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Appendix A-1: Scoping Report – Submitted on 27<sup>th</sup> April 2010



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TWICKENHAM STATION

EIA SCOPING REPORT

prepared for: Solum Regeneration

27.04.2010

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## 1.0 INTRODUCTION

- 1.1 This Environmental Impact Assessment Scoping Report has been prepared on behalf of Solum Regeneration in respect of the redevelopment of Twickenham Station in the London Borough of Richmond upon Thames. The location of the site and redline boundary is shown in Figure 1.
- 1.2 The development will comprise a residential led redevelopment of the site to provide up to 170 dwellings, a new transport interchange, commercial units, landscaping and open space provision.

### *REQUIREMENTS OF AN ENVIRONMENTAL IMPACT ASSESSMENT*

- 1.3 The Environmental Impact Assessment (EIA) process is the mechanism by which development proposals are appraised in terms of environmental and socio-economic criteria, in addition to the engineering and technical considerations. The EIA process defines the context of the proposed development and examines the issues considered significant.
- 1.4 The purpose of the EIA is to establish the nature of development, to identify likely 'significant effects' that may arise, by comparing the existing situation (baseline) with the situation once the proposals are in place. The significance of effects during construction will also be considered. The document produced as a result of the EIA process is the Environmental Statement (ES).
- 1.5 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 require that any proposed development falling within the description of a 'Schedule 2 development' within the meaning of the Regulations, is required to be subject to an Environmental Impact Assessment where such development is anticipated to have 'significant' effects on the environment by virtue of such factors as its nature, size or location (Regulation 2(b)). As confirmed by the London Borough of Richmond upon Thames' screening opinion the proposed development is considered to fall within Schedule 2 Section 10 (b) with respect to Infrastructure Projects. Part 10 (b) states; "*(b) Urban development projects, including the construction of shopping centres and car parks, sports stadium, leisure centres and multiplex cinemas*"
- 1.6 The relevant EIA threshold for an 'urban development' project is where "the area of the development exceeds 0.5 hectares". In considering if Schedule 2 development requires an EIA the following criteria are important (as discussed in Schedule 3 of the Regulations):
- The characteristics of the development
  - The environmental sensitivity of the location
  - The characteristics of the potential impacts
  - If the development is in, or partially in, a 'sensitive area' e.g. an Area of Outstanding Natural Beauty or Site of Special Scientific

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1.7 Having taken into account the selection criteria in Schedule 3, the London Borough of Richmond upon Thames' screening direction (letter dated 30th March 2010) believes the development could have significant effects on the environment due to the size of development (being significantly greater in scale than the existing or previous use of the land), with regard to the following:

- Visual Impact
- Transportation impact - Rail and Bus Services, Traffic Generation
- Air Quality and Noise Pollution
- Land Contamination
- Wildlife Corridor/Habitat Impacts
- Cumulative impact with other development proposed within the surrounding area

*PURPOSE OF THE SCOPING REPORT*

1.8 The primary purpose of scoping is to achieve a consensus of opinion over potentially significant environmental impacts and the content of the ES. The issues are presented as a scoping report, which is undertaken in order to ensure a thorough assessment. Regulation 10 of the EIA Regulations details the requirements in gaining a scoping opinion from the Local Planning Authority.

1.9 This scoping report sets out the framework within which the ES will be produced including topic areas and information that will be contained within the ES. Through the local authority, Statutory Consultees are invited to express their views on the proposed scope of the EIA, and/or suggest additional issues which may be considered to be of significance.

1.10 In terms of the context of this report:

- **Section 2** describes in broad terms, the nature of the proposals
- **Section 3** sets out, under a series of headings, the key issues which the EIA will address
- **Section 4** details potential key issues
- **Section 5** details the non significant issues
- **Section 6** identifies the proposed structure of the Environmental Statement
- **Section 7** identifies the statutory consultees and other parties which will be consulted concerning the Environmental Statement

## 2.0 DEVELOPMENT PROPOSALS

### *BROAD SITE DESCRIPTION*

- 2.1 The site area is approximately 0.6 hectares (ha) and is located to the north of Twickenham Town Centre at National Grid Reference TQ 161 738. The site is designated for redevelopment within the Local Plan and Core Strategy and is shown as Site T17 on the current Proposals Map. The site is outlined in red below.

Figure 1 – Site Location



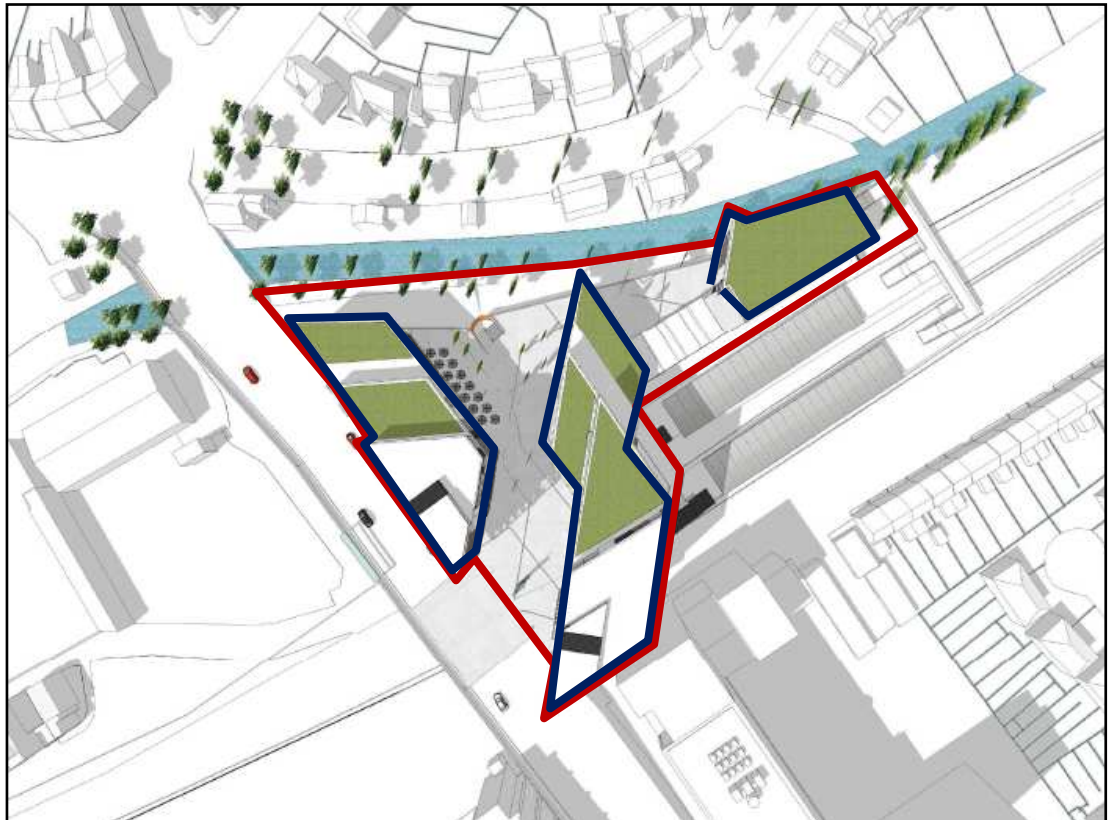
- 2.2 The site is occupied by Twickenham Railway Station, with the ticket office located to the west of the site and car parking occupying the northern part. The ticket office fronts onto London Road to the west and is single storey at road level. There are approximately 48 car parking spaces. Twickenham Station occupies an important location in the town, strategically situated to serve the town centre and Stadium.
- 2.3 The site is bounded by the River Crane to the north, railway tracks to the east, office units to the south and London Road to the west. The site lies approximately 1km to the south of Twickenham Rugby Football Union Stadium and experiences high footfall on match days.

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### DEVELOPMENT PROPOSALS

- 2.4 The proposed development is for a new station ticket office and concourse, approximately 170 residential units with elements of retail at the ground floor, improved public realm and open space provision. The development comprises three blocks, ranging in height from 5 to 10 storeys, with the highest element to the south west of the site on London Road. Key aspects of the design involve stepping the scale of the buildings to provide an appropriate balance of mass and materials in the site context.
- 2.5 The proportions of the buildings aim to be appropriate height for the situation, responding to the large bulk of Regal House and pin-point the station at the centre of the site. The main block achieves the same height as Regal House at the corner feature. The scale then cascades down towards the north, dropping down to create a series of pavilion type buildings against the River Crane. The proposed site layout is shown below.

Figure 2 – Proposed Site Layout





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2.6 Vehicular access for the site is proposed from London Road to the north of the site. A replacement number of parking spaces will be provided for commuters (approximately 48), and car club spaces for the future residents. No additional residential parking is proposed. Other features for the development include:

- Improved cycle parking facilities
- Taxi rank
- Amenity space
- New pedestrian footpath along the River Crane linking to the River Crane Walk

*POTENTIAL SENSITIVE RECEPTORS*

2.7 The following potential sensitive receptors to the proposed development have been identified:

- Residents of the surrounding area including Cole Park Road and Mary's Terrace
- Biodiversity and habitat currently found on-site
- River Crane Corridor Site of Important Nature Conservation
- Users of the transport interchange
- Users of the surrounding highway network
- Occupants of Regal House (70 London Road)
- Surrounding infrastructure including schools, health care facilities and community facilities

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### 3.0 ENVIRONMENTAL ISSUES

#### *NEED FOR SCOPING*

- 3.1 This section provides a brief summary of the general requirements of the ES, and sets the parameters for research and assessment to be undertaken during the EIA process in order to provide the ES.
- 3.2 The information presented in the ES will be in accordance with Schedule 4 of the 1999 EIA Regulations and will include:
- A description of the proposed development
  - A description of the aspects of the environment likely to be affected
  - The data required to identify and assess the likely effects of the development on the environment
  - A description of the mitigation measures
  - Consideration of alternatives
  - A non-technical summary

#### *SCOPE OF THE EIA*

- 3.3 The pertinent issues considered appropriate for assessment in the EIA process include:
- Socio-economics
  - Transport (incl Transport Assessment, Green Travel Plan)
  - Air Quality
  - Noise and Vibration
  - Ground Conditions (incl Contaminated Land and Geology Report)
  - Water Resources (incl Flood Risk Assessment)
  - Ecological Assessment
  - Rights of Light, Daylight and Sunlight and Overshadowing
  - Wind Analysis
  - Landscape and Visual Assessment
- 3.4 The ES will be prepared with reference to the following material:
- The Department of Environment (now the Communities and Local Government) "Preparation of Statements for Planning Projects that Require Environmental Assessment a Good Practice Guide 1995".
  - The Department of Transport Design Manual for Roads and Bridges, Volume 11: Environmental Assessment.
  - The Department of Environment, Transport and the Regions (now the Communities and Local Government) "Environmental Impact Assessment – A Guide to Procedures 2000"
  - IEMA 'Guidelines for Environmental Impact Assessment' 2004

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*SOCIO ECONOMIC ISSUES*

- 3.5 This section of the ES will examine the socio economic issues arising from the proposed development and, in particular, the effects upon the locality having regard to specific indicators such as the local employment market, education provision, healthcare provision, the requirement for affordable housing, public open space and the need for further facilities.
- 3.6 The socio-economic impact of the proposed development will be examined by:
- Assessing requirement for housing in the area, including affordable housing needs
  - Assessing the impact of additional economically active residents on the labour market and their prospects for employment
  - Assessing the impact of the development on primarily public services including education, social services, and health facilities
  - Considering the requirement for and impact on public open space
  - Seeking the views of Stakeholders and Service Providers
  - Consulting the local authority, community groups and business representatives as appropriate
- 3.7 The potential significant effects of the proposed development primarily relate to the increase in population and changes to the existing demographic profile of the area. The calculation of the population increase and changes to the local demography will therefore be used as the basis for assessment. The impact of the proposal upon the existing situation and facilities will then be tested and mitigation measures will subsequently be proposed as necessary.
- 3.8 An overview of potential impacts and benefits to the socio-economic environment will be included within the ES document. It is proposed to include a summary of the following issues:
- Housing – a summary will be provided on the role of this scheme in the provision of private and affordable housing
  - Jobs and investment – based on an estimated capital cost, an assessment can be made on the number of construction jobs such a development is likely to support, as well as suitable multipliers for calculating indirect and induced employment
  - Community benefits – the ES will consider the potential impacts on public amenity and access, and the options for providing additional community benefits to the local area.
  - Public services – a review of potential impacts to existing public services including accessibility and public transport, health provision, security and education

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### *TRANSPORT*

- 3.9 Twickenham Station is a busy transport hub that is strategically situated to serve the town centre and Stadium. A comprehensive Transport Assessment (TA) will be undertaken in line with local and national planning policy. This study, which will be a stand-alone document, will be submitted in support of the planning application. The ES will provide a summary of the key issues, the conclusions of the TA and the likely significance of identified impacts.
- 3.10 The proposals include a replacement provision of parking currently on-site and will not result in a net increase in parking space provision. Therefore, it is anticipated that the traffic impact associated with the redevelopment is likely to be minimal. Despite this however, it is accepted that measures should be implemented within the development to discourage use of the private car and encourage sustainable travel.
- 3.11 The EIA for the scheme proposals will address the following issues in relation to transport:
- Effects on local pedestrians, cyclists, buses, trains and other vehicles during the demolition and construction works
  - Effects on the public transport interchange
  - Effects on traffic flow and the local road network including any proposed modifications to the adjacent highway layout around the completed development
  - Effects on walking and cycling accessibility through the Proposed Development area and on the public highway in the adjacent area
- 3.12 The transport chapter within the ES will consider all modes of travel and the likely demands on the existing transportation network for public transport, walking, cycling and vehicular traffic to determine both base flows and assessment year flows.
- 3.13 An assessment year will be identified as the appropriate assessment year for the transport impacts on the development, dependent on the phasing and completion of the development. To ensure that the potential impacts of the development remain within acceptable parameters, mitigation measures may be necessary which will be determined having regard to the assessment of the operation of the transportation network.

### *AIR QUALITY*

- 3.14 An air quality assessment will be undertaken and the baseline air quality will be determined using data from nearby automatic monitoring stations, supplemented by local authority diffusion tube data and reports, if necessary. Further baseline monitoring is not proposed.
- 3.15 The methodology and site monitoring protocols to be employed for the Air Quality Assessment will be agreed in consultation with London Borough of Richmond Upon Thames, prior to assessment taking place.

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- 3.16 The Air Quality assessment is anticipated to include the following elements;
- Identification of air quality and emission sources, (during the demolition, construction and operation phases)
  - Consideration of the context of air quality management in the borough, as the borough has been declared an Air Quality Management Area
  - Consideration of the potential impacts of the development on the Council's Air Quality Action Plan (AQAP)
  - Qualitative and quantitative evaluation of existing air quality
  - Identification of sensitive receptors to air pollution
  - Modelling of air quality with and without the development (including committed development in the area) and comparison with current air quality and national air quality objectives
- 3.17 Mitigation measures will be developed as appropriate to minimise potential adverse impacts to air quality from demolition, site preparation, construction activities and operational traffic. It is anticipated that these measures would be part of any Construction Environmental Management Plan.
- 3.18 In addition, potential impacts and nuisance from construction dust and site plant exhaust emissions generated during the construction phase will be considered in a semi-quantitative context (i.e. basic screening assessment using estimated emissions data and worst-case assumptions), and where appropriate mitigating measures recommended to minimise, or remove, the potential impacts.
- 3.19 All plant equipment associated with the completed development (e.g. Combined Heat and Power (CHP) or low NO<sub>x</sub> boilers for heating and hot water provision) will be assessed either qualitatively if data is sparse, or quantitatively using the ADMS-4 atmospheric dispersion model if sufficient data is available to estimate the pollutant flux and likely stack parameters.
- NOISE*
- 3.20 The noise and vibration assessment will examine both the potential suitability of the site for residential development as well potential noise and vibration impacts arising from construction of the development. A baseline noise survey will be undertaken to detail the prevailing acoustic environment including ambient noise sources such as the rail and road traffic noise. Baseline measurements will be recorded at secure locations identified around the site for comparison and assessment against current guidelines for proposed residential use.
- 3.21 The EIA will investigate any other significant developments or proposed developments close to this site which might either affect the proposal, or be affected by the proposal or cause a cumulative noise impact to be generated.

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- 3.22 The proposed development will be affected principally by general urban noise with a predominant contribution from rail use and road traffic noise. The control of potential noise impacts upon new residential development is principally controlled by Planning Policy Guidance Note 24 (PPG 24) "Planning and noise". This requires assessment of the suitability of the site for residential development based upon measurement or calculation of the existing ambient noise climate affecting the proposed development site. Additional reference will be made to British Standard (BS) 8233: 1999 "Sound insulation and noise reduction for buildings" with regard to achieving suitable internal noise levels within buildings according to their use and Approved Document E of The Building Regulations 2000, with regard to the control of noise and vibration propagation between adjoining occupants/uses within buildings.
- 3.23 A site preparation and construction phase impact assessment will be undertaken based on construction activity and traffic movement information. From the results of the construction noise impact assessment, construction noise control measures will be developed in accordance with BS5228: 1997 "Noise and Vibration Control on Construction and Open Sites".

*GROUND CONDITIONS (INCL CONTAMINATED LAND AND GEOLOGY REPORT)*

- 3.24 The EIA will make an initial assessment of the Site's ground conditions through undertaking a Phase 1 desktop study for potential soil contamination in-line with the regime for contaminated land set out in Part IIA of the Environmental Protection Act (1990). The desktop study will refer to a site specific Envirocheck Report and will take account of historical and existing operations/services within the Proposed Development boundary. This will be supplemented by a site walkover. This information will be used to assess the potential for contaminative activities which may have taken place on site.
- 3.25 The results of the studies will be presented in a chapter of the ES, together with an assessment of the potential for the Proposed Development to impact upon the underlying ground conditions and other sensitive receptors. Mitigation measures will be suggested to reduce the risk of mobilising contaminants during demolition/construction (if considered necessary) and an assessment of the residual impacts provided.

*WATER RESOURCES INCLUDING FLOOD RISK ASSESSMENT*

- 3.26 The ES chapter will look at the site drainage, flood risk and will also investigate the adequacy of the water supply and existing water infrastructure. A drainage strategy for the new development will be prepared which, where possible, will adopt Sustainable Urban Drainage Systems principles, in order to control run-off at source or restrict surface water discharge, without detrimental impact upon the wider receiving catchment.

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3.27 The assessment will look at:

- Control of discharges to water bodies
- Changes to hydrology (surface and underground water), characteristics and effects of pollutants, waste, etc. on water quality and potential discharges to water bodies
- Impacts on any water courses, aquifers, surface and groundwater abstractions and impoundment, boreholes, soakaways, groundwater flooding, underground structures, dewatering and land-filling, and consider issues such as depth, flow direction, velocity, physical chemical conditions, quality, contamination, beneficial uses, proximity of nearest water bodies, surface discharge licenses, impact of building foundations and creating pathways for contamination from near surface to reach groundwater, flow of underground water. An assessment of the interaction between any identified aquifer(s) and surface water bodies
- Impact of building foundations upon groundwater flow
- Water efficiency measures to be included to minimising piped water demand / use within the buildings
- Water supply and impact on existing infrastructure

3.28 A Flood Risk Assessment (FRA) will be undertaken in accordance with PPS 25 to determine the implications of the proposed development in terms of flood risk. The FRA will be appended to the ES and the findings will provide the majority of the input to the Flood Risk and Drainage Chapter. The ES chapter will consider PPS 25 and will seek to address any potential impacts of the proposals, including the change on the flows in existing watercourses and mitigation methods proposed.

#### *ECOLOGY*

3.29 The EIA will assess the potential significant effects to the ecological receptors as a result of the proposed development. The ES Chapter will consider:

- any direct loss of habitats and associated flora and fauna
- indirect impacts around the site
- potential impacts upon protected and scare species
- construction impacts

3.30 Subsequently proposed mitigation strategies to deal with these potential impacts will be outlined. The assessment will also give consideration to the feasibility of creating new habitats as part of the proposed development, specifically within a green infrastructure network and other landscape proposals.

3.31 An extended Phase 1 Habitat survey and Arboricultural Survey has been undertaken and identifies the following features:

- The River Crane Corridor Site of Importance Nature Conservation
- Bat roost potential of buildings
- Japanese knotweed identified within the car park area
- Trees on site collectively have a high conservation value due to their ability to support breeding birds and/or bat roosts

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- 3.32 This information will be used to enable a strategy for their protection and where possible enhancement, during construction of the proposed development and in the long term.
- 3.33 The construction activity has the potential to affect retained trees if appropriate protective measures are not adopted. If adequate precautions are taken to protect the retained trees, the development proposal will have no significant adverse impact on the retained trees.
- 3.34 Protection measures will be discussed in the ES following confirmation of the final layout. All retained trees will require crown reduction in order to minimise damage during demolition and construction.
- 3.35 The EIA will confirm the overall ecological value of the Site and will include an Ecological Impact Assessment following the guidance set out by the Institute of Ecology and Environmental Managers (IEEM) in 2006. Once complete any relevant mitigation and/or enhancement measures will be identified and where possible incorporated into the design and landscaping strategy.

*RIGHTS OF LIGHT, DAYLIGHT AND SUNLIGHT AND OVERSHADOWING*

- 3.36 The existing environment is relatively open with low height buildings and open spaces. Neighbouring properties have very good levels of daylight at present. This does mean that any development of reasonable density may have the potential to reduce the daylight to the neighbouring properties by a noticeable amount. The average daylight factor to the neighbouring residential properties will be calculated in order to determine whether they will be left with more than the minimum adequate levels of internal illumination as advised by the Building Research Establishment
- 3.37 A daylight and sunlight study will be undertaken to assess the following issues:
- Impact on daylight to main habitable rooms of neighbouring residential properties
  - Impact on sunlight to main habitable rooms of neighbouring residential properties that face within 90° of due south
  - Shadow assessment to determine permanent shadow on 21 March to garden and amenity areas. As this is the spring equinox, the area in permanent shadow on 21 March will be in permanent shadow all winter
  - Shadow assessment to amenity areas to be constructed within the new development
  - Daylight assessment to identify that the new dwellings within the development will have adequate internal illuminates
- 3.38 The study will be carried out in accordance with the recommendations of the Building Research Establishment Report “site layout planning for daylight and sunlight 1991”. A 3D model will be constructed in AutoCAD and specialist computer software will help to calculate the daylight and sunlight assessments. The results will be reported within the ES.



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#### WIND ANALYSIS

- 3.39 A study will be undertaken to assess the wind microclimate affecting the proposed Twickenham Station redevelopment. The ES will consider the potential for changes to the wind environment in terms of pedestrian amenity and public open space. The assessment will include a desk study assessment as an initial phase to inform the design team. It is then proposed that a quantitative assessment undertaken to develop detailed mitigation where necessary.
- 3.40 The need for such a quantitative study will be discussed with the London Borough of Richmond upon Thames, as there may be a preference for either a wind tunnel assessment or a computational fluid dynamics (CFD) study.
- 3.41 A quantitative study would measure mean and peak wind speeds around the base of the Proposed Development and existing buildings for all wind directions. These results will be combined with long-term meteorological statistics for the area. The results of this analysis will then be compared with the well established Lawson Comfort Criteria to determine the suitability of the different areas for sitting, standing, entering a building, leisure walking, business walking or crossing the road.
- 3.42 The proposed assessment will demonstrate the changes in levels of windiness associated with the scheme, but also the suitability of the wind microclimate for the intended pedestrian use of the Site. Should mitigation measures be required, the areas requiring mitigation will be identified and the mitigation measures will be developed and tested through additional rounds of wind tunnel studies. The residual impacts will be provided and the assessment summarised within a chapter of the ES.
- 3.43 The assessment will include:
- Full analysis of the macro and microenvironments within the development
  - The effect on pedestrian comfort and building operation
  - Determination of the frequency of conditions, comfort map
  - The effect of proposed structures on surrounding buildings
  - Analysis of wind effects due to massing

#### LANDSCAPE AND VISUAL IMPACT

- 3.44 The ES will include an assessment of the landscape resources, landscape character and visual amenity. A landscape strategy and masterplan will be produced which will seek to introduce a series of new landscape features and elements that address the loss of any existing ones, and where possible develop and enhance a strong green infrastructure network and the existing landscape character. The strategy will also address the visual assessment with respect to screening and containment where necessary. The principles of the strategy will be incorporated into the parameters assessment plan accordingly.
- 3.45 The methodology proposed will conform to the Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Management and Assessment (2002), adapted for townscape analysis.

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3.46 Assessment work will include the following elements:

- Review of an historic analysis of the site and its surroundings
- Baseline study of the existing townscape character and visual quality of the site, the surrounding area and its cultural heritage through desk study and field survey
- Identification of visual receptors and key views to be used for assessment, to be agreed in consultation with London Borough of Richmond Upon Thames
- Qualitative assessment of potential impact of the proposed development on the setting of designated and undesignated cultural heritage assets around the proposed development site
- Visual impact assessment of townscape and key views, taking account of changes in visual quality, building height, massing, scale and views of the site
- Preparation of appropriate visualisations (method to be agreed) to demonstrate the significant viewpoints and the effect of the proposed scheme on the existing townscape
- Where necessary, the identification of mitigation measures to address any adverse impacts
- Consideration of these issues is likely to influence elements of the proposed development including building layout, configuration, height, massing and materials

#### *OTHER ELEMENTS OF THE ES*

3.47 Also to be included within the ES will be an assessment of alternatives considered, details of the planning policy context, details of the demolition and construction phasing and a cumulative impact assessment. Further details for these are set out below.

#### *ALTERNATIVES AND DESIGN EVOLUTION*

3.48 The EIA process provides an opportunity to consider alternative development options, as well as their respective environmental, social and economic implications, before a final design freeze is fixed. In accordance with EIA regulations and statutory guidance, the ES will describe those alternatives, which were considered by the Applicant and design team, including:

- ‘Do nothing scenario’ – the consequences of no development taking place
- ‘Alternative designs’ – the ES will summarise the evolution of the current design proposal, the modifications which have taken place to date and the environmental considerations which have led to those modifications. A summary of the main alternatives considered, such as alternative mixes of use; floor heights and bulking; and materials used will be presented, together with a justification for the final design

#### *PLANNING POLICY CONTEXT*

3.49 A summary of the Planning Statement (a separate document to be submitted in support of the planning application) will be provided within an ES chapter. It will have regard to national Planning Policy Guidance (PPG) Notes and Planning Policy Statements (PPSs) alongside Regional and Local Planning Policy. Relevant policy guidance and legislation relating to each technical aspect will be discussed specifically within each technical chapter of the ES.

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*DEMOLITION AND CONSTRUCTION*

3.50 The ES will provide details of the proposed programme together with specific demolition and construction activities and methods. A chapter describing the likely content of the Demolition and Construction Method Statement (DCMS) will be provided as part of the ES, which will detail the specific mitigation measures to be followed to reduce nuisance impacts from:

- Construction traffic
- Changes to access and the public rights of way
- Noise and vibration
- Utilities diversion
- Dust generation
- Soil removal
- Waste generation
- Lighting

*CUMULATIVE IMPACT ASSESSMENT*

3.51 Schemes in the surrounding area which have the potential to result in cumulative impacts with the Proposed Development will be set out in the Cumulative Effects Chapter.

3.52 Cumulative impacts can result from impacts from other developments in the surrounding area, with the Proposed Development and combined impacts from a number of difference environmental aspects. The section will include a summary of the methodology proposed and suggests potential mitigation measures where appropriate. There is no accepted methodology for cumulative assessment although guidance is available in the form of:

- EC (May 1999): Study on the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions
- Council on Environmental Quality (January 1997): Considering Cumulative Effects Under the [US] National Environmental Policy Act
- Town and Country Planning (Environmental Impact Assessment) Regulations as amended
- Circular 02/99 Environmental Impact Assessment (Office of the Deputy Prime Minister) 1999
- Preparation of Environmental Statements for Planning Projects that require Environmental Assessment. A Good Practice Guide (Department of the Environment) 1995

3.53 For the purposes of this assessment, schemes have only been considered if they meet the following criteria:

- If they have planning permission or resolution to grant; and/or
- Are defined as major development; and
- They are within 1km of the proposed development site.

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#### 4.0 SUMMARY OF KEY ISSUES

- 4.1 The following provides a summary of potential key environmental issues that will be assessed as part of the EIA.
- 4.2 **Demolition and construction:** Hazards associated with the removal of contaminated material; potential nuisance to local residents, workers and pedestrians; short-term increase in waste generation, litter and visual intrusion
- 4.3 **Socio-economics:** Provision of new residential infrastructure; provision of affordable and private residential units; potential investment and employment opportunities; increase in local expenditure
- 4.4 **Transport:** Potential beneficial impacts from improved transport interchange; potential short-term changes to local traffic flow patterns during demolition, construction and possible disruptions; long-term impacts on the public transport system
- 4.5 **Air quality:** Short-term increase in atmospheric emissions from construction traffic; increase in emissions from future residential road users; short-term increase in airborne dust and general nuisance to local residents and pedestrians during demolition and construction
- 4.6 **Noise and Vibration:** Short-term increase in noise emissions from demolition and construction activities; potential vibration impact on proposed development from train movements
- 4.7 **Ground conditions and contaminated land:** Creation of pathways for any potential existing contaminants; contamination of soil and groundwater during construction and demolition
- 4.8 **Water Resources:** Changes in surface run-off rates, drainage and flood risk
- 4.9 **Ecology:** Potential impacts on local flora and fauna, including on-site trees; accessibility improvements to River Crane SINC
- 4.10 **Daylight, sunlight and overshadowing:** Potential changes to daylight and sunlight to neighbouring properties
- 4.11 **Wind:** Changes to the speed and direction of the local wind patterns
- 4.12 **Townscape and visual assessment:** Short-term visual intrusion during demolition and construction; long-term changes to views, townscape character and local settings; potential improvements to public amenity space

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## 5.0 NON-SIGNIFICANT ISSUES

- 5.1 The aim of this Scoping Report is to focus the EIA on those environmental issues that may be significantly affected by the development proposals.

### *ARCHAEOLOGICAL ASSESSMENT*

- 5.2 A desktop archaeological assessment has been undertaken. The assessment confirms that the sites do not contain any Scheduled Ancient Monuments but lies within an 'Archaeological Priority Area' as defined by LB Richmond. This priority area follows the floodplain of the River Crane. A further priority area, which covers the historic core of the early Twickenham settlement, is located approximately 200m to the south of the subject site.
- 5.3 The impact of previous and existing buildings across the study site can be considered to have a cumulative negative impact on any archaeological deposits likely to be present. However, the initial assessment has concluded that the site has a low to medium potential for the prehistoric and Roman periods. Also it is concluded that the site has low potential for the Saxon, mediaeval and post mediaeval periods.
- 5.4 Given the low potential for archaeological deposits and the previous development of the site, further archaeological assessment is not proposed for the ES. If necessary, fieldwork, in the form of a targeted evaluation exercise (i.e. trial trenches) could be undertaken through the construction phase in order to establish the presence or absence of archaeological deposits, and subsequent mitigation measures may then be recommended should such remains be found. It is anticipated that this can be conducted after planning consent is achieved, as a planning condition.

### *WASTE*

- 5.5 Waste generation will be increased on site through the demolition and construction and operational phases. This will include construction waste, municipal household waste and commercial waste generation, however these increases in waste are not considered to be of a hazardous nature. A dedicated Waste chapter is not proposed as the impacts of waste generation will be considered within other areas of the ES and the proposed Sustainability Statement.
- 5.6 The demolition and construction phase has the potential for significant waste arisings. In accordance with the Site Waste Management Plan Regulations 2008 the principle contractor will be responsible for producing and implementing a Site Waste Management Plan (SWMP). A principal aim during construction will be to reduce the amount of waste generated and exported from site. This will be dealt with in the Demolition and Construction Chapter of the ES.

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- 5.7 The Sustainability Statement submitted in support of the planning application will contain details of waste minimisation measures including internal and external waste segregation and recycling storage facilities. The principles of waste minimisation will be integrated into the development through the Code for Sustainable Homes and BREEAM methodologies. Code for Sustainable Homes and BREEAM pre- assessments will be undertaken and submitted as appendices to the Sustainability Statement. The access arrangements for collection of waste from the development will be detailed within the Description of Development Chapter.

*INFRASTRUCTURE SERVICES*

- 5.8 The new development will require the provision of water, sewerage (foul water and surface water drainage), electricity, gas and telecommunications infrastructure. The relevant statutory undertaker will be contacted to establish the availability of the respective services and to discuss the means of supplying the site, including the consideration of upgrades if necessary.
- 5.9 The provision of new services on site is unlikely to give rise to any environmental or highway issues with the new supplies connecting onto the existing infrastructure on the site boundary. Therefore an ES Chapter and assessment of the infrastructure services is not proposed.

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## 6.0 STRUCTURE OF THE ENVIRONMENTAL STATEMENT

6.1 The structure of the Environmental Statement is likely to comprise three volumes; the first of which would set out the main reports and findings of the studies; the second would be the Landscape and Visual Assessment; and the third would include all of the other technical appendices which support Volume 1. A non-technical summary would also be provided as required by the Regulations.

6.2 Each key issue will form a discrete chapter in the Environmental Statement (Volume 1), which will be arranged as follows:

- Introduction
- EIA Methodology and Cumulative schemes
- Description of Development
- Alternatives and Design Evolution
- Planning Policy Context
- Demolition and Construction
- Socio-economics
- Transport (incl Transport Assessment, Green Travel Plan)
- Air Quality
- Noise and Vibration
- Ground Conditions (incl Contaminated Land and Geology Report)
- Water Resources (incl Flood Risk Assessment)
- Ecological Assessment
- Rights of Light, Daylight, Sunlight and Overshadowing
- Wind Analysis
- Cumulative Impact Assessment
- Conclusions

6.3 The structure within each technical chapter will be:

- Introduction
- Planning Policy
- Assessment Methodology
- Baseline Conditions
- Assessment of Impacts (construction and operation)
- Mitigation (construction and operation)
- Residual Effects
- Cumulative Impacts
- Conclusions

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## **7.0 STATUTORY AND OTHER CONSULTEES**

7.1 The following statutory and other consultees will be invited to comment on the proposed scope and contents of the Environmental Statement, where appropriate, through the Local Planning Authority as set out under Regulation 13 of the Environmental Impact Assessment Regulations 1999:

- Environment Agency
- Natural England
- English Heritage
- Local Authority (Environmental Health)
- Greater London Authority
- Transport for London

7.2 This will also include any other consultation bodies that the Planning Authority nominates, as required under Regulation 13. It would be useful if the Planning Authority could provide a list of those consultees they intend to invite to comment on the scope of the ES.



Mr Chris Tankard  
London Borough of Richmond upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

31.05.2010

Dear Mr Tankard

**Ref: 00081**

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Dear Mr Tankard,

**Subject: Twickenham Station Redevelopment – Extension to Five Week Scoping Response Period**

Following your meeting with David Maddox on 28<sup>th</sup> May 2010, please accept this letter as written confirmation of a two week extension to the statutory five week response period as detailed under section 10(4) of the EIA Regulations.

It is understood that you will provide information as it becomes available over the next two weeks, and adopt a formal scoping opinion by the 15<sup>th</sup> June 2010.

Please feel free to contact me should you have any questions.

Yours sincerely



**Jonathan Taylor**  
Associate

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Appendix A-2: London Borough of Richmond Upon Thames Scoping Opinion – Received on 10<sup>th</sup> June 2010



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

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

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

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

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

### **General Comment**

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

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

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

## **Consultations**

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

### Natural England

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

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

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

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

### Environment Agency

The key environmental issues and opportunities at this site are:

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

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

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

#### Greater London Authority

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

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

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

### London Borough of Richmond upon Thames Trees

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

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

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

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

### Ecology

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

### Urban Design

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

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

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

### Planning Policy

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

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

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

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

### Ground Contamination

No comments to make at this stage.

### Environmental Health

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

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

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

### Transport

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

### Air Quality

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

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



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

### Friends of the River Crane Environment

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

### Cole Park Residents Association

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

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

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

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

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

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

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

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

#### Other Consultees

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

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

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

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

##### Broad Site Description

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

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

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

### Development Proposals

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

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

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

### Potential Sensitive Receptors

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

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

### Socio-Economic Issues

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

### Transport

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

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

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

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

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

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

### Air Quality

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

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

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

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

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

### Noise

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

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

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

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

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

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

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

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

#### Water Resources Including Flood Risk Assessment

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

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

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

#### Ecology

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

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

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

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

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

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

### Wind Analysis

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

### Landscape and Visual Impact

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

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

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

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

### Other Elements of the ES

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

### Alternatives

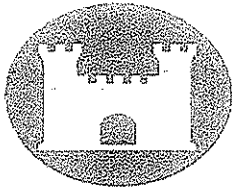
Versions with lower key massing than the current proposal and/or alternative massing arrangements should be illustrated and discussed as part of the EIA process. There will also be a need to demonstrate the relationship between developments on the Twickenham Station and Royal Mail sites as part of any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

### Summary of Key Issues

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

### Non-Significant Issues

Archaeological Assessment



# WINDSOR LINES

## Passengers' Association

From the Chairman: Dr A M Dempsey, 63 Gilpin Cres, TWICKENHAM, TW2 7BP  
Email: [chairman@wlpa.co.uk](mailto:chairman@wlpa.co.uk)

Chris Tankard  
Team Leader Development Control North Team  
Civic Centre, 44 York St  
Twickenham TW1 3BZ

25 MAY 2010

24<sup>th</sup> May 2010

Dear Mr Tankard,

Below is the WLPA response to your letter of 12 May 2010 regarding

### **Twickenham Station –Scoping Opinion**

WLPA represents users of the train service from Waterloo to Reading and Windsor.

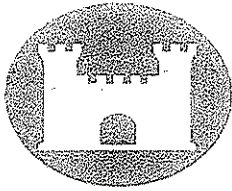
We make the following points:

- A redevelopment of Twickenham station is strongly supported.
- In detail the redevelopment should:
  1. Ensure that the new station is entirely redesigned and not just at street and ticket office level.
  2. Provide modern replacements for the footbridges, the stairs and the platform architecture.
  3. Ensure that there is full accessibility to the platforms for the mobility impaired, including lifts.
  4. Ensure that there are some retail units at platform level and not just at booking office level. This is to aid security which is not mentioned in the brief.
  5. Create a proper transport hub, where all buses and taxis in both directions turn into to drop off passengers undercover.
  6. Encourage more leisure use of rail by providing a drop-off point at ticket office level for those with heavy luggage. This is already important for those travelling on Eurostar or to Gatwick Airport. The arrival of Airtrack will make this essential for those going to Heathrow Airport.
  7. Ensure that the new design is capable of dealing safely with the large crowds using Twickenham Stadium and the Stoop. This would mean opening special separate entrances and exits on these occasions.
- The final plan must not hinder the reinstatement, at a future date, of FOUR running tracks (two up lines and two down lines) instead of the present three. These will be essential to allow fast trains to overtake slower trains when train travel increases and when Airtrack trains take up more train pathways. The basic facilities are already there and this will require full consultation with Network Rail.

Yours sincerely

Tony Dempsey  
Chair WLPA





# WINDSOR LINES

## Passengers' Association

From the Chairman: Dr A M Dempsey, 63 Gilpin Cres, TWICKENHAM, TW2 7BP  
Email: [chairman@wlpa.co.uk](mailto:chairman@wlpa.co.uk)

Chris Tankard  
Team Leader Development Control North Team  
Civic Centre, 44 York St  
Twickenham TW1 3BZ

25 MAY 2010

24<sup>th</sup> May 2010

Dear Mr Tankard,

Below is the WLPA response to your letter of 12 May 2010 regarding

### Twickenham Station –Scoping Opinion

WLPA represents users of the train service from Waterloo to Reading and Windsor.

We make the following points:

- A redevelopment of Twickenham station is strongly supported.
- In detail the redevelopment should:
  1. Ensure that the new station is entirely redesigned and not just at street and ticket office level.
  2. Provide modern replacements for the footbridges, the stairs and the platform architecture.
  3. Ensure that there is full accessibility to the platforms for the mobility impaired, including lifts.
  4. Ensure that there are some retail units at platform level and not just at booking office level. This is to aid security which is not mentioned in the brief.
  5. Create a proper transport hub, where all buses and taxis in both directions turn into to drop off passengers undercover.
  6. Encourage more leisure use of rail by providing a drop-off point at ticket office level for those with heavy luggage. This is already important for those travelling on Eurostar or to Gatwick Airport. The arrival of Airtrack will make this essential for those going to Heathrow Airport.
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Yours sincerely

Tony Dempsey  
Chair WLPA

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

#### Waste

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

#### Infrastructure services

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

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

Date of Opinion: 10/06/10

Jon Freer

Assistant Director of the Environment (Development and Street Scene)

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