the Development as Amended 2020

With reference to **Table 1**, the EIA Screening process undertaken for the Development and the Development as Amended 2019 (refer to **Appendices I - IV** inclusive), has already assessed project design parameters in excess of those proposed by the Development as Amended 2020. Accordingly, it can be inferred that the results and conclusion of this work, including the EIA Screening Opinions provided in **Appendix II and IV** represent a worst-case situation. This being the case, the Development as Amended cannot require full EIA.

There are only three design parameters of the Development as Amended 2020 which exceed those of the Development and the Development as Amended 2019. These are as follows:

- The maximum height of Block A (refer to **Section 1c** and **Table 1**).
- The maximum height of Block C (refer to **Section 1c** and **Table 1**).
- The total number of residential units proposed (refer to **Section 1c** and **Table 1**).

However, such exceedances are small (refer to **Section 1c** and **Table 1**) and are considered immaterial to the analysis already undertaken as part of the historic EIA Screening Process. Furthermore, as per the Development and the Development as Amended 2019, the design of the Development as Amended 2020 is being informed by appropriate townscape and visual, daylight, sunlight and overshadowing and wind microclimate analysis. Accordingly, significant adverse effects of the Development as Amended 2020 upon these topic areas are being managed as part of the overall pre-application and design process. Updated technical assessments for these topic areas will be provided as part of the forthcoming detailed planning application.

With regard to an overall uplift in the number of residential units proposed by the Development as Amended 2020 in comparison to the Development and the Development as Amended 2020, **Appendix I** and **Appendix III** sets out the existing capacity of social-infrastructure in the area demonstrating significant surplus primary school places, significant surplus secondary school places and confirming all GP surgeries within a 1 km radius of the site are accepting new patients. Accordingly, an uplift of 21 residential units is not anticipated to give rise to any material implication upon the supply and demand of such social infrastructure when compared to that established for the Development and the Development as amended 2019.

In view of the above, the results and conclusions contained within **Appendices I - IV** inclusive are considered to remain applicable and valid. As such, the Development as Amended 2020 is not defined as 'EIA development' under the EIA Regulations.

We look forward to your confirmation of the above via a formal EIA Screening Opinion

Yours sincerely

Hannah Fiszpan
Director
020 7911 2695
Hannah.Fiszpan@avisonyoung.com
For and on behalf of Avison Young (UK) Limited

cc: Rachel Crick, Director - Avison Young

Enc: Appendix I - EIA Screening Report, November 2018.
Appendix II - The LBRuT's EIA Scoping Opinion dated 14th December 2018.
Appendix III - EIA Screening Report, October 2019.
Appendix IV - The GLA's EIA Scoping Opinion dated 8th November 2019.

Appendix I
EIA Screening Report, November 2018

Environmental Impact Assessment (EIA) Screening Report

Redevelopment at Manor Road, North Sheen

November 2018

Contents

Appendices

Prepared By: Patrick Duffy
Status: Draft 004
Date: 12 November 2018

For and on behalf of GVA Grimley Limited

1. Purpose of this Report

1.1 This report accompanies a written request for an Environmental Impact Assessment (EIA) Screening Opinion from the London Borough of Richmond upon Thames (LBRuT) pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017[1] (the EIA Regulations). The purpose of this report is to inform the request for an EIA Screening Opinion in respect of Avanton Richmond Development Ltd's (the Applicant's) proposal (the Development) for the redevelopment of land at Manor Road, North Sheen (the Site).

1.2 This report has been prepared by GVA on behalf of the Applicant. In accordance with Regulation 6(2) of the EIA Regulations this report provides:

- A plan sufficient to identify the land subject to the Development (the Site) (refer to Section 2).
- A description of the Development (refer to Section 2).
- A description of the aspects of the environment likely to be significantly affected by the Development (refer to Section 5).
- To the extent that information is available, a description of any likely significant effects of the Development on the environment resulting from:
  - The expected residues and emissions and the production of waste, where relevant (refer to Section 5).
  - The use of natural resources, in particular soil, land, water and biodiversity (refer to Section 5).
- Other relevant information including features of the Development or any measures envisaged to avoid or prevent what might otherwise result in significant adverse effects on the environment (refer to Section 5).

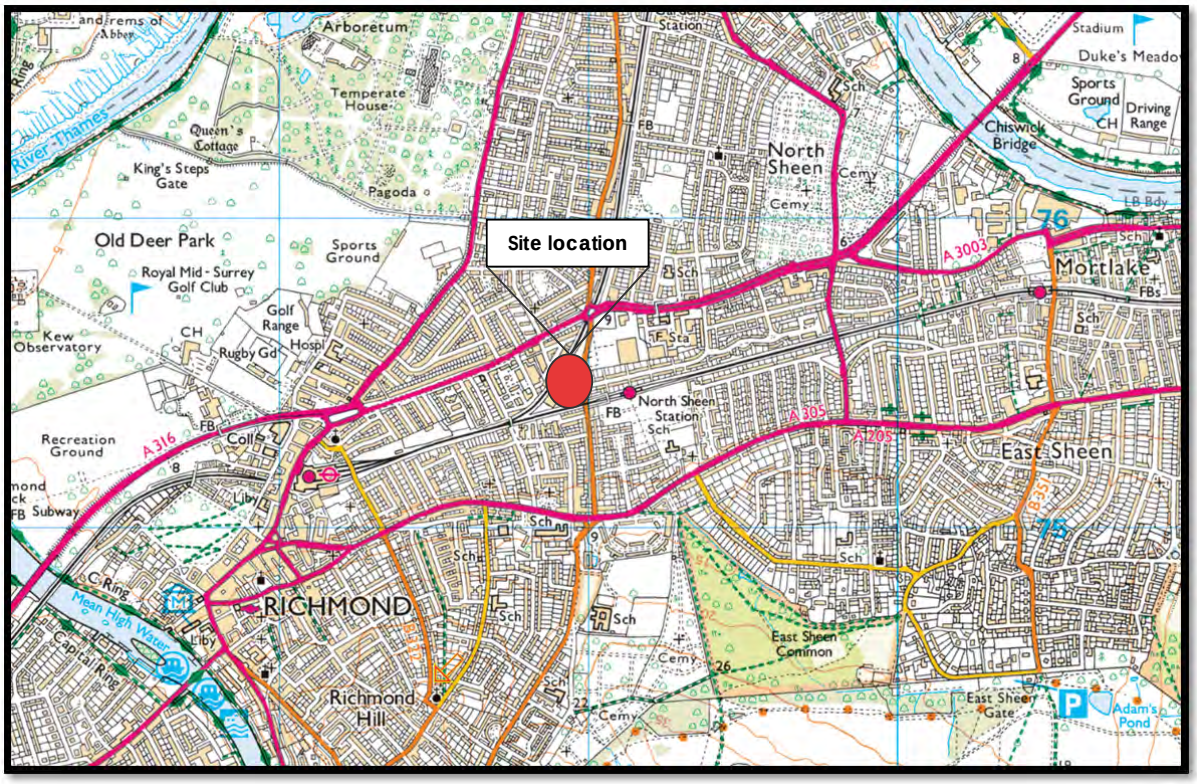
[1] The Town and Country Planning (Environmental Impact Assessment) Regulations, 2017.

2. Overview of the Site and the Development

Overview of the Site

2.1 As shown in Figure 1, the Site is located in North Sheen, south-west London within the administrative boundary of the LBRuT. The Site comprises an area of approximately 1.5 hectares (ha).

Figure 1: Site Location



2.2 Figure 2 illustrates the triangular shaped Site is bound by:

- The northern and easternmost extents of an access road which provided access to / from Manor Road (the B353) to the north.
- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

Figure 2: The Site

2.3 The existing Site currently comprises a low-rise retail store occupied by Homebase, Pets at Home and Pets4Vets. The retail store is located centrally of the Site. To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road which provides access to / from Manor Road (the B353), surface car-parking in the north-east of the Site and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

2.4 There are a number of trees planted within the surface car-parking area of the Site and at various locations around the Site's perimeter.

Overview of the Development

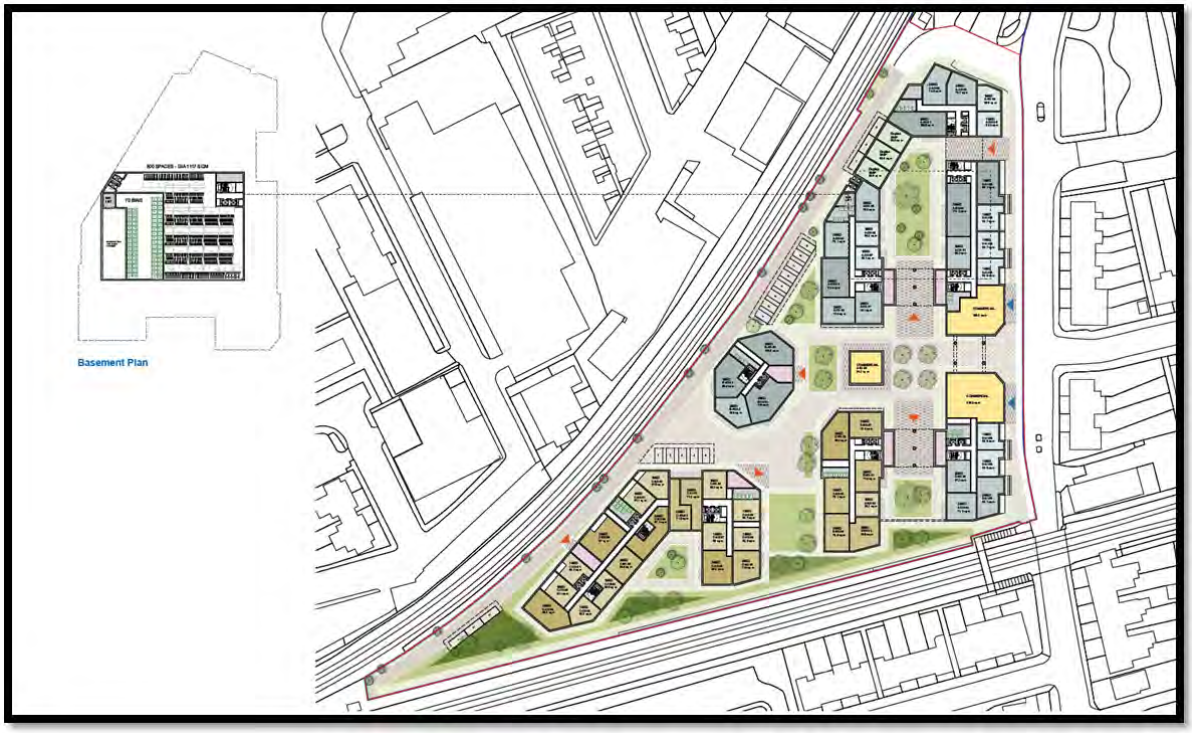
2.5 Whilst the design of the Development is not yet fixed for the purposes of the Applicant's forthcoming detailed planning application, the information provided to GVA by the Applicant in respect of the Development (and summarised here) is considered adequate to establish the likely environmental effects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

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

2.7 Figure 3 shows an illustrative sketch of the Development. Figure 4 shows a current basement and ground floor plan of the Development. With reference to Figure 3 and Figure 4, it is envisaged that the Development will provide in the region of 400 residential units (1, 2 and 3-bed units with an appropriate provision of affordable housing) together with a small quantum of commercial floorspace.

Figure 3: An Illustrative Sketch of the Development (viewed from the south-west) (source: Assael)

Figure 4: An Illustrative Basement and Ground Floor Plan of the Development (source: Assael)



2.8 The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys. Residential land uses will be present in all buildings. The proposed commercial floorspace is likely to be concentrated around the Manor Road frontage.

2.9 3 of the 4 buildings (those located in the north-east, south-east and south-west of the Site) will include various building components so that each building in totality will comprise a range of building heights and geometries. This will afford visual interest, avoid overly bulky building design and allow for other appropriate ground floor uses such as a well-defined public and private realm including new pedestrian routes, two new public squares, communal courtyards and communal gardens. The remaining building (within the east of the Site) will be of a uniform octagonal form. It is proposed that these buildings will be predominantly brick.

2.10 The siting and layout of buildings within the Site will define a new public and private realm. As previously noted, this will include for new pedestrian routes, two new public spaces within the centre of the Site and private residential amenity courtyards within the south and north of the site. Private (defensible) gardens / terraces will be provided for all ground floor level residential units. In addition, home-zones / shared spaces will be provided within the east of the Site, and an outdoor gym in the south-west of the Site. In addition, an appropriate quantum of children's play space will be provided.

2.11 The Development will provide a small single-level basement within the north of the Site. This will provide storage for refuse and in the region of 650 cycle parking spaces for residents of the Development.

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

2.13 Car-parking will be kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired. It is envisaged such parking will be provided on-street within the west of the Site. Servicing will occur at street level, predominantly along the eastern boundary of the Site.

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

3. Determining the Need for EIA

3.1 The need for EIA is determined by the definitions and criteria provided in Schedule 1 or Schedule 2 and Schedule 3 of the EIA Regulations. Where projects are classified as Schedule 1 development, EIA is mandatory. Where projects are classified as Schedule 2 development, EIA is only required if the project is likely to have significant environmental effects as referenced in Schedule 3 'Selection Criteria for Screening Schedule 2 Development'.

3.2 With reference to the information provided in Section 2 of this report, the Development does not fall within the definitions set out within Schedule 1 of the EIA Regulations. However, the Development has the potential to fall within Schedule 2 10(b) of the EIA Regulations. That is:

"10. Infrastructure projects...(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas..."

3.3 Although the Site is not in a 'sensitive area' as defined by the EIA Regulations (refer to Section 4) the Development does meet the second of the three applicable thresholds for Schedule 2 10 (b) projects:

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

3.4 In view of the above, the Development does meet the Schedule 2 criteria. Accordingly, Schedule 3 of the EIA Regulations must be carefully considered to determine the need (or otherwise) for EIA. Particular emphasis must be placed upon:

- The characteristics of the Development (refer to Section 2).
- The location of the Development (refer to Section 4).
- The types and characteristics of the potential environmental effects (refer to Section 5).

4. The Site, its Environmental Context and Sensitivity

Predominant Existing Land Uses

4.1 As noted in Section 2 the existing 1.5 ha Site currently comprises a low-rise retail store with associated hard-standing comprising the majority of an access road which provides access to / from Manor Road (the B353), surface car-parking in the north-east of the Site and servicing areas within the south-west of the Site. In total, the existing Site provides car-parking for approximately 150 vehicles. A number of trees exist within the surface car-parking area of the Site. Access to the Site is currently afforded from the northeast, via Manor Road (the B353).

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

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

Transport and Connectivity

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

4.4 Baseline traffic surveys have been undertaken by the Applicant's Transport Consultant (Sanderson Associates). Such surveys reveal 80 existing AM peak hour (08:30 - 09:30) two-way traffic movements to / from the Site and 108 PM peak hour (17:00 - 18:00) two-way traffic movements to / from the Site.

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

- North Sheen station, approximately 200 m east of the centre of the Site.
- Richmond station (served by Southwest Trains and the LUL District Line), approximately 900m south-west of the centre of the Site.

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

Core Social Infrastructure

4.7 There are 8 open primary schools within approximately 1 mile of the centre of the Site (deemed to be an appropriate distance for primary school children to commute to school). These primary schools have surplus capacity of 567 primary places[3].

4.8 There are 9 open secondary schools within approximately 2 miles of the centre of the Site (deemed to be an appropriate distance for secondary school children to commute to school). Together, these have a surplus capacity of 984 secondary places[3]. Of these places, 223 relate to all girls' secondary schools, 210 relate to a Convent secondary school, and 138 relate to a Church of England secondary school. As such, there are 413 existing mixed-gender and multi-faith secondary school places within 2 miles of the centre of the Site. This is likely to be a conservative under-estimate of existing capacity; capacity data is not available for the Green School for Boys which can accommodate up to 1,260 pupils.

4.9 There are 9 open GP surgeries within approximately 1 mile of the centre of the Site[4]. All 9 GP surgeries are currently accepting new patients[4].

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

[2] https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat
[3] https://get-information-schools.service.gov.uk
[4] https://nhs.uk

- North Sheen Recreational Ground, approximately 700 m north-east of the centre of the Site (at its nearest point).
- Green space surrounding Penfold Tennis Club, approximately 940 m north-east of the centre of the Site (at its nearest point).
- Fulham (North Sheen) Cemetery, approximately 760 m north-east of the centre of the Site (at its nearest point).
- Tangier Green, approximately 880 m east of the centre of the Site (at its nearest point).
- Pesthouse Common, approximately 480 m south of the centre of the Site (at its nearest point).
- East Sheen Common, approximately 570 m south-east of the centre of the Site (at its nearest point).
- East Sheen Cemetery, approximately 590 m south-east of the centre of the Site (at its nearest point).
- Richmond Athletic Ground, approximately 890 m west of the Site (at its nearest point).
- The north-eastern extent of the Royal Botanic Gardens at Kew, approximately 680 m north-west of the Site.

Townscape and Visual Matters

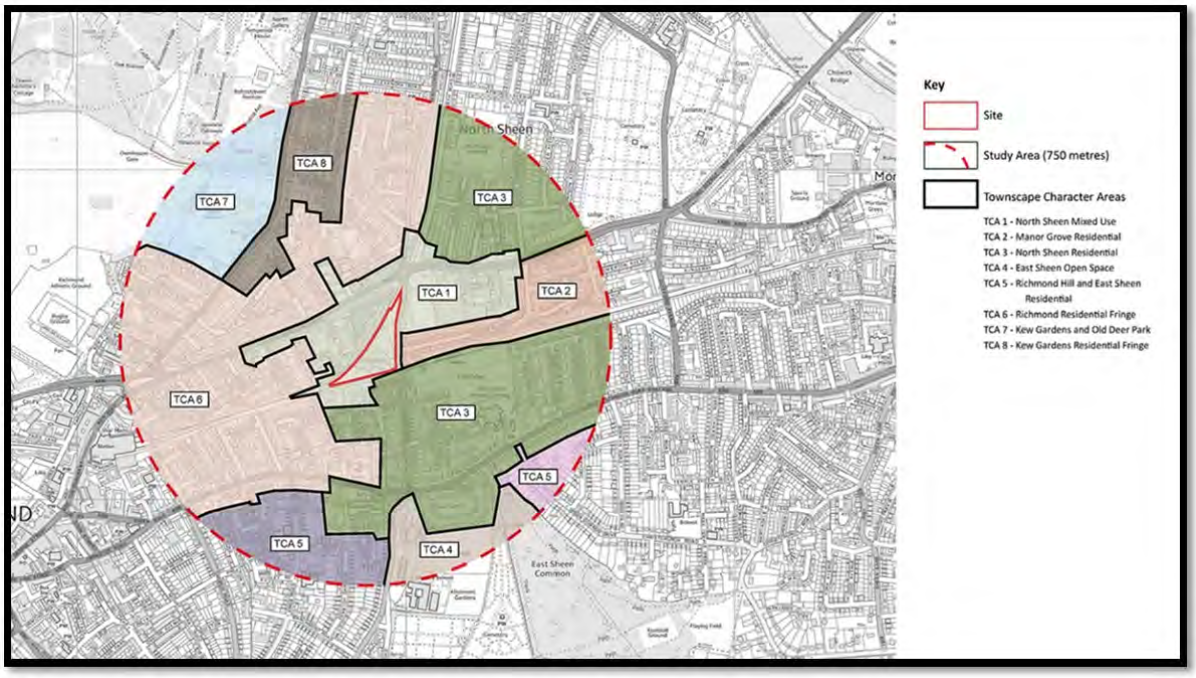
4.11 The Site and its immediate environs are characterised by built urban form which varies in scale, footprint and height, comprising residential, retail, light-industrial and transport infrastructure. Buildings and structures within and surrounding the Site are generally low - medium rise, ranging from 2 - 6-storeys. Exceptions to the low-rise building heights include a 1960s 12-storey block of flats located to the north-west of the Site and, to the south, a housing estate comprising 2 9-storey blocks. The spire of the Church of St Matthias (Grade II Listed) and the Pagoda (Grade I Listed) located within the Royal Botanic Gardens at Kew are local landmarks. However, following site visits undertaken by the Applicant's Townscape and Visual Consultants (Arc) it is confirmed that these landmarks are not visible from the Site.

4.12 The Site is not covered by any planning policy designations relating to townscape value. However, the LBRuT Richmond and Richmond Hill Village Planning Guidance Supplementary Planning Document (SPD)[5] identifies the Site as being located in 'Character Area 6: Old Gas Works'. This character area is described as occupying *"...the angle of 2 busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past"*.

4.13 The Applicant's Townscape and Visual Consultants (Arc) have undertaken a study to identify the likely Zone of Theoretical Visibility (ZTV) of the Site and the Townscape Character Areas relevant to the Site and its ZTV. The study concludes the ZTV to extend to a radius of 750 m from the centre of the Site. Figure 5 sets out the Townscape Character Areas within the ZTV.

[5] LBRuT. Richmond and Richmond Hill Village Planning Guidance. SPD. June 2016.

Figure 5: Townscape Character Areas within the ZTV (source: Arc)



4.14 With reference to Figure 5, the Site is located within TCA 1: North Sheen Mixed Use. This is considered to be of 'medium to low' value. However, 4 of the 8 TCAs identified within the ZTV are considered to be of 'high to exceptional' value. These relate to:

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

4.15 Several non-statutorily designated Other Open Land of Townscape Importance (OOLTI) are located within approximately 750 m of the centre of the Site. All are separated from the Site by significant road or rail infrastructure. The closest OOLTI's to the Site are located approximately 130 m north-east and 130 m south-east of the centre of the Site, adjacent to the east of Manor Road (the A355) and adjacent to the south-east of North Sheen Station respectively.

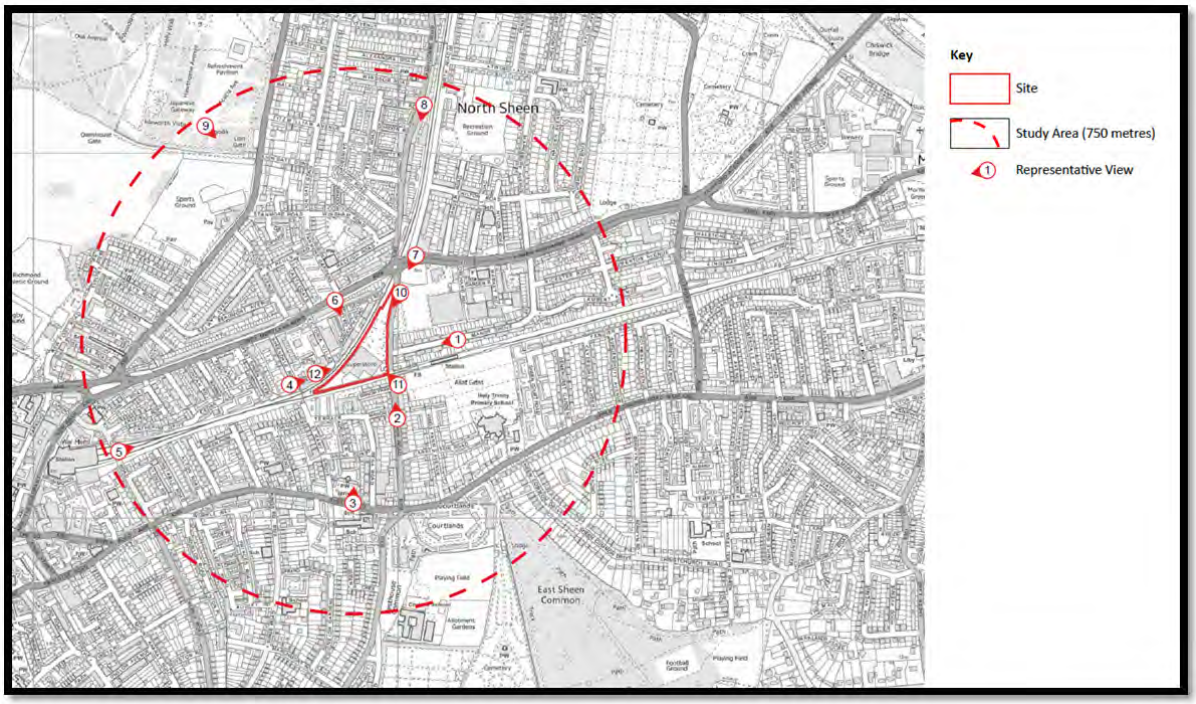
4.16 The Site is not subject to any statutorily protected view. Furthermore, none of the strategic and local views identified within the LBRuT's Proposals Map[6] are orientated towards the Site.

4.17 In consultation with the LBRuT, 12 views of importance to the Site have been identified. These include the following which are shown on Figure 6:

[6] London Borough of Richmond upon Thames. Proposal Map. 2009.

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

Figure 6: Views of Importance to the Site (source: Arc)

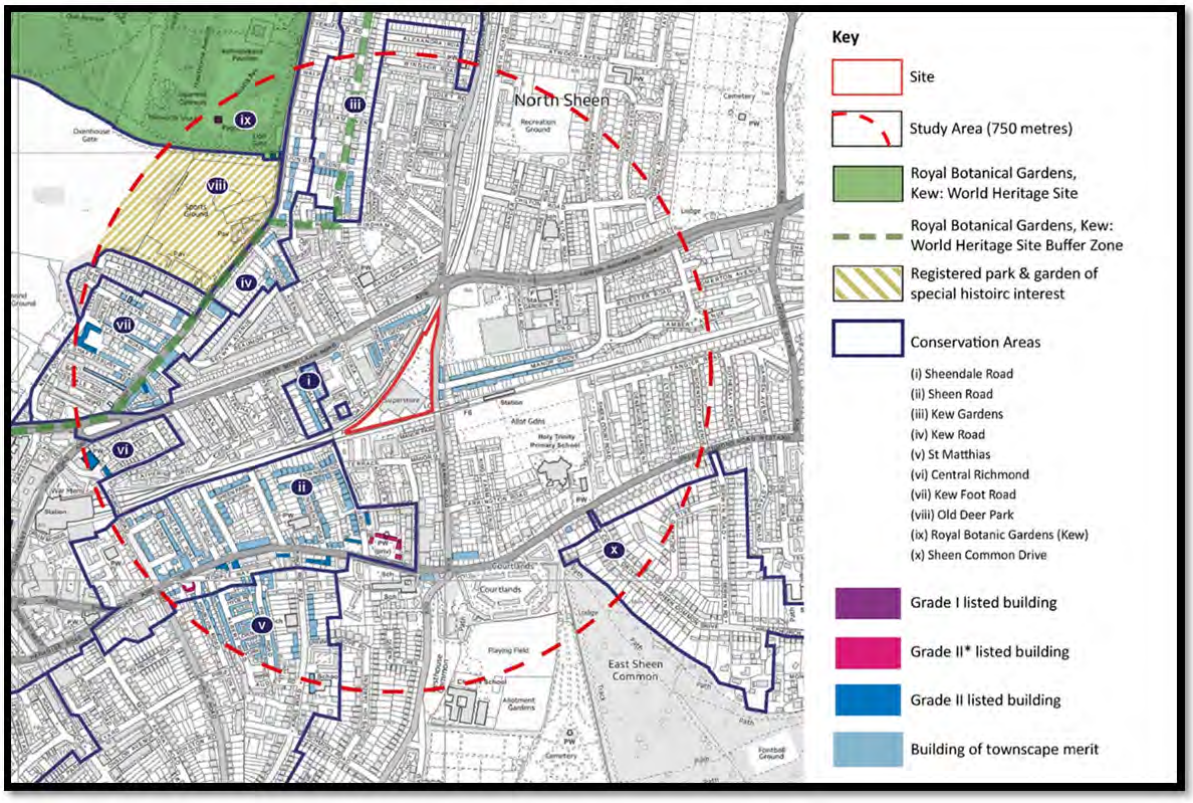


Statutory and Non-Statutory Heritage Designations

4.18 The Site is not subject to any statutory or non-statutory heritage designations. As such, the Site is not located in a World Heritage Site (WHS) or Conservation Area and does not contain any Scheduled Monuments (SMs), Listed Buildings, Registered Parks and Gardens or buildings and structures of local heritage value. Furthermore the Site is not within an Archaeological Priority Area (APA).

4.19 Above ground heritage assets within the ZTV are shown on Figure 7.

Figure 7: Above Ground Heritage Assets within the ZTV (source: Arc)



4.20 With reference to Figure 7, there are 10 Conservation Areas within the ZTV[7], the closest being Sheendale Road Conservation Area (south-west of the Site) and Sheen Road Conservation Area (west of the Site)[8]. In addition, there are approximately 20 listed buildings within the ZTV[9].

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

4.22 The extensive transport infrastructure and density of built form within the ZTV means that with the exception of the Sheendale Road and Sheen Road Conservation Areas. There is little relationship between the above ground heritage assets and the Site.

7 https://www.richmond.gov.uk/services/planning/conservation_areas
8 https://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_statements
9 https://historicengland.org.uk

4.23 There are no APA's within approximately 750 m of the Site. The Applicant's Archaeologist (MoLA) has identified the Site as being of low archaeological potential for all pre-Modern periods of past human activity. Furthermore, any archaeological potential will have been severely compromised by past land uses and activities associated with the Site.

Biodiversity / Ecology

4.24 There are no statutory or non-statutory sites of nature conservation within the Site.

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

4.26 There are no statutory nature conservation designations within approximately 500 m of the Site.

4.27 With respect to non-statutory nature conservation designations, the northern-most tip of East Sheen and Richmond Cemeteries and Pesthouse Common (a non-statutory Site of Nature Importance) is located approximately 480 m south of the Site (at its closest point). The 1.18 ha narrow area of parkland, adjacent to Queen's Road (the B353) includes a man-made nature conservation meadow, mature lime trees and horse chestnut trees within the site's perimeter. The northern section of Richmond Park and Associated Areas Site of Nature Importance is also located 480 m to the south of the Site. It is designated for its ancient woodland, rare invertebrates, breeding bird assemblage and fungi community.

4.28 The Applicant's Ecologist (Tyler Grange) has undertaken a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) for the Site (refer to Appendix 1). The PEA and PBRA confirms the Site comprises predominantly buildings and hard-standing, with areas of scrub, amenity grassland, trees and hedge / flower beds along the Site boundaries and within the parking areas. None of these habitats are considered to be habitats of principal importance. Indeed, such habitats are considered to be of limited ecological importance, although the trees may offer limited opportunities for nesting birds and one area of grass within the south-west corner of the Site has the potential to be used by hibernating hedgehogs. The Site yields negligible potential for roosting bats.

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

Geology, Ground Conditions and Contamination

4.30 The Site is not designated for any geological importance or interest and does not yield any significant geological resource.

4.31 According to the British Geological Survey (BGS)[10] the bedrock geology of the Site and the majority of its environs is that of the London Clay Formation. This comprises clay, silt and sand associated with sedimentary bedrock formed between 56 - 47.8 million years ago during the Palaeogene period. This is overlain by sand and gravel of the Kempton Park Gravel Member.

4.32 Historic maps for the area[11] show the Site to be farmland in the 1850s. However, today's major roads of the area are evidenced surrounding the Site, including the line of Manor Road and Queen's Road, Lower Richmond Road, Upper Richmond Road and Kew Road. The London and South-Western Railway is also present. By the mid-1860s a second rail line is present (that which currently boarders the east of the Site).

4.33 An 1871 - 1874 map shows a Gas Works adjacent to the north-east of the Site. By 1874 an increase in residential development occurs within the areas surrounding the Site. This continues through to the early 1900s and beyond. However, a 1913 map shows the Site to contain a timber yard and other industrial uses. The Site's industrial uses appear to be a constant feature until the present-day retail accommodation was erected, circa the 1980s.

4.34 The area surrounding the Site experienced bombing in the 1940s[12]. However, there is no evidence of the Site being subject to any direct bombing.

4.35 In view of the above historic land uses and activities, as is typical with many previously industrial sites, there may be the potential for sources of industrial related contamination beneath the Site.

Water Resources and Flood Risk

4.36 The Site is located in Flood Zone 1[13] (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and does not contain any surface water features.

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

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

Air Quality

4.39 The Site (and the entire LBRuT) is designated as an Air Quality Management Area (AQMA). This is due to the breach of the National Air Quality Objectives in relation to ambient annual mean Nitrogen Dioxide ($N0_2$) and 24-hour mean Particulate Matter (PM_{10})[14]. The key sources of such pollutants in LBRuT are attributable to road traffic and associated emissions.

10 https://bgs.ac.uk
11 https://www.old-maps.co.uk/#/
12 https://bombsight.org/
13 https://flood-map-for-planning.service.gov.uk
14 https://uk-air.defra.gov.uk

Noise and Vibration

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

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

Hazards

4.42 According to various on-line sources the Site and its immediate environs are not subject to any Control of Major Accidents and Hazards (COMAH) sites[15], geological hazards[16] or safeguarded aviation zones. Furthermore the Site and its environs are not in an area of significant Radon potential or risk[17] and the Site is not underlain by any high pressure gas pipelines[18].

4.43 As noted above, whilst the area surrounding the Site experienced bombing in the 1940s, there is no evidence of the Site being subject to any direct bombing.

Overall Sensitivity of the Site

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

- SSSI or any consultation area around an SSSI.
- Land to which Nature Conservation Orders apply.
- International conservation sites.
- National Parks.
- AONBs.
- WHSs.
- SMs.

[15] https://notifications.hse.gov.uk/COMAH2015/Search.aspx
[16] https://bgs.ac.uk
[17] https://ukradon.org/information/ukmaps
[18] https://www.nationalgrid.com/uk/about-grid/our-networks-and-assets/gas-network-route-maps

5. The Likelihood of Significant Environmental Effects

5.1 Giving due regard to Schedule 3 of the EIA Regulations together with the information provided within Section 2 and Section 4 of this report, the likelihood of significant environmental effects to result from the Development are considered as follows. For each environmental topic area considered, environmental effects are considered for:

- The Site preparation, demolition and construction works associated with the Development (the Works).
- The operation of the completed Development (the Completed Development).

5.2 With regard to the likelihood of significant environmental effects arising from the Development with other significant approved development (the Cumulative Scenario), as per the EIA Regulations, the potential for cumulative effects of the Development with other significant developments (Cumulative Schemes) has considered *"...existing and / or approved development."* Given that existing development is already considered in the analysis of the existing environmental baseline conditions relevant to the Site and the Development (refer to Section 4) and a consideration of the likelihood of significant environmental effects of the Development are judged against this existing situation, the Cumulative Scenario need focus only on Cumulative Schemes with:

- A resolution to grant planning permission.
- A valid planning permission and yet to start on-site.
- A valid planning permission and under construction.

5.3 For the purposes of this report, given the fragmented urban nature of the Site's environmental context, and the scale and nature of the Development, the potential for Cumulative Schemes (and therefore effects) need only be considered up to approximately 750 m from the centre of the Site. No Cumulative Schemes exist within this geographical area. As such, there can be no cumulative effects and the remainder of Section 5 does not deal with an assessment of the Cumulative Scenario.

Transport and Connectivity

The Works

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

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

The Completed Development

5.6 With reference to Section 2, with the exception of 12 car-parking spaces for the mobility impaired the Development will be car-free. The Development will, therefore, reduce the number of car-trips when compared to the existing situation. This is demonstrated by Table 1 which has been informed by work undertaken by the Applicant's Transport Consultant (Sanderson Associates).

Table 1: Existing and With-Development Two-Way Movements to / from the Site

Peak Period	Existing Two-Way Movements	With-Development Two-Way Movements	Change
AM 08:30 - 09:00	80	71	-9
PM 17:00 - 16:00	108	83	-25

5.7 Table 1 shows that with the Development in place, there will be a reduction on two-way traffic movements to / from the Site. When distributed to the wider road network, the overall traffic volumes and flows resulting from the Development are unlikely to be materially different to that of the existing situation**.** As such, the Development is unlikely to give rise to significant vehicular traffic effects. This will be further avoided by the implementation of a Travel Plan and Delivery Servicing Plan. The former will advocate and encourage occupiers of the Development to use non-car modes of transport. The latter will ensure effective, efficient and minimally disruptive delivery and servicing trips to and from the Development.

5.8 As noted in Section 2, the Development will provide a new pedestrian realm which will increase connectivity to the wider area and provide a direct pedestrian access to North Sheen station, located approximately 200 m east of the centre of the Site and the local bus network. Furthermore, the provision of approximately 650 cycle parking spaces for residents of the Development will further encourage the use of non-car modes of transport.

Recommendations

5.9 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by the following documents:

- A Draft CTLP.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).

Core Social Infrastructure

The Works

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

The Completed Development

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

- A surplus capacity of 567 primary school places is reported within the 8 existing primary schools within 1 mile of the Site.
- A surplus capacity of 984 secondary school places is reported within the 9 existing secondary schools within 2 miles of the Site. Of the 984 spaces, 413 are for mixed-gender, multi-faith secondary schools.

5.12 The Development (with an envisaged 400 new homes) is unlikely to generate a child yield in-excess of 567 primary school aged children and 413 secondary school aged children. Consequently, it is unlikely the Development will generate any significant demand and 'over-capacity' issues at local primary and secondary schools.

5.13 With regards to local healthcare, as noted in Section 4, all 9 GPs within 1 mile of the Site are accepting new patients. It is therefore reasonable to assume adequate GP services exist to serve the resident population of the Development.

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

Recommendations

5.15 Not applicable.

Townscape and Visual Effects

The Works

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

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

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

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

The Completed Development

5.19 The scale of the completed and operational Development will not be disproportionate to the surrounding townscape and has the potential to enhance the townscape character of the Site and its setting due to the replacement of an isolated retail 'island' with a well-design residential community with significant public realm and increased ground floor activity.

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

5.21 Considering all of the above, the physical presence of the completed and operational Development is unlikely to have significant adverse effects upon townscape or views.

Recommendations

5.22 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for townscape and visual construction management).
- A Townscape and Visual Assessment, informed by Accurate Verified Representations (AVRs) of the Development within the 12 key views referenced in Section 4, Figure 6 and any other further views agreed in consultation with the LBRuT. However, it should be noted that in agreement with LBRuT view 9 (looking south from the viewing platform at the top of the Pagoda at Kew Gardens) will not be a verified view and will be provided for information only.

Heritage Effects

The Works

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

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

5.25 Section 4 identifies that the Site is not located with an APA; neither are there any APAs within 500 m of the Site. As such, the Site and its surrounds are not recognised to be of any particular archaeological significance. Furthermore, as previously noted, the Applicant's Archaeologist (MoLA) has identified the Site as being of low archaeological potential for all pre-Modern periods of past human activity. Furthermore, any archaeological potential will have been severely compromised by past land uses and activities associated with the Site.

5.26 In view of the above, although the Works will include an element of intrusive ground works associated with construction of a small basement within the north of the Site, foundation works and the installation of piles, the lack of archaeological potential and significance at the Site mean that any archaeological effects are unlikely. MoLA therefore advise that no further archaeological study or mitigation is required.

The Completed Development

5.27 As noted previously, all above ground heritage assets within the ZTV are sufficiently geographically removed from the Site or are separated from the Site by intervening built form that their localised settings are unlikely to be affected by the presence of the completed and operational Development.

5.28 An appropriately qualified and experienced Heritage Consultant will closely collaborate with the Applicant's Architects (Asseal) to ensure the design of the Development will not result in significant adverse effects on any above ground heritage assets or on their setting.

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

Recommendations

5.30 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for above ground heritage asset construction management).
- A Heritage Statement.
- An Archaeological Desk-Based Assessment.

Biodiversity / Ecological Effects

The Works

5.31 With reference to Section 4, the Site does not contain any statutory or non-statutory ecological sites and there are no statutory nature conservation designations within approximately 500 m of the Site. However, the northern-most tips of both East Sheen and Richmond Cemeteries and Pesthouse Common and Richmond Park and Associated Areas are located approximately 480 m south of the Site. Both sites are non-statutory Sites of Nature Conservation Importance.

5.32 The location of the above mentioned Sites of Nature Conservation Importance are considered to be adequately geographically removed from the Site so that they will not be directly or indirectly affected by the Works. Furthermore, there is no ecological connectivity between the Site and either of the non-statutory Sites of Nature Conservation. It is therefore concluded that even in the absence of any standard construction site mitigation, the Works will not lead to any effect upon them.

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

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

The Completed Development

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

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

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

Recommendations

5.38 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for biodiversity / ecological construction management).
- A PEA and PBRA (a re-submitted version of the PEA and PBRA included at Appendix 1 for completeness).
- A Lighting Strategy.

Geology, Ground Conditions and Contamination

The Works

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

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

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

5.42 In addition to the above, standard and best practice environmental management controls will be implemented during the Works to safeguard against the risks (and associated effects) of unforeseen and unexpected potential contamination events such as accidental spills of construction related materials brought to and stored on the Site during the Works. Such environmental management controls will include but not be exclusive to:

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

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

5.44 With respect to the risk of UXO, all intrusive ground works will be subject to a UXO Watching Brief. This precautionary measure will ensure that should UXO be encountered, appropriate steps can be taken to immediately de-risk the situation. Again, it is envisaged that the CEMP will set out the correct process and procedures to follow should UXO be encountered.

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

The Completed Development

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

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

Recommendations

5.48 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- A Draft CEMP (including for contamination and UXO management).

Water Resources and Flood Risk

The Works

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

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

The Completed Development

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

5.52 The Development intends to replace existing hard-standing and impermeable areas with a similar type of land cover. However, climate change considerations require that the completed and operational Development must be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events. Similarly, the

Development must be designed to ensure surface water flooding is not increased at the Site, or elsewhere, accounting for climate change.

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

Recommendations

5.54 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for surface water drainage management).
- A Flood Risk Assessment (FRA) (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).

Air Quality

The Works

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

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

5.56 With regard to dust emissions and nuisance, this can be effectively managed by standard construction environmental management techniques, all to be included in the CEMP. These will include but not be exclusive to:

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

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

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

5.59 With regard to emissions from construction related traffic, as noted in a previous sub-section of Section 5 (Transport and Connectivity) the temporary increase in traffic generation associated with the Works is not envisaged to be significant. It therefore follows that road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

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

The Completed Development

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

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

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

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

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

Recommendations

5.65 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for dust and air quality management).
- An Air Quality Assessment.

Noise and Vibration

The Works

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

- Increased ambient noise and vibration and associated nuisance generated by the physical components of the Works.
- Increased ambient noise and vibration resulting from the operation of construction plant and machinery.
- Increased road traffic noise from construction related traffic generation.

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

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

5.68 With regard to noise generated from construction related traffic, as noted in a previous sub-section of Section 5 (Transport and Connectivity) the temporary increase in traffic generation associated with the Works is not envisaged to be significant. In addition, it is well known that it take a 20 - 25% change in traffic flow to create an audible difference in road traffic noise[19, 20]. It therefore follows that road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

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

The Completed Development

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

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

[19] Highways Agency. The Design Manual for Roads and Bridges. Volume 10 - Environmental Design. 2008.
[20] Highways Agency. The Design Manual for Roads and Bridges. Volume 11 - Environmental Assessment. 2009.

5.71 As noted in a previous sub-section of Section 5 (Transport and Connectivity) the overall traffic volumes and flows on the local road network attributable for the Development are unlikely to be materially different to that of the existing situation and certainly no more than +/- 20 - 25% when compared to the existing situation. Furthermore vehicular servicing of the Development will be designed so as to minimise noise impact to existing and future residents both on and off the Site. In this respect, a Delivery and Servicing Plan will be implemented.

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

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

Recommendations

5.74 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for noise and vibration management).
- A Noise and Vibration Assessment.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).

Wind Microclimate

The Works

5.75 The Site is not located in a particularly exposed or windy area which, as previously noted in Section 4, contains a relatively uniform massing, generally comprising low - medium rise buildings and structures ranging from 2 - 6-storeys. Whilst 2 12-storey towers are located approximately 170 m east of the centre of the Site, these are not located up-wind of the Site to the prevailing south-westerly winds. As such, these towers are unlikely to create any wind tunnelling effect at the existing Site. In conclusion, the existing Site is unlikely to be subject to any uncomfortably windy and potentially unsafe wind conditions.

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

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

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

The Completed Development

5.79 As noted previously, the Site is not located in a particularly exposed or windy area. Furthermore, the Development will be relatively modest in scale comprising 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys. It is therefore judged that the completed and operational Development will not create significantly different wind conditions to those prevailing within and surrounding the Site.

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

Recommendations

5.81 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Desk-Based Wind Microclimate Assessment.

Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

The Works

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

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

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

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

5.86 Incidences of solar glare are not anticipated to arise. Details are provided below.

The Completed Development

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

5.88 In view of the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant (Point 2 Surveyors) is informing the design of the Development to ensure any such changes to surrounding habitable rooms and amenity spaces are minimised and where changes do occur, are not unacceptable in the context of the dense urban setting of the Site. Furthermore, owing to the significant physical separation of existing surrounding residential receptors from the Site (a result of the Site being bound to the east by Manor Road and the south and west by overland rail lines) and the modest proposed massing of the Development, any daylight, sunlight and overshadowing effects to surrounding residential receptors are likely to be insignificant.

5.89 With regard to daylight, sunlight and overshadowing experienced by occupants, visitors and users of the Development itself, similar to the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant (Point 2 Surveyors) is informing the design of the Development to ensure acceptable standards will be met. This can be achieved by appropriate building massing, siting and orientation, the arrangement of living spaces and amenity spaces, and fenestration design.

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

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

Recommendations

5.92 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for light pollution management).
- A Daylight, Sunlight and Overshadowing Assessment.
- A Lighting Strategy.

Waste

The Works

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

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

The Completed Development

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

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

Recommendations

5.97 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for construction site waste management).
- An Operational Waste Management Plan.

Risk of Major Accidents and Disasters

The Works

5.98 As noted in Section 4, the Site and its environs are not subject to any COMAH sites, geological hazards or safeguarded aviation zones. Furthermore, with standard, tried and tested construction related environmental management controls in place (to be set out within the CEMP), previous sub-sections of Section 5 (Geology, Ground Conditions and Contamination and Water Resources and Flood Risk) demonstrate the Works are unlikely to give rise to significant risks associated with contamination, UXO and surface water flooding.

The Completed Development

5.99 As previously noted, the Site and its environs are not subject to any recognised risk or hazard zone(s). In addition, the completed and operational Development does not proposed any land uses that will increase the risk of major accidents and disasters. In this respect, the Development will be designed in accordance with all relevant health and safety requirements. Furthermore, previous sub-sections of Section 5 (Geology, Ground Conditions and Contamination and Water Resources and Flood Risk) justify that the completed and operational Development will unlikely give rise to any significant contamination or flood risk.

Recommendations

5.100 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for ground contamination, UXO and surface water drainage management).
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).

Health and Wellbeing

The Works

5.101 Previous sub-sections of Section 5 (Geology, Ground Conditions and Contamination, Air Quality and Noise and Vibration) demonstrate that the Works are not anticipated to give rise to any significant contamination, UXO, air quality and / or noise and vibration effects, all of which have the potential to affect human health and wellbeing. The likelihood of insignificant effects for all relevant topics is by virtue of the nature and location of the Development, together with the implementation of a broad range of standard, tried and tested construction related environmental management controls, all to be set out within the CEMP. Consequently, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the Works.

The Completed Development

5.102 Similar to the above, previous sub-sections of Section 5 (Geology, Ground Conditions and Contamination, Air Quality and Noise and Vibration, Wind Microclimate and Daylight, Sunlight, Overshadowing and Light Pollution) demonstrate that the Works are unlikely to give rise to significant contamination, air quality, noise and vibration, wind microclimate and / or daylight, sunlight, overshadowing, light pollution and solar glare effects. As such, with the Development in place, these environmental factors are unlikely to significantly

affect the health and wellbeing of residents, users and visitors of the Development and the surrounding locality.

5.103 With reference to Section 2, the Development will provide new and generously proportioned hard and soft landscaped areas throughout the Site and provide in the region of 650 cycle parking spaces for residents of the Development. This will improve pedestrian and cyclist connectivity throughout and to and from the Site. The landscaped areas will also provide dedicated children's play space and an outdoor gym.

5.104 In view of the above, the Development will improve pedestrian connectivity and provide opportunities for residents of the Development to walk and cycle. In addition the provision of amenity space (including children's play space and an outdoor gym) will allow for physical activity. Although these inherent design features are unlikely to affect human health and wellbeing on a significant scale, they will encourage direct access to opportunities which can contribute to a healthy lifestyle.

Recommendations

5.105 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for ground contamination, UXO, dust, air quality, noise and vibration and light pollution management).
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An Air Quality Assessment.
- A Daylight, Sunlight and Overshadowing Assessment**.**

Climate Change

The Works

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

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

The Completed Development

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

5.109 With reference to previous sub-sections in Section 5 (Transport and Connectivity and Air Quality) the Development will be car free, with the exception of 12 car-parking spaces provided for the mobility impaired. When considering servicing of the Development the overall vehicular trip generation from the Development is unlikely to be materially different to that of the existing situation. As such, the Development is unlikely to give rise to significant vehicular traffic effects. It therefore follows that the Development is unlikely to give rise to significant changes to vehicular traffic emissions which will include for greenhouse gases.

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

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

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

Recommendations

5.112 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by the following documents:

- A Draft CEMP (including for dust, air quality and noise and vibration management).
- A Draft CTLP.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).
- An Air Quality Assessment.
- A Sustainability Statement.

Cumulative Interactions of the Development

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

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

6. Conclusion and Recommendations

6.1 The Development is considered to be modest in scale and of a type that is consistent with other land in proximity to and further afield from the Site.

6.2 As noted within Section 4, the Site is not located in a 'sensitive area' as defined by the EIA Regulations. Accordingly, the absorption capacity of the natural environment in and surrounding the Site is judged to be high; the Site and its surrounds are resilient to change.

6.3 Any environmental effects associated with the Development are unlikely to be significant and can be adequately dealt with via the normal planning application process. As such, the Development is not considered to constitute EIA development.

6.4 Despite the above, it is acknowledged that to accord with various planning requirements (not the EIA Regulations), the Applicant's detailed planning application for the Development will need to be supported by the following suite of environmental technical studies:

- A Draft CEMP.
- A Draft CTLP.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).
- A Townscape and Visual Assessment.
- A Heritage Statement.
- A PEA.
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).
- An Air Quality Assessment.
- A Noise and Vibration Assessment.
- A Desk-Based Wind Microclimate Assessment.
- A Daylight, Sunlight and Overshadowing Assessment.
- A Lighting Strategy.
- An Operational Waste Management Plan.

- A Sustainability Statement.

Appendix I

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

16 October 2018

Homebase North Sheen

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

Report Number: 11778_RO1a_CC_JW

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Plans

Summary

S.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) at a retail park known as Homebase North Sheen, located along Manor Road, Richmond, London, Middlesex (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'. The purpose of this report is to inform a planning application for the construction of 381 new residential units, retail and office species and above ground parking.

S.2. The site is an active retail park, predominantly comprised of hardstanding with a central building actively used by members of the public and Homebase staff. The site is accessible directly from Manor Road. The site contains serval young to semi-mature trees, along with small areas of amenity grassland, introduced scrub, scattered scrub and tall ruderal vegetation. The site is bordered by active railway lines to the west and south, a bus park to the north and a road; Manor Road to the east.

S.3. The site is not covered by nor adjacent to any sites that are subject of statutory or non-statutory protection and no such sites are likely to be affected by the proposed development on the site. The majority of habitats within the site that may be lost as a result of a development (Buildings, hardstanding, amenity grassland and introduced scrub) are of negligible ecological importance and no specific mitigation is required.

S.4. The building and trees within the site have been assessed as having negligible potential to support roosting bats.

S.5. Precautionary checks for nesting breeding birds, reptiles and hedgehogs are recommended by an Ecological Clerk of Works (ECoW), if buildings or nesting bird habitat is removed in the nesting bird season (March – August, inclusive), Hedgehog hibernation season (October – April, inclusive), to prevent death or injury of individual by the proposed works. Should nesting birds be present with young or eggs, an appropriate buffer should be erected, and the nest checked periodically by an ECoW until it is clear the young have either failed or fledged. Should any hedgehogs be found they will be removed by an ECoW by hand and translocated to suitable off or onsite habitat that is suitable and similar to that in which they were found.

S.6. Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and the borough of Richmond Upon Thames Biodiversity Action Plan (BAP). New flora planted should be native and of local stock. In addition, enhancements for specific species groups will be provided post-construction including bird and bat boxes to increase the number of nest and nesting sites across the site and hedgehog boxes and highways and bug hotels to provide a net biodiversity gain.

Section 1: Introduction, Context and Purpose

Introduction

1.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a retail space at 86 Manor Road, Richmond, London (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'.

1.2. Plans are being drawn up to re-develop the site for housing, commercial and office spaces. A masterplan for the site is being produced, which will form the basis for a planning application in the near future.

Purpose

1.3. This report:

- Uses available background data and results of field surveys, to describe and evaluate the ecological features present within the likely 'zone of influence' (ZoI)[1] of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's future development for;
- Where appropriate, makes recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation listed in **Appendix 1**; and

1.4. This assessment and the terminology used are consistent with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, 2018).

[1] Defined as the area over which ecological features may be subject to significant effects as a result of activities associated with a project (CIEEM, 2018)

Section 2: Methodology

Data Search

2.1. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

2.2. The data search has been undertaken for a 10km radius around the site for European statutory sites, a 2km radius for national statutory and non-statutory sites and a 1km radius for protected and priority species[2] records. The search area was extended to 2km for bat records.

2.3. GiGL; Greenspace Information for Greater London Environmental Records Centre was contacted for details of protected and priority species and non-statutory sites. The information from GiGl was requested on 15th August 2018 and returned on 16th August 2018. Where relevant records were identified, the information provided has been incorporated into the report with due acknowledgement.

2.4. The Multi-Agency Geographic Information for the Countryside[3] website was accessed for information on the location of statutory designated nature conservation sites within a 2km radius the site.

2.5. The London Borough of Richmond upon Thames website was consulted for details of relevant local planning policies and supplementary planning guidance.

2.6. The London Borough of Richmond upon Thames BAP (LBAP) was consulted for priority habitats and species subject to conservation action, to assist with the evaluation of ecological features and to inform site enhancement strategies.

Extended Phase I Habitat Survey

2.7. An 'extended' Phase I habitat survey was undertaken on 8th August 2018 by Sarah Richardson, an experienced field ecologist and graduate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The technique was based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species.

2.8. The weather conditions for the survey were dry with 75% cloud cover, 24ºC degrees and 2 on the Beaufort scale.

2.9. Using the above method, the site was classified into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described.

2.10. Additionally, incidental records of fauna were also made during the survey and the habitats identified were evaluated for their potential to support legally protected and priority species.

[2] UK priority species and habitats are those subject to conservation action and referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). They are listed at Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.

[3] https://magic.defra.gov.uk/MagicMap.aspx

Preliminary Bat Roost Assessment – Buildings & Trees

2.11. A preliminary assessment of the buildings and trees present within the site was undertaken to assess their potential to support roosting bats. This survey was undertaken alongside the 'extended' Phase 1 habitat survey. The surveys followed standard methodologies (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) which are described below.

2.12. The PBRA for buildings comprised an external and internal inspection of all buildings present on-site to assess their potential to support roosting bats. In summary, this required the following:

- A visual inspection of the exterior and interior of the buildings on site was undertaken on the 8th August 2018, examining features such as brickwork, lead flashing, and tiles for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine; and
- A number of factors were considered including the presence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.

2.13. The PBRA for trees comprised a ground level inspection of all trees present on-site to determine the potential of each tree to support roosting bats. During this survey, Potential Roost Features (PRFs) that may be used by bats, as identified within the BCT Good Practice Guidelines (Collins, 2016), were sought. These included the following:

- Woodpecker holes, rot holes, knot holes arising from naturally shed branches and man-made holes;
- Hazard beams and other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached platey bark;
- Cankers;
- Other hollows or cavities, including butt-rots;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bird, bat or dormouse boxes.

2.14. Evidence of the presence of bat roosts was also sought. These signs include:

- Bat droppings in, around or below a PRF;
- Odour emanating from a PRF;
- Audible squeaking at dusk or in warm weather; and
- Visible staining below a PRF.

2.15. The potential of each building or tree at the site and immediately adjacent to the site to support roosting bats has been categorised against the criteria described in Table 2.1.

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on-site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat.

Table 2.1 – Roost Assessment Criteria (adapted from Collins 2016).

Evaluation

2.16. The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2018). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the site boundary only.

2.17. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Quality Control

2.18. All ecologists at Tyler Grange LLP are members of CIEEM and abide by the Institute's Code of Professional Conduct.

Section 3: Ecological Features and Evaluation

Context

3.1. The site is an active retail site, comprised of a central building surrounded by hardstanding actively used by staff and members of the public. The site is accessible directly from Manor Road; B353 and contains serval trees and areas of marginal vegetation, hedgerows, amenity grassland and introduced scrub.

3.2. The site is bordered by railway lines on the south and west boundary; Manor Road (the B353) on the east boundary and a bus bank on the north boundary.

Protected Sites

Statutory Sites

3.3. There are two sites of European designation within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species the stag beetle *Lucanus cervus*. Given that the site is designated as a SAC due to the stag beetle population present, it is considered to be of **European importance**.

- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu,* which is listed as an Annex II species. Due to the presence of stag beetles and the presences of both wet and dry heathlands Wimbledon Common is considered a of **European importance**.

3.4. There are two sites of National designation within 2km of the site:

- Svon Park is located 1.7km north-west of the site and is designated a SSSI. Svon Park is 21.5 Ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is considered to be of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is considered to be of **local importance**.

3.5. The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

3.6. LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 by local authorities. They are not necessarily of great ecological importance and are intended for public appreciation and enjoyment of wildlife. The LNR designation does not afford special protection, although LNRs are protected under legislation and planning policy.

Non-Statutory (Local) Sites

3.7. Non-statuatory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:

- Sites of Metropolitan Importance
- Sites of Borough Importance (borough grade 1 and borough grade 2)
- Sites of Local Importance.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scare plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pesthouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scare and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km- South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scare and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail *Balea biplicata* and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scare plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: - Marsh sow-thistle *Sonchus palustris* - Cut-grass *Leersia oryzoides*.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail *Balea biplicata* only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush *Bolboschoenus maritimus* and nationally rare invertebrates such as the, Thames/two-lipped door snail *Balia biplicata*.
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree *Juglans nigra*.

Table 3.1 – Non-Statutory Protected Sites within 2km of the site.

Habitats and Flora

3.8. The site supports the following habitats:

- Amenity Grassland;
- Buildings and Hardstanding;
- Dense Scrub;
- Introduced Scrub
- Scattered Broad-leaved Trees
- Scattered Scrub;
- Tall Ruderal;

3.9. For ease of reference, habitat types have been described alphabetically, below. All the features described are shown on the 11778_P01 Habitat Features Plan.

Amenity Grassland

3.10. Several small areas of amenity grassland are present in the northern area of the site; along the north section of the eastern boundary, along the northern boundary and at the top of car parking areas (see Habitat Feature Plan 11778_P01). The amenity grassland found throughout the site contains

species typical of this habitat type including perennial rye grass *Lolium perenne*, geranium *Gernium sp.*, common ivy *Hedera helix*, common daisy *Bellis perennis*, dandelion *Taraxacum officinale* and thistle sp *Cirsium sp*. These areas are regularly mown producing a low sward. The amenity grassland is of low species diversity and comprises a heavily managed short sward and as such it is of **negligible ecological importance**.

Buildings and Hardstanding

3.11. Areas of hardstanding are present within the site in the form of tarmac roads and carparks in the north and south-west sections of the site (see Habitat Feature Plan 11778_P01), large areas of concrete with large shelving units south of B1, and brick paths (see photograph 3.1). One strip of pavement along the western wall of B1 is broken by emergent vegetation consisting of willow herb *Epilobium hirsutum*, buddleia *Buddleja davidii* and dandelion *Taraxacum officinale.* As hardstanding has no inherent ecological importance and the area in which there was emergent vegetation was so small, this habitat is of **negligible ecological importance**.

Photograph 3.1: Hardstanding in the west of the sit (view south-west)

3.12. One building (B1) was identified during the site visit which is located in the centre of the site. The building is a red brick construction with a tiled pitch roof. The roof has an extended overhang with wooden cladding around the rim. The building is surrounded by hardstanding.

3.13. The building with the site is generally in good repair given their active use, and as the buildings offer little to the biodiversity resource to the site they are considered to be of **negligible ecological importance**. The potential of the building to support roosting bats, along with photos of the buildings

that were assessed for their potential to support roosting bats, are provided in Section 3; Fauna.

Dense Scrub

3.14. A small area of dense scrub is present in the south-west corner of the site between railway lines, comprising of bramble *Rubus fruticosus agg.*, common nettle *Urtica dioica*, buddleia, dandelion, common ivy and sycamore *Acer pseudoplatanus*. Given its small size, largely native species composition and position within the site, this area of habitat is considered to be of **ecological importance within the context of the site only.**

Introduced Scrub

3.15. Several small areas of introduced scrub were identified on the site along the eastern boundary of the site, and small patch surrounded by hardstanding in the car park area. These patches comprised of ornamental non-native species cotoneaster *Cotoneaster horizontalis*, buddleia and native Laurel *Laurus nobilis*. Given their small size and largely composed of non-native species, these habitat areas are considered to be of **negligible ecological importance.**

Scattered Broad-leaved Trees

3.16. Within the site there are several planted, young to semi-mature tree species present; along the east boundary surrounded by amenity grassland, within the car park area planted between bays, in an area of introduced scrub to the west of car park and along the east boundary (see Photograph 3.2). The tree species are composed of *Prunus sp*. common lime *Tilia* × *europaea*, sycamore, and silver birch *Betula pendula.* Due to there age, position within the site and native species composition this area of habitat is considered to be of **ecological importance within the context of the site only**.

Photograph 3.2: Scattered broadleaved trees in the north of the site (view east)

Scattered Scrub

3.17. Several small areas of scattered scrub are present throughout the site; on the east site boundary between amenity grassland and introduced scrub and running along the west boundary fence parallel to the railway track a largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain *Plantago lanceolata* (See photograph 3.3). Given the small area present within the site and the largely non-native composition of the habitat, area of habitat is considered to be of **ecological importance within the context of the site only**.

Photograph 3.3: Scattered scrub along the east boundary (view east).

Tall Ruderal

3.18. One small patch of tall ruderal vegetation is present on the southern boundary of the site, consisting of elder *Sambucus nigra*, common ivy, bramble, common nettle and cleavers *Galium aparine*. Given the small area present within the site this area of habitat is considered to be of **ecological importance within the context of the site only**.

Target Notes

Target Note 1

3.19. Area of bare ground with piles of turf and grass clipping (see Habitat Feature Plan 11778_P01). Potential refugia for reptiles and hedgehogs.

Target Note 2

3.20. Woody climbers along western fence boundary, parallel to the railway track (see Habitat Feature Plan 11778_P01). Composed of elder, cotoneaster and common ivy.

Protected and Priority Fauna

Amphibians

3.21. Three records of great crested newt *Triturus cristatus* (GCN) were returned within 2km of the site, the most recent of which was recorded in 2017.

3.22. A desk study of available aerial photography was conducted finding two ponds within a 500m radius of the site. As both waterbodies are on privately owned land a Habitat Suitability Assessment[4] could not be conducted on these waterbodies at the time of this report.

3.23. Terrestrial habitats at the site are considered to be largely unsuitable for GCN (predominantly hardstanding ground with small areas of amenity grassland, scattered scrub and introduced scrub). The areas of suitable habitat (scrub) are small and exhibit little to no connectivity with the wider landscape.

3.24. Due to the lack of suitable terrestrial habitat for GCN, lack of ponds or suitable waterbodies on or adjacent to the site and the presence of numerous land barriers; main roads, fenced gardens, buildings and between the site and the closest ponds, GCN are not considered to be a feature of the site.

Bats

3.25. Within 2km of the site, records of Brandt's bat *Myotis brandtii*, brown long-eared bat *Plecotus auratus*, common pipistrelle *Pipistrellus pipistrellus*, Daubenton's bat *Myotis daubentoniid*, lesser noctule *Nyctalus leisleri*, Nathusius' pipistrelle *Pipistrellus nathusii*, Natterer's bat *Myotis nattereri*, noctule bat *Nyctalus noctule*, serotine *Eptesicus serotinus*, soprano pipistrelle *Pipistrellus pygmaeus* and whiskered bat *Myotis mystacinus* were identified. The most recent of these was of a brown long-eared bat in 2017.

3.26. The building and trees within the site boundary were assessed for their potential to support roosting bats. The only building found on site; B1 is constructed of red brick with a corrugated clay tile roof. The roof is pitched with an extended overhang from the wall, with a wooden soffit box running around the length of the overhang (See Photograph 3.4).

[4] Habitat Index Assessment; HIS a quantitively method of determining a waterbodies suitability to support Great Crested Newts, using a combination of factors.

Photograph 3.4: View of the building from the front, facing north (view east).

3.27. There is little cladding on the building itself, aside from the plastic 'Homebase' sign on the western wall, the building is well sealed and in good repair. No entry points or roost features were identified during the PBRA of the building. It is there for considered to have **negligible potential** for roosting bats.

3.28. Bats are known to use railway corridors as commuting routes to and from feeding areas and roosts. While the site is well lit and does not offer suitable foraging habitat for bats, and therefore will only be used operatically. The vegetation along the southern boarder could act as a possible commuting corridor for access to site in the wider Borough area.

Badger

3.29. Within 2km of the site, 21 records of Badger *Meles meles* were returned the most recent from 2017.

3.30. No signs of badgers were identified on the site. The habitats on site are sub-optimal due to the large areas of hardstanding and only small areas of scattered scrub and tall ruderal vegetation. However, the is optimal habitat within the wider area such as the railway corridor along the south and west boundaries, allotments and woodland that are much more likely to be used by badgers, making them

less likely to use the sub-optimal habitat found on site. Furthermore, the site is geographically isolated by railways running along the west and south site boundaries and roads to the north and east, making access to and use of the site by badgers unlikely. Therefore, badgers are not considered a feature of the site.

Birds

3.31. Records of birds within 2km of the site include species red listed species according to the Birds of Conservation Concern (BoCC) criteria[5], including redwing *Turdus iliacus,* house sparrow *Passer domesticus*, tree sparrow *Passer montanus,* starling *Sturnus vulgaris*¸ yellow wagtail *Motacilla flava*.

3.32. The site has limited potential to support breeding bird populations with most of the site being large areas of hardstanding. The habitats areas within the site listed above; scattered trees, scattered scrub, introduced scrub and tall ruderal along the west, east and south boundaries have potential to support small populations of common and widespread bird species.

3.33. Therefore, any populations of birds utilising the site are considered to be of **site importance only**.

Invertebrates

3.34. The data search showed records of several species of invertebrate listed SoPI listed in the NERC Act (2006) as including the Stag Beetle *Lucanus cervus* with 16 records. The stag beetle is a London BAP species and protected under

3.35. There is limited suitable habitat with diversity therefore a significant population of rare or notable invertebrate species would not be expected. As such the any invertebrate populations are likely to be of **negligible ecological importance.**

West European Hedgehog

3.36. A total of 288 records of West European Hedgehog *Erinaceus europaeus* were identified within 2km of the site, the most recent of which was recorded in 2017.

3.37. The hedgehog is listed An SoPI and a priority species under the Richmond Biodiversity Action Plan (BAP).

3.38. One area (see habitat plan 11778_P01; Target note 1) of grass piles in the south- west corner of the site could potentially be used by hedgehogs as a hibernaculum during hibernation, however this is the only suitable area within and around the site. Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of **site importance**.

Reptiles

3.39. There are records for grass snake *Natrix natrix* and Viviparious lizard *Zootoca vivipara* within 2km of the site. The most recent of which was of a grass snake in 2012.

3.40. Given the large areas of continually used hardstanding and only small pockets of potentially suitable

[5] The Bird Species of Conservation Concern (BoCC) categorises bird species into the following classifications:
* Red List species are bird species of high conservation concern, such as those whose population or range is rapidly declining, recently or historically, and those of global conservation concern.
* Amber List species are bird species of medium conservation concern, such as those whose population is in moderate decline, rare breeders, internationally important and localised species, and those of unfavourable conservation status in Europe.
* Green List species are bird species in the least critical group of conservation concern, such as those that occur regularly in the UK but do not qualify under any of the above criteria.

habits; marginal vegetation in the south of the site and one area with suitable hibernacula a grass piles in the south-west corner of the site (see habitat plan 11778_P01; Target note 1). Reptiles present on site are likely to be a small population of common species. Therefore, any population on site is deemed to only be of **site importance.** Given that there is more suitable habitat adjacent to the site; allotments and railway corridor along the south and west border, reptiles are less likely to use the less suitable habitats present on site/ Therefore the population present on site is deems to be likely a small population of common species and are likely to be of **negligible ecological importance.**

Other species

3.41. No records of hazel dormouse *Muscardinus avellanarius* were returned from the data search. Hazel dormice are arboreal and generally require a well-connected and diverse habitat structure (Bright *et al*., 2006), such as that found in deciduous woodland, species-rich hedgerows and scrub. Given that there are no areas of of potentially suitable habitat for hazel dormouse, it is considered that hazel dormouse is highly likely to be absent from the site and as such are not considered further within this report.

3.42. No records of European otter *Lutra lutra*, water vole *Arvicola amphibius* and white-clawed crayfish *Austropotamobius pallipes* were returned by the data search from within 2km of the site. There is no suitable habitat on site to support these species therefore they are not considered features of the site.

Invasive species

3.43. Invasive species are those listed under Schedule 9 of the Wildlife and Countryside Act 1981. With regard to invasive plant species (listed under Part II of Schedule 9), it is an offence to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9.

3.44. One invasive species; Cotoneaster was identified during the PEA of the site. Cotoneaster is an (INNS) Category 2 species; requiring concerted control management and eradication as it is a high impact or presents a concern in the London area.

Section 4: Considerations in Respect of Future Development

Proposed Development

4.1. The masterplan for the site is currently evolving and was not available at the time of writing. It will however comprise demolition of the existing buildings and construction of a mixed-use development comprising residential units, retail and office spaces and associated infrastructure and green space.

4.2. The potential consequences with respect to development of the site are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 1**.

Protected Sites

4.3. Within 10km of the site boundary there are two sites protected under European designation; these are as follows:

- Richmond Park (SAC, NNR, SSSI), 0.5km south of the site, 846.6Ha in size; and
- Wimbledon Common (SAC, SSSI), 4.2km south-east of the site, 350Ha in size.

4.4. These statutory designated sites are separated from the site by buildings; residential and businesses, roads, hardstanding and areas of green space, and as such no direct impacts are anticipated. Two potential indirect impacts of development on these protected sites have been identified; increase in air pollution and increased recreational pressure.

4.5. In terms of potential impacts through increased air pollution, the scheme involves the removal of 150 car parking spaces from the existing site. The masterplan includes for 20 car parking spaces for the mobility impaired, but will otherwise be car free. As such, traffic levels and associated air pollutants resulting from the development of the site are likely to decrease. Potential adverse effects on these sites through a reduction in air quality are therefore considered to be unlikely.

4.6. As urban green spaces, both SAC's are managed to accommodate heavy recreational use, as stated the management plans for both sites: a strategy for Wimbledon and Putney Common (2017) and Richmond Park Management Plan (2014). In addition, both sites are primarily designated for supporting populations of stag beetles, which require dead wood to subsist on a site which is largely unaffected by recreational pressure. Wimbledon Common is also designated for supporting several areas of heathland habitats which can be affected by recreational use. However, as Wimbledon common is 4.4km away from the site and it is managed to accommodate recreational use, adverse effects are considered unlikely.

4.7. Within 2km of the site boundary there are two sites of national designation they are as follows;

- Svon Park (SSSI), 1.7km north-west of the site, 21.5Ha in size; and
- Isleworth Ait (SSSI), 2km west of the site, 3.46Ha in size.

4.8. These sites are not directly adjacent to the site boundary and geographically isolated by buildings, greenspace, hardstanding and roads. Therefore, the proposed development is not considered to have any direct or indirect impacts on the site and no specific mitigation is required.

4.9. Within 2km of the site boundary there are 16 non-statutory sites as discussed in **Section 3**;

4.10. None of the non-statutory sites border the site, the closest of which; Kew Botanic Gardens is 0.5km north-west of the site boundary therefore it is highly unlikely that any direct impacts on any of the sites will occur. Indirect increased recreation pressure upon the sites can be mitigated by the incorporation of multi-functional green space within the site boundary, furthermore several of the sites close to the site boundary are already managed for recreational purposes and are readily publicly accessible, therefore it is highly unlikely any indirect effects will occur.

Habitats and Flora

4.11. As per the A3004 Manor Road GLA per-app document 1, it is likely that all existing habitats on site will be lost to the development. However, all habitats identified are of negligible or site ecological importance only, therefore the legislation is not triggered, and no specific mitigation is required. Consideration should be given to retaining and enhancing the boundary trees and scrub within the development if possible.

4.12. In addition, in line with the NPPF and the Borough of Richmond Local Plan there is a significant opportunity for biodiversity gain on the site, thought the inclusion of new opportunities for specific species groups and the planting of native flora.

Invasive flora

4.13. The site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2, this may require an invasive species specialist to be properly removed from the site to avoid spreading the species during site clearance.

Fauna

Birds

4.14. In England and Wales, birds and their nest are protected under the Wildlife and Countryside Act (1981) (as amended).

4.15. The site has the potential to support nesting and foraging birds within he scattered trees, tall ruderal vegetation present on site. As such any vegetation clearance occurring during breeding bird season between (March - August); a pre-works check of the proposed removed vegetation should be undertaken Ecological Clerk of Works (ECoW) to determine if any nesting birds are present. Should any active nests be discovered contain either eggs or chicks the nest must be retained and buffered until an ECoW has confirmed the chick have fledged.

4.16. Furthermore, the habitat on site provides an opportunity for a biodiversity gain by improving the habitats suitable for breeding birds; scattered scrub, scattered trees and tall ruderal. Bird boxes along tree lines could be provides encouraging species to the site and providing a net biodiversity gain.

Bats

4.17. In England and Wales, bats and their roost are fully protected un the Wildlife and Countryside Act (1981) (as amended).

4.18. While the site has limited potential to support roosting bats it maybe be used by commuting and opportunistic foraging bats. While the habitats present on site itself are not suitable for foraging bats,

the railway corridor along the west and south of the site boundary provides opportunity for commuting bats. Lighting at the site during the construction and operation phases of the development should be sympathetic to bats that may be utilising the trees boundaries of the site for commuting and foraging activity. Any lightning for the proposed development should be designed to minimise disturbance to bats (e.g. through the use of timers, provision of low-level bollard lighting, use of hoods or cowls on lights, and provision of warm-white LED lighting – Collins, 2016; Institute of Lighting Professionals and BCT, 2018).

West European Hedgehog

4.19. In England and Wales, hedgehogs are listed as a SoPI under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

4.20. As the site has potential habitat to support hedgehogs and there are a large number of records from within 2km any potential habitat that might be used by hedgehogs should be retained where possible. However, if suitable habitat is removed it should be done so outside of the hibernation period (October to April). If removal is necessary within this period, a hand search should be undertaken by an ECoW before works take place. Should any hedgehogs be found during habitat removal or construction they should be removed by and from the site and place in suitable similar habitat to where they were found.

4.21. Within the area of the site habitats identified as suitable for hedgehogs should be retained and enhanced with native and local stock of plant species where possible. In regards, to hedgehogs the site can be enhanced to benefit them, by improving the scattered scrub and tall ruderal habitats. Features could also be provided to enhancing and improve hedgehog use of the site, the inclusion of a hedgehog highways; small holes in the site boundary fencing that would all for connectivity of on-site habitats to the wider landscape and hedgehog boxes, would do this.

Ecological Design Principles and Enhancement Opportunities

4.22. The National Planning Policy Framework (NPPF) encourages development to provide net gains in biodiversity where possible. Therefore, an effort should be made, through the development design, to provide ecological enhancement to deliver an overall increase in biodiversity of the site and opportunities to incorporate biodiversity in and around developments should be encouraged. This would also be in-line with the Policy LP 15 (Biodiversity) within the Local plan and Richmond BAP.

4.23. Considering the relevant policies, as summarised above, there is the opportunity to enhance the biodiversity of the site by adopting design principles informed by conservation strategies, notable the Biodiversity 2020: A strategy for England's wildlife and ecosystem services (hereafter referred to as Biodiversity 2020) and the NPPF. Such opportunities include:

- Creation of green infrastructure within the development, which can be multi-functional, delivering biodiversity, and drainage benefits. This can include retained and newly created habitats, such as those listed below;
- Sensitive lighting along south and west rail corridors to avoid disturbance of commuting bats along the south and west site boundaries;
- Planting of native flora in retained or newly created habitats; including scattered scrub and trees, tall ruderal and marginal vegetation, particularly planting of native trees along rail corridors to the south and west of the site. Thus, providing new opportunities for fauna;
- Green Infrastructure; Inclusion of brown; sedum roofs and terrace gardens as per A3004 Manor Road GLA per-app document 1, to increase areas of accessible green space and provide a net

biodiversity gain on site;

- Placement of bug hotels within terrace gardens, sedum roofs and newly created habitats across the site to encourage insects to the site;

- Integration of a hedgehog highway and boxes into suitable pre-existing or newly created habitat to facilitate and encourage hedgehog use of the site, and;

- Addition of bird and bat boxes across the site to improve nesting roosting opportunities; Swift boxes on high-rise buildings, bird boxes on lower buildings and on newly planted or retained buildings and box boxes on south facing walls of buildings facing the potential bat corridor on along the southern boundary of the site.

Further work

4.24. Although no further surveys are required to inform further planning applications, as is detailed by ODPM Circular 06/05 and BS 42020:2013 'Biodiversity – Code of practice for planning and development', it will be necessary to undertake precautionary checks to confirm whether legally protected and/or priority species would be affected by proposed development of the site. These surveys are summarised below.

- **Nesting Birds (pre-works check):** If building demolition or vegetation/tree removal is to occur between March-August, a pre-works check by an ECoW should be undertaken to determine whether active birds' nests are present. If nest(s) are present, no nests, eggs or young should be destroyed and an appropriate buffer must be instated until the chicks have been confirmed as fledged by an ECoW.

- **Hedgehogs (pre-works check):** If vegetation removal occurs on the site, a pre-works check by an ECoW should be undertaken to determine if any hedgehog are active on the site. If found, they will be removed by hand to a predetermined off-site location with similar and suitable habitat to that in which they were found.

Section 5: Conclusions

5.1. No ecological issues that could affect the principle of development of the site have been identified. Those important ecological features that exist, or could exist, at the site could be accommodated by the adoption of relatively simple design principles. The potential to improve the biodiversity of the site also exists, and recommendations are made that should contribute to local BAP targets.

5.2. In conclusion, there is every reason to suspect that future development of the site would accord with relevant planning policy that seeks to protect and enhance ecological features.

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Appendix 1: Legislation and Planning Policy

Appendix 1: Legislation and Planning Policy

Legislative Context

A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Hedgerows Regulations 1997;
- The Protection of Badgers Act 1992;
- The Natural Environment and Rural Communities Act (NERC) 2006; and
- The Wild Mammals (Protection) Act 1996.

A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).

A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

A1.5. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.6. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance (SoPI/HoPI) for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural

Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2018

A1.7. The National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A1.8. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

A1.9. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.

A1.10. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A1.11. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A1.12. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A1.13. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons58 and a suitable compensation strategy exists; and
d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."

A1.14. As stated in paragraph 176 the following should be given the same protection as habitats sites:

a) "potential Special Protection Areas and possible Special Areas of Conservation;
b) listed or proposed Ramsar sites; and
c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A1.15. Paragraph 177 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A1.16. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.17. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.18. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.

A1.19. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

Biodiversity Actions Plans

A1.20. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species agreed under the UK BAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been superseded, Species Action Plans (SAPs) and Habitat Action Plans (HAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.21. Most areas now possess a Local BAP (LBAP) to complement the national strategy where priority habitats and species are identified, and targets set for their conservation. BAP's are the key nature conservation initiative in the UK, working at national, regional and local levels.

A1.22. The London Borough of Richmond Upon Thames Biodiversity Action Plan was updated and re launched in 2017. It was prepared through the Richmond Biodiversity Partnership and sets out conservation targets and contains action plans for various priority habitats and species in Richmond Borough area.

Plans

Habitat Features Plan
11778_P01

- Site Boundary
- B1 Building
- Hardstanding
- Bare Ground
- A Amenity Grassland
- Tall Ruderal
- Dense Scrub
- Introduced Scrub
- Scattered Broad Leaved Trees
- Scattered Scrub
- Intact Species - Poor Hedge
- Wall
- Fence
- 1 Target Note

N

Project	Homebase North Sheen
Drawing Title	**Habitat Features Plan**
Scale	NTS
Drawing No.	11778/P01
Date	September 2018
Checked	LB/CC

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Appendix II
The LBRuT's EIA Scoping Opinion dated 14th December 2018

Environment Directorate / Development Management
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Tel: 020 8891 1411
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LONDON BOROUGH OF RICHMOND UPON THAMES

Please contact: Lucy Thatcher
Tel: 020 8891 1411
Email: l.thatcher@richmond.gov.uk

GVA
65 Gresham Street
London
EC2V 7NQ

Dear

Re: Redevelopment at Manor Road, North Sheen
Formal request for screening opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)

Thank you for your letter dated 12th November 2018, on behalf of Avanton Richmond Development Ltd (the applicant) and the accompanying EIA Screening Report, to seek a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicants forthcoming detailed planning application for the residential-led redevelopment at Manor Road, North Sheen.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 14 December 2018, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

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

FORMAL EIA SCRENNING OPINION IN CONNECTION WITH THE REDEVELOPMENT AT MANOR ROAD, NORTH SHEEN.

REGULATION 6

Under Regulation 6 (2) of the EIA Regulations, the person making a request for a screening opinion, must provide the following:

(a) a plan sufficient to identify the land;

(b) a description of the development, including in particular—
   i. a description of the physical characteristics of the development and, where relevant, of demolition works;
   ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

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

(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
   i. the expected residues and emissions and the production of waste, where relevant; and
   ii. the use of natural resources, in particular soil, land, water and biodiversity; and

(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

An EIA Screening Report (the Report) has been submitted. This:

(a) Identifies the site. (Figure 1)

The Site is located in North Sheen, south-west London within the administrative boundary of the LBRuT. The Site comprises an area of approximately 1.5 hectares (ha).

The triangular shaped Site is bound by:

- The northern and easternmost extents of an access road which provided access to / from Manor Road (the B353) to the north.
- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

The existing Site currently comprises a low-rise retail store occupied by Homebase, Pets at Home and Pets4Vets. The retail store is located centrally of the Site, towards the southern end.

To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road, surface car-parking in the north-east and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

There are several trees planted within the surface car-parking area and at various locations around the Site's perimeter.

Figure 1: Site Location

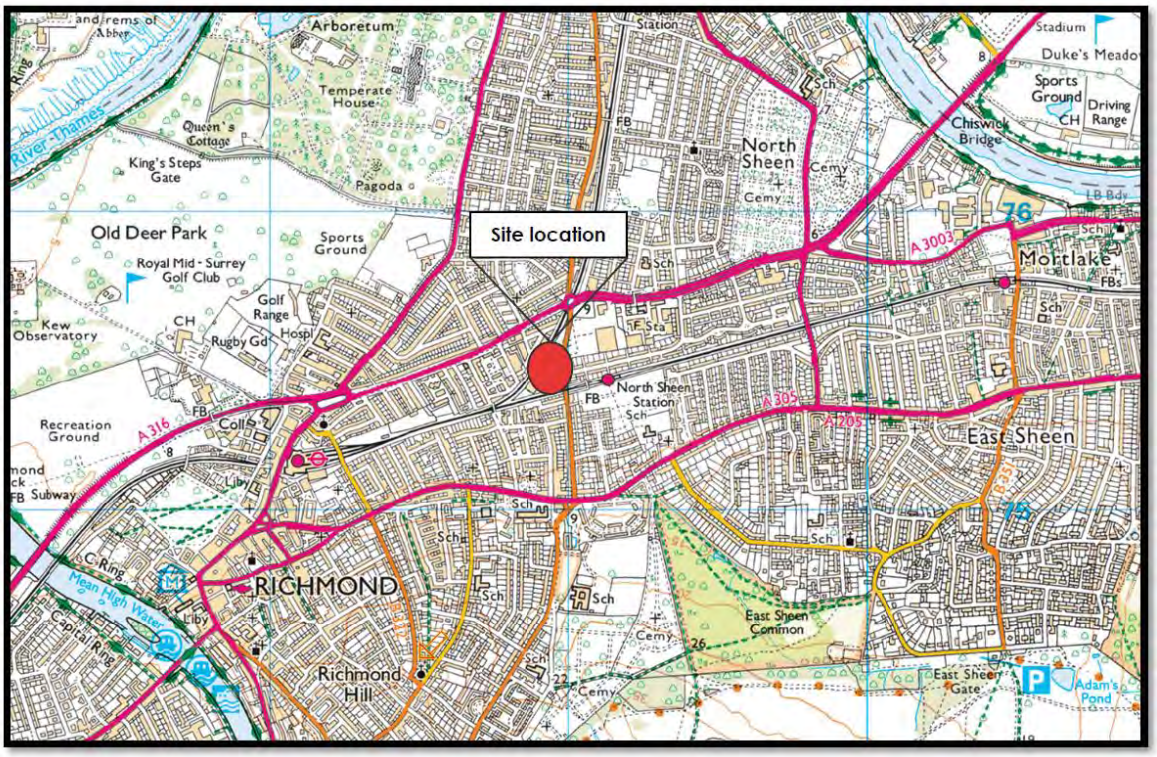
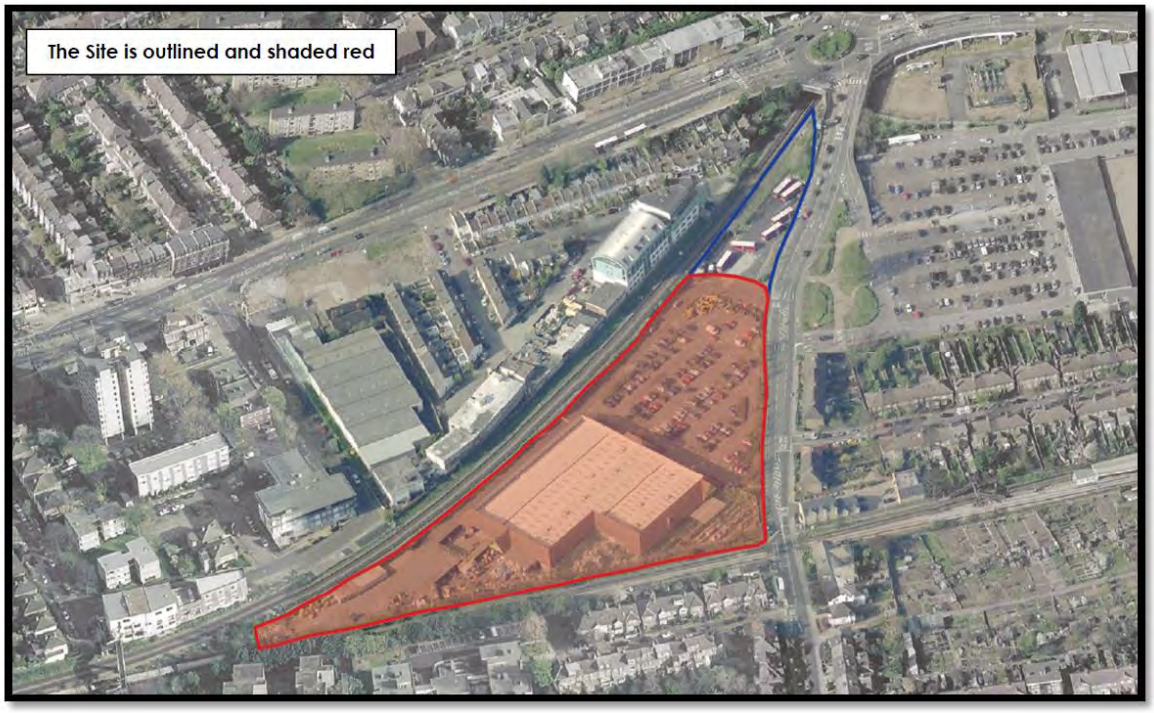


Figure 2: The Site



(b) ***Provides description / overview of the development:***

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

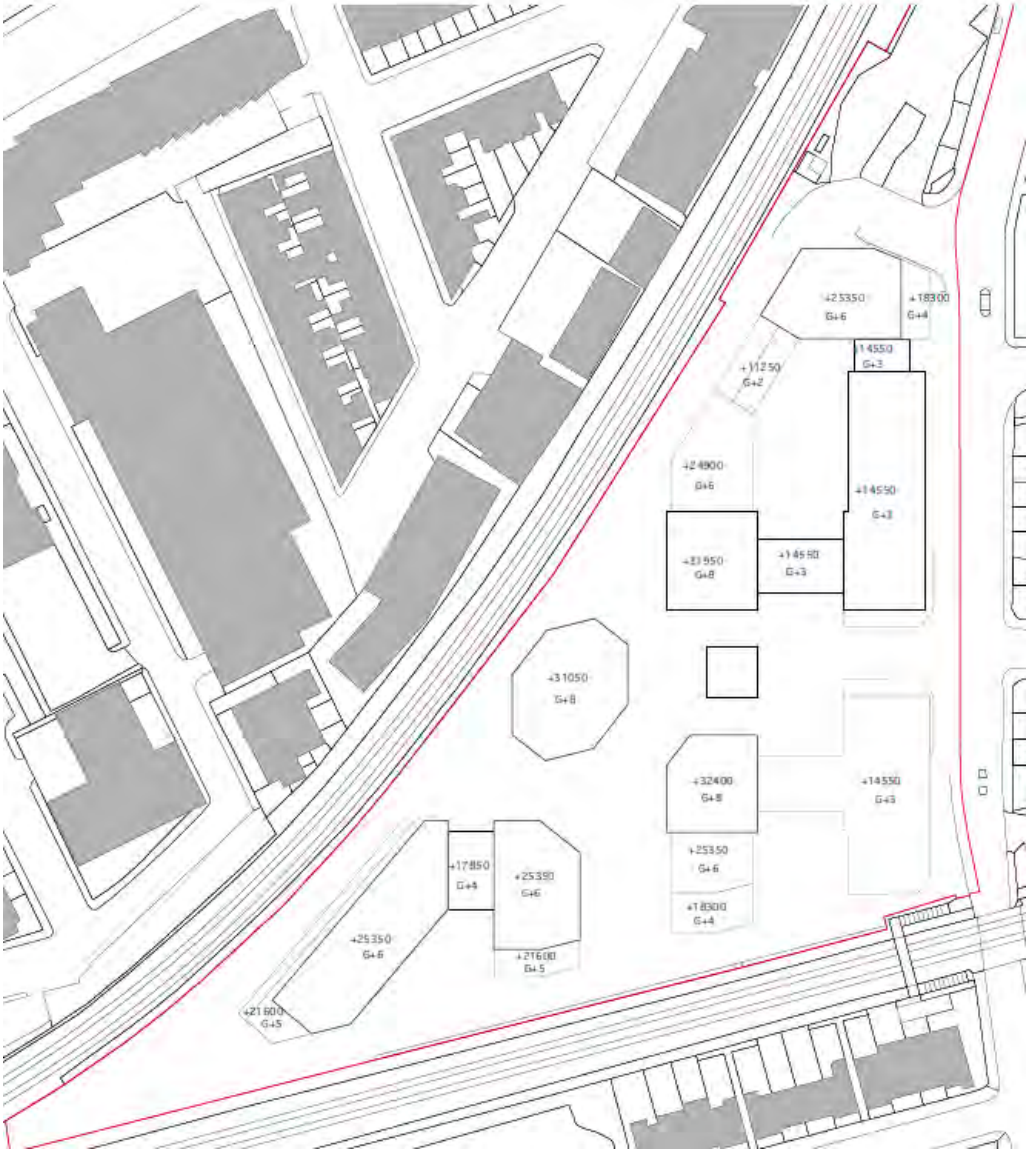
- The Development will provide in the region of 400 residential units (1, 2 and 3-bed units) with an appropriate provision of affordable housing) together with a small quantum of commercial floorspace. Since the submission of the EIA Report, the following breakdown has been provided:

  - 1 bed: 144 units
  - 2 beds: 162 units
  - 3 beds: 73 units

(i) Provides a description of the physical characteristics of the development and demolition works.

- The Development will necessitate the demolition of all existing buildings and structures.

- The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys.
  - Residential land uses will be present in all buildings.
  - The proposed commercial floorspace is likely to be concentrated around the Manor Road frontage.
  - Since the submission of the EIA Report, the following plan has been provided. This illustrates the heights:
    - 4-5 storeys along Manor Road
    - 4-6 storeys along the south boundary
    - 3, 6, 7, 9 storeys along west boundary



- It is proposed that these buildings will be predominantly brick.

- The siting and layout of buildings within the Site will define a new public and private realm. An appropriate quantum of children's play space will be provided.

- The Development will provide a small single-level basement within the north of the Site, providing storage for refuse and in the region of 650 cycle parking spaces for residents of the Development.

    - Vehicular access and egress to / from the Site will be provided in the north-east of the Site via Manor Road.
        - Vehicular circulation will be limited along an access road provided, adjacent to the off-Site rail lines.
        - Vehicular circulation will be afforded within the centre of the Site, around the perimeter of the new central public space.
        - Emergency vehicular access will be provided to all buildings.
        - Car-parking will be kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired.

- Servicing will occur at street level, predominantly along the eastern boundary of the Site.

Provides a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

Section 5 of the report provides:

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

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

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

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

Section 5 considers the following environmental topic areas…

- Transport and connectivity
- Core Social Infrastructure
- Townscape and Visual Effects
- Heritage Effects
- Biodiversity / Ecological Effects
- Geology, Ground Conditions and Contamination
- Water Resources and Flood Risk
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
- Waste
- Risk of Major Accidents and Disasters
- Health and Wellbeing
- Climate Change
- Cumulative Interactions of the Development

and considers the following environmental affects arising from:

- the site preparation, demolition and construction work associated with the Development (the Works)
- The operation of the completed development (the Completed Development)

(f) Identifies in Section 5, features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

This section addresses each of the potential environmental topic areas, and includes:

- Features of the development….
- Mitigation proposed ….
- Documents that will accompany an application ….

to avoid or prevent potential significant effects.

PREAMBLE

The EIA Regulations Threshold:

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

"Schedule 2 development" means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

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

"sensitive area" means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981;
- a National Park ;
- the Broads(**c**);
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(**d**);
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The LPA is of the view that the proposal would be an Urban Development Project as defined under Schedule 2 part 10 (B) of the Regulations. The site is not located in a 'sensitive area' and therefore the thresholds set out in Schedule 2 of the Regulations have been applied:

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

The EIA report confirms the site is approximately 1.5 ha and in the region of 400 residential units, and therefore exceeds the applicable thresholds, and so constitutes Schedule 2 development for the purposes of the EIA Regulations.

It therefore needs to be screened to determine whether it is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

National Planning Policy Guidance (NPPG):
When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the 2017 Regulations, however, the NPPG notes not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way:

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

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

The NPPG advises only a very small proportion of Schedule 2 development will require an EIA. While it is not possible to formulate criteria or thresholds which provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid LPA to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced, which includes an indication of the types of impact that are most likely to be significant for particular types of development.

Development type	Schedule 2 criteria and thresholds	Indicative criteria and threshold	Key issues to consider
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings or (iii) the overall area of the development exceeds 5 hectares.	Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless: • the new development is on a significantly greater scale than the previous use, or • the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: i. area of the scheme is more than 5 hectares; or ii. it would provide a total of more than 10,000 m2 of new commercial floorspace; or iii. the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).	Physical scale of such developments, potential increase in traffic, emissions and noise

In relation to this scheme, which this exceeds the Schedule 2 threshold (more than 150 units):

- The site is less than 5 ha
- The scheme does not provide more than 10,000m2 commercial space
- There are less than 1000 dwellings

However, it should not be presumed, that those falling above the indicative threshold should be subject to assessment, or those falling below these thresholds could never give rise to significant effects, and therefore each development will need to be considered on its merits.

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

SCREENING OPINION

When screening Schedule 2 developments, the EIA Regulations (5 (4)) require LPAs to take into account the following:

1. Any information provided by the applicant
2. The results of any relevant EU environmental assessment, which are reasonably available to the relevant planning authority
3. Such other selection criteria set out in Schedule 3.

(1) <u>Characteristics of the Development must be considered with particular regard to -</u>

(a) The size and design of the whole development

The existing triangular 1.5 ha Site, bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road, currently comprises a low-rise retail store with associated hardstanding comprising an access road, surface car-parking (for 150 cars) and servicing areas. A number of trees exist within the surface car-park.

The immediate environs are characterised by built urban form, which varies in scale, form, footprint and heights, comprising residential, retail, light-industrial and transport infrastructure. Buildings are generally low to medium rise, ranging from 2- 6 storeys, except the Towers to the NW, which extend to 11 storeys. There are a number of local land mark, including St Matthias Church(Grade II Listed) located to the south; and the Pagoda (Grade I Listed) at the World Heritage Site, in Kew. The EIA Report confirms that these are not visible from the site.

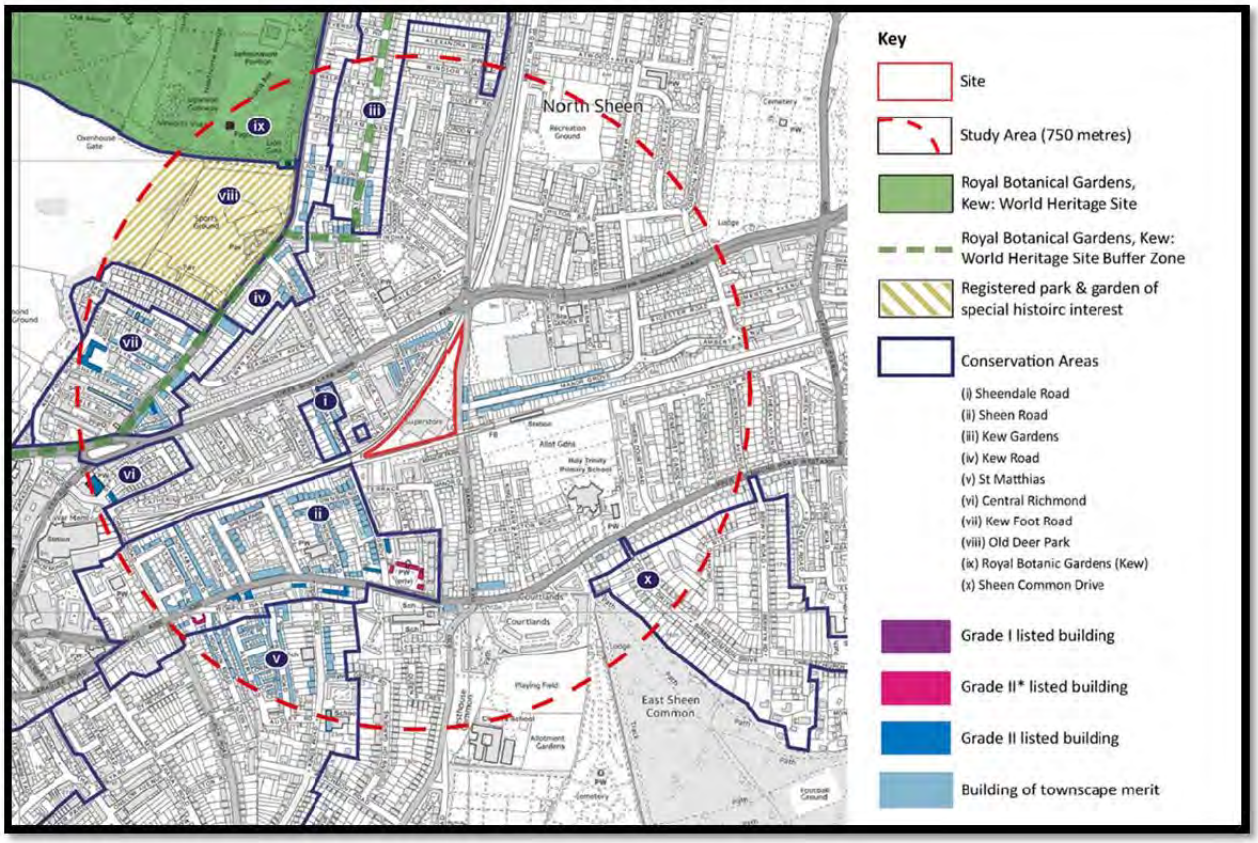
The site has the following principal designations:

- Critical Drainage Area
- Outer safeguarding zone for high pressure gas pipe
- Past industrial land use
- Area susceptible to surface water flooding

There are no specific heritage designations (designated or non-designated / statutory or non-statutory). Nor is the site within a protected view; setting of a listed building or World Heritage Site. The Site does not have any open space values (such as Other Open Land of Townscape Importance – OOLTI); and not within an archeologically priority area (or close proximity to one). However, the site is within the setting of:

- Other Land of Townscape Importance – Adjacent to the site on Manor Road and North Sheen Station Allotments.
- Conservation Area 31 ‘Sheen Road‘– to the SW
- Conservation Area 50 ‘Sheendale Road’– to the west
- Non-designated Heritage Assets – BTMs on west side of Manor Road, Manor Grove, Trinity Road, St Georges Road; Sheendale Road; Townshend Terrace

The EIA report identifies the above ground heritage assets within a 750m study area:



The site is identified within the Richmond and Richmond Hill Village SPG, as forming Character Area 6:

> *"This character area occupies the angle of two busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past.*
>
> *The north western part of the area was once covered by a gas works. Today the works area is confined to the land nearest the roundabout and is visually low key, except for the tall mesh fencing along the main roads. Much of the area is occupied by a large supermarket of modest height and its associated petrol station and large car park. The large shops on the west side of Manor Road are similarly laid out but have pitched clay tile roofs.*
>
> *Some trees are present in and around the car parks, but the character is defined by large expanses of hard surfacing.*
>
> *The central part of the area has a network of short roads: Orchard, Garden and Market. One two-storey Victorian house (former public house) survives on the corner of Orchard and Lower Richmond Roads, but the overall character is varied due to a mix of light industrial sheds, offices and modern apartment blocks. Cladding is in steel, timber and render. There are some planted beds but few street trees. Also, on Garden Road, there is a fire station and its exercise yard. East of Market Road are further light industrial sheds in brick with metal sheeting and small areas of car parking. On Lower Richmond Road is a small mid twentieth century shopping parade in red brick, with the fire station nearby.*
>
> *Characteristic materials and features include: Red brick, stock brick, metal cladding, metal windows, planted beds.*

Threats from development have been identified as: Lack of definition and coherence in street frontages due to loss of terraces and proliferation of small industrial yards and car parks.

Should redevelopment proposals come forward for appropriate uses there is an opportunity to re-plan and upgrade the public realm. There are also opportunities to achieve improvements to the visual appearance of the area, including when viewed from the A316 Lower Richmond Road. Proposals should demonstrate how they support this opportunity and also how they positively respond to the relationship with adjoining areas, which are primarily residential in character.

More appropriate paving, street furniture and street trees would enhance the character. Many of the pavements are presently in tarmac which could be replaced with a higher quality material."

The EIA Report identifies the Zone of Theoretical Visibility (ZTV) and the Townscape Character Areas relevant to the Site and its ZTV, with areas of value being:

- East Sheen Open Space
- Richmond Hill and East Sheen residential
- Richmond Residential Fringe
- Kew Gardens and Old Deer Park
- Kew Gardens, Residential Fringes

In consultation with the Authority, several views of the site have been identified.

The Development will necessitate the demolition of all existing buildings and structures on the Site. It is envisaged that the Development will provide in the region of 400 residential units (1, 2 and 3-bed units with an appropriate provision of affordable housing) together with a small quantum of commercial floor space. The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys, with residential land uses in all buildings. A previous illustration indicates

- 4-5 storeys along Manor Road
- 4-6 storeys along the south boundary
- 3, 6, 7, 9 storeys along west boundary

Three of 4 of the buildings will include various building components and comprise a range of building heights and geometries to afford visual interest, avoid over bulky design, and public and private realms. The remaining building will be of an octagonal form. It is proposed most will be brick. The development will provide a small single level basement for storage of refuse and approx. 650 cycle parking spaces. Access will be via Manor Road in the northeast, with vehicular circulation adjacent to offsite rail lines. Car parking is kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired. Servicing will occur at street level, predominately along the eastern boundary.

The works: Any Works have a consequential impact on the physical environment of the site and setting of designated and non-designated heritage assets, whether from hoarding, plant and machinery. However, there are no below or above ground heritage assets on the site, and therefore the development will not have a direct impact on such. It is deemed any townscape and visual effects associate with the Works are anticipated to be limited, localised, temporary and reversible. Further, with Construction Environmental Management Plan (CEMP - to cover Good Construction Site Housekeeping Initiatives; Maintenance of adequate construction site hoarding; Orderly segregation of construction site activities), these impacts will not be significant:

Competed development: The EIA Report does not deem the scale to be disproportionate to the surrounding townscape and has the potential to enhance the townscape, by providing public realm, residential community and increased ground floor activity. Further, confirms:

- The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
- The application will be accompanied with a Townscape and Visual Assessment.
- Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

The size and scale of the development (notably height) is significantly different to the existing, and the question is whether this is going to give rise to significant impacts to trigger an EIA.

The prevailing pattern of development is built up residential / commercial land uses, with transport infrastructure (road and rail). Prevailing heights are:

- Northwest of the district line: Two storey terraced properties; single storey commercial units; flatted developments (3, 4, 5, 11storeys)
- South of the site: Two storeys semi-detached and terraced properties, and 2/3 storey flatted developments.
- East of the site: Two storey terraced properties (some of which are Buildings of Townscape Merit); large commercial units; 4-6 storey flatted developments
- North of the site: Two storey residential properties; Two storey commercial units; 4 storey flatted developments

For the following reasons, based on the information provided; the Authority is of the view the scheme will have an urbanising effect on the local environment, and is of a size that will affect the townscape and heritage environment, however, for the following reasons this is not deemed to be of a scale that will raise significant effects that would trigger the need for a full EIA, and this can be dealt with through the planning application process:

- The brown field nature of the exiting site
- The built-up nature of the surrounding area
- The varied form of buildings and heights in the locality and relationship between each other
- Varied heights within the development, with lower heights long Manor Road and the south boundary.
- Heritage assets being separated from the site by rail lines, built form, roads
- The site not being located within a viewing corridors or Protected Views
- The site not being within the setting of listed buildings or World Heritage sites

The EIA Report was referred to Historic England and based on the information to date, they do not wish to offer any comments, and suggest the views of the authority's specialist conservation advisers are sought.

(b) The cumulation with other developments and / approved development

The EIA Regulations require consideration of cumulative effects of the proposed development with other existing and approved developments.

The following developments are considered of relevance, regarding their air quality, transport and impact on social infrastructure due to their scale, proximity to the site and the A316. However, given (1) and (2) are pending decision they do not form part of the cumulative impact assessment; and (3) was approved subject to various transport mitigation measures and highway works recommended by TfL due to the location of the site on the A316.

TfL and the Councils air quality officer were consulted on this EIA Screening Opinion request, who raised several points. Overall, there are not considered to be any existing or approved developments near the site that cumulatively might give rise to significant environmental effects subject to the mitigation measures (including highway works, travel plans, air quality assessments etc) proposed through a normal application process and subject to this EIA screening.

1. Stag Brewery redevelopment – Redevelopment to provide secondary school with sixth form; 443 residential apartments; 150 units of either assisted living or residential; 224 unit car / nursing home; Flexible use floorspace for various commercial uses, community and leisure; and hotel, cinema, gym and office floorspace; and associate parking (18/0547/FUL; 18/0547/FUL and 18/0549/FUL)
2. Kew Biothane Plant, Melliss Avenue, Kew: Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 89 units, communal healthcare, therapy, leisure and social facilities (including a Restaurant bar cafe and swimming pool). Provision of car and cycle parking, associated landscaping and publicly accessible amenity including a children's play area
3. Richmond College - 15/3038/OUT - Outline application for the demolition of existing college buildings and redevelopment of the site to provide:
    1) A new campus for education and enterprise purposes, comprising; Replacement College to accommodate up to 3,000 FTE day time students and a Science, Technology, Engineering and Maths of up to 6,100sqm;
    2) A new Secondary School for up to 750 students;
    3) A new Special Educational Needs (SEN) School for up to 115 students;
    4) A new ancillary 'Technical Hub' for Haymarket Media of up to 1,700sqm;
    5) Replacement on-site sports centre of up to 3,900sqm
    6) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316.
    7) Associated on-site parking (non-residential) for up to 230 vehicles
    8) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

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

- Land and soil: The existing site is a previously development brownfield site, which is predominately hard surfaced. The site is not designated for any geological importance or interest and does not yield any significant geological resource. Neither is the site within an archaeological priority area.

- Water: The site is in Flood Zone 1 (lowest risk of flooding), an Area Susceptible for Surface Water Flooding; and there is a Secondary an Aquifer beneath the site. There is no evidence that the site contains any important, high quality scare resource.

o Biodiversity: These Site is an active retail park, and predominately comprises of buildings and hardstanding, with areas of scrub, amenity grassland, trees and hedge / flower beds. There are no statutory or non-statutory sites of nature conservation within the site, or adjacent. The EIA Report appendixes included a Preliminary Ecological appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA), which advises the site supports the following habitats:

Habitat	**Importance**
Amenity grassland	o Of low species diversity and comprises a heavily managed short sward. o **Negligible ecological importance**.
Buildings and Hardstanding	o Buildings offer little to the biodiversity resource to the site. o **Negligible ecological importance**.
Dense Scrub	o Small areas of dense scrub in the south-west corner between railway lines, comprising of largely native species composition. o **Ecologically important within the context of the site only**
Introduced Scrub	o Small size and largely composed of non-native species o **Negligible ecological importance**

Scattered Broad-leaved Trees	o Several planted, young to semi-mature tree species; along east boundary surrounded by amenity grassland, within the car park, in an area west of the car park and along the east boundary. o Common lime; sycamore, and silver birch. o Due to their age, position and native species composition = **ecological important within the context of the site only**.
Scattered Scrub	o Scattered scrub throughout the site; on the east site boundary; running along the west boundary o Largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain *Plantago lanceolate.* o Given small area and the largely non-native composition = **ecological important within the context of the site only**
Tall Ruderal	o One small patch on the southern boundary of the site, consisting of elder *Sambucus nigra*, common ivy, bramble, common nettle and cleavers *Galium aparine*. o Given the small area = **Ecological important within the context of the site only**.
Great Crested Newt	o Not considered to be a feature of the site.
Bats	o The building and trees have **negligible potential** for roosting bats. o Vegetation along southern boarder could act as a possible commuting corridor
Badgers	o No signs of badgers were identified on the site
Birds	o Limited potential to support breeding bird populations o Potential to support nesting and foraging birds o Any populations of birds utilising the site are considered to be of **site important only**.
Invertebrates:	o Limited suitable habitat o Invertebrate populations are likely to be of **negligible ecological importance.**
West European Hedgehog:	o One area of grass piles in the south-west corner could potentially be used by hedgehogs as a hibernaculum o Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of **site importance**.
Reptiles	o Reptiles are likely to be a small population of common species = deemed to only be of **site importance.** o Given more suitable habitat adjacent to the site, reptiles are less likely to use the less suitable habitats present on site. Therefore, the population present on site is deems to be likely a small population of common species and are likely to be of **negligible ecological importance.**

The Works will include an element of intrusive ground works associated to the construction of the basement, foundation works and installation of piles. Further, the Development will clearly have an impact on the natural resource and existing habitats. However, the Report concludes that none of the habitats are considered of principle importance. Given these are either of negligible or site ecological importance only, it is deemed, through the provision of reports to accompany the application (required as part of the Local Validation Checklist), the adoption of design principles, and mitigation measures identified in the EIA Report (that can be secured by either condition or Section 106 Legal Agreement), the Works and Development is not deemed to give rise to significant environmental effect on natural resource.

Environmental topic	Report	Mitigation
Water	o Flood Risk Assessment o Sustainable Drainage Strategy	o London Plan Drainage Hierarchy o Flood resilient and resistant measures o Reduction in surface water discharge to greenfield run-off rates wherever feasible; or the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development
Biodiversity	o PEA and PBRA o Bat Activity surveys o Tree surveys, AIA, AMS o Lighting strategy	o Landscaping scheme – including native and local stock. o Inclusion of 1.2m between basement and ground to ensure sufficient depth for soil. o Sedum / brown roofs o Green walls o Ecological enhancement measures o Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and Richmond's Biodiversity Action Plan (BAP). o Green infrastructure – multi functional, delivering biodiversity and drainage benefits o Planting native flora in retained / new habitats. o Bug hotels o Hedgehog highway and boxes o Bird and bat boxes. o Time restriction for removal of vegetation – avoid bird nesting and hedgehog hibernation period, or under supervision by a qualified ecologist. o Sensitive lighting along rail corridors to avoid disturbance o CEMP: Best practice including measures to reduce noise; dust emissions; night time light emissions; avoid incidences of contamination run-off.

(d) Production of waste

It is inevitable that waste will be generated by the proposal, both through the Works and the completed development.

Any Works are likely to generate waste, and as such the emphasis is upon how to manage such. The EIA Report advises that the CEMP and Waste Management Plan will set out legal and best practice measures and protocols to ensure good construction site management to minimise waste creation and maximise re-use and recycling.

The proposed commercial and residential land uses are not deemed too given rise to particularly hazardous waste materials and general waste is not complex or an uncommon feature of such a scheme. Again, to minimise effects is down to management. The EIA report identifies that the development will include sufficient space and facilities for waste and recycling, and for collection and disposal.

As a response, and with the LVC and conditions to ensure such documents are submitted or secured with any decision, the development is unlikely to give rise to significant waste effects.

(e) Pollution and nuisance

The EIA Report confirms that the site is not within any COMAH sites; Geological hazards or Safeguarded aviation zones. However, recognises…

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site - which could be encounter and / or mobilised during the intrusive ground works.
- The site is within an Air Quality Management Area

Notwithstanding the above:

- The site is within a Critical Drainage Area and area susceptible to surface water flooding.
- The Outer Safeguarding Zone – High Pressure 30-inch Gas Pipeline Cadent Gas Ltd
- The site has a Past Industrial Lane use

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant.

The Council's Emergency Planning Officer does not have any observations in respect to the EIA report.

<u>Land / soil contamination:</u>

The site has a past industrial land use, and therefore during the Works there is the risk of contamination exposure to humans and wider environment. Further, there may be potential for UXO's. Whilst acknowledging such, the EIA Report deems that legislative requirements and best practice can be implemented to prevent the Works giving rise to significant impacts, including:

1. Site to be investigated prior to implementation of works; and if this identified contamination, a suitable remediation strategy will be devised and implemented.
    a. Phase 1 Contamination Assessment
    b. Depending on the outcome of the Phase 1, a Phase II Contamination Assessment and Remediation Strategy
2. Implementation of a CEMP, to ensure best practice environmental management controls (for contamination and UXO management) including, but not be exclusive to:
    a. The use of Personal Protective Equipment
    b. Procedures for the safe and contained storage of materials
    c. Procedures for dealing with accidental material spoils.
    d. With respect to the risk of Unexploded ordnance, any intrusive ground works will be subject to a UXO Watching Brief, which will set out appropriate steps to de-risk the situation.

The Scientific Officer has reviewed the EIA report and only recommended the standard contamination land condition. This will require (prior to commencement of development):

1. a desk study
2. details of a site investigation strategy
3. an intrusive site investigation
4. written reports
5. remediation strategy

6. a verification report, produced on completion of the remediation work,

Based on the reports (which is required as part of the LVC) and sampling and mitigation which could be secured through conditions on any future planning applications as well as the measures that could be applied and controlled through relevant Environmental and Health and Safety legislation, the development is not deemed to give rise to significant effects.

Whilst the Report states the site is not within any COMAH sites, it is within the Outer Safeguarding Zone for a high-pressure gas pipeline. To ensure any contamination, either during works or once Completed, and the safe evacuation in an emergency, it is recommended that the applicants refer to the HSE's Web app and apply the PADHI+ computer system.

Water resources and flood risk

The EIA Report identifies that the site does not contain any surface water features and the closest water feature to the site is the river Thames, approximately 1.5km away. Furthermore, the Site is within Flood Zone 1, an area of low flood risk. Whilst acknowledging such, the Council identifies the Site is susceptible to surface water flooding.

The EIA confirms that during works, the CEMP will ensure appropriate surface water drainage, to ensure no localised surface water flooding. Furthermore, given the completed development will:

- replace the existing hard surfacing and impermeable areas with a similar type of land cover.
- Include design measures to safeguard against surface water flooding
- Ensure additional demand for foul water drainage is addressed

The scheme is not given rise to significant adverse effects.

The authority agrees with such, and these reports / measures will either be required at validation of any application or condition:

- Flood risk Assessment
- Sustainable Drainage systems
- Foul sewerage and utilities statement
- CEMP

Air Quality:

The entire Borough is located within an AQMA. The EIA Report recognises that the Works have the potential to give rise to the following air quality effects:

- Dust emissions
- Emissions from operation of plant and machinery
- Emissions from construction traffic generation.

Accordingly, the following measures are suggested to manage such, including but not exclusive to:

1. CEMP:
    a. Reasonable construction hours
    b. Dampening down
    c. Appropriate covering of dust generation stock piled materials
    d. Avoiding dust generating activities during dry and windy weather conditions
    e. Dust monitoring
    f. Use of modern low emission plant and machinery
    g. Machinery being turned off, whilst not in use

The authority also recommended a robust CMP to manage construction traffic to keep additional pollution on Manor Rd between the very busy South Circular and A316 at peak hours to a minimum

The EIA report identifies the potential air quality effects of the completed and operation Development form:

- Traffic generation

- Building plant – heating and power plant.

Given the existing use (and associated traffic, the limited parking the scheme proposes (subject to measures to control on street parking), the sustainable location of the site (PTAL 4/5); the inclusion of Air Source Heat Pump for each block; and the following reports (which will be required at Validation, and secured through condition / S106) the development is not deemed to result in significant impacts on air quality from traffic emissions and associated effects or heating.

1. An Air Quality Assessment – This should comply with requirements of the EU Directive 2008/50/EC, the draft London Plan 2018, The Mayor's Control of Dust and Emissions during Construction and Demolition SPG 2014, LBRUT's 2017- 2022 Air Quality Action Plan, LBRuT's draft Air Quality SPD and the latest Government Plan to reduce nitrogen dioxide in towns and cities published on 18th January 2016
   - https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions
2. Mitigation measures will need to be conditioned both during the construction phase and once occupied to keep any additional pollution (NO2 + PM) both for existing receptors and site users to a minimum.
3. Provision of electric charging bays

Noise and Vibration:
The main sources of noise at the site are likely to arise from road traffic, servicing of the site, noise associated with the operation of the adjacent rail lines and noise from air traffic associated to Heathrow. There is a potential for vibration at the site due to the operation of the adjacent rail lines. The site has both noise generating and noise sensitive development adjacent to it. In addition, the Completed development will itself be considered as a noise sensitive development.

It is recognised the Works will have the potential to give rise to:

- Increased ambient noise and vibration generated by the physical component and construction plant and material
- Increased noise from construction related traffic.

The EIA Report suggests standard construction environmental management techniques to be included in the CEMP to reduce such effects, including, but not being exclusive to:

1. Limiting working hours
2. Use of construction techniques
3. Use of modern low noise emission plant and machinery
4. Noise and vibration monitoring.

The Completed development is deemed to give rise to the following potential noise and vibration effects:

- Traffic generation
- Noise from operation of plant

The EIA Report recommends:

1. A Noise and Vibration Assessment
   a. Low noise emission plant
   b. Acoustic screening, as necessary
2. A Transport Assessment
   a. Vehicular servicing is controlled through a Delivery and Servicing Plan
3. Draft CEMP - including noise and vibration management

With such measures and reports and the following reports suggested below, again secured through the Validation checklist and / or conditions; the Authority does not deem the Development will give rise to significant effects.

- The design (and acoustic design) should be based on the requirements contained in the 'Development Control for Noise Generating and Noise Sensitive Development' SPD.
- Travel Plan (encouraging walking, cycling and public transport)

Lighting:
No details have been provided of external lighting, but it is expected that some safety lighting will be in-situ for the Works, and security lighting or way finding would be installed around the site (including car park). External lighting could potentially impact on protected species (i.e. bats), however, these particular elements are unlikely to represent a significant part of the overall scheme and, without pre-determining the assessment that would be carried out through the application process, further details could be secured, and appropriate conditions and mitigation could be applied including, Hours of use; Design to ensure lighting is sympathetic to bats that may be utilising the trees boundaries; Provision of low-level bollard lighting; Use of hoods or cowls; and provision of warm-white LED lighting.

Japanese Knotweed
The Authority is aware that the site had Japanese Knotweed within the bed along Manor Road previously. There is concern that any digging in that area may stimulate any (if they are present) dormant rhizomes. The PEA advises the site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2.

On such basis, details will be required in any submission to demonstrate how this will be controlled through Works and the completed Development.

(f) and (g) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change; and risks to human health (due to water contamination or air pollution).

As previously identified

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site;
- The site is within an Air Quality Management Area
- The site is within a Critical Drainage Area and Area Susceptible to Surface Water Flooding.
- The site is within the Outer Safeguarding Zone – High Pressure 30 inch Gas Pipeline Cadent Gas Ltd

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant. It is the authorities' opinion that such risks can be suitably prevented / avoided through the following reports and measures contained within them, that the Authority can require at point of Validation, and secure through either condition or Section 106 Legal Agreement;

1. Contamination Report - a desk study; details of a site investigation strategy; an intrusive site investigation; written reports; remediation strategy and a verification report, produced on completion of the remediation work,
2. Implementation of a CEMP, to ensure:
    - Best practice environmental management controls (for contamination and UXO management);
    - Dust strategy – hours, dampening, monitoring, type of plant – in compliance with Local and Regional policy and guidance
    - Noise and vibration management
3. Referral to the HSE's Web app and apply the PADHI+ computer system
4. Flood Risk Assessment and Sustainable Drainage Strategy
5. Foul sewerage and utilities statement

Climate change:

Previous sections have addressed air quality. The EIA Report confirms that the design of the development will be informed by Sustainability and Building Services Engineers, and ensure that the scheme is in line with policy requirements and a Surface Water Drainage engineer to safeguard against surface water flooding. Accordingly, the scheme will incorporate sustainability design measures to reduce carbon footprint and greenhouse emission, including:

- Selection and use of building materials from sustainable sources
- Design faces to balance solar gain against daylight availability.
- Insulation to reduce heat demand
- Thermally efficient windows to reduce head demand]
- Air tightness
- Mechanical ventilation with heat recovery
- Energy efficiency lighting
- Use of photovoltaic panels.

The following documents will accompany an application:

- Draft CEMP – dust, air quality, noise and vibration
- Draft CTLP
- Transport Assessment – Travel Plan and Delivery and Servicing Plan
- Flood Risk Assessment
- Air Quality Assessment
- Sustainability Statement

With the above measures, and the following documents that will also be required at validation, the scheme is not deemed to raise significant effects on climate change.

- Statement of Sustainable Drainage System
- Sustainable Construction Checklist
- BREEAM Pre-Assessment – non-residential buildings over 100m2
- Energy Report: Confirming zero carbon

(2) Location of Development:

The existing triangular-shaped site is bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road. The area surrounding the site is mostly densely populated. It is within a London Underground rail safeguarding zone across the western edge of the site. There is a bus terminus to the immediate north of the access road, which is not part of the scheme. A Sainsbury's supermarket store (Site Allocation SA21 - for retail/residential) is situated immediately to the North East on the other side of Manor Road. Manor Road joins a strategic red route, the A316, which heads out of London towards the South West via the M3. The Royal Botanic Gardens World Heritage Site and Richmond Park, SSSI, National Nature Reserve and MOL are around 1km away.

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to

(a) The existing and proposed land use

The site is located within built up and densely populated part of the borough. The character of the area can be described as having a mixed use, which supports residential properties (flats and houses); retail; transport infrastructure (bus station and stops and rail lines); hotel; and light industrial and other commercial uses

To the north	1. Residential uses 2. Commercial uses to the north of the District Line – along Bardolph Road, Lower Mortlake Road 3. Transport infrastructure including a. District Line b. A bus terminus c. Lower Mortlake Road – Red route

To the north east	1. Residential land uses, 2. Commercial uses – on Manor Road and Lower Richmond Road, 3. Transport infrastructure including a. The Lower Richmond Road (the A316), b. North Road 4. North Sheen Recreation Ground
To the east	1. Sainsbury's store and associated parking areas, 2. Residential land uses 3. Transport infrastructure including: a. North Sheen Station and its associated rail-lines b. South Circular (the A205).
To the south-east	1. Residential land uses 2. Allotments, 3. Transport infrastructure including: • Sheen Road & Upper Richmond Road West (the A305), 4. Northern extent of Sheen Common and East Sheen Cemetery.
South	1. Residential land uses 2. Transport infrastructure including: a. Sheen Road (the A305) b. Queen's Road (the B353). • Network Rail line • Education use – Christ's School
To the southwest	1. Residential land uses, 2. Transport infrastructure including a. Sheen Road (the A305), b. LUL District Line c. Southwest Trains overland rail lines, d. North-eastern extent of Richmond town centre including Richmond Station.
To the west	1. Light industrial and other commercial land uses 2. Residential land uses, 3. Transport infrastructure including a. Lower Mortlake Road, Kew Road and Twickenham Road, b. Eastern extent of Richmond Athletic Ground.
To the north west	1. Light industrial, other commercial and residential land uses, 2. Transport infrastructure including a. Lower Mortlake Road (the A316) and Kew Road (the A307), 3. Richmond Lawn Tennis Club, 4. Richmond Cricket Club, 5. The eastern extent of the Royal Mid-Surrey Golf Club, 6. London Welsh RFC and Bowling Green 7. The south-eastern extent of the Royal Botanic Gardens at Kew.

The site currently comprises a low-rise retail store with associated hardstanding, for access road, car parking (150 cars) and outside delivery and storage area. The site has an extensive frontage along Manor Road, and thereby prominent. The south and north west boundaries are adjacent to rail lines (District line and network rail). Thereby views to the site from these locations are either from private gardens or over adjacent land uses. The Lower Mortlake Road and Lower Richmond Road met at Manor Road roundabout, which is elevated, and therefore the site is not prominent from this location.

The existing land uses on the site (retail) and the proposed land uses (residential and retail) will have a different character, in terms of impact on local sensitivities, including, Transport, Traffic, core social infrastructure, (such as impacts on schools, health, recreation use etc).

Transport:
The site has a PTAL rating of 4/5, owing to the sites proximity to: North Sheen Station; Richmond Station and Bus stop interchanges. Manor Road is a busy classified road, which is often congested in response to the barrier downtime (amongst factors) and leads to the A316, which is part of Transport for London Road Network.

It is recognised that inevitably the Work will give rise to some disruption to the normal operation and functioning of the local road network. However, it is deemed that such can be planned, programmed and controlled to avoid significant disruption and effects. The following will both be required at validation of an application and can be conditioned / secured in a Legal Agreement:

- Construction Traffic Logistics Plan: Accesses, routes, hours; pedestrian routes and signage etc.

The EIA report states Baseline traffic surveys have been undertaken on the existing use, and compared to the proposed use:

Table 1: Existing and With-Development Two-Way Movements to / from the Site

Peak Period	Existing Two-Way Movements	With-Development Two-Way Movements	Change
AM 08:30 - 09:00	80	71	-9
PM 17:00 - 16:00	108	83	-25

With regards to the completed development, except for 12 car parking spaces, the Development will be car free. Therefore, the EIA report concludes that the scheme has the potential to reduce the number of car trips when compared to the existing situation, or not have significant vehicular traffic effects. This will be further avoided by:

- The implementation of a Travel Plan and Delivery Servicing Plans.
- Provision of approximately 650 cycle parking spaces to encourage sustainable modes
- A Transport Assessment will be submitted with the above.

The EIA Report has been reviewed by both TfL and Transport Strategy.

Transport Strategy: Within the context of Manor Road, also being a classified road intended to carry relatively high flows, predicted changes in numbers of vehicles are considered relatively small. The profile of traffic during the day would be expected to change and there would be a new residential population. The developer proposes a new pedestrian realm within the site and cycle parking. The surrounding highways are of conventional design and construction, and new conventional accesses would be created into/from the site for pedestrian and vehicle access. The EIA report would have benefited from including some consideration of pedestrian movement and road safety outside the site as the development is considered likely to result in an increase in local people crossing roads and accessing nearby public transport. However, the development is not considered irregular in transport terms and is unlikely to require any road safety or other highway improvements that are not commonly found in urban areas with mixed land uses. In summary, it is not deemed to represent an EIA development, and will not have strategic impact on background highway flows and air quality. It should be noted that measures would be required to restrict on street parking, to avoid unacceptable traffic and air quality impacts.

TfL: The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

- Works: The impact of construction traffic on the operation of the TLRN including buses, pedestrians and cyclists must be considered and could be mitigated through the provision

of a Construction Logistics Plan (CLP). TfL would encourage the applicant to submit a draft plan as part of the application.

- Completed development: TfL would expect the application to be supported by a robust Transport Assessment (TA) and depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme, unless these are adequately addressed as part of the application. A framework residential travel plan should be prepared and submitted and should include information on deliveries and servicing. Any mitigation measures relating to TfL infrastructure and services must be secured through a s106 agreement. Depending on the level of transport mitigation agreed, it may be appropriate for TfL to be a signatory to any s106 agreement. Less significant issues can be dealt with by use of planning conditions and in some cases TfL may request that it is consulted prior to any discharge of a condition.

In addition to the reports recommended in the EIA report, the Authority will require the

1. Transport Assessment – to also include:
    - Traffic generation details off-peak and at the weekend - quantify the change in traffic on Saturdays and Sundays, as these are considered the busiest days for the DIY store.
    - To be in accordance with TfL's latest Transport Assessment Guidance. Depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme
    - Must include a multi-modal impact assessment including baseline and future car, bus, rail and pedestrian and cycle trips and mode share.
2. Travel Plan: Produced in accordance with TfL's Travel planning best practice guidance.
3. Health Streets Assessment
4. Parking surveys on local roads
5. Contribution for CPZ review and implementation – to prevent on-street parking
6. PERS
7. CERS
8. Road safety audit

<u>Schools:</u>
The Works will not generate any significant effects.

The IEA Report states there are 8 open primary schools within approximately 1m of the site, which have surplus capacity of 567 primary places. There are 9 secondary schools, within approximately 2 miles of the centre, with approximately 413 mixed gender and multi-faith secondary school placed. The EIA report advises that the scheme is unlikely to generate a child yield in-excess of 567 primary school aged pupils and 413 secondary school agreed pupils, and therefore not deemed to generate any significant demand and over capacity issues.

Applying the GLA Population Yield Calculator, the development may generate approximately:

- Aged 0-3: 39.6 persons
- Aged 4-10: 39 persons
- Aged 11-15: 11.3 persons
- Aged 16-17: 4.8 persons
- Aged 18-64: 651.6 persons
- Aged 65+: 15.5 persons
- **Total: 761.7 persons**

The Infrastructure Delivery Plan 2017 states:

- Primary education: The Council has a duty, under section 14 of the Education Act 1996, to ensure that sufficient schools are available for their area for providing primary education. The Council's overarching School Place Planning Strategy, adopted in January 2015 and revised in October 2015, sets out its priorities and strategy for ensuring a sufficiency of places up to 2024. In the medium to long term, additional provision will be needed in the Barnes and Teddington areas, for which plans are in place.

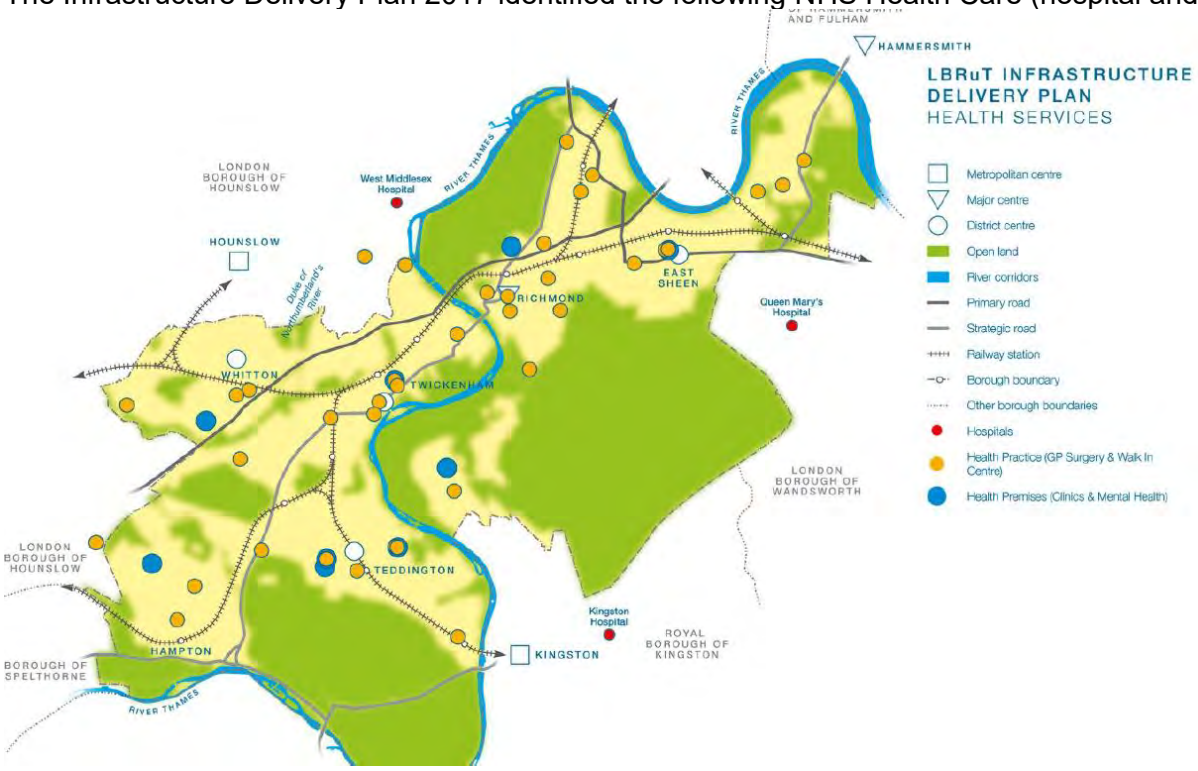
- Secondary Education: In the October 2015, the Council updated the School Place Planning Strategy and identified the need for one more free school to be provided as part of the redevelopment of the Stag Brewery site in Mortlake. This was in order to meet the localised forecast demand in the eastern areas of the borough. It is noted that the forecast for additional places in the west of the borough has been met by the provision of the three new schools.

Achieving for Children have been consulted, who deem that whilst there will clearly be an impact, given the varied ages and relatively low numbers, the impact will not be significant. In addition: At present there is some spare capacity in the primary phase at nearby schools, and the proposed establishment of Livingstone Academy ought to take care of the anticipated secondary pupil yield from the development.

Health:
The Works will not generate any significant effects.

The EIA Report states there are 9 open GP surgeries within approximately 1 mile of the site, which are accepting new patients. Therefore, not deemed to raise significant adverse impacts on such facilities.

The Infrastructure Delivery Plan 2017 identified the following NHS Health Care (hospital and GPs)



The CCG's has identified the following localities as key priority issues:

- Kew (North Road Surgery)
- Teddington (Park Road Surgery)
- Twickenham (York Medical Practice)

CCG have been notified, who advise the distances between the site and local practices:

- Seymour House – 0.5km (8 mins walk)
- Paradise Road - 1.1km (17 mins walk)
- North Road – 1.2km (19 mins walk)
- Parkshot – 1.5 (23 mins walk)
- Sheen Lane – 1.9km (29 mins walk)

- New North Road site - 2.5km (38 mins walk)

In addition, there is a second tier of priority practices who have applied to the NHS England Improvement Grant fund; these are based in Twickenham, Hampton, Kew, Richmond and Barnes. However, population growth, particularly in Twickenham and Richmond, will place increasing pressure on GP premises in these areas.

Public health has been consulted and have no comments from an EIA point of view, however, will require a Health Impact Assessment (HIA)and a Rapid Health Impact Assessment (RHIA) is undertaken.

The scheme will clearly impact upon local health services. However, it is deemed a HIA and RHIA would identify potential need, and mitigation can be applied to avoid or prevent such impact. This may include contributions to expand GPs to cater for demand. If deemed necessary, this would be secured through a legal agreement. Indicative costs are identified using the HUDU model, which uses the numbers of proposed housing units, and the likely resulting population and calculates what health care floorspace is required and estimates the subsequent capital costs.

Recreation facilities
The Works will not generate any significant effects.

There are 9 open spaces and recreation facilities (public and private) within close proximity of the site, including:

1. North Sheen Recreation Ground
2. Penfold Tennis club
3. Fulham (North Sheen) Cemetery
4. Tangier Green
5. Pesthosue Common
6. East Sheen Common
7. Richmond Athletic Ground
8. Royal Botanic Gardens at Kew.

Whilst the proposed use may result in increased recreational use, given policy requirements for amenity and play space on site, and potential ability for legal agreements for improvements to public open spaces, the scheme is not deemed to generate significant adverse impact on such provision.

Wind climate:
The surrounding area predominantly contains relative uniform massing – generally low – medium rise buildings ranging from 2-6 storeys, apart from two 12 storey towers to the west of the site, off Lower Mortlake Road (the Towers). Given the distance between these and the site (approx. 120m2) the relatively low rise adjacent to these, The Towers are not deemed to give rise to significant impacts.

The Works (demolition of existing building) are not deemed to significantly impact upon wind conditions, given their relatively low nature.

The completed development is proposed to be ground plus 8 storeys. Figure 4 shows the building lines are staggered within the site. Whilst the scheme proposes some height, the EIA Report confirms that the design will be informed by an appropriately qualified and experienced wind microclimate expert so that the physical presence will not create uncomfortable or unsafe wind conditions within the site or adjacent and the application will be accompanied with a Desk Based Wind Microclimate Assessment. With such assurances, it is deemed significant impacts can be avoided.

Daylight, sunlight, overshadowing, light pollution and solar glare

The Works are not deemed to give rise to significant changes to light, and significant light pollution can be controlled through a CEMP.

The completed development will change light conditions within the site and adjacent to the site. However, the EIA Report confirms that the Applicants Daylight, Sunlight and Overshadowing consultants are informing the design of the Development to ensure any changes to the conditions of habitable rooms and amenity space are minimised and where changes do occur they are not unacceptable. Further, owing to the separation between the site and residential receptors, these are likely to the insignificant. In addition, the advice will also inform the design of the site layout (massing, siting, orientation, arranging of living space and fenestration design) to ensure suitable conditions for future occupants and solar glare. A lighting strategy will be adopted to ensure lighting will not exceed existing ambient artificial light levels.

The authority agrees with the above approach, and with such assurances and the following documents that will be required at validation, the scheme is not deemed to give rise to significant effects in this regard:

- Draft CEMP – light pollution management
- A sunlight / daylighting and overshadowing report - this will be measured adjacent BRE guidance.
- Lighting strategy

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

As previously concluded, the site is not known to contain high quality or scarce resources. There are no statutory or non-statutory sites of nature conservation within the site. As previously concluded, subject to mitigation and reports, the Development is not deemed to give rise to significance environmental effect in this regard.

With regards to the environmental sensitivity of the biodiversity in the geographical area, consideration has been given to:

Statutory Sites- There are two sites of European designation within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species the stag beetle *Lucanus cervus*. Given that the site is designated as a SAC due to the stag beetle population present, it is of **European importance**.

- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu,* which is listed as an Annex II species. Due to the presence of stag beetles and the presences of both wet and dry heathlands Wimbledon Common is considered a of **European importance**.

There are two sites of National designation within 2km of the site:

- Sion Park is located 1.7km north-west of the site and is designated a SSSI. Sion Park is 21.5Ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is of **local importance**.
- The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

Non-Statutory (Local) Sites

- Non-statutory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:
    - Sites of Metropolitan Importance
    - Sites of Borough Importance (borough grade 1 and borough grade 2)
    - Sites of Local Importance

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scare plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pesthouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scare and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km- South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scare and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail *Balea biplicata* and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scare plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: - Marsh sow-thistle *Sonchus palustris* - Cut-grass *Leersia oryzoides*.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail *Balea biplicata* only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush *Bolboschoenus maritimus* and nationally rare invertebrates such as the, Thames/two-lipped door snail *Balia biplicata*.
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree *Juglans nigra*.

Potential impacts on the above sites may include, increased pollution (such as air, noise and light); and increased recreational use. However, given the distance of the development to the above sites and the sites being geographically isolated by buildings, greenspace, hardstanding and roads; the limited parking being provided on site, and with the following mitigation measures, that can be secured by condition and / or Section 106 Legal Agreement; significant impacts on such areas will be avoided.

- Incorporation of multi-functional green and play space within the site boundary,
- Limited car parking vision
- Electric charging points
- Lighting strategy

(c) the absorption capacity of the natural environment, paying particular attention to the following areas

- <u>wetlands, riparian areas, river mouths</u>
  No likely significant effect – the site is not within the immediate vicinity of any such areas.

- <u>coastal zones and the marine environment</u>
  No likely significant effect - the site is not within the vicinity of any such areas.

- <u>mountain and forest areas</u>
  No likely significant effect on mountain or forest areas.

  There are several trees on the site, and a group TPO applied. A Tree Survey and Constraints Plan; An Arboricultural Impact and Method Statement, and landscaping Scheme would be requirement of the Local Validation Checklist. These would identity the value of the trees, and which are of townscape or amenity value, and mitigation. Whilst there will inevitably be the loss of planting on site, the Authority has the ability (under policy LP 16) to secure replacement planting (on site or offsite) thereby to avoid significant environmental effects.

When considering the landscaping scheme, the applicants should provide details of the quality of the soil and suitability for landscaping within the site; and ensure sufficient soil volume is made available above the basement to support new trees.

- Nature reserves and parks
No likely significant effect through physical building works – the site is not within the immediate vicinity of any such areas.

With the increase in population, the Development may impact upon the usage on local parks, most notably North Sheen Recreation Ground in Dancer Road. Policy LP 31 requires financial contributions to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development. Consequently, no significant environmental effects on nature reserves or parks in the vicinity are considered likely.

- European sites and other areas classified or protected under national legislation;
The proposed development is not considered likely to affect birds protected through the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds). Various sites and species are also protected through the Habitats Directive (92/43/EEC) as set out in Schedule 2 of the Habitats Regulations 2017 which transposes the Habitats Directive into UK law. The site is not within the immediate close proximity to any European protected sites (the nearest being Richmond Park SAC).

Natural England has been consulted and based on the material supplied. They confirm that the site is not located within, or partially within any Site of Special Scientific Interest (SSSI) or Special Area of conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significant affect the interest features for this they are notified. The location of the development is not within, nor is it significantly close to a National Park, Area of Outstanding Beauty or Heritage Coats to impact upon the purpose for which these sites are designate. Therefore, in so far as statutory designated sites, landscapes and protected species are concerned there are no potential significant impacts.

The applicant is advised that they must provide information supporting this application sufficient for the Authority to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

- areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
The entire Borough is designated as an Air Quality Management Area (AQMA). However, as already discussed, the development is within a sustainable location, on previously developed land, proposes minimal onsite parking, and subject to conditions, measures to restrict on-street parking and relevant reports, is not deemed to give rise to significant adverse effects. The relevant Environmental Health officer also does not deem the scheme to trigger an EIA.

- densely populated areas;
The site is in a medium-density area outside of the Borough's town centres. However, the development may cause impacts on the surrounding population in terms of the following:

  - Noise, emissions, dust during construction
  - Noise, light pollution, air quality and transport impact from proposed use
  - Visual impact on townscape

The above matters have been discussed elsewhere in this report. Given the scale and siting of the development, the surrounding context (in terms of adjoining neighbours and land uses) and considering measures that could be applied and controlled through relevant Environmental and

Health and Safety legislation and planning conditions, the development is not deemed to give rise to significant effects.

- landscapes and sites of historical, cultural or archaeological significance.
  The site is not located within an Archaeological Priority Area, and the EIA Report states that the site has a low archaeological potential due to previous disturbance. Historic England have been consulted on the EIA Report, and confirm that Archaeology does not need to be part of the EIA process due to there not being high potential for significant remains to be present on the site. However, recommend the detailed application should be accompanied by an Archaeological Desk -Based Assessment, and this can be a stand-alone report, which would enable GLAAS to make a decision on whether any further archaeological surveys or mitigation works will be necessary. On this basis, no significant environmental effects are likely.

  The site is not within a conservation area, nor does not contain any listed buildings, World Heritage Status, Scheduled Monuments; Building of Townscape Merits. Neither is the site within the setting of listed buildings, the buffer of a World Heritage Site, or Schedule Monument. Opposite the site on Manor Road and on the north side of the district line are two storey Buildings of Townscape Merit, non-designated heritage assets. To the west and south west (again beyond the district line or network rail line) are two conservation areas, north of the site (beyond the district line).

  The Authority is of the view the scheme is of a different physical scale to existing and will affect the setting of such, however, given, the varied heights within the development; built-up nature of the area; the varied form of buildings and heights in the locality and their existing relationship; Heritage assets being separated from the site by rail lines, built form, roads; the site not being located within a viewing corridors or Protected Views of such area; this is not deemed to give rise to significant adverse effects. Further, the EIA Report confirms:
  - The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
  - The application will be accompanied with a Townscape and Visual Assessment.
  - Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

(3) Type and characteristics of the potential impact - The likely significant effects of the development on the environment must be considered in relation to criteria set out in points 1 and 2, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
(b) the nature of the impact;
(c) the transboundary nature of the impact;
(d) the intensity and complexity of the impact;
(e) the probability of the impact;
(f) the expected onset, duration, frequency and reversibility of the impact;
(g) the cumulation of the impact with the impact of other existing and/or approved development;
(h) the possibility of effectively reducing the impact.

The criteria set out in part 3 of Schedule 3 of the Regulations have been considered in the assessment above (see table below). The proposed development, both through Works and Completed development, could impact upon several areas of acknowledged interest in this borough.

		Works	Completed Development
Natural Resource	Physical changes to topography	The existing site is flat. The works will involve the construction of a basement, piling and foundations. The Works equipment will impact on the townscape; however, this is not complex, uncommon, of any great magnitude, temporary and reversible.	The development will impact upon the topography and townscape and have a greater urbanising effect. However, given the built-up nature of the site and area; varied character in height and form; non designated nature of site; and the measures outlined in the EIA Report, this is not deemed too given rise to significant effects.
	Impact on natural resource – land, soil, water, materials and energy	No significant impact.	Given the existing brownfield nature of the site, which is predominantly hard surfaced and its limited ecological value, the authority concludes the scale and characteristics of the development will not result in any significant effect on nature resources.
	Impact on high quality or scarce resources – forestry, agricultural, water / coastal, fisheries, minerals.	The Works are not deemed to impact upon high quality or scarce resource.	The Development is not deemed to significantly impact upon high quality scare resource.
Waste	Production of waste	Any scheme will produce waste during Works, and therefore this is not deemed complex. The duration will be limited, and frequency and magnitude can be controlled through measures such as CEMP and waste management plan.	The scheme proposes 400 units and commercial floorspace, therefore will produce waste. However, this is not uncommon, complex or of great magnitude. Measures, such as refuse and recycling facilities, will reduce impact and ensure this is not significant.
Pollution and nuisances	Release of pollutants	The works will generate pollution through operating machinery, transport, plant, dust. Whilst these will occur on a frequent basis, these are not uncommon on a construction site, and will be for a limited duration, and measures ca apply to reduce impacts, such as travel plans, CEMP, dust management plan, to ensure no significant.	The completed development will release pollutant from energy, vehicles, mechanical plant etc. However, these are not deemed to be complex, of magnitude or significant, when taking into measures to reduce such impacts, such as Air Quality Assessment; limited parking; sustainability design and energy measures.
	Noise, vibration, light, heat, energy pollution	The works will generate noise, vibration, pollution. However, this is not significant or complex. Measures can reduce any impact, and the duration will be limited.	Any development will generate noise, light, heat and energy pollution. Whilst 400 units, this is not deemed complex in this regard, and policy and measures can be applied to ensure no significant impact.
	Impact on contamination	The site has a past industrial land use, and therefore it is probably	The proposed land use is not deemed to give rise to

		contamination exist. However, with appropriate investigations and remediation, this is not deemed to give rise to significant effect.	contamination. Areas of soft landscaping are proposed. If contamination is found, remediation will be required, and this will mitigate impact and ensure no significant impact.
	Areas already subject to pollution and environmental damage – air quality	The site is adjacent to the A316, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, rail and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact (insulation, design measures, travel plans, cycle parking), sustainability measures.
Pollution and human health	Risk of accidents	No evidence to suggest an accident, however, any possibility can be reduced through CEMP, FRA.	No evidence to suggest an accident, however, any possibility can be reduced through referral to HSE, application of PADHI+.
	Risk to human health – air pollution and contamination	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during Works is not deemed of great complexity, the duration will be limited, and measures can be applied to reduce impact.	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during operation, whilst frequent and potential for long duration) this is not deemed to be significant, given measures applied to reduce impact. Such as design features, limited car parking, remediation, Travel Plans etc.
Water resources	Impact on water resources and flooding	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.
Biodiversity	Impact on: protected areas Sensitive areas	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; limited duration of Works, and measures to reduce impact, impact through Works, is not deemed to be significant.	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; and measures to reduce impact, impact is not deemed to be significant.

	Impact on protected spaces on / around the site	The PEA has not identified protected species on or around the site. No significant impact.	The PEA has not identified protected species on or around the site. No significant impact.
Landscape and visual	Impact on areas / features on or around the site protected or non-designated areas of landscape and scenic value	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will not be significant.	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the development will have a visual impression on both their settings, given the character of the area; this will be not being significant.
	Is the development going to be highly visible – where, what direct and distances	It is not uncommon for developments to have cranes etc. These will be visible from the immediate location and further afield, however, this is not to be of a magnitude to generate significant impact.	The development will be prominent from Manor Road, given the length of the frontage. Whilst it will be visible from the south and north west, this will either be over rail lines, properties etc. The A316 is slightly elevated to the north of the site, and with the existing landscaping, it limits its prominence. Notwithstanding such, given the built-up nature of the site, and tight urban grain, this is not deemed too given rise to significant adverse impacts. The applicant will be submitted a Townscape and Visual Appraisal.
Cultural heritage and archaeology	Impact on areas / features protected for their cultural or archaeological value. Local designation / non-designated heritage assets	The site is not of cultural, heritage or archaeological value. There are designated heritage assets within the setting of the site (conservation areas) and non-designated assets (BTMs). Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will be not being significant.	The site is not of cultural, heritage or archaeological value. Within the setting there are designated heritage assets (conservation areas) and non-designated assets (BTMs). There is a World Heritage site in Kew. Given the distance to the World Heritage Site (not with core or buffer zone), the varied character of the area (and relationship between existing pattern of development and heritage assets); the Applicants confirming a views analysis and heritage statement will be developed, and design measures applied to ensue no significant impact; (and the local and non-designated nature of the BTMs), it is not deemed to give rise to significant effects.
Transport and access	Impact on routes on or around the location to access recreation or other facilities.	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. No details have been provided, however, it is probable the Work will impact on this. A CLP will be required to demonstrate how the two can run concurrently and this can be	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. The indicative layout does not indicate an impact on such faculties.

		secured to avoid any significant impact.	
	Impact on transport routes susceptible to congestion or cause environmental problems	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact.
Land use	Existing land uses or community facilities that could be addressed – housing, indusial, health, education, places of worship, leisure, sports and recreation	No significant impacts deemed during Works, given nature; limited duration; reversibility.	The development will increase pressure on existing facilities, however, these are no complex, uncommon, and through unit mix, Health Impact Assessment, appropriate play and amenity space; contributions for improvements (if necessary) not deemed to raise significant impact.
	Any plans for future land uses around location that could be affected.	No significant impacts deemed during Works, given nature; limited duration; reversibility.	There is a site allocation for the Sainsbury's site opposite. (SA 21), which supports the comprehensive redevelopment for retail and residential uses. The continued use of the site as a food store and the re-provision of the existing retail floorspace is required. The Development is not deemed to prejudice such.
Land stability and climate	Is the site / area susceptible to and stability, winds, that could present environmental problems	No significant impact.	In response to build up pattern of development, and the Applicants confirming the design will be informed by a microclimate expert, there is no evidence to suggest a significant effect.
Transboundary effects	Is the project likely to leads to transboundary effects?	The Works will lead to construction traffic along the A316, through neighbouring boroughs. However, this is not deemed to be significant, especially given the limited duration and measures to reduce impact.	Given the distance of the site to neighbouring borough's and the limited parking on site, the scheme is not deemed to give rise to signage transboundary effects. Various consultees which consider transboundary matters (including TfL, Natural England, Historic England etc) have been consulted on this screening opinion and have not requested a positive EIA screening.

Any Works have a consequential impact on the physical environment, pollution, transport etc. Whilst the impacts through the works will be frequent, given the duration of the impacts will be limited to just construction; not being complex or uncommon; temporary in nature; a number being

reversible (air, noise, traffic, visual impact), with the mitigation measures put forward, these are not deemed significant. It is probable the Works will generate short term employment opportunities

Several impacts arising from the completed Development will not be reversible and due to the visible location of the development would not be limited to the immediate locality, potentially affecting a significant number of people. However, the Council:

1. Does not consider that the characteristics of the site and development would be likely to result in any significant effect on natural resources.
2. Whilst there is always the risk of pollution (air, noise, light, waste, contamination) being generated through operation, with the use of appropriate conditions, documents, and design measures will avoid significant impact or significant risk.
3. Does not consider, based on the evidence submitted, the Development would raise significant impact on protect and sensitive areas of biodiversity and protected landscapes.
4. Recognised that transport matters have been and can be addressed through design (limited parking) and Travel Plans, cycle infrastructure, on-street parking controls; and legal agreements to secure such.

The Completed development will have an urbanising effect on the townscape. The Authority considers that the key issue relating to the potential impact of the Development, both on-site and in the vicinity, relates to the visual impact. However, given the character of the area (form, built nature and height); the limited evidence of likely significant impacts on sensitive landscape or archaeological or nature conservation interests; and the design being influenced by heritage and townscape consultants, the impact is not deemed to be sufficient to warrant an EIA.

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

Mitigation measures

The NPPG states, "*Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment*". Further, "*Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance*".

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment, the type and characteristics of the potential impact are effectively reduced. The table below (column 2) identifies the features of the development / mitigation measures put forward by the applicants to avoid or prevent what might otherwise have been significant adverse effects on the environment. The third column identifies further reports / mitigation, recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission.

Issue	**Features / mitigation / documents to be submitted to avoid or prevent potential significant effects:**	**Additional mitigation / reports recommended by the Local Planning Authority:**
Transport and connectivity	• Car free development, except spaces for mobility impaired. • Construction Transport Logistics Plan • Transport Assessment	• Contributions towards highways measures and parking controls around the site

	• Draft Travel Plan • Draft Delivery and Services Plan • Signposting	• Highways and traffic management legislation. • Car Park Management Plan • Healthy Street Assessment • Parking survey • PERS/ CERS • Road Safety Audit
Core Social Infrastructure	• Appropriate quantum of play space will be provided within the Site • Generous hard and soft landscaped areas for public and private use	• Health Impact Assessment
Townscape and visual Effects	• Construction Environmental Management Plan (CEMP) • A Townscape and Visual Assessment	
Heritage Effects	• A Draft CEMP (including for above ground heritage asset construction management). • A Heritage Statement. • An Archaeological Desk-Based Assessment	
Biodiversity / Ecological Effects	• Avoid conflict with bird nesting or hedgehog hibernation during the Works • Draft CEMP (including for biodiversity / ecological construction management). • A PEA and PBRA (a re-submitted version of the PEA and PBRA included at Appendix 1 for completeness). • A Lighting Strategy.	• Provision of new public open space • Ecological enhancements • Arboricultural Method Statement • Landscaping scheme
Geology, Ground Conditions and contamination	• Environmental management controls • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). • Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination • Assessment and Remediation Strategy. • A Draft CEMP (including for contamination and UXO management).	
Water Resources and flood Risk	• A Draft CEMP (including for surface water drainage management). • A Flood Risk Assessment (FRA) (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).	• Foul sewerage and utilities statement.
Air Quality	• Apply construction environmental management techniques • Air Source Heat Pump solution • A Draft CEMP (including for dust and air quality management). • An Air Quality Assessment.	• Design of the development • Potential additional bus services, subject to TfL approval • Provision of the minimum number of vehicular parking spaces, • Electric vehicle parking spaces, • Cycle parking and infrastructure,
Noise and Vibration	• Apply construction environmental management techniques • A Draft CEMP (including for noise and vibration management). • A Noise and Vibration Assessment. • A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).	• Siting the least sensitive rooms nearest to the noise sources

		• Acoustically attenuated natural ventilation and/or mechanical ventilation
Wind Microclimate	• A Desk-Based Wind Microclimate Assessment.	
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	• Draft CEMP (including for light pollution management). • A Daylight, Sunlight and Overshadowing Assessment. • A Lighting Strategy.	
Waste	• A Draft CEMP (including for construction site waste management). • An Operational Waste Management Plan.	• Refuse and recycling facilities
Risk of Major Accidents and disasters	• A Draft CEMP (including for ground contamination, UXO and surface water drainage management). • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). o Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination o Assessment and Remediation Strategy. • An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).	• HSEs Web App • PADHI+ • Foul sewage and utilities statement
Health and Wellbeing	• A Draft CEMP (including for ground contamination, UXO, dust, air quality, noise and vibration and light pollution management). • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). o Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination o Assessment and Remediation Strategy. • An Air Quality Assessment. • A Daylight, Sunlight and Overshadowing Assessment**.**	• Health Impact Assessment – The applicants are advised to control Jabed Rahman, Public Health Lead.
Climate Change	• Design features: • The selection and use of building materials from sustainable sources and with low embodied carbon. • The incorporation of appropriately designed façades to balance solar gain against daylight availability. • The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand. • The use of thermally efficient windows to reduce head demand. • The achievement of good levels of air tightness. • Mechanical ventilation with heat recovery. • The use of energy efficient lighting. • All electrical heating systems to take advantage of decreasing UK grid electricity carbon factor. • The use of photovoltaic panels mounted at roof level. • A Draft CEMP (including for dust, air quality and noise and vibration management). • A Draft CTLP. • A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).	• Sustainable Construction Checklist • Sustainable Drainage Strategy • BREEAM Pre-Assessment • Energy Report.

	• An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy). • An Air Quality Assessment. • A Sustainability Statement	

Conclusion
Based on the information provided, and for the reasons set out above and potential mitigation measures, which will assist in avoiding / preventing any potential significant effects, significant effects on the environment are not considered likely. As such, an Environmental Impact Assessment would not be required for any future planning applications under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended).

Decision: Negative Screening Opinion

Date of Opinion: 14th December 2018

Yours faithfully

Robert Angus
Head of Development Management

Appendix III
EIA Screening Report, October 2019

Environmental Impact Assessment (EIA) Screening Report

Redevelopment at Manor Road, North Sheen

October 2019

Contents

Appendices

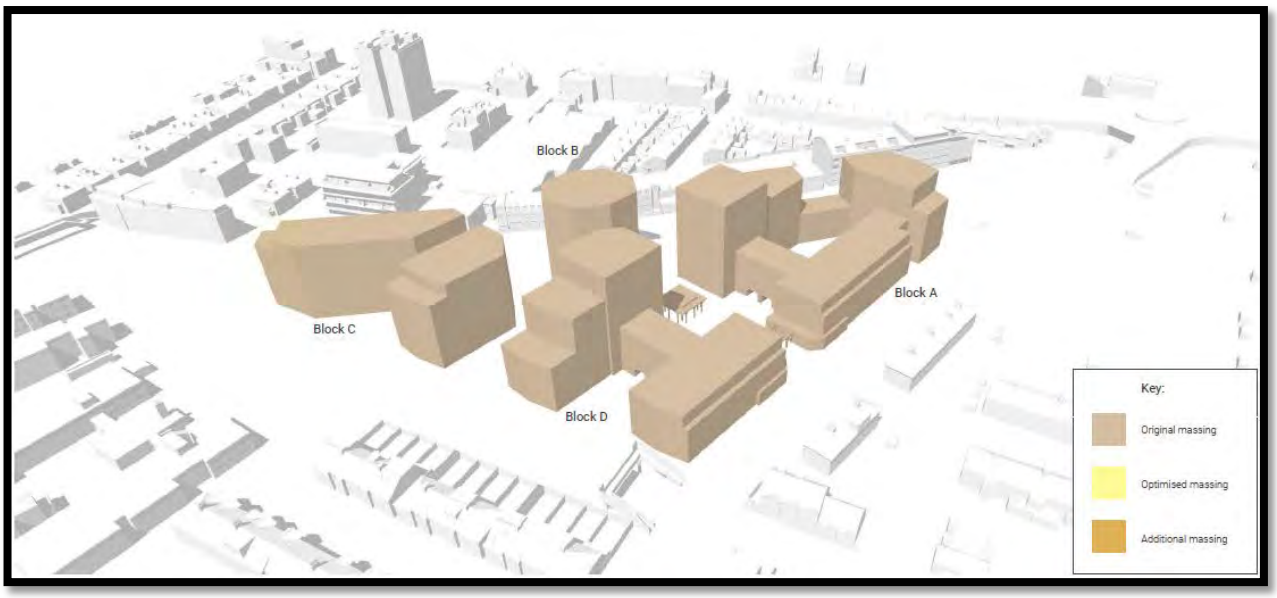
Prepared By: Hannah Fiszpan and Alice White
Status: Draft 007
Date: October 2019

For and on behalf of GVA Grimley Limited trading as Avison Young

1. Background to and Purpose of this Report

1.1 In February 2019, Avanton Richmond Development Ltd (the Applicant) submitted a detailed planning application (Planning Application Reference: 19/0510/FUL) for the residential-led mixed-use redevelopment of land at Manor Road, North Sheen (the 'Development'). In brief, the Development comprised demolition of existing buildings and structures and comprehensive residential-led redevelopment of a single storey pavilion, basements and four buildings of between four and nine storeys to provide 385 residential units (Class C3), flexible retail / community / office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works. The massing of the Development is shown in **Figure 1**.

Figure 1: Massing of the Development (Source: Assael)



1.2 During the pre-application stage of the Development, the Applicant commissioned Avison Young to prepare an 'Environmental Impact Assessment (EIA) Screening Report' (dated November 2018). The purpose of the EIA Screening Report was to inform a formal request for an EIA Screening Opinion under Regulation 6 of the EIA Regulations. The EIA Screening Report and formal request for an EIA Screening Opinion was submitted to the London Borough of Richmond upon Thames (LBRuT) (as the relevant determining authority) on 12th November 2018.

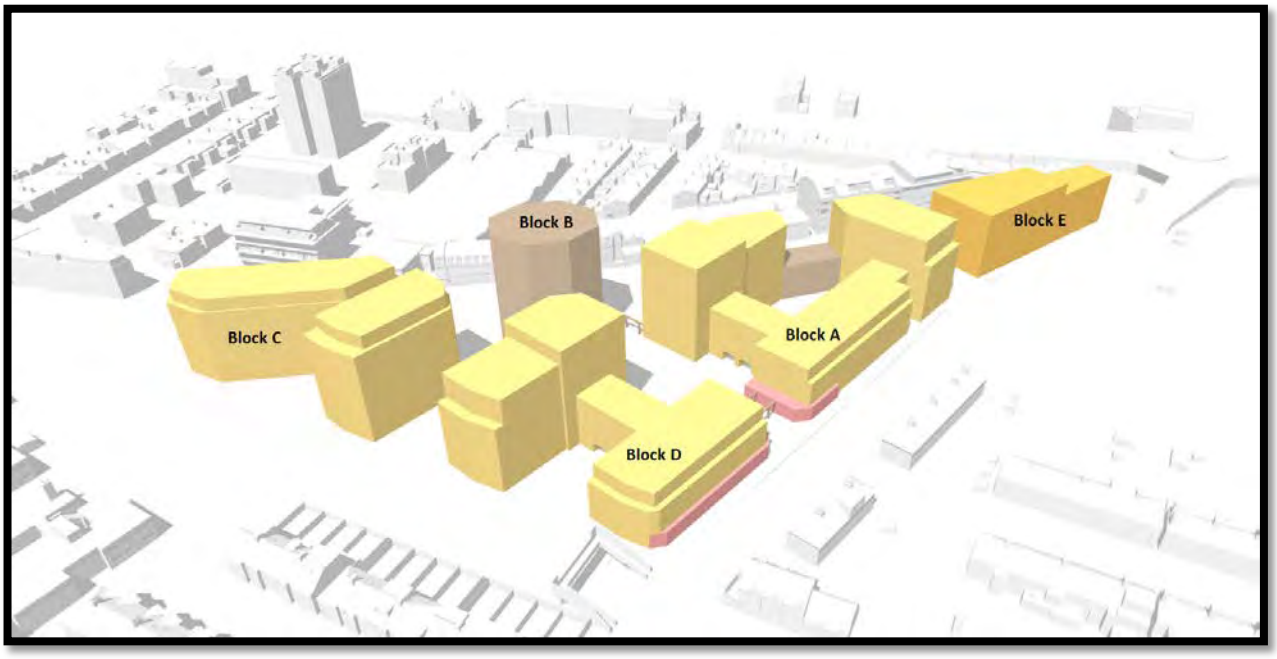
1.3 Informed by the evidence presented in the EIA Screening Report, LBRuT issued an EIA Screening Opinion on 14 December 2019. The EIA Screening Opinion, which can be found in **Appendix 1**, concluded that the Development was **not** classified as 'EIA development'.

1.4 In July 2019, LBRuT resolved to refuse planning permission for the Development. The Development was therefore referred to the Mayor of London. As such, the Greater London Authority (GLA) is now the determining authority for the Development.

1.5 Further to the above, the Applicant now wishes to make some amendments to the Development (the 'Development as Amended'). In general terms, when compared to the Development, the Development as

Amended provides optimised internal layouts and massing within three of the four buildings proposed, a potential additional storey to Block B, with an additional building located above the North Sheen Bus Terminus, will provide in total an additional c.54 homes and an increase of affordable housing from 35% to 40% by habitable room. The additional building (Block E) will comprise a 6 m height ground floor level to accommodate the reprovided North Sheen Bus layover facility with parking for up to 5 buses, above which four levels of residential use will be located, including a roof terrace. The pavilion within the central open space for commercial uses may be retained. The emerging massing for the Development as Amended is shown in **Figure 2**.

Figure 2: Massing of the Emerging Development as Amended (Source: Assael)



1.6 In accordance with their statutory duties, the GLA will need to be satisfied that the Development as Amended is correctly screened in accordance with the EIA Regulations. Accordingly, this report accompanies a written request for an EIA Screening Opinion in relation to the Development as Amended from the Greater London Authority (GLA) pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017[1] (the EIA Regulations). The purpose of this report is to inform the request for an EIA Screening Opinion.

1.7 This report has been prepared by Avison Young on behalf of the Applicant. In accordance with Regulation 6(2) of the EIA Regulations this report provides:

- A plan sufficient to identify the land subject to the Development as Amended (the Site) (refer to **Section 2**).
- A description of the Development as Amended (refer to **Section 2**).
- A description of the aspects of the environment likely to be significantly affected by the Development as Amended (refer to **Section 5**).

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations, 2017.

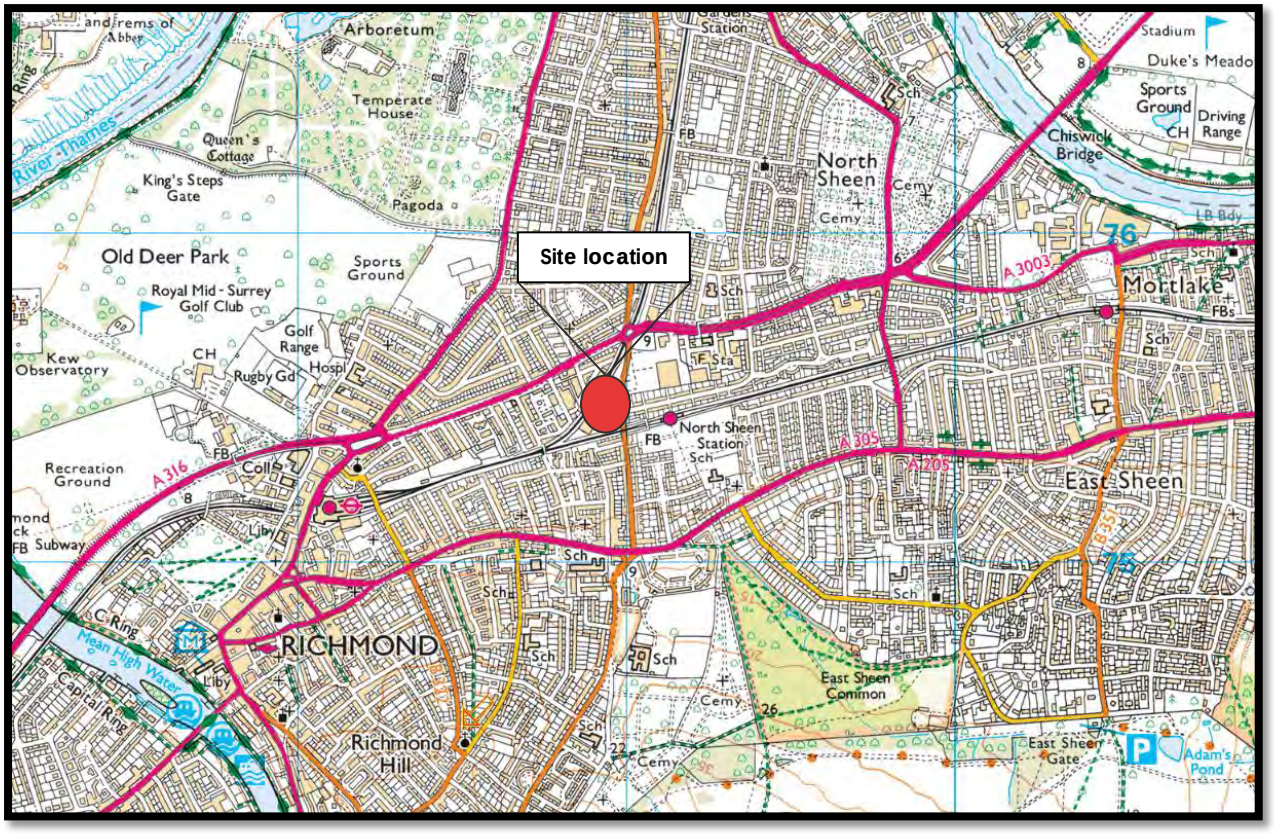
- A description of any likely significant effects of the Development as Amended on the environment resulting from:
  - The expected residues and emissions and the production of waste, where relevant (refer to **Section 5**).
  - The use of natural resources, in particular soil, land, water and biodiversity (refer to **Section 5**).
- Other relevant information including features of the Development as Amended or any measures envisaged to avoid or prevent what might otherwise result in significant adverse effects on the environment (refer to **Section 5**).

2. Overview of the Site and the Development as Amended

Overview of the Site

2.1 As shown in **Figure 3**, the Site is located in North Sheen, south-west London within the administrative boundary of the LBRuT. The Site comprises an area of approximately 2 hectares (ha).

Figure 3: Site Location



2.2 **Figure 4** illustrates the triangular shaped Site is bound by:

- The northern and easternmost extents of an access road which provided access to / from Manor Road (the B353) to the north.
- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

Figure 4: The Site

2.3 The existing Site currently comprises a low-rise retail store occupied by Homebase, Pets at Home and Pets4Vets, associated car-parking and a bus layover. The retail store is located centrally of the Site. To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road which provides access to / from Manor Road (the B353), surface car-parking in the north-east of the Site and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

2.4 The north of the surface car-parking is the North Sheen Bus Terminus within which Richmond Manor Road Bus Stop is located.

2.5 There are a number of trees planted within the surface car-parking area of the Site, to the north of the bus layover and at various locations around the Site's perimeter.

Overview of the Development as Amended

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

2.7 The Development as Amended will necessitate the demolition of all existing buildings and structures on the Site.

2.8 The previously referenced **Figure 2** demonstrates the current massing of the Development as Amended. **Figure 5** presents the current ground floor plan of the Development as Amended. **Figure 6** shows an illustrative sketch of the Development as Amended. With reference to **Figure 2**, **Figure 5** and **Figure 6**, it is envisaged that the Development will provide in the region of 439 residential units (1, 2 and 3-bed units with 40% affordable housing) together with a small quantum of commercial floorspace.

Figure 5: An Illustrative Ground Floor Plan of the Development (source: Assael)

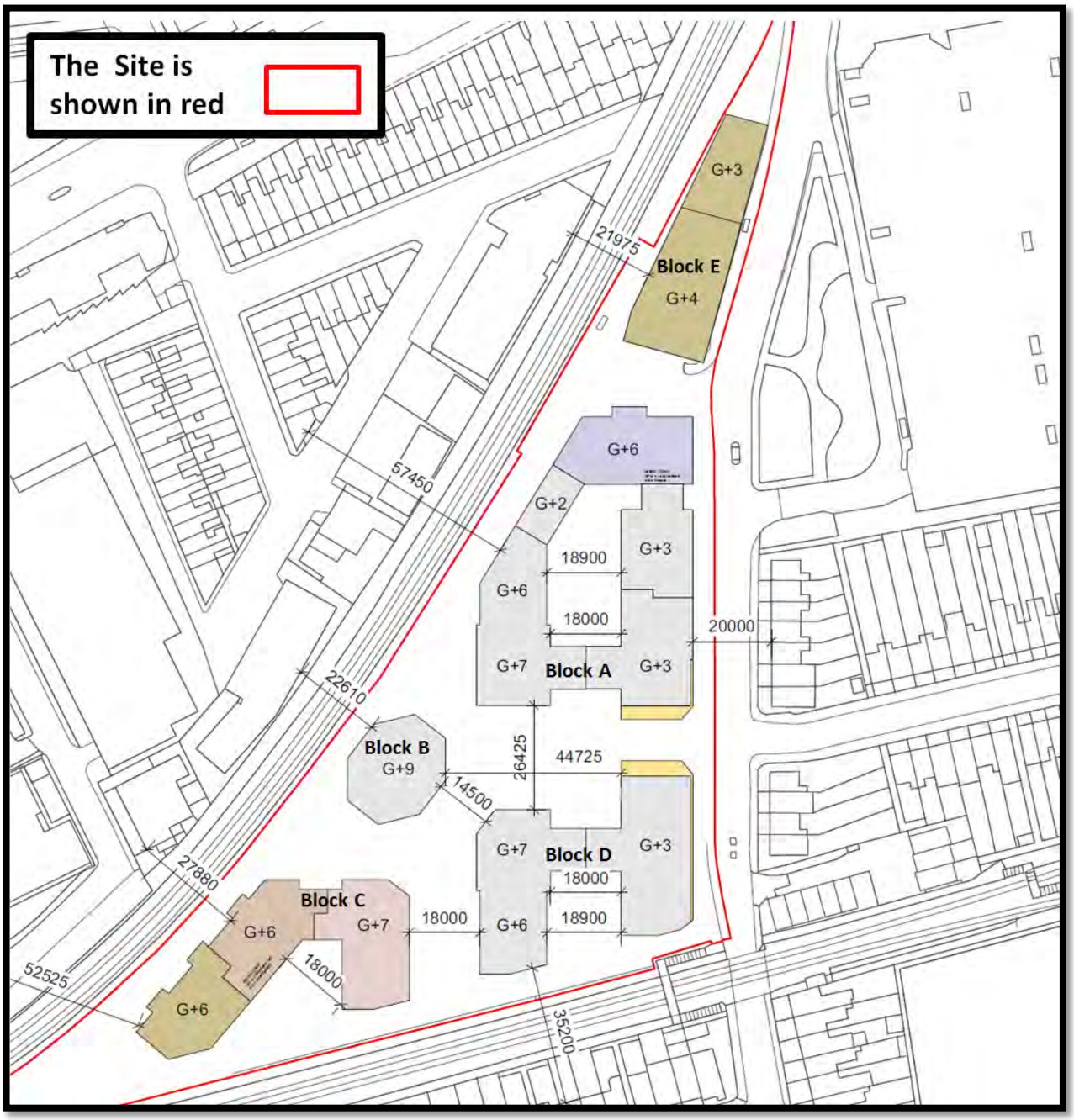


Figure 6: An Illustrative Sketch of the Development (viewed from Manor Road) (Source: Assael)

2.9 The new land uses will be provided within 5 buildings ranging from ground level plus 1-storey to ground level plus 9-storeys. Residential land uses will be present in all buildings. The proposed commercial floorspace is likely to be concentrated Block A and D, either side of the proposed public square.

2.10 4 of the 5 buildings (those located in the north-east, south-east and south-west of the Site) will include various building components so that each building in totality will comprise a range of building heights and geometries. This will afford visual interest, avoid overly bulky building design and allow for other appropriate ground floor uses such as a well-defined public and private realm including new pedestrian routes, a new public square, communal courtyards and communal gardens. The remaining building (within the east of the Site) will be of a uniform octagonal form. It is proposed that these buildings will be predominantly brick.

2.11 The Development as Amended will now provide for an additional building, referred to as Block E, comprising a suitably designed ground floor level to accommodate up to five buses, plant room and cycle storage. The western façade of the North Sheen Bus Terminus will comprise 'hit and miss' brickwork to afford natural lighting and ventilation. The North Sheen Bus Terminus would remain operational throughout the Works required to facilitate the Development as Amended and would directly reprovided the existing public transport services as a like for like. Residential uses will be situated above the ground level North Sheen Bus Terminus within Block E, with a stepped building of three residential floors in the northern portion of Block E and four floors in the southern portion. The stepped design of Block E will afford a rooftop amenity space that will comprise areas of designated play space.

2.12 The siting and layout of buildings within the Site will define a new public and the provision of a shared amenity space for the benefit of residents within Block E. As previously noted, this will include for new pedestrian routes, new public spaces within the centre of the Site and private residential amenity courtyards to Blocks A, C and D. Private (defensible) gardens / terraces will be provided for all ground floor level residential units. In addition, home-zones / shared spaces will be provided within the east of the Site. In addition, an appropriate quantum of children's play space will be provided.

2.13 The Development as Amended will provide a small single-level basement within the north of the Site. This will provide storage for refuse and in the region of c.650 cycle parking spaces for residents of the Development as Amended.

2.14 Vehicular access and egress to / from the Site will be provided in the north-east of the Site via the existing access and egress to Manor Road. Vehicular circulation will be limited along an access road provided within the east of the Site, adjacent to the off-Site rail lines. Further vehicular circulation will be afforded within the centre of the Site, around the perimeter of the new central public space to provide emergency vehicular access will be provided to all buildings. The reprovided North Sheen Bus Terminus, located within the ground floor of Block E in the north of the Site, would remain to be accessed as per the existing route, via Manor Road.

2.15 Car-parking will be kept to a minimum, with an anticipated 14 spaces provided for the mobility impaired. It is envisaged such parking will be provided on-street within the west of the Site. Servicing will occur at street level, predominantly along the eastern boundary of the Site.

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

3. Determining the Need for EIA

3.1 The need for EIA is determined by the definitions and criteria provided in Schedule 1 or Schedule 2 and Schedule 3 of the EIA Regulations. Where projects are classified as Schedule 1 development, EIA is mandatory. Where projects are classified as Schedule 2 development, EIA is only required if the project is likely to have significant environmental effects as referenced in Schedule 3 'Selection Criteria for Screening Schedule 2 Development'.

3.2 With reference to the information provided in **Section 2** of this report, the Development as Amended does not fall within the definitions set out within Schedule 1 of the EIA Regulations. However, the Development as Amended has the potential to fall within Schedule 2 10(b) of the EIA Regulations. That is:

"10. Infrastructure projects...(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas..."

3.3 Although the Site is not in a 'sensitive area' as defined by the EIA Regulations (refer to **Section 4**) the Development as Amended does meet the second of the three applicable thresholds for Schedule 2 10 (b) projects:

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

3.4 In view of the above, the Development as Amended does meet the Schedule 2 criteria. Accordingly, Schedule 3 of the EIA Regulations must be carefully considered to determine the need (or otherwise) for EIA. Particular emphasis must be placed upon:

- The characteristics of the Development as Amended (refer to **Section 2**).
- The location of the Development as Amended (refer to **Section 4**).
- The types and characteristics of the potential environmental effects (refer to **Section 5**).

4. The Site, its Environmental Context and Sensitivity

Predominant Existing Land Uses

4.1 As noted in **Section 2** the existing 2 ha Site currently comprises a low-rise retail store with associated hard-standing which includes the majority of an access road which provides access to / from Manor Road (the B353), surface car-parking in the north-east of the Site and servicing areas within the south-west of the Site. In total, the existing Site provides car-parking for approximately 150 vehicles. A number of trees exist within the surface car-parking area of the Site and in the northern areas of North Sheen Bus Terminus. Access to the Site is currently afforded from the northeast, via Manor Road (the B353).

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

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

Transport and Connectivity

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

4.4 Baseline traffic surveys have been undertaken by the Applicant's Transport Consultant (Sanderson Associates). Such surveys reveal 80 existing AM peak hour (08:30 - 09:30) two-way traffic movements to / from the Site and 108 PM peak hour (17:00 - 18:00) two-way traffic movements to / from the Site.

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

- North Sheen station, approximately 200 m east of the centre of the Site.
- Richmond station (served by Southwest Trains and the LUL District Line), approximately 900 m south-west of the centre of the Site.

4.6 A number of bus stops are located within 200 m of the Centre of the Site to the north, north-east and north-west of the Site. Such bus stops offer a range of bus routes to destinations including Richmond Town Centre, Kingston, Twickenham, Barnes, Chiswick and Kew. North Sheen Bus terminus is located in the northern section of the Site and comprises five bus parking space and the Richmond Manor Road bus stop.

Core Social Infrastructure

4.7 There are 9 open primary schools within approximately 1 mile of the centre of the Site (deemed to be an appropriate distance for primary school children to commute to school). These primary schools are all non-private and have surplus capacity of 480 primary places[3].

4.8 There are 8 open secondary schools within approximately 2 miles of the centre of the Site (deemed to be an appropriate distance for secondary school children to commute to school). Together, these have a surplus capacity of 1,596 secondary places[3]. Of these places, 97 relate to all girls' secondary schools, 217 relate to a Convent secondary school, and 40 relate to a Church of England secondary school. As such, there are 1,242 existing mixed-gender and multi-faith secondary school places within 2 miles of the centre of the Site.

4.9 There are 8 open GP surgeries within approximately 1 mile of the centre of the Site[4]. All 8 GP surgeries are currently accepting new patients[4].

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

2 https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat
3 https://get-information-schools.service.gov.uk
4 https://nhs.uk

- North Sheen Recreational Ground, approximately 450 m north-east of the centre of the Site (at its nearest point).
- Green space surrounding Penfold Tennis Club, approximately 820 m north-east of the centre of the Site (at its nearest point).
- Fulham (North Sheen) Cemetery, approximately 630 m north-east of the centre of the Site (at its nearest point).
- Tangier Green, approximately 880 m east of the centre of the Site (at its nearest point).
- Pesthouse Common, approximately 480 m south of the centre of the Site (at its nearest point).
- East Sheen Common, approximately 570 m south-east of the centre of the Site (at its nearest point).
- East Sheen Cemetery, approximately 590 m south-east of the centre of the Site (at its nearest point).
- Richmond Athletic Ground, approximately 890 m west of the Site (at its nearest point).
- The north-eastern extent of the Royal Botanic Gardens at Kew, approximately 570 m north-west of the Site.

Townscape and Visual Matters

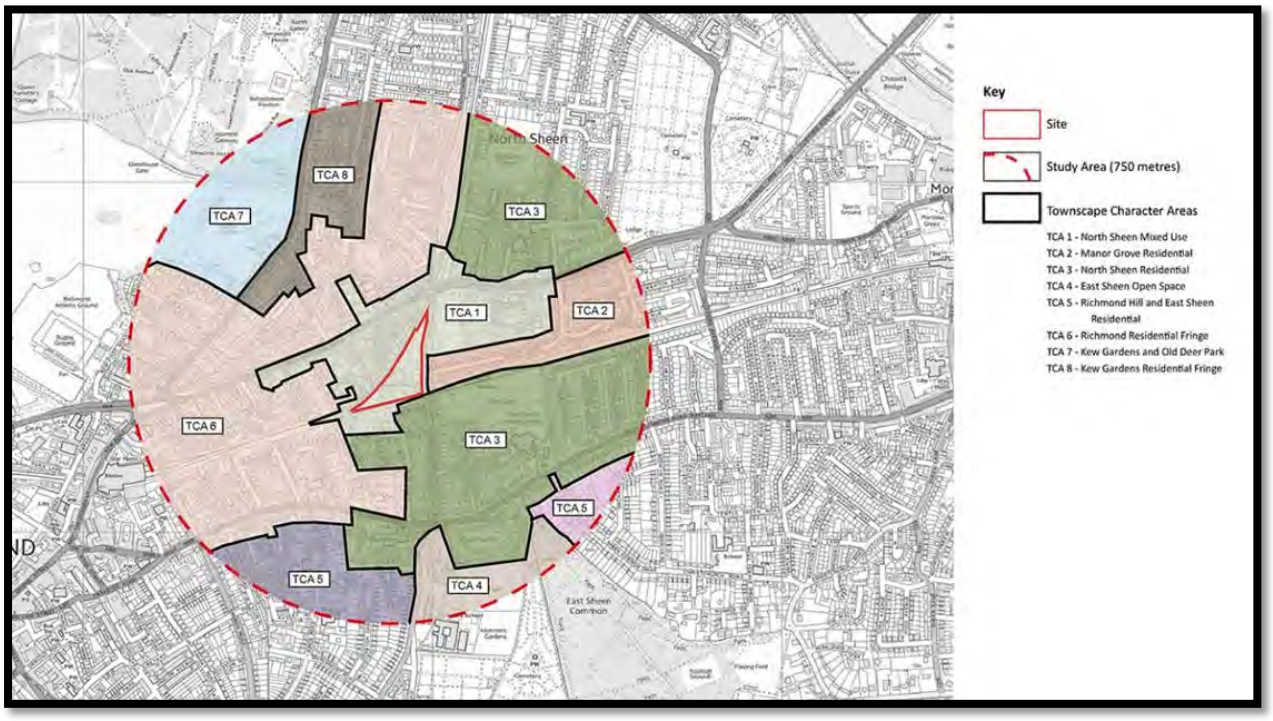
4.11 The Site and its immediate environs are characterised by built urban form which varies in scale, footprint and height, comprising residential, retail, light-industrial and transport infrastructure. Buildings and structures within and surrounding the Site are generally low - medium rise, ranging from 2 - 6-storeys. Exceptions to the low-rise building heights include a 1960s 12-storey block of flats located to the north-west of the Site and, to the south, a housing estate comprising 2 9-storey blocks. The spire of the Church of St Matthias (Grade II Listed) and the Pagoda (Grade I Listed) located within the Royal Botanic Gardens at Kew are local landmarks. However, following site visits undertaken by the Applicant's Townscape and Visual Consultants (Arc) it is confirmed that these landmarks are not visible from the Site.

4.12 The Site is not covered by any planning policy designations relating to townscape value. However, the LBRuT Richmond and Richmond Hill Village Planning Guidance Supplementary Planning Document (SPD)[5] identifies the Site as being located in 'Character Area 6: Old Gas Works'. This character area is described as occupying *"...the angle of 2 busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past"*.

4.13 The Applicant's Townscape and Visual Consultants (Arc) have undertaken a study to identify the likely Zone of Theoretical Visibility (ZTV) of the Site and the Townscape Character Areas relevant to the Site and its ZTV. The study concludes the ZTV to extend to a radius of 750 m from the centre of the Site. **Figure 5** sets out the Townscape Character Areas within the ZTV.

[5] LBRuT. Richmond and Richmond Hill Village Planning Guidance. SPD. June 2016.

Figure 5: Townscape Character Areas within the ZTV (source: Arc)



4.14 With reference to **Figure 5**, the Site is located within TCA 1: North Sheen Mixed Use. This is considered to be of 'medium to low' value. However, 4 of the 8 TCAs identified within the ZTV are considered to be of 'high to exceptional' value. These relate to:

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

4.15 Several non-statutorily designated Other Open Land of Townscape Importance (OOLTI) are located within approximately 750 m of the centre of the Site. All are separated from the Site by significant road or rail infrastructure. The closest OOLTI's to the Site are located approximately 130 m north-east and 130 m south-east of the centre of the Site, adjacent to the east of Manor Road (the A355) and adjacent to the south-east of North Sheen Station respectively.

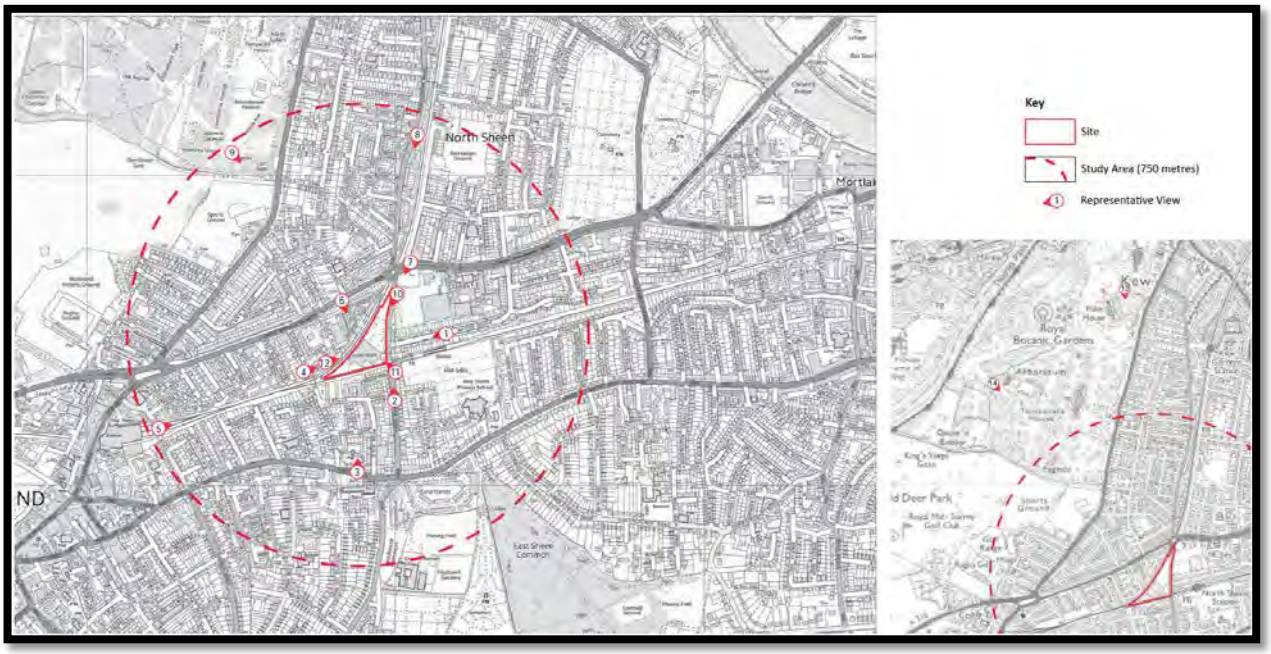
4.16 The Site is not subject to any statutorily protected view. Furthermore, none of the strategic and local views identified within the LBRuT's Proposals Map[6] are orientated towards the Site.

4.17 In consultation with the LBRuT, 14 views of importance to the Site have been identified. These include the following which are shown on **Figure 6**:

[6] London Borough of Richmond upon Thames. Proposal Map. 2009.

- View 1: View looking west along Manor Grove.
- View 2: View from Manor Road opposite Townsend Terrace.
- View 3: View looking north from Sheen Road, over Hickey's Almshouses.
- View 4: View looking east along Dee Road.
- View 5: View looking east on Church Road, over the railway line.
- View 6: View looking south on Trinity Road.
- View 7: View looking south from Lower Richmond Road / Manor Road roundabout.
- View 8: View looking south on Sandycombe Road, close to junction with Dudley Road.
- View 9: View looking south from viewing platform at the top of the Pagoda at Kew Gardens.
- View 10: View looking south-west across Manor Road at the entrance to Sainsbury's.
- View 11: View looking north-west across Manor Road at the west end of Manor Grove.
- View 12: View looking east along Dee Road from the south end of Crown Terrace and Victoria Villages.
- View 13: View from Broad Walk in Royal Botanic Gardens, Kew.
- View 14: View from Cedar Vista in Royal Botanic Gardens, Kew.

Figure 6: Views of Importance to the Site (source: Arc)

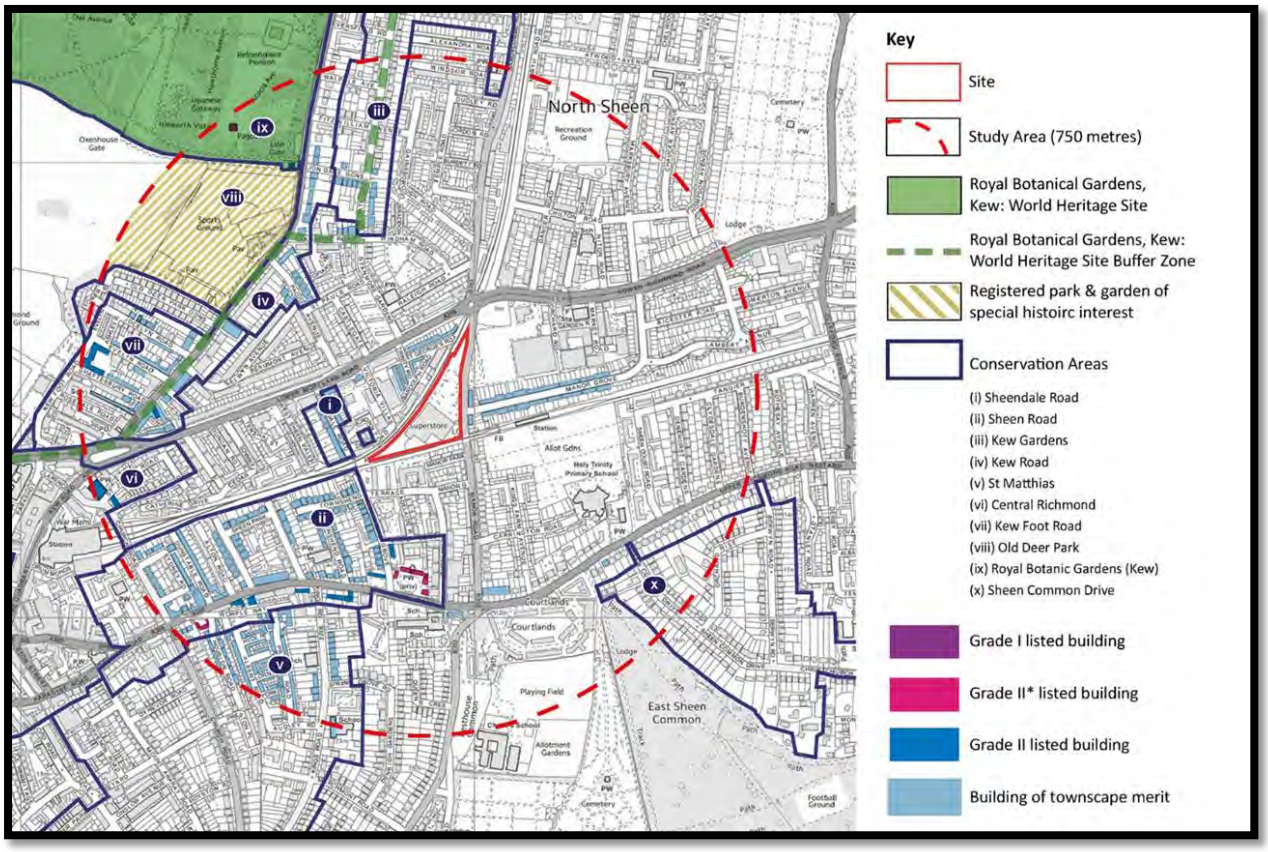


Statutory and Non-Statutory Heritage Designations

4.18 The Site is not subject to any statutory or non-statutory heritage designations. As such, the Site is not located in a World Heritage Site (WHS) or Conservation Area and does not contain any Scheduled Monuments (SMs), Listed Buildings, Registered Parks and Gardens or buildings and structures of local heritage value. Furthermore the Site is not within an Archaeological Priority Area (APA).

4.19 Above ground heritage assets within the ZTV are shown on **Figure 7**.

Figure 7: Above Ground Heritage Assets within the ZTV (source: Arc)



4.20 With reference to **Figure 7**, there are 10 Conservation Areas within the ZTV[7], the closest being Sheendale Road Conservation Area (south-west of the Site) and Sheen Road Conservation Area (west of the Site)[8]. In addition, there are approximately 20 listed buildings within the ZTV[9].

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

4.22 The extensive transport infrastructure and density of built form within the ZTV means that with the exception of the Sheendale Road and Sheen Road Conservation Areas. There is little relationship between the above ground heritage assets and the Site.

7 https://www.richmond.gov.uk/services/planning/conservation_areas
8 https://www.richmond.gov.uk/services/planning/conservation_areas/conservation_area_statements
9 https://historicengland.org.uk

4.23 There are no APA's within approximately 750 m of the Site. The Applicant's Archaeologist (MoLA) has identified the Site as being of low archaeological potential for all pre-Modern periods of past human activity. Furthermore, any archaeological potential will have been severely compromised by past land uses and activities associated with the Site.

Biodiversity / Ecology

4.24 There are no statutory or non-statutory sites of nature conservation within the Site.

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

4.26 There are no statutory nature conservation designations within approximately 500 m of the Site.

4.27 With respect to non-statutory nature conservation designations, the northern-most tip of East Sheen and Richmond Cemeteries and Pesthouse Common (a non-statutory Site of Nature Importance) is located approximately 480 m south of the Site (at its closest point). The 1.18 ha narrow area of parkland, adjacent to Queen's Road (the B353) includes a man-made nature conservation meadow, mature lime trees and horse chestnut trees within the site's perimeter. The northern section of Richmond Park and Associated Areas Site of Nature Importance is also located 480 m to the south of the Site. It is designated for its ancient woodland, rare invertebrates, breeding bird assemblage and fungi community.

4.28 The Applicant's Ecologist (Tyler Grange) has undertaken a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) for the Site (refer to **Appendix 2**). The PEA and PBRA confirms the Site comprises predominantly buildings and hard-standing, with areas of scrub, amenity grassland, trees and hedge / flower beds along the Site boundaries and within the parking areas. None of these habitats are considered to be habitats of principal importance. Indeed, such habitats are considered to be of limited ecological importance, although the trees may offer limited opportunities for nesting birds and one area of grass within the south-west corner of the Site has the potential to be used by hibernating hedgehogs. The Site yields negligible potential for roosting bats.

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

Geology, Ground Conditions and Contamination

4.30 The Site is not designated for any geological importance or interest and does not yield any significant geological resource.

4.31 According to the British Geological Survey (BGS)[10] the bedrock geology of the Site and the majority of its environs is that of the London Clay Formation. This comprises clay, silt and sand associated with sedimentary bedrock formed between 56 - 47.8 million years ago during the Palaeogene period. This is overlain by sand and gravel of the Kempton Park Gravel Member.

4.32 Historic maps for the area[11] show the Site to be farmland in the 1850s. However, today's major roads of the area are evidenced surrounding the Site, including the line of Manor Road and Queen's Road, Lower Richmond Road, Upper Richmond Road and Kew Road. The London and South-Western Railway is also present. By the mid-1860s a second rail line is present (that which currently boarders the east of the Site).

4.33 An 1871 - 1874 map shows a Gas Works adjacent to the north-east of the Site. By 1874 an increase in residential development occurs within the areas surrounding the Site. This continues through to the early 1900s and beyond. However, a 1913 map shows the Site to contain a timber yard and other industrial uses. The Site's industrial uses appear to be a constant feature until the present-day retail accommodation was erected, circa the 1980s.

4.34 The area surrounding the Site experienced bombing in the 1940s[12]. However, there is no evidence of the Site being subject to any direct bombing.

4.35 In view of the above historic land uses and activities, as is typical with many previously industrial sites, there may be the potential for sources of industrial related contamination beneath the Site.

Water Resources and Flood Risk

4.36 The Site is located in Flood Zone 1[13] (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and does not contain any surface water features.

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

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

Air Quality

4.39 The Site (and the entire LBRuT) is designated as an Air Quality Management Area (AQMA). This is due to the breach of the National Air Quality Objectives in relation to ambient annual mean Nitrogen Dioxide ($N0_2$) and 24-hour mean Particulate Matter (PM_{10})[14]. The key sources of such pollutants in LBRuT are attributable to road traffic and associated emissions.

10 https://bgs.ac.uk
11 https://www.old-maps.co.uk/#/
12 https://bombsight.org/
13 https://flood-map-for-planning.service.gov.uk
14 https://uk-air.defra.gov.uk

Noise and Vibration

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

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

Hazards

4.42 According to various on-line sources the Site and its immediate environs are not subject to any Control of Major Accidents and Hazards (COMAH) sites[15], geological hazards[16] or safeguarded aviation zones. Furthermore the Site and its environs are not in an area of significant Radon potential or risk[17] and the Site is not underlain by any high pressure gas pipelines[18].

4.43 As noted above, whilst the area surrounding the Site experienced bombing in the 1940s, there is no evidence of the Site being subject to any direct bombing.

Overall Sensitivity of the Site

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

- SSSI or any consultation area around an SSSI.
- Land to which Nature Conservation Orders apply.
- International conservation sites.
- National Parks.
- AONBs.
- WHSs.
- SMs.

15 https://notifications.hse.gov.uk/COMAH2015/Search.aspx
16 https://bgs.ac.uk
17 https://ukradon.org/information/ukmaps
18 https://www.nationalgrid.com/uk/about-grid/our-networks-and-assets/gas-network-route-maps

5. The Likelihood of Significant Environmental Effects

5.1 Giving due regard to Schedule 3 of the EIA Regulations together with the information provided within **Section 2** and **Section 4** of this report, the likelihood of significant environmental effects to result from the Development are considered as follows. For each environmental topic area considered, environmental effects are considered for:

- The Site preparation, demolition and construction works associated with the Development as Amended (the Works).
- The operation of the completed Development as Amended (the Completed Development as Amended).

5.2 With regard to the likelihood of significant environmental effects arising from the Development as Amended with other significant approved development (the Cumulative Scenario), as per the EIA Regulations, the potential for cumulative effects of the Development as Amended with other significant developments (Cumulative Schemes) has considered *"...existing and / or approved development."* Given that existing development is already considered in the analysis of the existing environmental baseline conditions relevant to the Site and the Development as Amended (refer to **Section 4**) and a consideration of the likelihood of significant environmental effects of the Development as Amended are judged against this existing situation, the Cumulative Scenario need focus only on Cumulative Schemes with:

- A resolution to grant planning permission.
- A valid planning permission and yet to start on-site.
- A valid planning permission and under construction.

5.3 For the purposes of this report, given the fragmented urban nature of the Site's environmental context, and the scale and nature of the Development as Amended, the potential for Cumulative Schemes (and therefore effects) need only be considered up to approximately 750 m from the centre of the Site. No Cumulative Schemes exist within this geographical area. As such, there can be no cumulative effects and the remainder of **Section 5** does not deal with an assessment of the Cumulative Scenario.

Transport and Connectivity

The Works

5.4 Inevitably, the Works will give rise to some disruption to the normal operation and functioning of the local road network. However, the Works will be rigorously planned and programmed to minimise such disruption and allow for continued access to surrounding land uses. In this respect, a Construction Traffic Logistics Plan (CTLP) will set out all traffic and transport related management methods and controls to ensure minimal disruption to the surrounding road network. For example, designated vehicular access and egress to the Site will be stipulated and vehicular traffic arising from construction site deliveries and pick-ups will follow pre-agreed designated routes and be timed to avoid peak traffic hours. Accordingly, while the Works may

temporarily increase vehicular traffic generation associated with the Site, the traffic increase is not envisaged to be significant.

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

5.6 Although the North Sheen Bus Terminus is located within the north of the Site, a phasing plan would be implemented to ensure the terminus remains operational throughout the Works. This would likely comprise on-Site relocation of the terminus, whilst Block E was under construction. As such, the phased approach would negate any likely significant effects in relation to the operations of the North Sheen Bus Terminus.

The Completed Development as Amended

5.7 With reference to **Section 2**, with the exception of 14 car-parking spaces for the mobility impaired the Development as Amended will be car-free. The Development as Amended will, therefore, reduce the number of car-trips when compared to the existing situation. This is demonstrated by **Table 1** which has been informed by work undertaken by the Applicant's Transport Consultant (Sanderson Associates).

Table 1: Existing and With-Development as Amended Two-Way Movements to / from the Site

Peak Period	Existing Two-Way Movements	With-Development Two-Way Movements	Change
AM 08:30 - 09:00	80	71	-9
PM 17:00 - 16:00	108	83	-25

5.8 **Table 1** shows that with the Development as Amended in place, there will be a reduction on two-way traffic movements to / from the Site. When distributed to the wider road network, the overall traffic volumes and flows resulting from the Development as Amended are unlikely to be materially different to that of the existing situation**.** As such, the Development as Amended is unlikely to give rise to significant vehicular traffic effects. This will be further avoided by the implementation of a Travel Plan and Delivery Servicing Plan. The former will advocate and encourage occupiers of the Development as Amended to use non-car modes of transport. The latter will ensure effective, efficient and minimally disruptive delivery and servicing trips to and from the Development as Amended.

5.9 As noted in **Section 2**, the Development as Amended will provide a new pedestrian realm which will increase connectivity to the wider area and provide a direct pedestrian access to North Sheen station, located approximately 200 m east of the centre of the Site and the local bus network. Furthermore, the provision of approximately 650 cycle parking spaces for residents of the Development as Amended will further encourage the use of non-car modes of transport.

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

Recommendations

5.11 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by the following documents:

- A Draft CTLP.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).

Core Social Infrastructure

The Works

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

The Completed Development as Amended

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

- A surplus capacity of 480 primary school places is reported within the 9 existing primary schools within 1 mile of the Site.
- A surplus capacity of 1,596 secondary school places is reported within the 8 existing secondary schools within 2 miles of the Site. Of the 1,596 spaces, 1,242 are for mixed-gender, multi-faith secondary schools.

5.14 The Development as Amended (with an envisaged 439 new homes) is unlikely to generate a child yield in-excess of 480 primary school aged children and 1,596 secondary school aged children. Consequently, it is unlikely the Development as Amended will generate any significant demand and 'over-capacity' issues at local primary and secondary schools.

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

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

Recommendations

5.17 Not applicable.

Townscape and Visual Effects

The Works

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

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

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

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

The Completed Development as Amended

5.21 The scale of the completed and operational Development as Amended will not be disproportionate to the surrounding townscape and has the potential to enhance the townscape character of the Site and its setting due to the replacement of an isolated retail 'island' with a well-design residential community with significant public realm and increased ground floor activity.

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

5.23 Considering all of the above, the physical presence of the completed and operational Development as Amended is unlikely to have significant adverse effects upon townscape or views.

Recommendations

5.24 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for townscape and visual construction management).
- A Townscape and Visual Assessment, informed by Accurate Verified Representations (AVRs) of the Development within the 14 key views referenced in **Section 4**, **Figure 6** and any other further views agreed in consultation with the LBRuT. However, it should be noted that in agreement with LBRuT view 9 (looking south from the viewing platform at the top of the Pagoda at Kew Gardens) will not be a verified view and will be provided for information only.

Heritage Effects

The Works

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

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

5.27 **Section 4** identifies that the Site is not located with an APA; neither are there any APAs within 500 m of the Site. As such, the Site and its surrounds are not recognised to be of any particular archaeological significance. Furthermore, as previously noted, the Applicant's Archaeologist (RPS) has identified the Site as being of low archaeological potential for all pre-Modern periods of past human activity. Furthermore, any archaeological potential will have been severely compromised by past land uses and activities associated with the Site.

5.28 In view of the above, although the Works will include an element of intrusive ground works associated with construction of a small basement within the north of the Site, foundation works and the installation of piles, the lack of archaeological potential and significance at the Site mean that any archaeological effects are unlikely. RPS therefore advise that no further archaeological study or mitigation is required.

The Completed Development as Amended

5.29 As noted previously, all above ground heritage assets within the ZTV are sufficiently geographically removed from the Site or are separated from the Site by intervening built form that their localised settings are unlikely to be affected by the presence of the completed and operational Development as Amended.

5.30 The Applicant's Heritage Consultant (Geoff Noble Heritage and Urban Design) has closely worked with (and will continue to work with) the Applicant's Architects (Assael) to ensure potential significant adverse effects to relevant heritage assets and their settings as a result of the Development as Amended are avoided.

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

Recommendations

5.32 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for above ground heritage asset construction management).
- A Heritage Statement.
- An Archaeological Desk-Based Assessment.

Biodiversity / Ecological Effects

The Works

5.33 With reference to **Section 4**, the Site does not contain any statutory or non-statutory ecological sites and there are no statutory nature conservation designations within approximately 500 m of the Site. However, the northern-most tips of both East Sheen and Richmond Cemeteries and Pesthouse Common and Richmond Park and Associated Areas are located approximately 480 m south of the Site. Both sites are non-statutory Sites of Nature Conservation Importance.

5.34 The location of the above mentioned Sites of Nature Conservation Importance are considered to be adequately geographically removed from the Site so that they will not be directly or indirectly affected by the Works. Furthermore, there is no ecological connectivity between the Site and either of the non-statutory Sites of Nature Conservation. It is therefore concluded that even in the absence of any standard construction site mitigation, the Works will not lead to any effect upon them.

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

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

The Completed Development as Amended

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

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

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

Recommendations

5.40 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for biodiversity / ecological construction management).
- A PEA and PBRA (a re-submitted version of the PEA and PBRA included at **Appendix 2** for completeness).
- A Lighting Strategy.

Geology, Ground Conditions and Contamination

The Works

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

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

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

5.44 In addition to the above, standard and best practice environmental management controls will be implemented during the Works to safeguard against the risks (and associated effects) of unforeseen and unexpected potential contamination events such as accidental spills of construction related materials brought to and stored on the Site during the Works. Such environmental management controls will include but not be exclusive to:

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

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

5.46 With respect to the risk of UXO, all intrusive ground works will be subject to a UXO Watching Brief. This precautionary measure will ensure that should UXO be encountered, appropriate steps can be taken to immediately de-risk the situation. Again, it is envisaged that the CEMP will set out the correct process and procedures to follow should UXO be encountered.

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

The Completed Development as Amended

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

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

Recommendations

5.50 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- A Draft CEMP (including for contamination and UXO management).

Water Resources and Flood Risk

The Works

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

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

The Completed Development

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

5.54 The Development as Amended intends to replace existing hard-standing and impermeable areas with a similar type of land cover. However, climate change considerations require that the completed and operational Development must be designed with the resilience to cope with increases in precipitation frequency and intensity which may give rise to increased incidences of surface water flooding events.

Similarly, the Development as Amended must be designed to ensure surface water flooding is not increased at the Site, or elsewhere, accounting for climate change.

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

Recommendations

5.56 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for surface water drainage management).
- A Flood Risk Assessment (FRA) (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).

Air Quality

The Works

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

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

5.58 With regard to dust emissions and nuisance, this can be effectively managed by standard construction environmental management techniques, all to be included in the CEMP. These will include but not be exclusive to:

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

- Dust monitoring to assess the effectiveness of dust management controls and to indicate if any when additional measures may be required.

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

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

5.61 With regard to emissions from construction related traffic, as noted in a previous sub-section of **Section 5** (Transport and Connectivity) the temporary increase in traffic generation associated with the Works is not envisaged to be significant. It therefore follows that road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

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

The Completed Development as Amended

5.63 Potential air quality effects of the completed and operational Development as Amended could arise from:

- Additional emissions to the atmosphere from traffic generated by the completed and operational Development.

- Additional emissions to the atmosphere from the operation of building plant, particularly any heating and power plant.

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

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

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

Recommendations

5.67 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for dust and air quality management).

- An Air Quality Assessment.

Noise and Vibration

The Works

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

- Increased ambient noise and vibration and associated nuisance generated by the physical components of the Works.
- Increased ambient noise and vibration resulting from the operation of construction plant and machinery.
- Increased road traffic noise from construction related traffic generation.

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

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

5.70 With regard to noise generated from construction related traffic, as noted in a previous sub-section of **Section 5** (Transport and Connectivity) the temporary increase in traffic generation associated with the Works is not envisaged to be significant. In addition, it is well known that it take a 20 - 25% change in traffic flow to create an audible difference in road traffic noise[19, 20]. It therefore follows that road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

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

The Completed Development as Amended

5.72 Potential noise and vibration effects of the completed and operational Development as Amended could arise from:

[19] Highways Agency. The Design Manual for Roads and Bridges. Volume 10 - Environmental Design. 2008.
[20] Highways Agency. The Design Manual for Roads and Bridges. Volume 11 - Environmental Assessment. 2009.

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

5.73 As noted in a previous sub-section of **Section 5** (Transport and Connectivity) the overall traffic volumes and flows on the local road network attributable for the Development as Amended are unlikely to be materially different to that of the existing situation and certainly no more than +/- 20 - 25% when compared to the existing situation. Furthermore vehicular servicing of the Development as Amended will be designed so as to minimise noise impact to existing and future residents both on and off the Site. In this respect, a Delivery and Servicing Plan will be implemented.

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

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

Recommendations

5.76 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for noise and vibration management).
- A Noise and Vibration Assessment.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).

Wind Microclimate

The Works

5.77 The Site is not located in a particularly exposed or windy area which, as previously noted in **Section 4**, contains a relatively uniform massing, generally comprising low - medium rise buildings and structures ranging from 2 - 6-storeys. Whilst 2 12-storey towers are located approximately 170 m east of the centre of the Site, these are not located up-wind of the Site to the prevailing south-westerly winds. As such, these towers are unlikely to create any wind tunnelling effect at the existing Site. In conclusion, the existing Site is unlikely to be subject to any uncomfortably windy and potentially unsafe wind conditions.

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

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

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

The Completed Development as Amended

5.81 As noted previously, the Site is not located in a particularly exposed or windy area. Furthermore, the Development as Amended will be relatively modest in scale comprising 5 buildings ranging from ground level plus 1-storey to ground level plus 9-storeys. It is therefore judged that the completed and operational Development as Amended will not create significantly different wind conditions to those prevailing within and surrounding the Site.

5.82 Despite the above, the design of the Development as Amended has and will continue to be informed by an appropriately qualified and experienced wind microclimate expert so that the physical presence of the completed and operational Development as Amended will not create any uncomfortable or un-safe wind conditions either within or surrounding the Site.

Recommendations

5.83 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Desk-Based Wind Microclimate Assessment.

Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

The Works

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

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

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

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

5.88 Incidences of solar glare are not anticipated to arise. Details are provided below.

The Completed Development as Amended

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

5.90 In view of the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant (Point 2 Surveyors) is informing the design of the Development as Amended to ensure any such changes to surrounding habitable rooms and amenity spaces are minimised and where changes do occur, are not unacceptable in the context of the dense urban setting of the Site. Furthermore, owing to the significant physical separation of existing surrounding residential receptors from the Site (a result of the Site being bound to the east by Manor Road and the south and west by overland rail lines) and the modest proposed massing of the Development as Amended, any daylight, sunlight and overshadowing effects will be within a practical application of the BRE Guidelines[21].

5.91 With regard to daylight, sunlight and overshadowing experienced by occupants, visitors and users of the Development itself, similar to the above, the Applicant's Daylight, Sunlight and Overshadowing Consultant (Point 2 Surveyors) is informing the design of the Development as Amended to ensure acceptable standards will be met. This can be achieved by appropriate building massing, siting and orientation, the arrangement of living spaces and amenity spaces, and fenestration design.

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

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

[21] Building Research Establishment (BRE) Guidelines. Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Second Edition. 2011.

Recommendations

5.94 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for light pollution management).
- A Daylight, Sunlight and Overshadowing Assessment.
- A Lighting Strategy.

Waste

The Works

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

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

The Completed Development as Amended

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

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

Recommendations

5.99 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for construction site waste management).
- An Operational Waste Management Plan.

Risk of Major Accidents and Disasters

The Works

5.100 As noted in **Section 4**, the Site and its environs are not subject to any COMAH sites, geological hazards or safeguarded aviation zones. Furthermore, with standard, tried and tested construction related environmental management controls in place (to be set out within the CEMP), previous sub-sections of **Section 5** (Geology, Ground Conditions and Contamination and Water Resources and Flood Risk) demonstrate the Works are unlikely to give rise to significant risks associated with contamination, UXO and surface water flooding.

The Completed Development as Amended

5.101 As previously noted, the Site and its environs are not subject to any recognised risk or hazard zone(s). In addition, the completed and operational Development as Amended does not proposed any land uses that will increase the risk of major accidents and disasters. In this respect, the Development as Amended will be designed in accordance with all relevant health and safety requirements. Furthermore, previous sub-sections of **Section 5** (Geology, Ground Conditions and Contamination and Water Resources and Flood Risk) justify that the completed and operational Development as Amended will unlikely give rise to any significant contamination or flood risk.

Recommendations

5.102 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for ground contamination, UXO and surface water drainage management).
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).

Health and Wellbeing

The Works

5.103 Previous sub-sections of **Section 5** (Geology, Ground Conditions and Contamination, Air Quality and Noise and Vibration) demonstrate that the Works are not anticipated to give rise to any significant contamination, UXO, air quality and / or noise and vibration effects, all of which have the potential to affect human health and wellbeing. The likelihood of insignificant effects for all relevant topics is by virtue of the nature and location of the Development as Amended, together with the implementation of a broad range of standard,

tried and tested construction related environmental management controls, all to be set out within the CEMP. Consequently, the health and wellbeing of construction site workers, local residents, local workers and visitors to the locality is unlikely to be significantly affected by the Works.

The Completed Development as Amended

5.104 Similar to the above, previous sub-sections of **Section 5** (Geology, Ground Conditions and Contamination, Air Quality and Noise and Vibration, Wind Microclimate and Daylight, Sunlight, Overshadowing and Light Pollution) demonstrate that the Works are unlikely to give rise to significant contamination, air quality, noise and vibration, wind microclimate and / or daylight, sunlight, overshadowing, light pollution and solar glare effects. As such, with the Development as Amended in place, these environmental factors are unlikely to significantly affect the health and wellbeing of residents, users and visitors of the Development as Amended and the surrounding locality.

5.105 With reference to **Section 2**, the Development as Amended will provide new and generously proportioned hard and soft landscaped areas throughout the Site and provide in the region of 650 cycle parking spaces for residents of the Development as Amended. This will improve pedestrian and cyclist connectivity throughout and to and from the Site. The landscaped areas will also provide dedicated children's play space and an outdoor gym.

5.106 In view of the above, the Development as Amended will improve pedestrian connectivity and provide opportunities for residents of the Development as Amended to walk and cycle. In addition the provision of amenity space (including children's play space and an outdoor gym) will allow for physical activity. Although these inherent design features are unlikely to affect human health and wellbeing on a significant scale, they will encourage direct access to opportunities which can contribute to a healthy lifestyle.

Recommendations

5.107 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by:

- A Draft CEMP (including for ground contamination, UXO, dust, air quality, noise and vibration and light pollution management).
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An Air Quality Assessment.
- A Daylight, Sunlight and Overshadowing Assessment**.**

Climate Change

The Works

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

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

The Completed Development as Amended

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

5.111 With reference to previous sub-sections in **Section 5** (Transport and Connectivity and Air Quality) the Development will be car free, with the exception of 14 car-parking spaces provided for the mobility impaired. When considering servicing of the Development as Amended the overall vehicular trip generation from the Development is unlikely to be materially different to that of the existing situation. As such, the Development as Amended is unlikely to give rise to significant vehicular traffic effects. It therefore follows that the Development as Amended is unlikely to give rise to significant changes to vehicular traffic emissions which will include for greenhouse gases.

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

- The selection and use of building materials from sustainable sources and with low embodied carbon.
- The incorporation of appropriately designed façades to balance solar gain against daylight availability.
- The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand.
- The use of thermally efficient windows to reduce head demand.
- The achievement of good levels of air tightness.
- Mechanical ventilation with heat recovery.

- The use of energy efficient lighting.
- All electrical heating systems to take advantage of decreasing UK grid electricity carbon factor.
- The use of photovoltaic panels mounted at roof level.

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

Recommendations

5.114 In line with planning policy and best-practice guidance, the detailed planning application will be accompanied by the following documents:

- A Draft CEMP (including for dust, air quality and noise and vibration management).
- A Draft CTLP.
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).
- An Air Quality Assessment.
- A Sustainability Statement.

Cumulative Interactions of the Development

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

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

6. Conclusion and Recommendations

6.1 The Development as Amended is considered to be modest in scale and of a type that is consistent with existing development in close proximity to and further afield from the Site.

6.2 As noted within **Section 4**, the Site is not located in a 'sensitive area' as defined by the EIA Regulations. Accordingly, the absorption capacity of the natural environment in and surrounding the Site is judged to be high; the Site and its surrounds are resilient to change.

6.3 Any environmental effects associated with the Development as Amended are unlikely to be significant and can be adequately dealt with via the normal planning application process. As such, the Development as Amended is not considered to constitute EIA development.

6.4 Despite the above, it is acknowledged that to accord with various planning requirements (not the EIA Regulations), the Applicant's detailed planning application for the Development as Amended will need to be supported by the following suite of environmental technical studies:

- A Draft CEMP.
- A Draft CTLP (within CEMP).
- A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).
- A Townscape and Visual Assessment.
- A Heritage Statement.
- A PEA.
- A Phase 1 Contamination Assessment (including for a UXO Risk Assessment).
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment and Remediation Strategy.
- An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).
- An Air Quality Assessment.
- A Noise and Vibration Assessment.
- A Desk-Based Wind Microclimate Assessment.
- A Daylight, Sunlight and Overshadowing Assessment.
- A Lighting Strategy.
- An Operational Waste Management Plan.

- A Sustainability Statement.

Appendix I

EIA Screening Opinion for the Submitted Development

Environment Directorate / Development Management
Web: www.richmond.gov.uk/planning
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LONDON BOROUGH OF RICHMOND UPON THAMES

Please contact: Lucy Thatcher
Tel: 020 8891 1411
Email: l.thatcher@richmond.gov.uk

GVA
65 Gresham Street
London
EC2V 7NQ

Dear

Re: Redevelopment at Manor Road, North Sheen
Formal request for screening opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)

Thank you for your letter dated 12th November 2018, on behalf of Avanton Richmond Development Ltd (the applicant) and the accompanying EIA Screening Report, to seek a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicants forthcoming detailed planning application for the residential-led redevelopment at Manor Road, North Sheen.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 14 December 2018, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

Robert Angus
Head of Development Management

LONDON BOROUGH OF RICHMOND UPON THAMES

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

FORMAL EIA SCRENNING OPINION IN CONNECTION WITH THE REDEVELOPMENT AT MANOR ROAD, NORTH SHEEN.

REGULATION 6

Under Regulation 6 (2) of the EIA Regulations, the person making a request for a screening opinion, must provide the following:

(a) a plan sufficient to identify the land;

(b) a description of the development, including in particular—
   i. a description of the physical characteristics of the development and, where relevant, of demolition works;
   ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

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

(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
   i. the expected residues and emissions and the production of waste, where relevant; and
   ii. the use of natural resources, in particular soil, land, water and biodiversity; and

(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

An EIA Screening Report (the Report) has been submitted. This:

(a) Identifies the site. (Figure 1)

The Site is located in North Sheen, south-west London within the administrative boundary of the LBRuT. The Site comprises an area of approximately 1.5 hectares (ha).

The triangular shaped Site is bound by:

- The northern and easternmost extents of an access road which provided access to / from Manor Road (the B353) to the north.
- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

The existing Site currently comprises a low-rise retail store occupied by Homebase, Pets at Home and Pets4Vets. The retail store is located centrally of the Site, towards the southern end.

To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road, surface car-parking in the north-east and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

There are several trees planted within the surface car-parking area and at various locations around the Site's perimeter.

Figure 1: Site Location

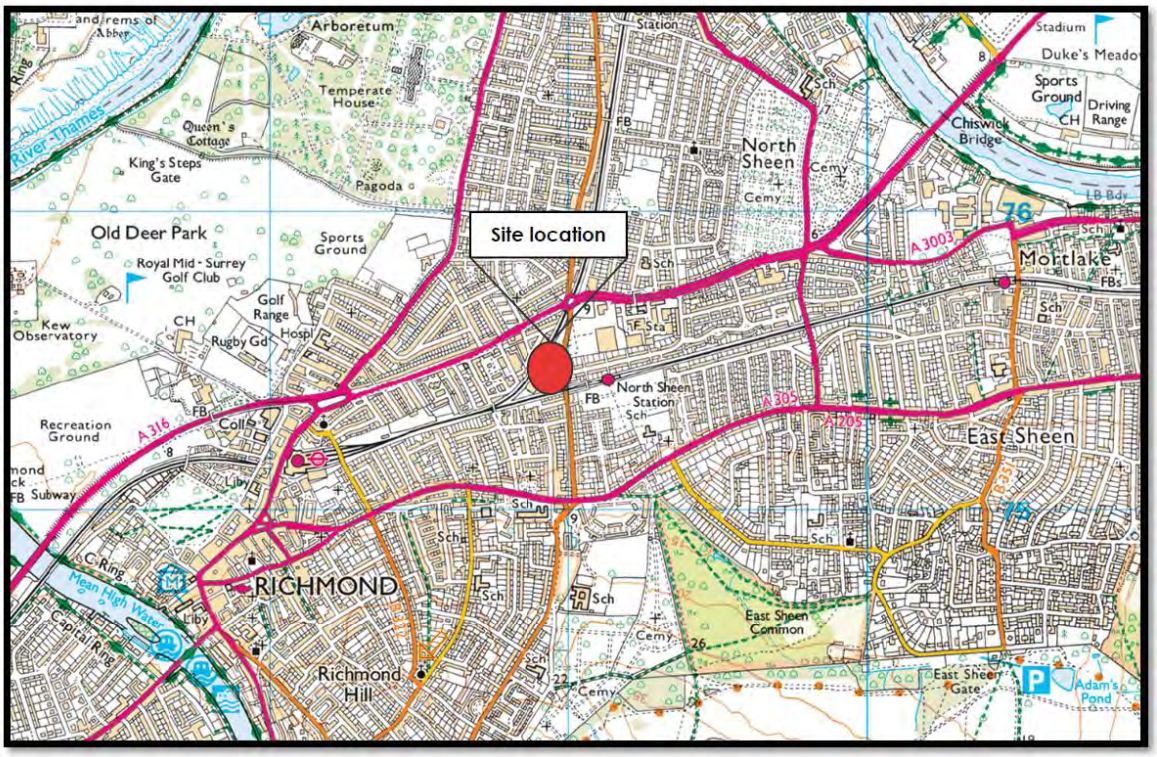
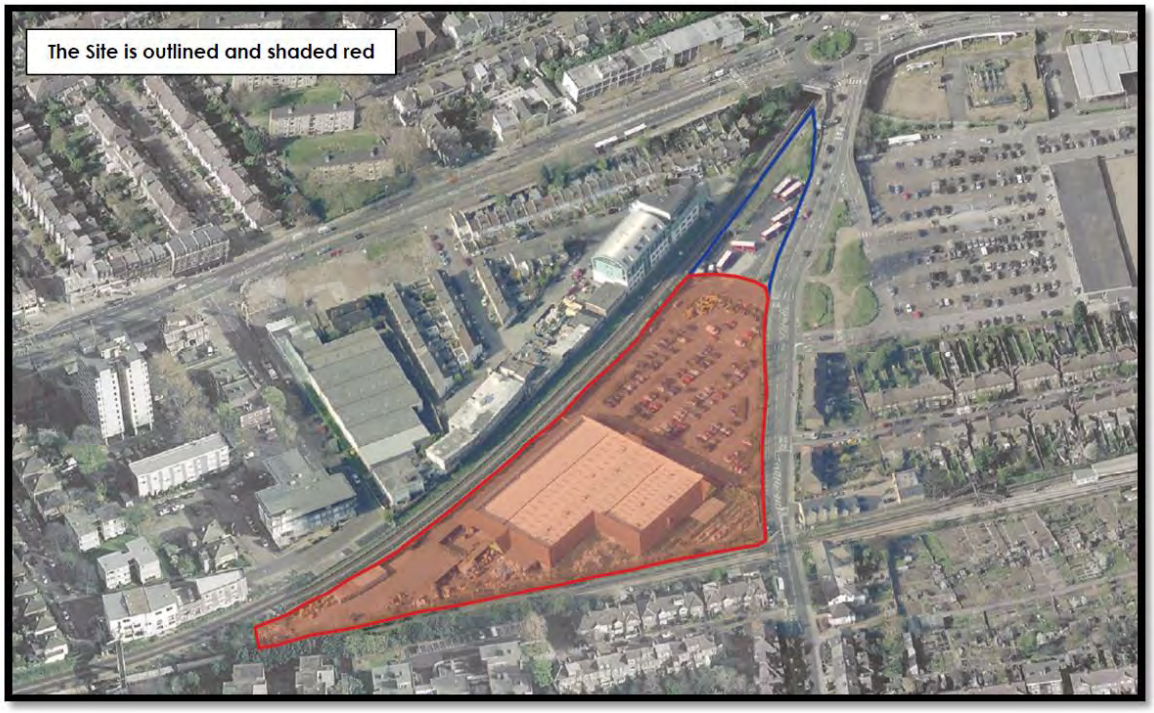


Figure 2: The Site



(b) ***Provides description / overview of the development:***

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

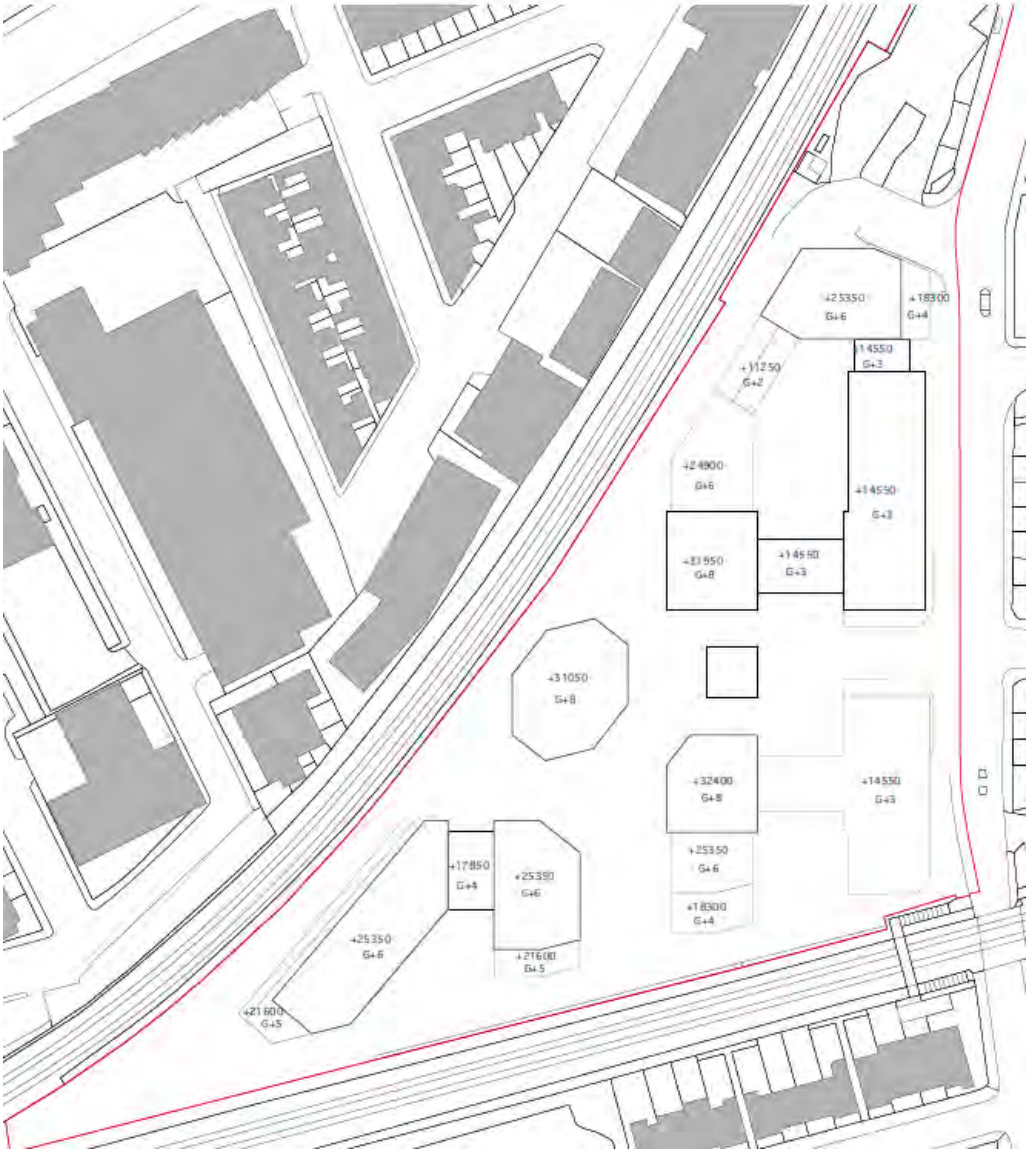
- The Development will provide in the region of 400 residential units (1, 2 and 3-bed units) with an appropriate provision of affordable housing) together with a small quantum of commercial floorspace. Since the submission of the EIA Report, the following breakdown has been provided:

  - 1 bed: 144 units
  - 2 beds: 162 units
  - 3 beds: 73 units

(i) Provides a description of the physical characteristics of the development and demolition works.

- The Development will necessitate the demolition of all existing buildings and structures.

- The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys.
  - Residential land uses will be present in all buildings.
  - The proposed commercial floorspace is likely to be concentrated around the Manor Road frontage.
  - Since the submission of the EIA Report, the following plan has been provided. This illustrates the heights:
    - 4-5 storeys along Manor Road
    - 4-6 storeys along the south boundary
    - 3, 6, 7, 9 storeys along west boundary



- It is proposed that these buildings will be predominantly brick.

- The siting and layout of buildings within the Site will define a new public and private realm. An appropriate quantum of children's play space will be provided.

- The Development will provide a small single-level basement within the north of the Site, providing storage for refuse and in the region of 650 cycle parking spaces for residents of the Development.

    - Vehicular access and egress to / from the Site will be provided in the north-east of the Site via Manor Road.
        - Vehicular circulation will be limited along an access road provided, adjacent to the off-Site rail lines.
        - Vehicular circulation will be afforded within the centre of the Site, around the perimeter of the new central public space.
        - Emergency vehicular access will be provided to all buildings.
        - Car-parking will be kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired.

- Servicing will occur at street level, predominantly along the eastern boundary of the Site.

Provides a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

Section 5 of the report provides:

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

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

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

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

Section 5 considers the following environmental topic areas…

- Transport and connectivity
- Core Social Infrastructure
- Townscape and Visual Effects
- Heritage Effects
- Biodiversity / Ecological Effects
- Geology, Ground Conditions and Contamination
- Water Resources and Flood Risk
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
- Waste
- Risk of Major Accidents and Disasters
- Health and Wellbeing
- Climate Change
- Cumulative Interactions of the Development

and considers the following environmental affects arising from:

- the site preparation, demolition and construction work associated with the Development (the Works)
- The operation of the completed development (the Completed Development)

(f) Identifies in Section 5, features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

This section addresses each of the potential environmental topic areas, and includes:

- Features of the development….
- Mitigation proposed ….
- Documents that will accompany an application ….

to avoid or prevent potential significant effects.

PREAMBLE

The EIA Regulations Threshold:

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

"Schedule 2 development" means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

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

"sensitive area" means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981;
- a National Park ;
- the Broads(**c**);
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(**d**);
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The LPA is of the view that the proposal would be an Urban Development Project as defined under Schedule 2 part 10 (B) of the Regulations. The site is not located in a 'sensitive area' and therefore the thresholds set out in Schedule 2 of the Regulations have been applied:

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

The EIA report confirms the site is approximately 1.5 ha and in the region of 400 residential units, and therefore exceeds the applicable thresholds, and so constitutes Schedule 2 development for the purposes of the EIA Regulations.

It therefore needs to be screened to determine whether it is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

National Planning Policy Guidance (NPPG):
When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the 2017 Regulations, however, the NPPG notes not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way:

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

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

The NPPG advises only a very small proportion of Schedule 2 development will require an EIA. While it is not possible to formulate criteria or thresholds which provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid LPA to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced, which includes an indication of the types of impact that are most likely to be significant for particular types of development.

Development type	Schedule 2 criteria and thresholds	Indicative criteria and threshold	Key issues to consider
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings or (iii) the overall area of the development exceeds 5 hectares.	Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless: • the new development is on a significantly greater scale than the previous use, or • the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: i. area of the scheme is more than 5 hectares; or ii. it would provide a total of more than 10,000 m2 of new commercial floorspace; or iii. the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).	Physical scale of such developments, potential increase in traffic, emissions and noise

In relation to this scheme, which this exceeds the Schedule 2 threshold (more than 150 units):

- The site is less than 5 ha
- The scheme does not provide more than 10,000m2 commercial space
- There are less than 1000 dwellings

However, it should not be presumed, that those falling above the indicative threshold should be subject to assessment, or those falling below these thresholds could never give rise to significant effects, and therefore each development will need to be considered on its merits.

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

SCREENING OPINION

When screening Schedule 2 developments, the EIA Regulations (5 (4)) require LPAs to take into account the following:

1. Any information provided by the applicant
2. The results of any relevant EU environmental assessment, which are reasonably available to the relevant planning authority
3. Such other selection criteria set out in Schedule 3.

(1) <u>Characteristics of the Development must be considered with particular regard to -</u>

(a) The size and design of the whole development

The existing triangular 1.5 ha Site, bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road, currently comprises a low-rise retail store with associated hardstanding comprising an access road, surface car-parking (for 150 cars) and servicing areas. A number of trees exist within the surface car-park.

The immediate environs are characterised by built urban form, which varies in scale, form, footprint and heights, comprising residential, retail, light-industrial and transport infrastructure. Buildings are generally low to medium rise, ranging from 2- 6 storeys, except the Towers to the NW, which extend to 11 storeys. There are a number of local land mark, including St Matthias Church(Grade II Listed) located to the south; and the Pagoda (Grade I Listed) at the World Heritage Site, in Kew. The EIA Report confirms that these are not visible from the site.

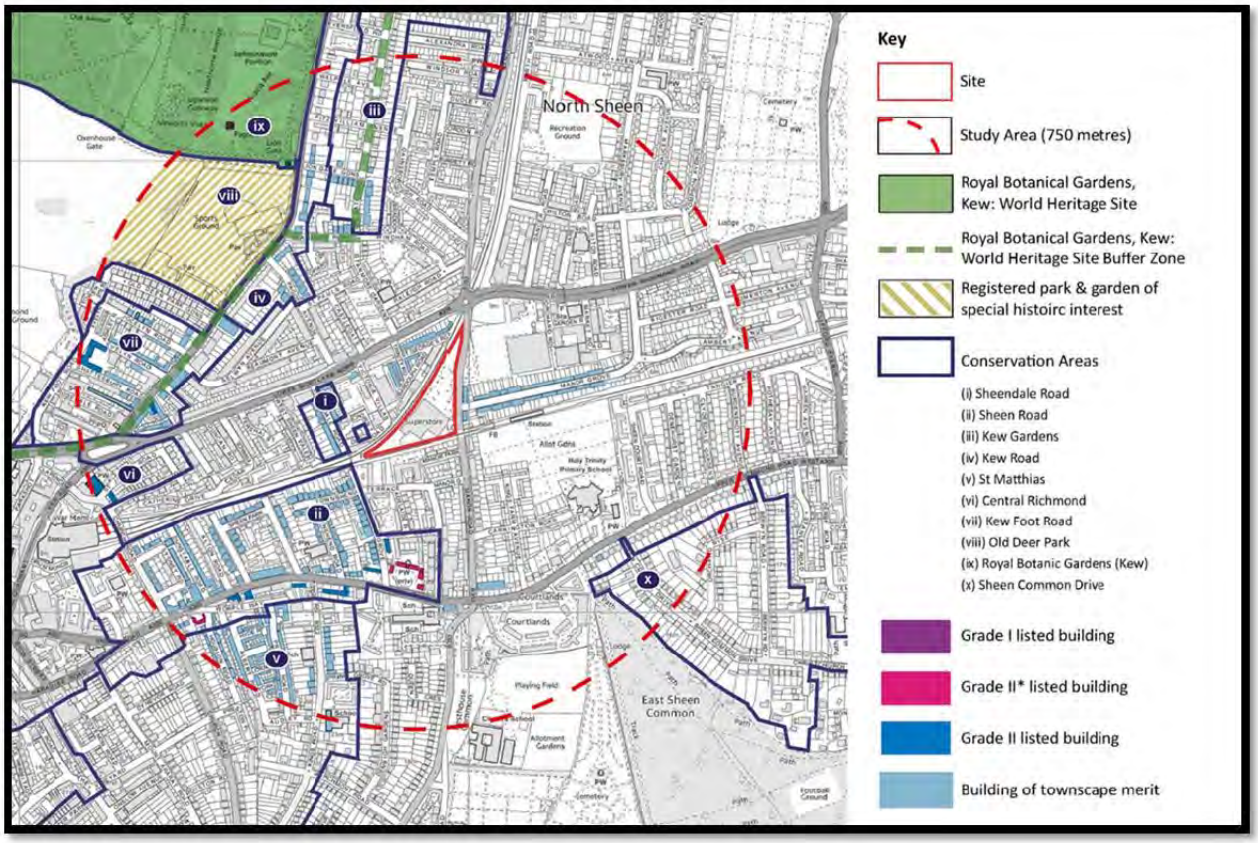
The site has the following principal designations:

- Critical Drainage Area
- Outer safeguarding zone for high pressure gas pipe
- Past industrial land use
- Area susceptible to surface water flooding

There are no specific heritage designations (designated or non-designated / statutory or non-statutory). Nor is the site within a protected view; setting of a listed building or World Heritage Site. The Site does not have any open space values (such as Other Open Land of Townscape Importance – OOLTI); and not within an archeologically priority area (or close proximity to one). However, the site is within the setting of:

- Other Land of Townscape Importance – Adjacent to the site on Manor Road and North Sheen Station Allotments.
- Conservation Area 31 ‘Sheen Road‘– to the SW
- Conservation Area 50 ‘Sheendale Road’– to the west
- Non-designated Heritage Assets – BTMs on west side of Manor Road, Manor Grove, Trinity Road, St Georges Road; Sheendale Road; Townshend Terrace

The EIA report identifies the above ground heritage assets within a 750m study area:



The site is identified within the Richmond and Richmond Hill Village SPG, as forming Character Area 6:

> *"This character area occupies the angle of two busy through routes: Lower Richmond Road and Manor Road. There is no coherent frontage to either road and the whole area has an irregular, adhoc character due to its industrial past.*
>
> *The north western part of the area was once covered by a gas works. Today the works area is confined to the land nearest the roundabout and is visually low key, except for the tall mesh fencing along the main roads. Much of the area is occupied by a large supermarket of modest height and its associated petrol station and large car park. The large shops on the west side of Manor Road are similarly laid out but have pitched clay tile roofs.*
>
> *Some trees are present in and around the car parks, but the character is defined by large expanses of hard surfacing.*
>
> *The central part of the area has a network of short roads: Orchard, Garden and Market. One two-storey Victorian house (former public house) survives on the corner of Orchard and Lower Richmond Roads, but the overall character is varied due to a mix of light industrial sheds, offices and modern apartment blocks. Cladding is in steel, timber and render. There are some planted beds but few street trees. Also, on Garden Road, there is a fire station and its exercise yard. East of Market Road are further light industrial sheds in brick with metal sheeting and small areas of car parking. On Lower Richmond Road is a small mid twentieth century shopping parade in red brick, with the fire station nearby.*
>
> *Characteristic materials and features include: Red brick, stock brick, metal cladding, metal windows, planted beds.*

Threats from development have been identified as: Lack of definition and coherence in street frontages due to loss of terraces and proliferation of small industrial yards and car parks.

Should redevelopment proposals come forward for appropriate uses there is an opportunity to re-plan and upgrade the public realm. There are also opportunities to achieve improvements to the visual appearance of the area, including when viewed from the A316 Lower Richmond Road. Proposals should demonstrate how they support this opportunity and also how they positively respond to the relationship with adjoining areas, which are primarily residential in character.

More appropriate paving, street furniture and street trees would enhance the character. Many of the pavements are presently in tarmac which could be replaced with a higher quality material."

The EIA Report identifies the Zone of Theoretical Visibility (ZTV) and the Townscape Character Areas relevant to the Site and its ZTV, with areas of value being:

- East Sheen Open Space
- Richmond Hill and East Sheen residential
- Richmond Residential Fringe
- Kew Gardens and Old Deer Park
- Kew Gardens, Residential Fringes

In consultation with the Authority, several views of the site have been identified.

The Development will necessitate the demolition of all existing buildings and structures on the Site. It is envisaged that the Development will provide in the region of 400 residential units (1, 2 and 3-bed units with an appropriate provision of affordable housing) together with a small quantum of commercial floor space. The new land uses will be provided within 4 buildings ranging from ground level plus 1-storey to ground level plus 8-storeys, with residential land uses in all buildings. A previous illustration indicates

- 4-5 storeys along Manor Road
- 4-6 storeys along the south boundary
- 3, 6, 7, 9 storeys along west boundary

Three of 4 of the buildings will include various building components and comprise a range of building heights and geometries to afford visual interest, avoid over bulky design, and public and private realms. The remaining building will be of an octagonal form. It is proposed most will be brick. The development will provide a small single level basement for storage of refuse and approx. 650 cycle parking spaces. Access will be via Manor Road in the northeast, with vehicular circulation adjacent to offsite rail lines. Car parking is kept to a minimum, with an anticipated 12 spaces provided for the mobility impaired. Servicing will occur at street level, predominately along the eastern boundary.

The works: Any Works have a consequential impact on the physical environment of the site and setting of designated and non-designated heritage assets, whether from hoarding, plant and machinery. However, there are no below or above ground heritage assets on the site, and therefore the development will not have a direct impact on such. It is deemed any townscape and visual effects associate with the Works are anticipated to be limited, localised, temporary and reversible. Further, with Construction Environmental Management Plan (CEMP - to cover Good Construction Site Housekeeping Initiatives; Maintenance of adequate construction site hoarding; Orderly segregation of construction site activities), these impacts will not be significant:

Competed development: The EIA Report does not deem the scale to be disproportionate to the surrounding townscape and has the potential to enhance the townscape, by providing public realm, residential community and increased ground floor activity. Further, confirms:

- The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
- The application will be accompanied with a Townscape and Visual Assessment.
- Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

The size and scale of the development (notably height) is significantly different to the existing, and the question is whether this is going to give rise to significant impacts to trigger an EIA.

The prevailing pattern of development is built up residential / commercial land uses, with transport infrastructure (road and rail). Prevailing heights are:

- Northwest of the district line: Two storey terraced properties; single storey commercial units; flatted developments (3, 4, 5, 11storeys)
- South of the site: Two storeys semi-detached and terraced properties, and 2/3 storey flatted developments.
- East of the site: Two storey terraced properties (some of which are Buildings of Townscape Merit); large commercial units; 4-6 storey flatted developments
- North of the site: Two storey residential properties; Two storey commercial units; 4 storey flatted developments

For the following reasons, based on the information provided; the Authority is of the view the scheme will have an urbanising effect on the local environment, and is of a size that will affect the townscape and heritage environment, however, for the following reasons this is not deemed to be of a scale that will raise significant effects that would trigger the need for a full EIA, and this can be dealt with through the planning application process:

- The brown field nature of the exiting site
- The built-up nature of the surrounding area
- The varied form of buildings and heights in the locality and relationship between each other
- Varied heights within the development, with lower heights long Manor Road and the south boundary.
- Heritage assets being separated from the site by rail lines, built form, roads
- The site not being located within a viewing corridors or Protected Views
- The site not being within the setting of listed buildings or World Heritage sites

The EIA Report was referred to Historic England and based on the information to date, they do not wish to offer any comments, and suggest the views of the authority's specialist conservation advisers are sought.

(b) The cumulation with other developments and / approved development

The EIA Regulations require consideration of cumulative effects of the proposed development with other existing and approved developments.

The following developments are considered of relevance, regarding their air quality, transport and impact on social infrastructure due to their scale, proximity to the site and the A316. However, given (1) and (2) are pending decision they do not form part of the cumulative impact assessment; and (3) was approved subject to various transport mitigation measures and highway works recommended by TfL due to the location of the site on the A316.

TfL and the Councils air quality officer were consulted on this EIA Screening Opinion request, who raised several points. Overall, there are not considered to be any existing or approved developments near the site that cumulatively might give rise to significant environmental effects subject to the mitigation measures (including highway works, travel plans, air quality assessments etc) proposed through a normal application process and subject to this EIA screening.

1. Stag Brewery redevelopment – Redevelopment to provide secondary school with sixth form; 443 residential apartments; 150 units of either assisted living or residential; 224 unit car / nursing home; Flexible use floorspace for various commercial uses, community and leisure; and hotel, cinema, gym and office floorspace; and associate parking (18/0547/FUL; 18/0547/FUL and 18/0549/FUL)
2. Kew Biothane Plant, Melliss Avenue, Kew: Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 89 units, communal healthcare, therapy, leisure and social facilities (including a Restaurant bar cafe and swimming pool). Provision of car and cycle parking, associated landscaping and publicly accessible amenity including a children's play area
3. Richmond College - 15/3038/OUT - Outline application for the demolition of existing college buildings and redevelopment of the site to provide:
    1) A new campus for education and enterprise purposes, comprising; Replacement College to accommodate up to 3,000 FTE day time students and a Science, Technology, Engineering and Maths of up to 6,100sqm;
    2) A new Secondary School for up to 750 students;
    3) A new Special Educational Needs (SEN) School for up to 115 students;
    4) A new ancillary 'Technical Hub' for Haymarket Media of up to 1,700sqm;
    5) Replacement on-site sports centre of up to 3,900sqm
    6) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316.
    7) Associated on-site parking (non-residential) for up to 230 vehicles
    8) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

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

- Land and soil: The existing site is a previously development brownfield site, which is predominately hard surfaced. The site is not designated for any geological importance or interest and does not yield any significant geological resource. Neither is the site within an archaeological priority area.

- Water: The site is in Flood Zone 1 (lowest risk of flooding), an Area Susceptible for Surface Water Flooding; and there is a Secondary an Aquifer beneath the site. There is no evidence that the site contains any important, high quality scare resource.

o Biodiversity: These Site is an active retail park, and predominately comprises of buildings and hardstanding, with areas of scrub, amenity grassland, trees and hedge / flower beds. There are no statutory or non-statutory sites of nature conservation within the site, or adjacent. The EIA Report appendixes included a Preliminary Ecological appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA), which advises the site supports the following habitats:

Habitat	**Importance**
Amenity grassland	o Of low species diversity and comprises a heavily managed short sward. o **Negligible ecological importance**.
Buildings and Hardstanding	o Buildings offer little to the biodiversity resource to the site. o **Negligible ecological importance**.
Dense Scrub	o Small areas of dense scrub in the south-west corner between railway lines, comprising of largely native species composition. o **Ecologically important within the context of the site only**
Introduced Scrub	o Small size and largely composed of non-native species o **Negligible ecological importance**

Scattered Broad-leaved Trees	o Several planted, young to semi-mature tree species; along east boundary surrounded by amenity grassland, within the car park, in an area west of the car park and along the east boundary. o Common lime; sycamore, and silver birch. o Due to their age, position and native species composition = **ecological important within the context of the site only**.
Scattered Scrub	o Scattered scrub throughout the site; on the east site boundary; running along the west boundary o Largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain *Plantago lanceolate.* o Given small area and the largely non-native composition = **ecological important within the context of the site only**
Tall Ruderal	o One small patch on the southern boundary of the site, consisting of elder *Sambucus nigra*, common ivy, bramble, common nettle and cleavers *Galium aparine*. o Given the small area = **Ecological important within the context of the site only**.
Great Crested Newt	o Not considered to be a feature of the site.
Bats	o The building and trees have **negligible potential** for roosting bats. o Vegetation along southern boarder could act as a possible commuting corridor
Badgers	o No signs of badgers were identified on the site
Birds	o Limited potential to support breeding bird populations o Potential to support nesting and foraging birds o Any populations of birds utilising the site are considered to be of **site important only**.
Invertebrates:	o Limited suitable habitat o Invertebrate populations are likely to be of **negligible ecological importance.**
West European Hedgehog:	o One area of grass piles in the south-west corner could potentially be used by hedgehogs as a hibernaculum o Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of **site importance**.
Reptiles	o Reptiles are likely to be a small population of common species = deemed to only be of **site importance.** o Given more suitable habitat adjacent to the site, reptiles are less likely to use the less suitable habitats present on site. Therefore, the population present on site is deems to be likely a small population of common species and are likely to be of **negligible ecological importance.**

The Works will include an element of intrusive ground works associated to the construction of the basement, foundation works and installation of piles. Further, the Development will clearly have an impact on the natural resource and existing habitats. However, the Report concludes that none of the habitats are considered of principle importance. Given these are either of negligible or site ecological importance only, it is deemed, through the provision of reports to accompany the application (required as part of the Local Validation Checklist), the adoption of design principles, and mitigation measures identified in the EIA Report (that can be secured by either condition or Section 106 Legal Agreement), the Works and Development is not deemed to give rise to significant environmental effect on natural resource.

Environmental topic	Report	Mitigation
Water	o Flood Risk Assessment o Sustainable Drainage Strategy	o London Plan Drainage Hierarchy o Flood resilient and resistant measures o Reduction in surface water discharge to greenfield run-off rates wherever feasible; or the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development
Biodiversity	o PEA and PBRA o Bat Activity surveys o Tree surveys, AIA, AMS o Lighting strategy	o Landscaping scheme – including native and local stock. o Inclusion of 1.2m between basement and ground to ensure sufficient depth for soil. o Sedum / brown roofs o Green walls o Ecological enhancement measures o Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and Richmond's Biodiversity Action Plan (BAP). o Green infrastructure – multi functional, delivering biodiversity and drainage benefits o Planting native flora in retained / new habitats. o Bug hotels o Hedgehog highway and boxes o Bird and bat boxes. o Time restriction for removal of vegetation – avoid bird nesting and hedgehog hibernation period, or under supervision by a qualified ecologist. o Sensitive lighting along rail corridors to avoid disturbance o CEMP: Best practice including measures to reduce noise; dust emissions; night time light emissions; avoid incidences of contamination run-off.

(d) Production of waste

It is inevitable that waste will be generated by the proposal, both through the Works and the completed development.

Any Works are likely to generate waste, and as such the emphasis is upon how to manage such. The EIA Report advises that the CEMP and Waste Management Plan will set out legal and best practice measures and protocols to ensure good construction site management to minimise waste creation and maximise re-use and recycling.

The proposed commercial and residential land uses are not deemed too given rise to particularly hazardous waste materials and general waste is not complex or an uncommon feature of such a scheme. Again, to minimise effects is down to management. The EIA report identifies that the development will include sufficient space and facilities for waste and recycling, and for collection and disposal.

As a response, and with the LVC and conditions to ensure such documents are submitted or secured with any decision, the development is unlikely to give rise to significant waste effects.

(e) Pollution and nuisance

The EIA Report confirms that the site is not within any COMAH sites; Geological hazards or Safeguarded aviation zones. However, recognises…

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site - which could be encounter and / or mobilised during the intrusive ground works.
- The site is within an Air Quality Management Area

Notwithstanding the above:

- The site is within a Critical Drainage Area and area susceptible to surface water flooding.
- The Outer Safeguarding Zone – High Pressure 30-inch Gas Pipeline Cadent Gas Ltd
- The site has a Past Industrial Lane use

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant.

The Council's Emergency Planning Officer does not have any observations in respect to the EIA report.

<u>Land / soil contamination:</u>

The site has a past industrial land use, and therefore during the Works there is the risk of contamination exposure to humans and wider environment. Further, there may be potential for UXO's. Whilst acknowledging such, the EIA Report deems that legislative requirements and best practice can be implemented to prevent the Works giving rise to significant impacts, including:

1. Site to be investigated prior to implementation of works; and if this identified contamination, a suitable remediation strategy will be devised and implemented.
    a. Phase 1 Contamination Assessment
    b. Depending on the outcome of the Phase 1, a Phase II Contamination Assessment and Remediation Strategy
2. Implementation of a CEMP, to ensure best practice environmental management controls (for contamination and UXO management) including, but not be exclusive to:
    a. The use of Personal Protective Equipment
    b. Procedures for the safe and contained storage of materials
    c. Procedures for dealing with accidental material spoils.
    d. With respect to the risk of Unexploded ordnance, any intrusive ground works will be subject to a UXO Watching Brief, which will set out appropriate steps to de-risk the situation.

The Scientific Officer has reviewed the EIA report and only recommended the standard contamination land condition. This will require (prior to commencement of development):

1. a desk study
2. details of a site investigation strategy
3. an intrusive site investigation
4. written reports
5. remediation strategy

6. a verification report, produced on completion of the remediation work,

Based on the reports (which is required as part of the LVC) and sampling and mitigation which could be secured through conditions on any future planning applications as well as the measures that could be applied and controlled through relevant Environmental and Health and Safety legislation, the development is not deemed to give rise to significant effects.

Whilst the Report states the site is not within any COMAH sites, it is within the Outer Safeguarding Zone for a high-pressure gas pipeline. To ensure any contamination, either during works or once Completed, and the safe evacuation in an emergency, it is recommended that the applicants refer to the HSE's Web app and apply the PADHI+ computer system.

Water resources and flood risk

The EIA Report identifies that the site does not contain any surface water features and the closest water feature to the site is the river Thames, approximately 1.5km away. Furthermore, the Site is within Flood Zone 1, an area of low flood risk. Whilst acknowledging such, the Council identifies the Site is susceptible to surface water flooding.

The EIA confirms that during works, the CEMP will ensure appropriate surface water drainage, to ensure no localised surface water flooding. Furthermore, given the completed development will:

- replace the existing hard surfacing and impermeable areas with a similar type of land cover.
- Include design measures to safeguard against surface water flooding
- Ensure additional demand for foul water drainage is addressed

The scheme is not given rise to significant adverse effects.

The authority agrees with such, and these reports / measures will either be required at validation of any application or condition:

- Flood risk Assessment
- Sustainable Drainage systems
- Foul sewerage and utilities statement
- CEMP

Air Quality:

The entire Borough is located within an AQMA. The EIA Report recognises that the Works have the potential to give rise to the following air quality effects:

- Dust emissions
- Emissions from operation of plant and machinery
- Emissions from construction traffic generation.

Accordingly, the following measures are suggested to manage such, including but not exclusive to:

1. CEMP:
    a. Reasonable construction hours
    b. Dampening down
    c. Appropriate covering of dust generation stock piled materials
    d. Avoiding dust generating activities during dry and windy weather conditions
    e. Dust monitoring
    f. Use of modern low emission plant and machinery
    g. Machinery being turned off, whilst not in use

The authority also recommended a robust CMP to manage construction traffic to keep additional pollution on Manor Rd between the very busy South Circular and A316 at peak hours to a minimum

The EIA report identifies the potential air quality effects of the completed and operation Development form:

- Traffic generation

- Building plant – heating and power plant.

Given the existing use (and associated traffic, the limited parking the scheme proposes (subject to measures to control on street parking), the sustainable location of the site (PTAL 4/5); the inclusion of Air Source Heat Pump for each block; and the following reports (which will be required at Validation, and secured through condition / S106) the development is not deemed to result in significant impacts on air quality from traffic emissions and associated effects or heating.

1. An Air Quality Assessment – This should comply with requirements of the EU Directive 2008/50/EC, the draft London Plan 2018, The Mayor's Control of Dust and Emissions during Construction and Demolition SPG 2014, LBRUT's 2017- 2022 Air Quality Action Plan, LBRuT's draft Air Quality SPD and the latest Government Plan to reduce nitrogen dioxide in towns and cities published on 18th January 2016
   - https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions
2. Mitigation measures will need to be conditioned both during the construction phase and once occupied to keep any additional pollution (NO2 + PM) both for existing receptors and site users to a minimum.
3. Provision of electric charging bays

Noise and Vibration:
The main sources of noise at the site are likely to arise from road traffic, servicing of the site, noise associated with the operation of the adjacent rail lines and noise from air traffic associated to Heathrow. There is a potential for vibration at the site due to the operation of the adjacent rail lines. The site has both noise generating and noise sensitive development adjacent to it. In addition, the Completed development will itself be considered as a noise sensitive development.

It is recognised the Works will have the potential to give rise to:

- Increased ambient noise and vibration generated by the physical component and construction plant and material
- Increased noise from construction related traffic.

The EIA Report suggests standard construction environmental management techniques to be included in the CEMP to reduce such effects, including, but not being exclusive to:

1. Limiting working hours
2. Use of construction techniques
3. Use of modern low noise emission plant and machinery
4. Noise and vibration monitoring.

The Completed development is deemed to give rise to the following potential noise and vibration effects:

- Traffic generation
- Noise from operation of plant

The EIA Report recommends:

1. A Noise and Vibration Assessment
   a. Low noise emission plant
   b. Acoustic screening, as necessary
2. A Transport Assessment
   a. Vehicular servicing is controlled through a Delivery and Servicing Plan
3. Draft CEMP - including noise and vibration management

With such measures and reports and the following reports suggested below, again secured through the Validation checklist and / or conditions; the Authority does not deem the Development will give rise to significant effects.

- The design (and acoustic design) should be based on the requirements contained in the 'Development Control for Noise Generating and Noise Sensitive Development' SPD.
- Travel Plan (encouraging walking, cycling and public transport)

Lighting:
No details have been provided of external lighting, but it is expected that some safety lighting will be in-situ for the Works, and security lighting or way finding would be installed around the site (including car park). External lighting could potentially impact on protected species (i.e. bats), however, these particular elements are unlikely to represent a significant part of the overall scheme and, without pre-determining the assessment that would be carried out through the application process, further details could be secured, and appropriate conditions and mitigation could be applied including, Hours of use; Design to ensure lighting is sympathetic to bats that may be utilising the trees boundaries; Provision of low-level bollard lighting; Use of hoods or cowls; and provision of warm-white LED lighting.

Japanese Knotweed
The Authority is aware that the site had Japanese Knotweed within the bed along Manor Road previously. There is concern that any digging in that area may stimulate any (if they are present) dormant rhizomes. The PEA advises the site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2.

On such basis, details will be required in any submission to demonstrate how this will be controlled through Works and the completed Development.

(f) and (g) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change; and risks to human health (due to water contamination or air pollution).

As previously identified

- The area surrounding the site experienced bombing in the 1940s, however, no evidence of the site being subject to any direct bombing.
- They may be potential for sources of industrial related contamination beneath the site;
- The site is within an Air Quality Management Area
- The site is within a Critical Drainage Area and Area Susceptible to Surface Water Flooding.
- The site is within the Outer Safeguarding Zone – High Pressure 30 inch Gas Pipeline Cadent Gas Ltd

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant. It is the authorities' opinion that such risks can be suitably prevented / avoided through the following reports and measures contained within them, that the Authority can require at point of Validation, and secure through either condition or Section 106 Legal Agreement;

1. Contamination Report - a desk study; details of a site investigation strategy; an intrusive site investigation; written reports; remediation strategy and a verification report, produced on completion of the remediation work,
2. Implementation of a CEMP, to ensure:
    - Best practice environmental management controls (for contamination and UXO management);
    - Dust strategy – hours, dampening, monitoring, type of plant – in compliance with Local and Regional policy and guidance
    - Noise and vibration management
3. Referral to the HSE's Web app and apply the PADHI+ computer system
4. Flood Risk Assessment and Sustainable Drainage Strategy
5. Foul sewerage and utilities statement

Climate change:

Previous sections have addressed air quality. The EIA Report confirms that the design of the development will be informed by Sustainability and Building Services Engineers, and ensure that the scheme is in line with policy requirements and a Surface Water Drainage engineer to safeguard against surface water flooding. Accordingly, the scheme will incorporate sustainability design measures to reduce carbon footprint and greenhouse emission, including:

- Selection and use of building materials from sustainable sources
- Design faces to balance solar gain against daylight availability.
- Insulation to reduce heat demand
- Thermally efficient windows to reduce head demand]
- Air tightness
- Mechanical ventilation with heat recovery
- Energy efficiency lighting
- Use of photovoltaic panels.

The following documents will accompany an application:

- Draft CEMP – dust, air quality, noise and vibration
- Draft CTLP
- Transport Assessment – Travel Plan and Delivery and Servicing Plan
- Flood Risk Assessment
- Air Quality Assessment
- Sustainability Statement

With the above measures, and the following documents that will also be required at validation, the scheme is not deemed to raise significant effects on climate change.

- Statement of Sustainable Drainage System
- Sustainable Construction Checklist
- BREEAM Pre-Assessment – non-residential buildings over 100m2
- Energy Report: Confirming zero carbon

(2) Location of Development:

The existing triangular-shaped site is bound by 2 main rail lines used by London Underground, London Overground and South Western Railways and Manor Road. The area surrounding the site is mostly densely populated. It is within a London Underground rail safeguarding zone across the western edge of the site. There is a bus terminus to the immediate north of the access road, which is not part of the scheme. A Sainsbury's supermarket store (Site Allocation SA21 - for retail/residential) is situated immediately to the North East on the other side of Manor Road. Manor Road joins a strategic red route, the A316, which heads out of London towards the South West via the M3. The Royal Botanic Gardens World Heritage Site and Richmond Park, SSSI, National Nature Reserve and MOL are around 1km away.

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to

(a) The existing and proposed land use

The site is located within built up and densely populated part of the borough. The character of the area can be described as having a mixed use, which supports residential properties (flats and houses); retail; transport infrastructure (bus station and stops and rail lines); hotel; and light industrial and other commercial uses

To the north	1. Residential uses 2. Commercial uses to the north of the District Line – along Bardolph Road, Lower Mortlake Road 3. Transport infrastructure including a. District Line b. A bus terminus c. Lower Mortlake Road – Red route

To the north east	1. Residential land uses, 2. Commercial uses – on Manor Road and Lower Richmond Road, 3. Transport infrastructure including a. The Lower Richmond Road (the A316), b. North Road 4. North Sheen Recreation Ground
To the east	1. Sainsbury's store and associated parking areas, 2. Residential land uses 3. Transport infrastructure including: a. North Sheen Station and its associated rail-lines b. South Circular (the A205).
To the south-east	1. Residential land uses 2. Allotments, 3. Transport infrastructure including: • Sheen Road & Upper Richmond Road West (the A305), 4. Northern extent of Sheen Common and East Sheen Cemetery.
South	1. Residential land uses 2. Transport infrastructure including: a. Sheen Road (the A305) b. Queen's Road (the B353). • Network Rail line • Education use – Christ's School
To the southwest	1. Residential land uses, 2. Transport infrastructure including a. Sheen Road (the A305), b. LUL District Line c. Southwest Trains overland rail lines, d. North-eastern extent of Richmond town centre including Richmond Station.
To the west	1. Light industrial and other commercial land uses 2. Residential land uses, 3. Transport infrastructure including a. Lower Mortlake Road, Kew Road and Twickenham Road, b. Eastern extent of Richmond Athletic Ground.
To the north west	1. Light industrial, other commercial and residential land uses, 2. Transport infrastructure including a. Lower Mortlake Road (the A316) and Kew Road (the A307), 3. Richmond Lawn Tennis Club, 4. Richmond Cricket Club, 5. The eastern extent of the Royal Mid-Surrey Golf Club, 6. London Welsh RFC and Bowling Green 7. The south-eastern extent of the Royal Botanic Gardens at Kew.

The site currently comprises a low-rise retail store with associated hardstanding, for access road, car parking (150 cars) and outside delivery and storage area. The site has an extensive frontage along Manor Road, and thereby prominent. The south and north west boundaries are adjacent to rail lines (District line and network rail). Thereby views to the site from these locations are either from private gardens or over adjacent land uses. The Lower Mortlake Road and Lower Richmond Road met at Manor Road roundabout, which is elevated, and therefore the site is not prominent from this location.

The existing land uses on the site (retail) and the proposed land uses (residential and retail) will have a different character, in terms of impact on local sensitivities, including, Transport, Traffic, core social infrastructure, (such as impacts on schools, health, recreation use etc).

Transport:
The site has a PTAL rating of 4/5, owing to the sites proximity to: North Sheen Station; Richmond Station and Bus stop interchanges. Manor Road is a busy classified road, which is often congested in response to the barrier downtime (amongst factors) and leads to the A316, which is part of Transport for London Road Network.

It is recognised that inevitably the Work will give rise to some disruption to the normal operation and functioning of the local road network. However, it is deemed that such can be planned, programmed and controlled to avoid significant disruption and effects. The following will both be required at validation of an application and can be conditioned / secured in a Legal Agreement:

- Construction Traffic Logistics Plan: Accesses, routes, hours; pedestrian routes and signage etc.

The EIA report states Baseline traffic surveys have been undertaken on the existing use, and compared to the proposed use:

Table 1: Existing and With-Development Two-Way Movements to / from the Site

Peak Period	Existing Two-Way Movements	With-Development Two-Way Movements	Change
AM 08:30 - 09:00	80	71	-9
PM 17:00 - 16:00	108	83	-25

With regards to the completed development, except for 12 car parking spaces, the Development will be car free. Therefore, the EIA report concludes that the scheme has the potential to reduce the number of car trips when compared to the existing situation, or not have significant vehicular traffic effects. This will be further avoided by:

- The implementation of a Travel Plan and Delivery Servicing Plans.
- Provision of approximately 650 cycle parking spaces to encourage sustainable modes
- A Transport Assessment will be submitted with the above.

The EIA Report has been reviewed by both TfL and Transport Strategy.

Transport Strategy: Within the context of Manor Road, also being a classified road intended to carry relatively high flows, predicted changes in numbers of vehicles are considered relatively small. The profile of traffic during the day would be expected to change and there would be a new residential population. The developer proposes a new pedestrian realm within the site and cycle parking. The surrounding highways are of conventional design and construction, and new conventional accesses would be created into/from the site for pedestrian and vehicle access. The EIA report would have benefited from including some consideration of pedestrian movement and road safety outside the site as the development is considered likely to result in an increase in local people crossing roads and accessing nearby public transport. However, the development is not considered irregular in transport terms and is unlikely to require any road safety or other highway improvements that are not commonly found in urban areas with mixed land uses. In summary, it is not deemed to represent an EIA development, and will not have strategic impact on background highway flows and air quality. It should be noted that measures would be required to restrict on street parking, to avoid unacceptable traffic and air quality impacts.

TfL: The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

- Works: The impact of construction traffic on the operation of the TLRN including buses, pedestrians and cyclists must be considered and could be mitigated through the provision

of a Construction Logistics Plan (CLP). TfL would encourage the applicant to submit a draft plan as part of the application.

- Completed development: TfL would expect the application to be supported by a robust Transport Assessment (TA) and depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme, unless these are adequately addressed as part of the application. A framework residential travel plan should be prepared and submitted and should include information on deliveries and servicing. Any mitigation measures relating to TfL infrastructure and services must be secured through a s106 agreement. Depending on the level of transport mitigation agreed, it may be appropriate for TfL to be a signatory to any s106 agreement. Less significant issues can be dealt with by use of planning conditions and in some cases TfL may request that it is consulted prior to any discharge of a condition.

In addition to the reports recommended in the EIA report, the Authority will require the

1. Transport Assessment – to also include:
    - Traffic generation details off-peak and at the weekend - quantify the change in traffic on Saturdays and Sundays, as these are considered the busiest days for the DIY store.
    - To be in accordance with TfL's latest Transport Assessment Guidance. Depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme
    - Must include a multi-modal impact assessment including baseline and future car, bus, rail and pedestrian and cycle trips and mode share.
2. Travel Plan: Produced in accordance with TfL's Travel planning best practice guidance.
3. Health Streets Assessment
4. Parking surveys on local roads
5. Contribution for CPZ review and implementation – to prevent on-street parking
6. PERS
7. CERS
8. Road safety audit

<u>Schools:</u>
The Works will not generate any significant effects.

The IEA Report states there are 8 open primary schools within approximately 1m of the site, which have surplus capacity of 567 primary places. There are 9 secondary schools, within approximately 2 miles of the centre, with approximately 413 mixed gender and multi-faith secondary school placed. The EIA report advises that the scheme is unlikely to generate a child yield in-excess of 567 primary school aged pupils and 413 secondary school agreed pupils, and therefore not deemed to generate any significant demand and over capacity issues.

Applying the GLA Population Yield Calculator, the development may generate approximately:

- Aged 0-3: 39.6 persons
- Aged 4-10: 39 persons
- Aged 11-15: 11.3 persons
- Aged 16-17: 4.8 persons
- Aged 18-64: 651.6 persons
- Aged 65+: 15.5 persons
- **Total: 761.7 persons**

The Infrastructure Delivery Plan 2017 states:

- Primary education: The Council has a duty, under section 14 of the Education Act 1996, to ensure that sufficient schools are available for their area for providing primary education. The Council's overarching School Place Planning Strategy, adopted in January 2015 and revised in October 2015, sets out its priorities and strategy for ensuring a sufficiency of places up to 2024. In the medium to long term, additional provision will be needed in the Barnes and Teddington areas, for which plans are in place.

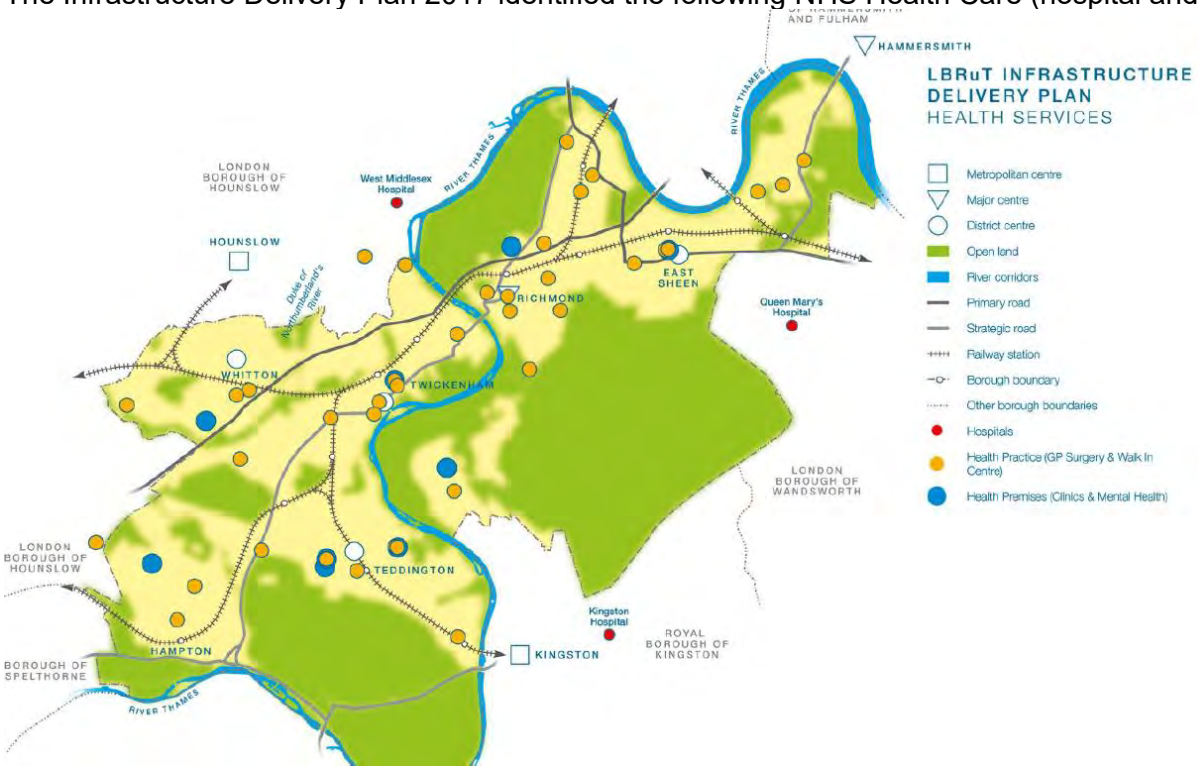
- Secondary Education: In the October 2015, the Council updated the School Place Planning Strategy and identified the need for one more free school to be provided as part of the redevelopment of the Stag Brewery site in Mortlake. This was in order to meet the localised forecast demand in the eastern areas of the borough. It is noted that the forecast for additional places in the west of the borough has been met by the provision of the three new schools.

Achieving for Children have been consulted, who deem that whilst there will clearly be an impact, given the varied ages and relatively low numbers, the impact will not be significant. In addition: At present there is some spare capacity in the primary phase at nearby schools, and the proposed establishment of Livingstone Academy ought to take care of the anticipated secondary pupil yield from the development.

Health:
The Works will not generate any significant effects.

The EIA Report states there are 9 open GP surgeries within approximately 1 mile of the site, which are accepting new patients. Therefore, not deemed to raise significant adverse impacts on such facilities.

The Infrastructure Delivery Plan 2017 identified the following NHS Health Care (hospital and GPs)



The CCG's has identified the following localities as key priority issues:

- Kew (North Road Surgery)
- Teddington (Park Road Surgery)
- Twickenham (York Medical Practice)

CCG have been notified, who advise the distances between the site and local practices:

- Seymour House – 0.5km (8 mins walk)
- Paradise Road - 1.1km (17 mins walk)
- North Road – 1.2km (19 mins walk)
- Parkshot – 1.5 (23 mins walk)
- Sheen Lane – 1.9km (29 mins walk)

- New North Road site - 2.5km (38 mins walk)

In addition, there is a second tier of priority practices who have applied to the NHS England Improvement Grant fund; these are based in Twickenham, Hampton, Kew, Richmond and Barnes. However, population growth, particularly in Twickenham and Richmond, will place increasing pressure on GP premises in these areas.

Public health has been consulted and have no comments from an EIA point of view, however, will require a Health Impact Assessment (HIA)and a Rapid Health Impact Assessment (RHIA) is undertaken.

The scheme will clearly impact upon local health services. However, it is deemed a HIA and RHIA would identify potential need, and mitigation can be applied to avoid or prevent such impact. This may include contributions to expand GPs to cater for demand. If deemed necessary, this would be secured through a legal agreement. Indicative costs are identified using the HUDU model, which uses the numbers of proposed housing units, and the likely resulting population and calculates what health care floorspace is required and estimates the subsequent capital costs.

Recreation facilities
The Works will not generate any significant effects.

There are 9 open spaces and recreation facilities (public and private) within close proximity of the site, including:

1. North Sheen Recreation Ground
2. Penfold Tennis club
3. Fulham (North Sheen) Cemetery
4. Tangier Green
5. Pesthosue Common
6. East Sheen Common
7. Richmond Athletic Ground
8. Royal Botanic Gardens at Kew.

Whilst the proposed use may result in increased recreational use, given policy requirements for amenity and play space on site, and potential ability for legal agreements for improvements to public open spaces, the scheme is not deemed to generate significant adverse impact on such provision.

Wind climate:
The surrounding area predominantly contains relative uniform massing – generally low – medium rise buildings ranging from 2-6 storeys, apart from two 12 storey towers to the west of the site, off Lower Mortlake Road (the Towers). Given the distance between these and the site (approx. 120m2) the relatively low rise adjacent to these, The Towers are not deemed to give rise to significant impacts.

The Works (demolition of existing building) are not deemed to significantly impact upon wind conditions, given their relatively low nature.

The completed development is proposed to be ground plus 8 storeys. Figure 4 shows the building lines are staggered within the site. Whilst the scheme proposes some height, the EIA Report confirms that the design will be informed by an appropriately qualified and experienced wind microclimate expert so that the physical presence will not create uncomfortable or unsafe wind conditions within the site or adjacent and the application will be accompanied with a Desk Based Wind Microclimate Assessment. With such assurances, it is deemed significant impacts can be avoided.

Daylight, sunlight, overshadowing, light pollution and solar glare

The Works are not deemed to give rise to significant changes to light, and significant light pollution can be controlled through a CEMP.

The completed development will change light conditions within the site and adjacent to the site. However, the EIA Report confirms that the Applicants Daylight, Sunlight and Overshadowing consultants are informing the design of the Development to ensure any changes to the conditions of habitable rooms and amenity space are minimised and where changes do occur they are not unacceptable. Further, owing to the separation between the site and residential receptors, these are likely to the insignificant. In addition, the advice will also inform the design of the site layout (massing, siting, orientation, arranging of living space and fenestration design) to ensure suitable conditions for future occupants and solar glare. A lighting strategy will be adopted to ensure lighting will not exceed existing ambient artificial light levels.

The authority agrees with the above approach, and with such assurances and the following documents that will be required at validation, the scheme is not deemed to give rise to significant effects in this regard:

- Draft CEMP – light pollution management
- A sunlight / daylighting and overshadowing report - this will be measured adjacent BRE guidance.
- Lighting strategy

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

As previously concluded, the site is not known to contain high quality or scarce resources. There are no statutory or non-statutory sites of nature conservation within the site. As previously concluded, subject to mitigation and reports, the Development is not deemed to give rise to significance environmental effect in this regard.

With regards to the environmental sensitivity of the biodiversity in the geographical area, consideration has been given to:

Statutory Sites- There are two sites of European designation within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species the stag beetle *Lucanus cervus*. Given that the site is designated as a SAC due to the stag beetle population present, it is of **European importance**.

- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu,* which is listed as an Annex II species. Due to the presence of stag beetles and the presences of both wet and dry heathlands Wimbledon Common is considered a of **European importance**.

There are two sites of National designation within 2km of the site:

- Sion Park is located 1.7km north-west of the site and is designated a SSSI. Sion Park is 21.5Ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is of **local importance**.
- The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

Non-Statutory (Local) Sites

- Non-statutory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:
    - Sites of Metropolitan Importance
    - Sites of Borough Importance (borough grade 1 and borough grade 2)
    - Sites of Local Importance

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scare plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pesthouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scare and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km- South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scare and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail *Balea biplicata* and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scare plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: - Marsh sow-thistle *Sonchus palustris* - Cut-grass *Leersia oryzoides*.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail *Balea biplicata* only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush *Bolboschoenus maritimus* and nationally rare invertebrates such as the, Thames/two-lipped door snail *Balia biplicata*.
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree *Juglans nigra*.

Potential impacts on the above sites may include, increased pollution (such as air, noise and light); and increased recreational use. However, given the distance of the development to the above sites and the sites being geographically isolated by buildings, greenspace, hardstanding and roads; the limited parking being provided on site, and with the following mitigation measures, that can be secured by condition and / or Section 106 Legal Agreement; significant impacts on such areas will be avoided.

- Incorporation of multi-functional green and play space within the site boundary,
- Limited car parking vision
- Electric charging points
- Lighting strategy

(c) the absorption capacity of the natural environment, paying particular attention to the following areas

- <u>wetlands, riparian areas, river mouths</u>
  No likely significant effect – the site is not within the immediate vicinity of any such areas.

- <u>coastal zones and the marine environment</u>
  No likely significant effect - the site is not within the vicinity of any such areas.

- <u>mountain and forest areas</u>
  No likely significant effect on mountain or forest areas.

  There are several trees on the site, and a group TPO applied. A Tree Survey and Constraints Plan; An Arboricultural Impact and Method Statement, and landscaping Scheme would be requirement of the Local Validation Checklist. These would identity the value of the trees, and which are of townscape or amenity value, and mitigation. Whilst there will inevitably be the loss of planting on site, the Authority has the ability (under policy LP 16) to secure replacement planting (on site or offsite) thereby to avoid significant environmental effects.

When considering the landscaping scheme, the applicants should provide details of the quality of the soil and suitability for landscaping within the site; and ensure sufficient soil volume is made available above the basement to support new trees.

- Nature reserves and parks
No likely significant effect through physical building works – the site is not within the immediate vicinity of any such areas.

With the increase in population, the Development may impact upon the usage on local parks, most notably North Sheen Recreation Ground in Dancer Road. Policy LP 31 requires financial contributions to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development. Consequently, no significant environmental effects on nature reserves or parks in the vicinity are considered likely.

- European sites and other areas classified or protected under national legislation;
The proposed development is not considered likely to affect birds protected through the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds). Various sites and species are also protected through the Habitats Directive (92/43/EEC) as set out in Schedule 2 of the Habitats Regulations 2017 which transposes the Habitats Directive into UK law. The site is not within the immediate close proximity to any European protected sites (the nearest being Richmond Park SAC).

Natural England has been consulted and based on the material supplied. They confirm that the site is not located within, or partially within any Site of Special Scientific Interest (SSSI) or Special Area of conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significant affect the interest features for this they are notified. The location of the development is not within, nor is it significantly close to a National Park, Area of Outstanding Beauty or Heritage Coats to impact upon the purpose for which these sites are designate. Therefore, in so far as statutory designated sites, landscapes and protected species are concerned there are no potential significant impacts.

The applicant is advised that they must provide information supporting this application sufficient for the Authority to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

- areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
The entire Borough is designated as an Air Quality Management Area (AQMA). However, as already discussed, the development is within a sustainable location, on previously developed land, proposes minimal onsite parking, and subject to conditions, measures to restrict on-street parking and relevant reports, is not deemed to give rise to significant adverse effects. The relevant Environmental Health officer also does not deem the scheme to trigger an EIA.

- densely populated areas;
The site is in a medium-density area outside of the Borough's town centres. However, the development may cause impacts on the surrounding population in terms of the following:

  - Noise, emissions, dust during construction
  - Noise, light pollution, air quality and transport impact from proposed use
  - Visual impact on townscape

The above matters have been discussed elsewhere in this report. Given the scale and siting of the development, the surrounding context (in terms of adjoining neighbours and land uses) and considering measures that could be applied and controlled through relevant Environmental and

Health and Safety legislation and planning conditions, the development is not deemed to give rise to significant effects.

- landscapes and sites of historical, cultural or archaeological significance.
  The site is not located within an Archaeological Priority Area, and the EIA Report states that the site has a low archaeological potential due to previous disturbance. Historic England have been consulted on the EIA Report, and confirm that Archaeology does not need to be part of the EIA process due to there not being high potential for significant remains to be present on the site. However, recommend the detailed application should be accompanied by an Archaeological Desk -Based Assessment, and this can be a stand-alone report, which would enable GLAAS to make a decision on whether any further archaeological surveys or mitigation works will be necessary. On this basis, no significant environmental effects are likely.

  The site is not within a conservation area, nor does not contain any listed buildings, World Heritage Status, Scheduled Monuments; Building of Townscape Merits. Neither is the site within the setting of listed buildings, the buffer of a World Heritage Site, or Schedule Monument. Opposite the site on Manor Road and on the north side of the district line are two storey Buildings of Townscape Merit, non-designated heritage assets. To the west and south west (again beyond the district line or network rail line) are two conservation areas, north of the site (beyond the district line).

  The Authority is of the view the scheme is of a different physical scale to existing and will affect the setting of such, however, given, the varied heights within the development; built-up nature of the area; the varied form of buildings and heights in the locality and their existing relationship; Heritage assets being separated from the site by rail lines, built form, roads; the site not being located within a viewing corridors or Protected Views of such area; this is not deemed to give rise to significant adverse effects. Further, the EIA Report confirms:
  - The Applicants Townscape and Visual Consultant and Heritage Consultant are closely working with the Applicants Architects to ensure potential significant adverse effects on the townscape, views and heritage assets are avoided;
  - The application will be accompanied with a Townscape and Visual Assessment.
  - Design principle will be devised to ensure the form, massing, materials, landscaping and other design features are complementary to the existing townscape.

(3) Type and characteristics of the potential impact - The likely significant effects of the development on the environment must be considered in relation to criteria set out in points 1 and 2, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
(b) the nature of the impact;
(c) the transboundary nature of the impact;
(d) the intensity and complexity of the impact;
(e) the probability of the impact;
(f) the expected onset, duration, frequency and reversibility of the impact;
(g) the cumulation of the impact with the impact of other existing and/or approved development;
(h) the possibility of effectively reducing the impact.

The criteria set out in part 3 of Schedule 3 of the Regulations have been considered in the assessment above (see table below). The proposed development, both through Works and Completed development, could impact upon several areas of acknowledged interest in this borough.

		Works	Completed Development
Natural Resource	Physical changes to topography	The existing site is flat. The works will involve the construction of a basement, piling and foundations. The Works equipment will impact on the townscape; however, this is not complex, uncommon, of any great magnitude, temporary and reversible.	The development will impact upon the topography and townscape and have a greater urbanising effect. However, given the built-up nature of the site and area; varied character in height and form; non designated nature of site; and the measures outlined in the EIA Report, this is not deemed too given rise to significant effects.
	Impact on natural resource – land, soil, water, materials and energy	No significant impact.	Given the existing brownfield nature of the site, which is predominantly hard surfaced and its limited ecological value, the authority concludes the scale and characteristics of the development will not result in any significant effect on nature resources.
	Impact on high quality or scarce resources – forestry, agricultural, water / coastal, fisheries, minerals.	The Works are not deemed to impact upon high quality or scarce resource.	The Development is not deemed to significantly impact upon high quality scare resource.
Waste	Production of waste	Any scheme will produce waste during Works, and therefore this is not deemed complex. The duration will be limited, and frequency and magnitude can be controlled through measures such as CEMP and waste management plan.	The scheme proposes 400 units and commercial floorspace, therefore will produce waste. However, this is not uncommon, complex or of great magnitude. Measures, such as refuse and recycling facilities, will reduce impact and ensure this is not significant.
Pollution and nuisances	Release of pollutants	The works will generate pollution through operating machinery, transport, plant, dust. Whilst these will occur on a frequent basis, these are not uncommon on a construction site, and will be for a limited duration, and measures ca apply to reduce impacts, such as travel plans, CEMP, dust management plan, to ensure no significant.	The completed development will release pollutant from energy, vehicles, mechanical plant etc. However, these are not deemed to be complex, of magnitude or significant, when taking into measures to reduce such impacts, such as Air Quality Assessment; limited parking; sustainability design and energy measures.
	Noise, vibration, light, heat, energy pollution	The works will generate noise, vibration, pollution. However, this is not significant or complex. Measures can reduce any impact, and the duration will be limited.	Any development will generate noise, light, heat and energy pollution. Whilst 400 units, this is not deemed complex in this regard, and policy and measures can be applied to ensure no significant impact.
	Impact on contamination	The site has a past industrial land use, and therefore it is probably	The proposed land use is not deemed to give rise to

		contamination exist. However, with appropriate investigations and remediation, this is not deemed to give rise to significant effect.	contamination. Areas of soft landscaping are proposed. If contamination is found, remediation will be required, and this will mitigate impact and ensure no significant impact.
	Areas already subject to pollution and environmental damage – air quality	The site is adjacent to the A316, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, rail and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact (insulation, design measures, travel plans, cycle parking), sustainability measures.
Pollution and human health	Risk of accidents	No evidence to suggest an accident, however, any possibility can be reduced through CEMP, FRA.	No evidence to suggest an accident, however, any possibility can be reduced through referral to HSE, application of PADHI+.
	Risk to human health – air pollution and contamination	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during Works is not deemed of great complexity, the duration will be limited, and measures can be applied to reduce impact.	The whole Borough is designated an Air Quality Management Area, and the site have a previous industrial land use. Any risk to human health during operation, whilst frequent and potential for long duration) this is not deemed to be significant, given measures applied to reduce impact. Such as design features, limited car parking, remediation, Travel Plans etc.
Water resources	Impact on water resources and flooding	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.	The site is located within a low flood risk area, however, is susceptible to surface water flooding, and there is an Aquifer below grounds. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude, and with a FRA, Sustainable Drainage Strategy, significant effects can be avoided.
Biodiversity	Impact on: protected areas Sensitive areas	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; limited duration of Works, and measures to reduce impact, impact through Works, is not deemed to be significant.	The site is not a protected area, nor are those adjacent. Given distance to nearest protected site and sensitive areas; barriers between these sites; limited parking on site; and measures to reduce impact, impact is not deemed to be significant.

	Impact on protected spaces on / around the site	The PEA has not identified protected species on or around the site. No significant impact.	The PEA has not identified protected species on or around the site. No significant impact.
Landscape and visual	Impact on areas / features on or around the site protected or non-designated areas of landscape and scenic value	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will not be significant.	The site is not a protected or non-designated area of landscape and scenic value. The site is opposite an OOLTI, and within the setting of another. Whilst the development will have a visual impression on both their settings, given the character of the area; this will be not being significant.
	Is the development going to be highly visible – where, what direct and distances	It is not uncommon for developments to have cranes etc. These will be visible from the immediate location and further afield, however, this is not to be of a magnitude to generate significant impact.	The development will be prominent from Manor Road, given the length of the frontage. Whilst it will be visible from the south and north west, this will either be over rail lines, properties etc. The A316 is slightly elevated to the north of the site, and with the existing landscaping, it limits its prominence. Notwithstanding such, given the built-up nature of the site, and tight urban grain, this is not deemed too given rise to significant adverse impacts. The applicant will be submitted a Townscape and Visual Appraisal.
Cultural heritage and archaeology	Impact on areas / features protected for their cultural or archaeological value. Local designation / non-designated heritage assets	The site is not of cultural, heritage or archaeological value. There are designated heritage assets within the setting of the site (conservation areas) and non-designated assets (BTMs). Whilst the Works will impact upon their setting visually, this is not uncommon, and duration will be not being significant.	The site is not of cultural, heritage or archaeological value. Within the setting there are designated heritage assets (conservation areas) and non-designated assets (BTMs). There is a World Heritage site in Kew. Given the distance to the World Heritage Site (not with core or buffer zone), the varied character of the area (and relationship between existing pattern of development and heritage assets); the Applicants confirming a views analysis and heritage statement will be developed, and design measures applied to ensue no significant impact; (and the local and non-designated nature of the BTMs), it is not deemed to give rise to significant effects.
Transport and access	Impact on routes on or around the location to access recreation or other facilities.	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. No details have been provided, however, it is probable the Work will impact on this. A CLP will be required to demonstrate how the two can run concurrently and this can be	There are no routes through the site. Adjacent to the north boundary there is access to a bus station. The indicative layout does not indicate an impact on such faculties.

		secured to avoid any significant impact.	
	Impact on transport routes susceptible to congestion or cause environmental problems	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.	The site is adjacent to the A316, a TLPN. This is prone to congestion, and the whole Borough is located within an Air Quality Management Area. The completed development is not deemed to unacceptably add to the issues of the A316 and Air Quality, given the limited on-site parking, and measures applied to reduce such impact.
Land use	Existing land uses or community facilities that could be addressed – housing, indusial, health, education, places of worship, leisure, sports and recreation	No significant impacts deemed during Works, given nature; limited duration; reversibility.	The development will increase pressure on existing facilities, however, these are no complex, uncommon, and through unit mix, Health Impact Assessment, appropriate play and amenity space; contributions for improvements (if necessary) not deemed to raise significant impact.
	Any plans for future land uses around location that could be affected.	No significant impacts deemed during Works, given nature; limited duration; reversibility.	There is a site allocation for the Sainsbury's site opposite. (SA 21), which supports the comprehensive redevelopment for retail and residential uses. The continued use of the site as a food store and the re-provision of the existing retail floorspace is required. The Development is not deemed to prejudice such.
Land stability and climate	Is the site / area susceptible to and stability, winds, that could present environmental problems	No significant impact.	In response to build up pattern of development, and the Applicants confirming the design will be informed by a microclimate expert, there is no evidence to suggest a significant effect.
Transboundary effects	Is the project likely to leads to transboundary effects?	The Works will lead to construction traffic along the A316, through neighbouring boroughs. However, this is not deemed to be significant, especially given the limited duration and measures to reduce impact.	Given the distance of the site to neighbouring borough's and the limited parking on site, the scheme is not deemed to give rise to signage transboundary effects. Various consultees which consider transboundary matters (including TfL, Natural England, Historic England etc) have been consulted on this screening opinion and have not requested a positive EIA screening.

Any Works have a consequential impact on the physical environment, pollution, transport etc. Whilst the impacts through the works will be frequent, given the duration of the impacts will be limited to just construction; not being complex or uncommon; temporary in nature; a number being

reversible (air, noise, traffic, visual impact), with the mitigation measures put forward, these are not deemed significant. It is probable the Works will generate short term employment opportunities

Several impacts arising from the completed Development will not be reversible and due to the visible location of the development would not be limited to the immediate locality, potentially affecting a significant number of people. However, the Council:

1. Does not consider that the characteristics of the site and development would be likely to result in any significant effect on natural resources.
2. Whilst there is always the risk of pollution (air, noise, light, waste, contamination) being generated through operation, with the use of appropriate conditions, documents, and design measures will avoid significant impact or significant risk.
3. Does not consider, based on the evidence submitted, the Development would raise significant impact on protect and sensitive areas of biodiversity and protected landscapes.
4. Recognised that transport matters have been and can be addressed through design (limited parking) and Travel Plans, cycle infrastructure, on-street parking controls; and legal agreements to secure such.

The Completed development will have an urbanising effect on the townscape. The Authority considers that the key issue relating to the potential impact of the Development, both on-site and in the vicinity, relates to the visual impact. However, given the character of the area (form, built nature and height); the limited evidence of likely significant impacts on sensitive landscape or archaeological or nature conservation interests; and the design being influenced by heritage and townscape consultants, the impact is not deemed to be sufficient to warrant an EIA.

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

Mitigation measures

The NPPG states, "*Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment*". Further, "*Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance*".

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment, the type and characteristics of the potential impact are effectively reduced. The table below (column 2) identifies the features of the development / mitigation measures put forward by the applicants to avoid or prevent what might otherwise have been significant adverse effects on the environment. The third column identifies further reports / mitigation, recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission.

Issue	**Features / mitigation / documents to be submitted to avoid or prevent potential significant effects:**	**Additional mitigation / reports recommended by the Local Planning Authority:**
Transport and connectivity	• Car free development, except spaces for mobility impaired. • Construction Transport Logistics Plan • Transport Assessment	• Contributions towards highways measures and parking controls around the site

	• Draft Travel Plan • Draft Delivery and Services Plan • Signposting	• Highways and traffic management legislation. • Car Park Management Plan • Healthy Street Assessment • Parking survey • PERS/ CERS • Road Safety Audit
Core Social Infrastructure	• Appropriate quantum of play space will be provided within the Site • Generous hard and soft landscaped areas for public and private use	• Health Impact Assessment
Townscape and visual Effects	• Construction Environmental Management Plan (CEMP) • A Townscape and Visual Assessment	
Heritage Effects	• A Draft CEMP (including for above ground heritage asset construction management). • A Heritage Statement. • An Archaeological Desk-Based Assessment	
Biodiversity / Ecological Effects	• Avoid conflict with bird nesting or hedgehog hibernation during the Works • Draft CEMP (including for biodiversity / ecological construction management). • A PEA and PBRA (a re-submitted version of the PEA and PBRA included at Appendix 1 for completeness). • A Lighting Strategy.	• Provision of new public open space • Ecological enhancements • Arboricultural Method Statement • Landscaping scheme
Geology, Ground Conditions and contamination	• Environmental management controls • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). • Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination • Assessment and Remediation Strategy. • A Draft CEMP (including for contamination and UXO management).	
Water Resources and flood Risk	• A Draft CEMP (including for surface water drainage management). • A Flood Risk Assessment (FRA) (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).	• Foul sewerage and utilities statement.
Air Quality	• Apply construction environmental management techniques • Air Source Heat Pump solution • A Draft CEMP (including for dust and air quality management). • An Air Quality Assessment.	• Design of the development • Potential additional bus services, subject to TfL approval • Provision of the minimum number of vehicular parking spaces, • Electric vehicle parking spaces, • Cycle parking and infrastructure,
Noise and Vibration	• Apply construction environmental management techniques • A Draft CEMP (including for noise and vibration management). • A Noise and Vibration Assessment. • A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).	• Siting the least sensitive rooms nearest to the noise sources

		• Acoustically attenuated natural ventilation and/or mechanical ventilation
Wind Microclimate	• A Desk-Based Wind Microclimate Assessment.	
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	• Draft CEMP (including for light pollution management). • A Daylight, Sunlight and Overshadowing Assessment. • A Lighting Strategy.	
Waste	• A Draft CEMP (including for construction site waste management). • An Operational Waste Management Plan.	• Refuse and recycling facilities
Risk of Major Accidents and disasters	• A Draft CEMP (including for ground contamination, UXO and surface water drainage management). • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). o Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination o Assessment and Remediation Strategy. • An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy).	• HSEs Web App • PADHI+ • Foul sewage and utilities statement
Health and Wellbeing	• A Draft CEMP (including for ground contamination, UXO, dust, air quality, noise and vibration and light pollution management). • A Phase 1 Contamination Assessment (including for a UXO Risk Assessment). o Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination o Assessment and Remediation Strategy. • An Air Quality Assessment. • A Daylight, Sunlight and Overshadowing Assessment**.**	• Health Impact Assessment – The applicants are advised to control Jabed Rahman, Public Health Lead.
Climate Change	• Design features: • The selection and use of building materials from sustainable sources and with low embodied carbon. • The incorporation of appropriately designed façades to balance solar gain against daylight availability. • The use of good levels of insulation for wall, floor and roof elements, thereby reducing heat demand. • The use of thermally efficient windows to reduce head demand. • The achievement of good levels of air tightness. • Mechanical ventilation with heat recovery. • The use of energy efficient lighting. • All electrical heating systems to take advantage of decreasing UK grid electricity carbon factor. • The use of photovoltaic panels mounted at roof level. • A Draft CEMP (including for dust, air quality and noise and vibration management). • A Draft CTLP. • A Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan).	• Sustainable Construction Checklist • Sustainable Drainage Strategy • BREEAM Pre-Assessment • Energy Report.

	• An FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy). • An Air Quality Assessment. • A Sustainability Statement	

Conclusion
Based on the information provided, and for the reasons set out above and potential mitigation measures, which will assist in avoiding / preventing any potential significant effects, significant effects on the environment are not considered likely. As such, an Environmental Impact Assessment would not be required for any future planning applications under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended).

Decision: Negative Screening Opinion

Date of Opinion: 14th December 2018

Yours faithfully

Robert Angus
Head of Development Management

Appendix II

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

Manor Road / Richmond

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

Tyler Grange

February 2019

12 February 2019

Manor Road, Richmond

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

Report Number: 11778_R01d_CC_MM

Author: Christian Cairns MSc

Checked: Hazel Murrells MCIEEM CEnv

Tyler Grange

Birmingham · Cotswolds · Exeter · London · Manchester

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Plans

Summary

S.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton Richmond Development Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) at a retail park known as Homebase North Sheen, located along Manor Road, Richmond, London, Middlesex (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'. The purpose of this report is to inform a planning application for the construction of 385 new residential units, 480sqm of flexible retail/community/office use, and above ground parking.

S.2. The site is an active retail park, predominantly comprised of hardstanding with a central building actively used by members of the public and Homebase staff. The site is accessible directly from Manor Road. The site contains serval young to semi-mature trees, along with small areas of amenity grassland, introduced shrub, scattered scrub and tall ruderal vegetation. The site is bordered by active railway lines to the west and south, a bus park to the north and a road; Manor Road to the east.

S.3. The site is not covered by nor adjacent to any sites that are subject of statutory or non-statutory protection and no such sites are likely to be affected by the proposed development on the site. The majority of habitats within the site that may be lost as a result of a development (Buildings, hardstanding, amenity grassland and introduced shrub) are of negligible ecological importance and no specific mitigation is required.

S.4. The building and trees within the site have been assessed as having negligible potential to support roosting bats.

S.5. Precautionary checks for nesting breeding birds, reptiles and hedgehogs are recommended by an Ecological Clerk of Works (ECoW), if buildings or nesting bird habitat is removed in the nesting bird season (March – August, inclusive), Hedgehog hibernation season (October – April, inclusive), to prevent death or injury of individual by the proposed works. Should nesting birds be present with young or eggs, an appropriate buffer should be erected, and the nest checked periodically by an ECoW until it is clear the young have either failed or fledged. Should any hedgehogs or reptiles be found they will be removed by an ECoW by hand and translocated to suitable off or onsite habitat that is suitable and similar to that in which they were found.

S.6. Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and the borough of Richmond Upon Thames Biodiversity Action Plan (BAP). New flora planted should be native and of local stock. In addition, enhancements for specific species groups will be provided post-construction including bird and bat boxes to increase the number of nest and nesting sites across the site and hedgehog boxes and highways and bug hotels to provide a net biodiversity gain.

Section 1: Introduction, Context and Purpose

Introduction

1.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton Richmond Development Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a retail space at 86 Manor Road, Richmond, London (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'.

1.2. This report has been produced to support a planning application for the redevelopment of the site. The proposed development will involve the demolition of existing buildings and structures and the comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

Purpose

1.3. This report:

- Is to be submitted in order to support a planning application for the site;
- Uses available background data and results of field surveys, to describe and evaluate the ecological features present within the likely 'zone of influence' (ZoI)[1] of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's future development for; and
- Where appropriate, makes recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation listed in **Appendix 1**;

1.4. This assessment and the terminology used are consistent with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, 2018).

[1] Defined as the area over which ecological features may be subject to significant effects as a result of activities associated with a project (CIEEM, 2018)

Section 2: Methodology

Data Search

2.1. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

2.2. The data search has been undertaken for a 10km radius around the site for European statutory sites, a 2km radius for national statutory and non-statutory sites and a 1km radius for protected and priority species[2] records. The search area was extended to 2km for bat records.

2.3. GiGL; Greenspace Information for Greater London Environmental Records Centre was contacted for details of protected and priority species and non-statutory sites. The information from GiGl was requested on 15th August 2018 and returned on 16th August 2018. Where relevant records were identified, the information provided has been incorporated into the report with due acknowledgement.

2.4. The Multi-Agency Geographic Information for the Countryside[3] website was accessed for information on the location of statutory designated nature conservation sites within a 2km radius the site.

2.5. The London Borough of Richmond upon Thames website was consulted for details of relevant local planning policies and supplementary planning guidance.

2.6. The London Borough of Richmond upon Thames BAP (LBAP) was consulted for priority habitats and species subject to conservation action, to assist with the evaluation of ecological features and to inform site enhancement strategies.

Extended Phase I Habitat Survey

2.7. An 'extended' Phase I habitat survey was undertaken on 8th August 2018 by Sarah Richardson, an experienced field ecologist and graduate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The technique was based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species. The weather conditions for the survey were dry with 75% cloud cover, 24°C degrees and 2 on the Beaufort scale.

2.8. A second phase 1 habitat survey was undertaken on 14th January 2019 by Christian Cairns MSc a student member of CIEEM. This was undertaken in order to survey an extension to the original site boundary to the north to encompass the bus park. The weather conditions for the survey were sunny, cold and try, with 25% cloud cover and 6°C degrees and 2 on the Beaufort scale.

2.9. Using the above method, the site was classified into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described.

[2] UK priority species and habitats are those subject to conservation action and referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). They are listed at Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.

[3] https://magic.defra.gov.uk/MagicMap.aspx

Additionally, incidental records of fauna were also made during the survey and the habitats identified were evaluated for their potential to support legally protected and priority species.

Preliminary Bat Roost Assessment – Buildings & Trees

2.10. A preliminary assessment of the buildings and trees present within the site was undertaken to assess their potential to support roosting bats. This survey was undertaken alongside the 'extended' Phase 1 habitat survey. The surveys followed standard methodologies (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) which are described below.

2.11. The PBRA for buildings comprised an external and internal inspection of all buildings present on-site to assess their potential to support roosting bats. In summary, this required the following:

- A visual inspection of the exterior and interior of the buildings on site was undertaken on the 8th August 2018, examining features such as brickwork, lead flashing, and tiles for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine; and
- A number of factors were considered including the presence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.

2.12. The PBRA for trees comprised a ground level inspection of all trees present on-site to determine the potential of each tree to support roosting bats. During this survey, Potential Roost Features (PRFs) that may be used by bats, as identified within the BCT Good Practice Guidelines (Collins, 2016), were sought. These included the following:

- Woodpecker holes, rot holes, knot holes arising from naturally shed branches and man-made holes;
- Hazard beams and other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached platey bark;
- Cankers;
- Other hollows or cavities, including butt-rots;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bird, bat or dormouse boxes.

2.13. Evidence of the presence of bat roosts was also sought. These signs include:

- Bat droppings in, around or below a PRF;
- Odour emanating from a PRF;
- Audible squeaking at dusk or in warm weather; and
- Visible staining below a PRF.

2.14. The potential of each building or tree at the site and immediately adjacent to the site to support roosting bats has been categorised against the criteria described in Table 2.1.

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on-site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat.

Table 2.1 – Roost Assessment Criteria (adapted from Collins 2016).

Evaluation

2.15. The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2018). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the site boundary only.

2.16. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Quality Control

2.17. All ecologists at Tyler Grange LLP are members of CIEEM and abide by the Institute's Code of Professional Conduct.

Section 3: Ecological Features and Evaluation

Context

3.1. The site is an active retail site, comprised of a central building surrounded by hardstanding actively used by staff and members of the public. The site is accessible directly from Manor Road; B353 and contains serval trees and areas of marginal vegetation, hedgerows, amenity grassland and introduced shrub.

Figure 3.1. Aerial photography showing site boundary and surrounding landscape

3.2. The site is bordered by railway lines on the south and west boundary; Manor Road (the B353) on the east boundary and north boundary.

Protected Sites

Statutory Sites

3.3. There are two sites protected under the Conservation of Habitats and Species Regulations 2017 within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species: stag beetle *Lucanus cervus*. Given that the site is designated as a SAC, it is considered to be of **international importance**.

- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu,* which is listed as an Annex II species. Given that the site is designated as a SAC, it is considered to be of **international importance**.

3.4. There are two statutory protected sites within 2km of the site:

- Svon Park is located 1.7km north-west of the site and is designated a SSSI. Svon Park is

21.5ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is considered to be of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is considered to be of **local importance**.

3.5. The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 by local authorities. They are not necessarily of great ecological importance and are intended for public appreciation and enjoyment of wildlife. The LNR designation does not afford special protection, although LNRs are protected under legislation and planning policy.

Non-Statutory (Local) Sites

3.6. Non-statutory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:

- Sites of Metropolitan Importance
- Sites of Borough Importance (borough grade 1 and borough grade 2)
- Sites of Local Importance.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scare plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pesthouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scare and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km- South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scare and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail *Balea biplicata* and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scare plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: - Marsh sow-thistle *Sonchus palustris* - Cut-grass *Leersia oryzoides*.
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail *Balea biplicata* only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush *Bolboschoenus maritimus* and nationally rare invertebrates such as the, Thames/two-lipped door snail *Balia biplicata*.
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree *Juglans nigra*.

Table 3.1 – Non-Statutory Protected Sites within 2km of the site.

Habitats and Flora

3.7. The site supports the following habitats:

- Amenity Grassland;
- Buildings and Hardstanding;
- Dense Scrub;
- Ephemeral/Short Perennial;

- Introduced Shrub
- Scattered Broadleaved Trees
- Scattered Scrub; and,
- Tall Ruderal.

3.8. For ease of reference, habitat types have been described alphabetically, below. All the features described are shown on the 11778_P01b Habitat Features Plan.

Amenity Grassland

3.9. Several small areas of amenity grassland are present in the northern area of the site; along the north section of the eastern boundary, along the northern boundary and at the top of car parking areas (see Habitat Feature Plan 11778_P01b). The amenity grassland found throughout the site contains

species typical of this habitat type including annual meadow grass *Poa annua*, perennial rye grass *Lolium perenne*, geranium *Gernium sp.*, common ivy *Hedera helix*, common daisy *Bellis perennis*, dandelion *Taraxacum officinale* and thistle sp *Cirsium sp*. These areas are regularly mown producing a low sward. The amenity grassland is of low species diversity and comprises a heavily managed short sward and as such it is of **negligible ecological importance**.

Buildings and Hardstanding

3.10. Areas of hardstanding are present within the site in the form of tarmac roads and carparks in the north and south-west sections of the site (see Habitat Feature Plan 11778_P01b), large areas of concrete with large shelving units south of B1, and brick paths (see photograph 3.1). One strip of pavement along the western wall of B1 is broken by emergent vegetation consisting of willow herb *Epilobium hirsutum*, buddleia *Buddleja davidii* and dandelion. As hardstanding has no inherent ecological importance and the area in which there was emergent vegetation was so small, this habitat is of **negligible ecological importance**.

Photograph 3.1: Hardstanding in the west of the site.

3.11. One building (B1) was identified during the site visit which is located in the centre of the site. The building is a red brick construction with a tiled pitch roof. The roof has an extended overhang with wooden cladding around the rim. The building is surrounded by hardstanding.

3.12. The building with the site is generally in good repair given their active use, and as the buildings offer little to the biodiversity resource to the site they are considered to be of **negligible ecological importance**. The potential of the building to support roosting bats, along with photos of the buildings that were assessed for their potential to support roosting bats, are provided in Section 3; Fauna.

Dense Scrub

3.13. A small area of dense scrub is present in the south-west corner of the site between railway lines, comprising of bramble *Rubus fruticosus agg.*, common nettle *Urtica dioica*, buddleia, dandelion, common ivy and sycamore *Acer pseudoplatanus*.

3.14. A second small are of dense scrub was identified in the northern corner of the site, within the bus park area Species present included vetch, cocks' foot *Dactylis glomerata*, Yorkshire fog *Holcus lanatus*, cleavers, dandelion, common ivy, bluebell *Hyacinthoides non-scripta*, daffodil *Narcissus sp.*, bramble, geranium, buddleia, cherry laurel *Laurus nobilis*.

3.15. Given the small extent of these two areas, they are considered to be of **ecological importance within the context of the site only.**

Ephemeral/Short Perennial

3.16. One small area of ephemeral/short perennial habitat was identified within the north bus park area, adjacent to manor road. The area is composed of Annual meadow grass, yarrow *Achillea millefolium*, dandelion, red dead-nettle *Lamium purpureum*, herb-Robert *Geranium robertianum*, common ivy and cleavers *Galium aparine*. Given the small size of this area of habitat it is considered to be of **negligible ecological importance.**

Introduced Shrub

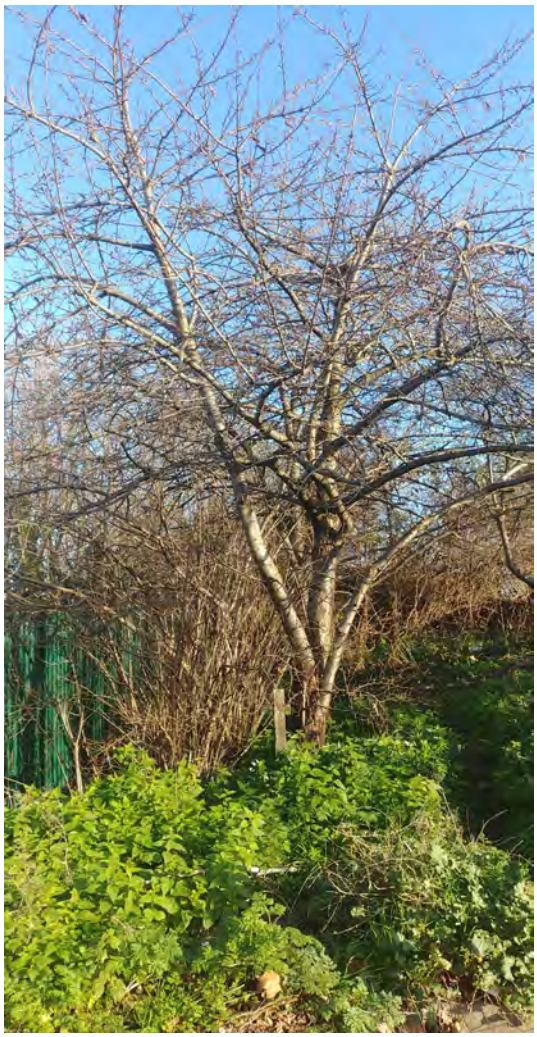
3.17. Several small areas of introduced shrub were identified on the site along the eastern boundary of the site, and small patch surrounded by hardstanding in the car park area. These patches comprised of ornamental non-native species cotoneaster *horizontalis*, buddleia and native cherry laurel. Given their small size and largely composed of non-native species, these habitat areas are considered to be of **negligible ecological importance.**

Scattered Broadleaved Trees

3.18. Within the site there are several planted, young to semi-mature tree species present; along the east boundary surrounded by amenity grassland, within the car park area planted between bays, in an area of introduced shrub to the west of car park and along the east boundary (see Photograph 3.2). The tree species are composed of *Prunus sp*. common lime *Tilia* × *europaea*, sycamore, and silver birch *Betula pendula.*

Photograph 3.2: Scattered broadleaved trees in the north of the site.

3.19. Two more areas of scattered trees were identified during the second phase 1 survey within the northern bus park area. Two small cherry trees *Prunus avium* within an area of ephemeral/short perennial and several scattered trees; namely hazel *Corylus avellane*, hawthorn *Crataegus monogyna* and cherry within the dense scrub in the most northerly area of the bus park (See Photograph 3.3).



Photograph 3.3: Scattered broad leaved trees within the dense scrub area.

Due to their age, position within the site and native species composition, this area of habitat is considered to be of **ecological importance within the context of the site only**.

Scattered Scrub

Several small areas of scattered scrub are present throughout the site; on the east site boundary between amenity grassland and introduced shrub and running along the west boundary fence parallel to the railway track a largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain *Plantago lanceolata* (See photograph 3.4). Given the small area present within the site and the largely non-native composition of the habitat, area of habitat is considered to be of **ecological importance within the context of the site only**.

Photograph 3.4: Scattered scrub along the east boundary

Tall Ruderal

3.17. One small patch of tall ruderal vegetation is present on the southern boundary of the site, consisting of elder *Sambucus nigra*, common ivy, bramble, common nettle and cleavers *Galium aparine*. Given the small area present within the site this area of habitat is considered to be of **ecological importance within the context of the site only**.

Target Notes

Target Note 1

3.18. Area of bare ground with piles of turf and grass clipping (see Habitat Feature Plan 11778_P01b). Potential refugia for reptiles and hedgehogs.

Target Note 2

3.19. Woody climbers along western fence boundary, parallel to the railway track (see Habitat Feature Plan 11778_P01b). Composed of elder, cotoneaster and common ivy.

Flora

3.20. One protected species of flora: bluebell was identified on site within the dense scrub in the north of the site.

Protected and Priority Fauna

Amphibians

3.21. Three records of great crested newt *Triturus cristatus* (GCN) were returned within 2km of the site, the most recent of which was recorded in 2017.

3.22. A desk study of available aerial photography was conducted finding two ponds within a 500m radius of the site. As both waterbodies are on privately owned land a Habitat Suitability Assessment[4] could not be conducted on these waterbodies at the time of this report.

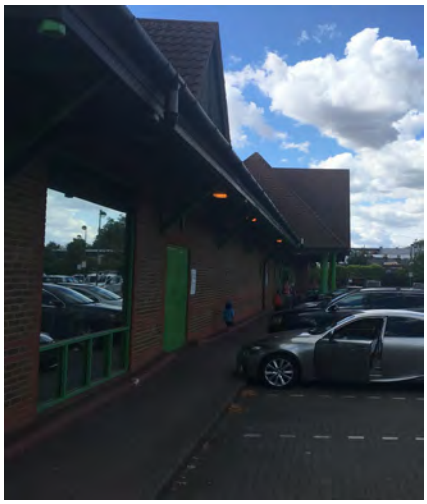
3.23. Terrestrial habitats at the site are considered to be largely unsuitable for GCN (predominantly hardstanding ground with small areas of amenity grassland, scattered scrub and introduced shrub). The areas of suitable habitat (scrub) are small and exhibit little to no connectivity with the wider landscape.

3.24. Due to the lack of suitable terrestrial habitat for GCN, lack of ponds or suitable waterbodies on or adjacent to the site and the presence of numerous land barriers; main roads, fenced gardens, buildings and between the site and the closest ponds, GCN are not considered to be a feature of the site.

Bats

3.25. Within 2km of the site, records of Brandt's bat *Myotis brandtii*, brown long-eared bat *Plecotus auratus*, common pipistrelle *Pipistrellus*, Daubenton's bat *Myotis daubentoniid*, lesser noctule *Nyctalus leisleri*, Nathusius' pipistrelle *Pipistrellus nathusii*, Natterer's bat *Myotis nattereri*, noctule bat *Nyctalus noctule*, serotine *Eptesicus serotinus*, soprano pipistrelle *Pipistrellus pygmaeus* and whiskered bat *Myotis mystacinus* were identified. The most recent of these was of a brown long-eared bat in 2017.

3.26. The building and trees within the site boundary were assessed for their potential to support roosting bats. The only building found on site; B1 is constructed of red brick with a corrugated clay tile roof. The roof is pitched with an extended overhang from the wall, with a wooden soffit box running around the length of the overhang (See Photograph 3.6).



Photograph 3.6: View of the building from the front, facing north.

[4] Habitat Index Assessment; HIS a quantitively method of determining a waterbodies suitability to support Great Crested Newts, using a combination of factors.

3.27. There is little cladding on the building itself, aside from the plastic 'Homebase' sign on the western wall, the building is well sealed and in good repair. No entry points or roost features were identified during the PBRA of the building. It is there for considered to have **negligible potential** for roosting bats.Bats are known to use railway corridors as commuting routes to and from feeding areas and roosts. While the site is well lit and does not offer suitable foraging habitat for bats, and therefore will only be used operatically. The vegetation along the southern boarder could act as a possible commuting corridor for access to site in the wider Borough area.

Badger

3.28. Within 2km of the site, 21 records of Badger *Meles meles* were returned the most recent from 2017.

3.29. No signs of badgers were identified on the site. The habitats on site are sub-optimal due to the large areas of hardstanding and only small areas of scattered scrub and tall ruderal vegetation. However, the is optimal habitat within the wider area such as the railway corridor along the south and west boundaries, allotments and woodland that are much more likely to be used by badgers, making them less likely to use the sub-optimal habitat found on site. Furthermore, the site is geographically isolated by railways running along the west and south site boundaries and roads to the north and east, making access to and use of the site by badgers unlikely. Therefore, badgers are not considered a feature of the site.

Birds

3.30. Records of birds within 2km of the site include species red listed species according to the Birds of Conservation Concern (BoCC) criteria[5], including redwing *Turdus iliacus,* house sparrow *Passer domesticus*, tree sparrow *Passer montanus,* starling *Sturnus vulgaris*¸ yellow wagtail *Motacilla flava*.

3.31. The site has limited potential to support breeding bird populations with most of the site being large areas of hardstanding. The habitats areas within the site listed above; scattered trees, scattered scrub, introduced shrub, dense scrub and tall ruderal along the west, east and south boundaries have potential to support small populations of common and widespread bird species.

3.32. Therefore, any populations of birds utilising the site are considered to be of **site importance only**.

Invertebrates

3.33. The data search showed records of several species of invertebrate listed SoPI listed in the NERC Act (2006) as including the Stag Beetle *Lucanus cervus* with 16 records. The stag beetle is a London BAP species and protected under

3.34. There is limited suitable habitat with diversity therefore a significant population of rare or notable invertebrate species would not be expected. As such the any invertebrate populations are likely to be of **negligible ecological importance.**

[5] The Bird Species of Conservation Concern (BoCC) categorises bird species into the following classifications:
* Red List species are bird species of high conservation concern, such as those whose population or range is rapidly declining, recently or historically, and those of global conservation concern.
* Amber List species are bird species of medium conservation concern, such as those whose population is in moderate decline, rare breeders, internationally important and localised species, and those of unfavourable conservation status in Europe.
* Green List species are bird species in the least critical group of conservation concern, such as those that occur regularly in the UK but do not qualify under any of the above criteria.

West European Hedgehog

3.35. A total of 288 records of West European Hedgehog *Erinaceus europaeus* were identified within 2km of the site, the most recent of which was recorded in 2017.

3.36. The hedgehog is listed An SoPI and a priority species under the Richmond Biodiversity Action Plan (BAP).

3.37. One area (see habitat plan 11778_P01b; Target note 1) of grass piles in the south- west corner of the site could potentially be used by hedgehogs as a hibernaculum during hibernation, however this is the only suitable area within and around the site. Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of **site importance**.

Reptiles

3.38. There are records for grass snake *Natrix* and Viviparious lizard *Zootoca vivipara* within 2km of the site. The most recent of which was of a grass snake in 2012.

3.39. There are some limited areas of habitat onsite suitable for reptile species. This comprises marginal vegetation in the south of the site and one area with suitable hibernacula a grass piles in the south-west corner of the site (see habitat plan 11778_P01b; Target note 1) and the dense scrub in the northern section of the site. 01bGiven the urban nature of the site and the limited extent of potentially suitable habitat for reptiles onsite, any population present is likely to be small and comprise common and widespread species.

Other species

3.40. No records of hazel dormouse *Muscardinus avellanarius* were returned from the data search. Hazel dormice are arboreal and generally require a well-connected and diverse habitat structure (Bright *et al*., 2006), such as that found in deciduous woodland, species-rich hedgerows and scrub. Given that there are no areas of potentially suitable habitat for hazel dormouse, it is considered that hazel dormouse is highly likely to be absent from the site and as such are not considered further within this report.

3.41. No records of European otter *Lutra lutra*, water vole *Arvicola amphibius* and white-clawed crayfish *Austropotamobius pallipes* were returned by the data search from within 2km of the site. There is no suitable habitat on site to support these species therefore they are not considered features of the site.

Invasive species

3.42. Invasive species are those listed under Schedule 9 of the Wildlife and Countryside Act 1981. With regard to invasive plant species (listed under Part II of Schedule 9), it is an offence to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9.

3.43. One invasive species; Cotoneaster was identified during the PEA of the site. Cotoneaster is an (INNS) Category 2 species; requiring concerted control management and eradication as it is a high impact or presents a concern in the London area.

Section 4: Considerations in Respect of Future Development

Proposed Development

4.1. The masterplan for the site will require the demolition of the existing buildings and redevelopment of the site. The scheme comprises four new buildings between four and nine stories in height, providing retail unit (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

4.2. The potential impacts with respect to development of the site are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 1**.

Protected Sites

4.3. Within 10km of the site boundary there are two sites protected under European designation; these are as follows:

- Richmond Park (SAC, NNR, SSSI), 0.5km south of the site, 846.6Ha in size; and
- Wimbledon Common (SAC, SSSI), 4.2km south-east of the site, 350Ha in size.

4.4. These statutory designated sites are separated from the site by buildings; residential and businesses, roads, hardstanding and areas of green space, and as such no direct impacts are anticipated. Two potential indirect impacts of development on these protected sites have been identified; increase in air pollution and increased recreational pressure.

4.5. In terms of potential impacts through increased air pollution, the scheme involves the removal of 150 car parking spaces from the existing site. The masterplan includes for 20 car parking spaces for the mobility impaired, but will otherwise be car free. As such, traffic levels and associated air pollutants resulting from the development of the site are likely to decrease. Potential adverse effects on these sites through a reduction in air quality are therefore considered to be unlikely.

4.6. As urban green spaces, both SAC's are managed to accommodate heavy recreational use, as stated the management plans for both sites: a strategy for Wimbledon and Putney Common (2017) and Richmond Park Management Plan (2014). In addition, both sites are primarily designated for supporting populations of stag beetles, which require dead wood to subsist on a site which is largely unaffected by recreational pressure. Wimbledon Common is also designated for supporting several areas of heathland habitats which can be affected by recreational use. However, as Wimbledon common is 4.4km away from the site and it is managed to accommodate recreational use, adverse effects are considered unlikely.

4.7. Within 2km of the site boundary there are two sites of national designation they are as follows;

- Svon Park (SSSI), 1.7km north-west of the site, 21.5Ha in size; and
- Isleworth Ait (SSSI), 2km west of the site, 3.46Ha in size.

4.8. These sites are not directly adjacent to the site boundary and geographically isolated by buildings, greenspace, hardstanding and roads. Therefore, the proposed development is not considered to have any direct or indirect impacts on the site and no specific mitigation is required.

4.9. Within 2km of the site boundary there are 16 non-statutory sites as discussed in **Section 3**;

4.10. None of the non-statutory sites border the site, the closest of which; Kew Botanic Gardens is 0.5km north-west of the site boundary therefore it is highly unlikely that any direct impacts on any of the sites will occur. Indirect increased recreation pressure upon the sites can be mitigated by the incorporation of multi-functional green space within the site boundary, furthermore several of the sites close to the site boundary are already managed for recreational purposes and are readily publicly accessible, therefore it is highly unlikely any indirect effects will occur.

Habitats and Flora

4.11. As per the A3004 Manor Road GLA per-app document 1, it is likely that the majority of existing habitats on site will be lost to the development. However, all habitats identified are of negligible or site ecological importance only, therefore the legislation is not triggered, and no specific mitigation is required. Consideration should be given to retaining and enhancing the boundary trees and scrub within the development if possible.

4.12. In addition, in line with the NPPF and the Borough of Richmond Local Plan there is a significant opportunity for biodiversity gain on the site, thought the inclusion of new opportunities for specific species groups and the planting of native flora.

Invasive flora

4.13. The site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2, this may require an invasive species specialist to be properly removed from the site to avoid spreading the species during site clearance.

Fauna

Birds

4.14. In England and Wales, birds and their nest are protected under the Wildlife and Countryside Act (1981) (as amended).

4.15. The site has the potential to support nesting and foraging birds within the scattered trees, tall ruderal and dense scrub vegetation present on site. As such any vegetation clearance occurring during breeding bird season between (March - August); a pre-works check of the proposed removed vegetation should be undertaken Ecological Clerk of Works (ECoW) to determine if any nesting birds are present. Should any active nests be discovered contain either eggs or chicks the nest must be retained and buffered until an ECoW has confirmed the chick have fledged.

4.16. Furthermore, the habitat on site provides an opportunity for a biodiversity gain by improving the habitats suitable for breeding birds; scattered scrub, scattered trees, tall ruderal and dense scrub. Bird boxes along tree lines could be provides encouraging species to the site and providing a net biodiversity gain.

Bats

4.17. In England and Wales, bats and their roost are fully protected un the Wildlife and Countryside Act (1981) (as amended).

4.18. While the site has limited potential to support roosting bats it maybe be used by commuting and opportunistic foraging bats. While the habitats present on site itself are not suitable for foraging

bats, the railway corridor along the west and south of the site boundary provides opportunity for commuting bats. Lighting at the site during the construction and operation phases of the development should be sympathetic to bats that may be utilising the trees boundaries of the site for commuting and foraging activity. Any lightning for the proposed development should be designed to minimise disturbance to bats (e.g. through the use of timers, provision of low-level bollard lighting, use of hoods or cowls on lights, and provision of warm-white LED lighting – Collins, 2016; Institute of Lighting Professionals and BCT, 2018).

Reptiles

4.19. Common reptile species in the UK are afforded some protection under the WCA 1981 (as amended). All common reptile species (slow worm *Anguis fragilis*, grass snake, viviparous lizard and adder *Vipera berus*) are SoPI.

4.20. As the amount of suitable habitat on site is limited in extent, habitat manipulation should be undertaken within the active season for reptiles (which is between mid-March and October inclusive) to encourage them to leave the development area and prevent them being killed or injured during construction. Habitat manipulation should be directional, moving from south to north, thus displacing the reptiles in the direction of suitable habitat to the west and north, along the railway corridor and allowing them to disperse to other areas of more suitable habitat within this corridor.

4.21. In the first instance, the area of scrub (if it is to be removed) should be reduced to 200mm in height. Vegetation will be cleared using hand tools (such as strimmers and brushcutters or hand-held shears). This should be completed under the supervision of an ecologist. Any hedgerows and trees affected should be felled using hand tools, and tree stumps/ root systems left in-situ until after mid-March to avoid impacting hibernating reptiles.

4.22. Following the completion of the first phase, the vegetation should then be cut back to ground level at least one week after completion of the first phase. A destructive search of the area can then be carried out under the supervision of an ecologist to ensure that any remaining reptiles are removed from the area, placed in a container and moved to an area of retained suitable habitat or the offsite area of suitable habitat.

4.23. No ground works should be undertaken in the area until the habitat manipulation exercise is complete. The vegetation in the construction footprint should then be regularly strimmed to ensure that the sward is kept below 150mm and remains unsuitable for reptiles during development works.

4.24. The timings of the works should also take into consideration the recommendations previously with respect to breeding birds and hedgehogs, which recommends that any clearance of vegetation suitable for breeding birds should be undertaken outside of the bird nesting season i.e. between September and February or if undertaken in the presence of an ECoW The habitats on the site that are suitable for breeding birds are scattered trees, dense scrub, scattered scrub and tall ruderal. The clearance of these habitats should not impact hibernating reptiles if carried out between February and mid-March, providing the recommendations set out below are followed.

West European Hedgehog

4.25. In England and Wales, hedgehogs are listed as a SoPI under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

4.26. As the site has potential habitat to support hedgehogs and there are 288 records from within 2km any potential habitat that might be used by hedgehogs should be retained where possible.

However, if suitable habitat is removed it should be done so outside of the hibernation period (October to April). If removal is necessary within this period, a hand search should be undertaken by an ECoW before works take place. Should any hedgehogs be found during habitat removal or construction they should be removed by and from the site and place in suitable similar habitat to where they were found.

4.27. Within the area of the site habitats identified as suitable for hedgehogs should be retained and enhanced with native and local stock of plant species where possible. In regards, to hedgehogs the site can be enhanced to benefit them, by improving the scattered scrub and tall ruderal habitats. Features could also be provided to enhancing and improve hedgehog use of the site, the inclusion of a hedgehog highways; small holes in the site boundary fencing that would all for connectivity of on-site habitats to the wider landscape and hedgehog boxes, would do this.

Ecological Design Principles and Enhancement Opportunities

4.28. The National Planning Policy Framework (NPPF) encourages development to provide net gains in biodiversity where possible. Therefore, an effort has been made through the design process to provide ecological enhancement with the aim of delivering an overall increase in biodiversity of the site. This would also be in-line with the Policies LP15 and LP17 (Biodiversity) of the Local plan as well as the Richmond BAP.

4.29. Considering the relevant policies, summarised above, the proposed development complies with these policies through adopting relevant principles that have been incorporated into the design as the scheme has evolved. These are summarised below:

- Creation of green infrastructure within the development, which can be multi-functional, delivering biodiversity, and drainage benefits;
- Retention of existing habitats where possible, including the dense scrub in the south-west and north of the site and the linear vegetation adjacent to the railway corridors that abut the site;
- Planting of native flora/species of known benefit to wildlife as part of newly created habitats. This includes shrubs, trees, grasses and forb species;
- Inclusion of brown; sedum roofs and terrace gardens as per A3004 Manor Road GLA per-app document 1, to increase areas of accessible green space and provide a net gain in habitats on site post-development;

4.30. Additional measures are proposed to be included as part of detailed design that will provide biodiversity enhancement. These should be controlled though appropriately worded planning conditions and are summarised below:

- Placement of bug hotels within terrace gardens, sedum roofs and newly created habitats, and the inclusion of bee bricks within suitable brick walls, across the site to encourage insects to the site;
- Sensitive lighting design along south and west rail corridors to avoid disturbance of commuting bats along the south and west site boundaries;
- Integration of hedgehog boxes into suitable pre-existing or newly created habitat to facilitate and encourage hedgehog use of the site, and;
- Addition of bird and bat boxes across the site to improve nesting roosting opportunities; Swift boxes on high-rise buildings, bird boxes on lower buildings and on newly planted or retained

buildings and box boxes on south facing walls of buildings facing the potential bat corridor on along the southern boundary of the site.

Further work

4.31. Although no further surveys are required to inform the planning application, as is detailed by ODPM Circular 06/05 and BS 42020:2013 'Biodiversity – Code of practice for planning and development', it will be necessary to undertake precautionary checks to confirm whether legally protected and/or priority species would be affected by proposed development of the site. These surveys are summarised below.

- **Nesting Birds (pre-works check):** If building demolition or vegetation/tree removal is to occur between March-August, a pre-works check by an ECoW should be undertaken to determine whether active birds' nests are present. If nest(s) are present, no nests, eggs or young should be destroyed and an appropriate buffer must be instated until the chicks have been confirmed as fledged by an ECoW.

- **Hedgehogs (pre-works check):** If vegetation removal occurs on the site, a pre-works check by an ECoW should be undertaken to determine if any hedgehog are active on the site. If found, they will be removed by hand to a predetermined off-site location with similar and suitable habitat to that in which they were found.

- **Reptiles (precautionary staged vegetation removal):** If scrub removal occurs on site, the habitat should be manipulated ass outlined in the method described above.

Section 5: Conclusions

5.1. No ecological issues that could affect the principle of development of the site have been identified. Those important ecological features that exist, or could exist, at the site have been accommodated through the adoption of simple design principles as described in paragraph 4.29. The potential to improve the biodiversity of the site also exists, and recommendations are made that should contribute to local BAP targets as described in paragraph 4.30 which can be secured through appropriately worded planning conditions.

5.2. In conclusion, the proposed development would accord with the NPPF and Policies LP15 and LP17 of the London Borough of Richmond Upon Thames Local Plan. The aim of which is to protect and enhance existing ecological features and provide a net gain in biodiversity.

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Appendix 1: Legislation and Planning Policy

Appendix 1: Legislation and Planning Policy

Legislative Context

A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Hedgerows Regulations 1997;
- The Protection of Badgers Act 1992;
- The Natural Environment and Rural Communities Act (NERC) 2006; and
- The Wild Mammals (Protection) Act 1996.

A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).

A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

A1.5. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.6. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance (SoPI/HoPI) for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2018

A1.7. The National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A1.8. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

A1.9. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.

A1.10. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A1.11. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A1.12. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A1.13. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons58 and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."

A1.14. As stated in paragraph 176 the following should be given the same protection as habitats sites:

a) "potential Special Protection Areas and possible Special Areas of Conservation;
b) listed or proposed Ramsar sites; and
c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A1.15. Paragraph 177 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A1.16. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.17. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.18. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.

A1.19. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

London Borough of Richmond Upon Thames Local Plan (2018)

A1.20. The Local Plan sets out strategic policies relating to the development of land use in Richmond Borough and development proposals for the strategic sites identified within it. The local plan sets out to guide new development within the Borough for the period up until 2033. The following policies relate to biodiversity and are therefore applicable to this site:

A1.21. Policy LP 9

Floodlighting

Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions. The following criteria will be taken into account when assessing floodlighting:

1. *the impacts on local character or historic integrity;*

2. *the impacts on amenity and living conditions;*

3. *the impacts on biodiversity and wildlife;*

4. *the benefits and impacts of the provision of floodlighting on the wider community;*

5. *the benefits and effects on the use and viability of the facility;*

6. *that it meets an identified need as set out within the council's playing pitch strategy;*

Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts.

A1.22. Policy LP 15

Biodiversity

A.The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. *protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;*

2. *supporting enhancements to biodiversity;*

3. *incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;*

4. *ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;*

5. *enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and 6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.*

B. Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

1. *firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),*

2. *secondly be adequately mitigated; or*

3. *as a last resort, appropriately compensated for.*

A1.23. Policy LP 17

Green roofs and walls

Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

Biodiversity Actions Plans

A1.24. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species agreed under the UK BAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been superseded, Species Action Plans (SAPs) and Habitat Action Plans (HAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.25. Most areas now possess a Local BAP (LBAP) to complement the national strategy where priority habitats and species are identified, and targets set for their conservation. BAP's are the key nature conservation initiative in the UK, working at national, regional and local levels.

A1.26. The London Borough of Richmond Upon Thames Biodiversity Action Plan was updated and re launched in 2017. It was prepared through the Richmond Biodiversity Partnership and sets out conservation targets and contains action plans for various priority habitats and species in Richmond Borough area.

Plans

Habitat Features Plan
11778_P01b

- Site Boundary
- Building
- Hardstanding
- Bare Ground
- Amenity Grassland
- Dense Scrub
- Ephemeral /Short Perennial
- Introduced Scrub
- Scattered Broad Leaved Trees
- Scattered Scrub
- Tall Ruderal
- Wall
- Fence
- Target Note

N

0 50 m

Project	Homebase North Sheen
Drawing Title	**Habitat Features Plan**
Scale	As Shown (Approximate)
Drawing No.	11778/P01b
Date	January 2019
Checked	CC

Tyler Grange

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Appendix IV
The GLA's EIA Scoping Opinion dated 8th November 2019

GREATER**LONDON**AUTHORITY

Rachel Crick
GVA
65 Gresham Street
London
EC2V 7NQ

Department: Planning
Your reference:
Our reference: GLA/4795/LB
Date: 8 November 2019

Dear Rachel Crick

Town & Country Planning Act 1990 (as amended); Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 (As Amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008
Environmental Impact Assessment updated Screening Opinion

TAKE NOTICE that the Greater London Authority, as Local Planning Authority (pursuant to the Mayor's direction) under the above legislation, hereby determines that:

AN ENVIRONMENTAL IMPACT ASSESSMENT IS NOT REQUIRED

At: Homebase, 84 Manor Road, North Sheen, London TW9 1YB

The plans accompanying this application are:

- Environmental Impact Assessment (EIA) Screening Report dated October 2019 prepared by Avison Young.

The reasons for this decision are as follows:

CONSIDERATIONS

Relevant legislation and guidance

- Greater London Authority Act 2007 & the Mayor of London Order 2008
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended) (the 'Regulations');

- National Planning Policy Guidance for Environmental Impact Assessments published 15 March 2019

Description of the existing site

The site is located in North Sheen on Manor Road in the London Borough of Richmond upon Thames, approximately 1 kilometre to north east of Richmond town centre. The site is 1.5 hectares in size and bounded by railway lines (mainline, underground and overground lines) to the north and south. The east of the site is bounded by Manor Road. North Sheen Bus Terminus is located within the site at its northernmost end. The site contains a single storey building with high ratio of associated parking and is currently in retail use (occupied by Homebase and Pets at Home).

Access to the site is off Manor Road with a dedicated access point to the north for vehicles, serving the car parking and the bus terminus, and one for pedestrians nearer the store entrance to the south. The surrounding area comprises a mix of uses, mainly being residential but also the Sainsbury's superstore to the east, North Sheen Bus Terminus to the north and commercial premises.

Description of the proposals

Development comprises demolition of existing buildings and structures and comprehensive residential-led redevelopment of a single storey pavilion, basements and four buildings of between four and eleven storeys to provide 439 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works.

The Regulations

The Regulations apply to two separate lists of development project. 'Schedule 1 development' for which the carrying out of an Environmental Impact Assessment (EIA) is mandatory and 'Schedule 2 development' which require the carrying out of an EIA if the particular project is considered likely to give rise to significant effects on the environment.

The development described in the documentation submitted is not considered to be of a description identified in Schedule 1 of the regulations.

The development described in the documentation is considered to be of a description identified in column 1 of the Schedule 2 of the Regulations, where:
(a) any part of that development is to be carried out in a sensitive area; or
(b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;
"Sensitive area" means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and
- Countryside Act 1981;
- a National Park ;
- the Broads(c);
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(d);
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The development described in this report is deemed to fall within the description of 'infrastructure projects' and more specifically 'urban development projects' (paragraph 10(b)).

The site identified in the plan accompanying the screening opinion request is not considered to be in or partly in a sensitive area as defined in the Regulations.

As a development falling within the description of an urban development project does not fall in or partly within a sensitive area, the relevant threshold and criteria in column 2 of Schedule 2 of the Regulations have been applied:

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

The site is of 1.5 hectares and the proposals comprises more than 150 residential units. The proposal is therefore Schedule 2 development.

The GLA as the local planning authority for the purposes of determining this application as prescribed by the Greater London Authority Act 2008 has rescreened the application under the provisions of the relevant legislation stated above. Where a local planning authority has to decide whether Schedule 2 development is EIA development the authority must take into account in making that decision such of the selection criteria set out in Schedule 3 of the Regulations as are relevant to the development. The selection criteria for screening Schedule 2 developments identified in Schedule 3 are as follows:

<u>Characteristics of development</u>

1. The characteristics of development must be considered with particular regard to—
(a) the size and design of the whole development;
(b) cumulation with other existing development and/or approved development;
(c) the use of natural resources, in particular land, soil, water and biodiversity;
(d) the production of waste;

(e) pollution and nuisances;
(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
(g) the risks to human health (for example, due to water contamination or air pollution).

Location of development

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—
(a) the existing and approved land use;
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
(c) the absorption capacity of the natural environment, paying particular attention to the following areas—
(i) wetlands, riparian areas, river mouths;
(ii) coastal zones and the marine environment;
(iii) mountain and forest areas;
(iv) nature reserves and parks;
(v) European sites and other areas classified or protected under national legislation;
(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
(vii) densely populated areas;
(viii) landscapes and sites of historical, cultural or archaeological significance.

Types and characteristics of the potential impacts

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
(b) the nature of the impact;
(c) the transboundary nature of the impact;
(d) the intensity and complexity of the impact;
(e) the probability of the impact;
(f) the expected onset, duration, frequency and reversibility of the impact;
(g) the cumulation of the impact with the impact of other existing and/or approved development;
(h) the possibility of effectively reducing the impact.

The National Planning Policy Guidance sets out indicative criteria and thresholds for Schedule 2 EIA developments:

Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

On sites which have not previously been intensively developed:
(i) area of the scheme is more than 5 hectares; or
(ii) it would provide a total of more than 10,000 m2 of new commercial floorspace; or
(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

The proposals do not exceed any of the above thresholds. Each proposal should be assessed on its own circumstance.

The proposal is considered and evaluated against these criteria, as far as they are relevant, below. For avoidance of doubt this report does not consider the planning merits of the proposed development. Instead it deals solely with determining whether there is a need for an Environment Statement to be submitted with a subsequent application to carry out development of the nature set out in the information submitted. An Environmental Statement will need to accompany an application where a development is likely to give rise to significant effects on the environment in the sense intended by the Regulations.

SCREENING OPINION

Assessment of the development against the criteria found in Schedule 3 of the Regulations

The development described in the information submitted comprises the demolition of all existing buildings on the site and the construction of up to 439 residential units (Use Class C3) and 450 sq.m. commercial uses (Use Classes A1, A2, A3, D2, B1) along with provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

The site comprises 1.5 hectares of previously developed land in a built-up area with a mixture of uses. The land does not fall within or partially within a sensitive area as defined in the Regulations.

It is recognised that the whole of the London Borough of Richmond-upon-Thames (and therefore the site of the proposal) has been designated as an Air Quality Management Area. However, it is not considered that a proposal of the nature put forward would be likely to have a significant effect on air quality. The site does not fall within any of the other 'areas' identified under paragraph 2 (c) of schedule 3 of the Regulations.

The nature of the proposal is not deemed to be such that it would result in a use of natural resources or produce a level of waste, pollution or risk of accidents that would be likely to result in a significant effect on the environment, in the sense intended by the Regulations, in this regard.

The key likely potential environmental effects of a development of the nature proposed are considered to arise from:

- The cumulative impact alongside other developments in the locality;
- The impact of demolition and construction works on the amenities of neighbouring occupiers in terms of noise, air quality and vehicle movements;
- The design, size, height and scale of the built form proposed and the impact of the proposal on the amenities of neighbouring occupiers and other users;
- The density and amount of development proposed;
- Townscape and heritage impacts;
- Use of natural resources; production of waste; and pollution and nuisances;
- The parking and traffic implications of the development; and
- Social infrastructure.

Each of these points is therefore considered in greater detail below.

<u>The cumulative impact alongside other developments in the locality</u>

Committed developments (developments with planning permission and under construction/complete) in this area are listed below:

1. **Richmond College - 15/3038/OUT** – approved. Redevelopment of the site to provide a replacement campus for education and enterprise purposes, and a new residential development of up to 180 units together with associated parking, open space and landscaping.

The following developments are still pending decision by Richmond Council:

2. **Stag Brewery redevelopment** – Redevelopment to provide secondary school with sixth form; 443 residential apartments; 150 units of either assisted living or residential; 224 unit care / nursing home; flexible commercial uses, community and leisure; and hotel, cinema, gym and office floorspace; and associated parking;
3. **Kew Biothane Plant, Melliss Avenue, Kew** - Redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 89 units, communal healthcare, therapy, leisure and social facilities, provision of car and cycle parking, associated landscaping and publicly accessible amenity including a children's play area; and

There are considered to be no other major committed developments in the vicinity of the site that could lead to cumulative impacts with the proposed development.

<u>The impact of demolition and construction works on the amenities of neighbouring occupiers in terms of noise, air quality and vehicle movements</u>

The proposed development is expected to result in environmental impacts and have some impact on the amenities of neighbouring occupiers in the locality of the development site in terms of noise, air quality and vehicle movements during the demolition and construction phase of the development. However, it is considered that this can be planned, programmed and controlled and any planning application submitted would need to be ensure it carefully addressed mitigation of potential impacts.

Whilst assessing the impacts as part of this screening does not diminish the substantial effects possible from a development of this scale, these are not considered to be significant enough to be of more than local importance when considered in the context of the Regulations.

The design, size, height and scale of the built form proposed and the impact of the proposal on the amenities of neighbouring occupiers and other users

It is recognised that the scheme by nature of its design, size, height and scale is likely to result in environmental, microclimate and visual impact on neighbouring occupiers in the locality of the development site and any future users of the site and surroundings. Any planning application submitted would need to be ensure such matters were carefully addressed.

Whilst assessing the impacts as part of this screening does not diminish the substantial effects possible from a development of this scale, these impacts are not considered to be significant enough to be of more than local importance when considered in the context of the Regulations.

The density and amount of development proposed

The submitted screening report indicates that the density of residential development proposed would equate to 292 dwellings per hectare (based on 439 units and a site area of 1.5 hectares).

The public transport accessibility of the site (PTAL) is 5. the site could be considered to have an urban or suburban context. Given the proximity of the site to the North Sheen train station, and in light of its varying context and PTAL, it is expected that the site should be optimised, with a high density.

The residential density is an important matter in terms of assessing the acceptability of the proposal against planning policy, and an excessively dense scheme could result in substantial issues (such as the provision of inadequate amenities for future occupiers), it is not considered that the magnitude, extent of complexity of this impact is such that it would result in significant effect on the environment, in the sense intended by the Regulations.

Townscape and heritage impacts

The site is not within a conservation area nor does it contain any statutory of non-statutory listed buildings. The Site is not subject to any statutorily or locally protected view. The site is not considered to be archaeologically sensitive.

The applicant has set out the potential heritage assets within the Zone of Theoretical Visibility (ZTV). This demonstrates that the scheme is of a size that could affect the townscape and historic environment, however this is not deemed to be of a scale that would give rise to significant environmental effects when considered under the Regulations.

Use of natural resources; production of waste; and pollution and nuisances

The proposed development does not contain any hazardous or contaminative land uses, although there could be some land contamination associated with historic uses on the site. It does have the potential to result in impact on effects of production of waste, pollution and nuisances from traffic generation and the plant (heating and power) when in operation. The site is within Flood Zone 1 and the development is not considered likely to cause significant adverse impact that cannot be mitigated.

The amount of development proposed would be substantial, resulting in new infrastructure and impacting on existing infrastructure. The development would be futureproofed in the event of a district heat network being implemented in the area, and whilst the development would give rise to the use of natural resources, creation of waste, pollution and noise, this is not expected to be of a magnitude, extent or complexity that it would result in significant effect on the environment when considered in the context of the Regulations.

The parking and traffic implementations of the development

The proposed development has the potential to impact on the road network during the construction. This can be planned, programmed and controlled in line with a Construction Traffic Logistics Plan, which would be required as part of any planning application. The development is car free with the exception of 12 blue badge parking spaces. As such, it is not considered the completed development would have a significant impact on the local road network.

Any planning application submitted would need to ensure it carefully addresses the transport, traffic and parking issues raised by the proposal put forward. Whilst it cannot be assessed at this stage if the proposal is acceptable in these regards, it is not considered that the transport, traffic and parking impacts of the development of the nature proposed would be more than localised in nature, or of a magnitude, extent or complexity that they would have a significant impact on the environment in the sense intended by the Regulations.

Social infrastructure

The proposed development has the potential to impact on core social infrastructure as a result of the additional 439 dwellings. The applicant has set out the current situation with regards to school and GP places in the EIA screening report which demonstrates there is sufficient capacity. When considering the potential impacts of the proposals in light of the Regulations, they are considered to not have a significant or wide ranging impact in this regard.

Documents and mitigation measures to accompany any application

Although it is not determinative in assessing whether the proposal would have a significant effect on the environment, any application made would need to be accompanied by an appropriate suite of technical documents that clearly set out the proposal put forward and enable its full assessment against all relevant planning policies. This would be likely to include the following documents:

- Draft CEMP
- Draft CTLP
- Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan)
- Townscape and Visual Assessment
- Heritage Statement
- Preliminary Ecology Appraisal
- Phase 1 Contamination Assessment (including for a UXO Risk Assessment)
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment
- Assessment and Remediation Strategy
- FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy)
- Air Quality Assessment
- Noise and Vibration Assessment
- Desk-Based Wind Microclimate Assessment
- Daylight, Sunlight and Overshadowing Assessment
- Lighting Strategy
- Operational Waste Management Plan
- Sustainability Statement

Conclusion

The above analysis evaluates the proposal in terms of the characteristics of development, location of development and the characteristics of the potential impacts of the proposal. For the reasons identified it is concluded that in each of these respects and taken in totality the proposal would not be likely to give rise to significant effects on the environment in the sense intended by the Regulations, despite the scheme's potential to conflict with several aspects of planning policy without potential mitigation to be discussed during the application.

Decision: negative screening opinion
Date of opinion: 2019

Yours sincerely

John Finlayson

John Finlayson
Head of Development Management