

Proposed Residential Redevelopment

Broom Road, Teddington TW11 9BE

Teddington Riverside

Environmental Statement Part 2 – Project Information



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## DOCUMENTS COMPRISING THE ENVIRONMENTAL STATEMENT

This document forms part of an Environmental Statement submitted in respect of development proposals at Teddington Studios, Broom Road, Teddington.

The full Environmental Statement comprises:

<b>Part 1</b>	Non-Technical Summary
<b>Part 2</b>	Project Information
<b>Part 3</b>	Reports and Analysis
<b>Part 4</b>	Appendices & Figures

### Additional documents:

The following stand alone reports are also submitted with the planning application:

- Design and Access Statement prepared by TP Bennett;
- Planning Statement prepared by CgMs;
- Heritage Statement prepared by CgMs;
- Framework Travel Plan prepared by Savill Bird and Axon;
- Flood Risk Assessment prepared by Hydro-Logic;
- Energy and Sustainability Statement prepared by Cundall;
- Flood Sequential Test by CgMs;
- Ecology Report prepared by Catherine Bickmore Associates Ltd;
- Sunlight/Daylight Assessment;
- Statement of Community Engagement prepared by GKA;
- Tree Report prepared by ACS Consulting;
- Construction Management Plan prepared by Wates Construction;
- A document setting out the draft S106 heads of terms prepared by CgMs / Dechert LLP.

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**APPENDICES**

Appendix 1 - Location Plan A9991 – D – 0001

Appendix 2 - Screening Opinion

## **1.0 INTRODUCTION**

### **Environmental Impact Assessment**

- 1.1 Environmental Impact Assessment (EIA) is a means of identifying and assessing the likely significant environmental effects of a development project. It is intended to focus on those aspects which might give rise to significant effects both in terms of impacts and benefits and to provide information to be taken into account both by those preparing the scheme and by the decision making body. This Environmental Statement brings together the findings of a number of assessments carried out for Haymarket Media the landowner of the application site.
- 1.2 It has been prepared under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Relevant guidance is contained within Circular 2/99 'Environmental Impact Assessment'. Regard has also been had to 'Preparation of Environmental Statements for Planning Projects that Require Environmental Assessment – A Good Practice Guide', first published by the DETR in 1995, 'Environmental Impact Assessment – A guide to procedures', published by the DETR in November 2000, and guidance issued by the professional bodies of the various disciplines involved in the assessment.

### **General Background to the Planning Application**

- 1.3 The proposed development has been developed over a significant period, and has involved pre-application discussions with officers of London Borough of Richmond upon Thames, as well as a comprehensive public consultation exercise. Details of the community involvement undertaken in relation to the proposed development are set out in the separate Statement of Community Involvement submitted with the planning application.

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## **Project to be Assessed**

- 1.4 A planning application is being submitted by CgMs Consulting (CgMs) on behalf of Haymarket Media, seeking full planning permission for the development of land at Broom Road, Teddington, TW11 BE. The location of the application site is shown in **Appendix 1**. The description of the development in the planning application is as follows:

*"Demolition of the existing buildings with the exception of Weir Cottage and the erection of part four/part five/part six/part seven storey buildings to provide 213 flats, erection of 6 three storey houses to Broom Road frontage, use of Weir Cottage for residential purposes, provision of 258 car parking spaces at basement and ground level, closure of existing access and provision of two new accesses from Broom Road, provision of publically accessible riverside walk together with cycle parking and landscaping"*

- 1.5 This report constitutes part of an Environmental Statement (ES). The ES is intended to inform the Council's decision on this application. It comprises a number of documents:

### **Part 1 - Non – Technical Summary**

This document summarises the findings of the Environmental Statement in non-technical language.

### **Part 2 - Project Information**

The Regulations require information to be provided on a number of matters including, for example, a description of the development. This Part of the ES introduces the Environmental Impact Assessment procedures and provides information on the scheme and on planning policy.

### **Part 3 - Reports and Analysis**

The reports on specific topics (such as noise, cultural heritage and air quality) are included as chapters in Part 3.

### **Part 4 - Appendices**

This volume contains the appendices referred to in part 3.

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## **Additional Documents**

The following reports are enclosed with the full planning application to provide further detailed technical information:

- Design and Access Statement prepared by TP Bennett
- Planning Statement prepared by CgMs
- Heritage Statement prepared by CgMs
- Framework Travel prepared by Savill Bird Axon.
- Flood Risk Assessment prepared by Hydro-Logic Services
- Flood Sequential Assessment by CgMs
- Ecology Report prepared by Catherine Bickmore Associates Ltd
- Sunlight/Daylight Assessment prepared by Savills
- Statement of Community Engagement prepared by GKN
- Tree Report prepared by ACS Consulting
- Construction Management Plan by Wates Construction
- Energy and Sustainability Statement prepared by Cundall
- Draft S106 Heads of Terms prepared by CgMs and Dechart Solicitors

Other technical reports such as a Transport Assessment, Archaeology Statement, Geotechnical Desk Study, etc. form part of the relevant chapters to the ES.

## 2.0 SCREENING

### Introduction

- 2.1 The Council and the applicant considered that it was necessary to undertake a screening opinion as to whether the proposed development fell within Schedule 2 paragraph 10(b) of the EIA Regulations as an 'urban development project' and, therefore, an Environmental Statement (ES) was required to support the planning application for the development of the site.
- 2.2 Schedule 2 Paragraph 10 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 advises that an Environmental Statement should be prepared for urban developments covering an area of at least 0.5 hectares, if there are significant environmental issues which will need to be assessed.

### Screening

- 2.3 The London Borough of Richmond upon Thames provided a formal screening opinion by letter dated the 12<sup>th</sup> August 2013 (**Appendix 2**)
- 2.4 Whilst no formal scoping of the proposal was undertaken, through the pre-application process the applicant in discussion with the Council has identified the following key considerations:
- Socio-economic
  - Geology and soils
  - Ground contamination
  - Flood risk
  - Ground and surface water drainage
  - Archaeology
  - Built Heritage
  - Ecology
  - Noise

- Air Quality
- Transport
- Wind
- Daylight and sunlight



### 3.0 METHODOLOGY

#### General Methodology

3.1 The topics identified as potentially significant have been assessed using the following general methodology:

- **Environmental Baseline** - The existing environmental baseline data conditions were ascertained.
- **Analysis** – The ways in which the existing baseline conditions would be affected were assessed. This included identifying the resources and receptors likely to be affected.
- **Assessment of Impact** - Target groups and areas were identified and the extent of direct and indirect effects was assessed. Cumulative impacts were also considered.
- **Mitigation** - Where significant adverse impacts were identified, mitigation measures were outlined in order to reduce such effects.
- **Conclusion** - The conclusions draw together the results of the surveys and analysis and residual effects after mitigation.

3.2 Different topic areas require different methods of prediction and analysis and therefore each section adopts a slightly different format, although they do follow the general methodology set out above. Separate methodologies are outlined at the beginning of the sections on specific topics. The topic sections also identify the general limitations of the assessments, and where uncertainties exist.

3.3 Throughout this process the consultants have sought to focus upon the identification and mitigation of significant impacts.

## Project Team

3.4 Expertise from a variety of disciplines has been used to conduct the research and obtain the information necessary for the compilation of this ES.

3.5 The project team includes:

<b>TOPIC AREA</b>	<b>CONSULTANT</b>
Socio-Economic	CgMs Consulting
Ground Contamination	Campbell Reith
Services	Cundalls
Flood Risk	Hydro-Logic Services
Archaeology	CgMs Consulting
Heritage	CgMs Consulting
Noise	Moir Hands
Air Quality	Air Quality Consultants
Landscape and Visual Quality	Allen Pyke Associates
Transportation	Savill Bird Axon
Wind	RWDI
Daylight and Sunlight	Savills
Sustainability	Cundall

## 4.0 DESCRIPTION OF THE SITE AND SURROUNDINGS

### Application Site

- 4.1 The application site comprises a 1.86 hectare area of land to the south of the River Thames adjacent to Teddington Lock and approximately 1km to the east of Teddington Town Centre.
- 4.2 The site is broadly rectangular in shape and slopes down gradually to the north towards the river. With the exception of trees around the north, east and west perimeter, there is very little greenery and no public amenity space. The existing buildings sit in the centre of the site and to the east of the site and comprise of studios and office space, with car parking to the west and north sides.
- 4.3 The existing buildings on site has expanded gradually through piecemeal development since the Studio's founding in 1910 so as such, are marked by a variety of different architectural styles and heights. The buildings however are all tired and are unsuitable for conversion to another use. With the exception of the locally listed Weir Cottage to the west of the site, there are no notable buildings.
- 4.4 The existing structure relates poorly to its context, displaying inactive or minimal facades and providing no direct public access or views down to the river. To the south the site is bordered by Broom Road and to the east by the gardens and conference/leisure facilities of the 4\* Lensbury Hotel.
- 4.5 There is a small amount of car parking to the front of the studios building along Broom Road, separated from the public footway by low walls and planting. This is accessed by wide dropped curbs. The main vehicle and servicing access is achieved from the west side directly off Broom Road, which follows the western perimeter round the site towards the main car park to the rear. There are a total of 350 car parking spaces currently on the wider site.

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## Surroundings

- 4.6 The site has in the main a PTAL of 2. It is approximately 1.5km from Teddington National Rail Station which is served by South West trains and connects Waterloo to Shepperton, either via Kingston or via Richmond. The 285 (Kingston-Heathrow), 281 (Tolworth-Hounslow) and the R68 (Hampton Court-Kew) bus route's come within 215m of the site though their range is limited to the south and west London suburbs.
- 4.7 The Teddington Lock Conservation Area (CA27) that includes a sliver of the north west boundary of the site is characterised by open green space, views of the river and a mix of period large Victorian houses and smaller cottages. The coloured suspension Teddington Footbridge is Grade II Listed and is a notable landmark and sits within view of the north-west corner of the site.
- 4.8 Lensbury Club to the west, Udney Hall Gardens to the south and Manor Road Recreation Ground to the north are all Metropolitan Open Land (DM OS 2) and the river and its banks to the north is a site of Nature Importance (CP4)
- 4.9 The wider Teddington area is largely affluent and residential in nature. Houses are typically low density with front and back gardens. The site is less than 200m away from the LDF's designated "Teddington Town Centre Boundary" (Policy DM TC 1). Teddington High Street is the focal point of the town centre and is typified by a mix of Victorian and Edwardian architecture, ground floor retail units with original shop fronts and residential units above. The High Street is within the High Street Conservation Area (CA37) and borders the Teddington Lock Conservation Area at its eastern boundary.

## 5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

5.1 The planning application seeks permission for:

*"Demolition of the existing buildings with the exception of Weir Cottage and the erection of part three/ part four/part five/part six/part seven storey buildings to provide 213 flats, erection of 6 three storey houses to Broom Road frontage, use of Weir Cottage for residential purposes, provision of 259 car parking spaces at basement and ground level, closure of existing access and provision of two new accesses from Broom Road, provision of publically accessible riverside walk together with cycle parking and landscaping".*

5.2 Copies of the drawings that show the form and design of the development upon which this EIA has been assessed form part of the application package and are set out below:

**Table 1.1 Schedule of Plans**

Drawing No.	Revision	Drawing Title
A9991 – D – 0001	P1	Site location plan
A9991 – D – 0002	P1	As proposed site location plan
A9991 – D – 0003	P1	As proposed site plan
A9991 – D – 0099	P1	Basement plan
A9991 – D – 0100	P1	Ground floor plan
A9991 – D – 0101	P1	First floor plan
A9991 – D – 0102	P1	Second floor plan
A9991 – D – 0103	P1	Third floor plan
A9991 – D – 0104	P1	Fourth floor plan
A9991 – D – 0105	P1	Fifth floor plan
A9991 – D – 0106	P1	Sixth Floor Plan
A9991 – D – 0107	P1	Roof plan
A9991 – D – 0500	P1	Car park ramp IN
A9991 – D – 0501	P1	Car park ramp OUT
A9991 – D – 0200	P1	Proposed elevation 1-1 Proposed elevation 2-2
A9991 – D – 0201	P1	Proposed elevation 3-3 Proposed elevation 4-4

A9991 – D – 0202	P1	Proposed elevation 5-5 Proposed elevation 6-6
A9991 – D – 0203	P1	Proposed elevation 7-7 Proposed elevation 8-8
A9991 – D – 0204	P1	Proposed elevation 9-9 Proposed elevation 10-10
A9991 – D – 0205		Proposed elevation 1-1 Proposed elevation 2-2 (COLOUR)
A9991 – D – 0206		Proposed elevation 3-3 Proposed elevation 4-4 (COLOUR)
A9991 – D – 0207		Proposed elevation 5-5 Proposed elevation 6-6 (COLOUR)
A9991 – D – 0210	P1	Comparative elevation 1-1 Comparative elevation 2-2
A9991 – D – 0211	P1	Comparative elevation 3-3 Comparative elevation 4-4
A9991 – D – 0212	P1	Perspectives 1 of 2
A9991 – D – 0213	P1	Perspectives 2 of 2
A9991 – D – 0300	P1	Section 1-1
A9991 – D – 0301	P1	Wall section 1-1
A9991 – D – 0302	P1	Wall section 2-2
A9991 – F – 0200	P1	Existing Elevations 1-1 Existing Elevations 2-2
A9991 – F – 0201	P1	Existing Elevations 3-3 Existing Elevations 4-4
2459 – TS - 01		Trees to be retained/removed
2459 – LA - 01	P1	Landscape layout
2459 – LA - 02	P1	Illustrative landscape masterplan

- 5.3 A Design and Access Statement prepared by TP Bennett is submitted in support of this application as a separate document.

### ***Proposed Use***

- 5.4 Teddington Studios consists of a piecemeal development of office and studio spaces. It is a bulky and a tired mass of buildings that significantly restricts movements and views down to the river. Not suitable for conversion without significant cost, it is considered to have a largely detrimental effect not just on the character of the adjacent Conservation Area, but also on the character of the neighbourhood as a whole.

- 5.5 It is proposed to clear the site and create a residential development containing 213 self contained flats along with 6 three storey houses fronting Broom Road. The site will be landscaped extensively with open green space and a “piazza” in order to maximise views down to the river. A new public river walkway is to be created.

### ***Accommodation Mix and Density***

- 5.6 The proposed development will consist of four blocks of apartments of varying heights and sizes. A further six “villas”, will front onto Broom Road. The accommodation mix is set out in the table below:

Building A	1 bed	2 bed	3 bed	4 bed
Ground	2	3	2	0
First	5	2	4	0
Second	5	2	4	0
Third	1	4	3	0
Fourth	2	0	3	0
Fifth	0	0	0	0
<b>Total Units</b>	<b>15</b>	<b>11</b>	<b>16</b>	<b>0</b>

Building B	1 bed	2 bed	3 bed	4 bed
Ground	1	1	4	0
First	0	2	4	0
Second	0	2	4	0
Third	0	2	4	0
Fourth	0	2	4	0
Fifth	0	2	4	0
Sixth	0	0	4	0
<b>Total Units</b>	<b>1</b>	<b>11</b>	<b>28</b>	<b>0</b>

Building C	1 bed	2 bed	3 bed	4 bed
Ground	4	9	1	0
First	1	10	4	0
Second	1	10	4	0
Third	1	10	4	0
Fourth	3	8	3	0
Fifth	4	3	4	0
Sixth	0	0	0	0
<b>Total Units</b>	<b>14</b>	<b>50</b>	<b>20</b>	<b>0</b>

Building D	1 bed	2 bed	3 bed	4 bed
Ground	3	3	1	0
First	2	6	0	0
Second	2	6	0	0
Third	2	5	0	0
Fourth	2	3	0	0
Fifth	0	0	0	0
<b>Total Units</b>	<b>11</b>	<b>23</b>	<b>1</b>	<b>0</b>

Building E7	1 bed	2 bed	3 bed	4 bed
Ground	2	2	0	0
First	1	3	0	0
Second	1	3	0	0
<b>Total Units</b>	<b>4</b>	<b>8</b>	<b>0</b>	<b>0</b>

Houses	1 bed	2 bed	3 bed	4 bed
Ground				6
First				
Second				
<b>Total Units</b>				<b>6</b>

<b>Net Total Units</b>				<b>219</b>
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5.7 In addition to the above Weir Cottage is to be refurbished as a residential building again, reverting it to its original use.

5.8 Given the residential unit mix above, the table below illustrates the Gross Internal Area of each residential block:

	Building A (GIA m <sup>2</sup> )	Building B (GIA m <sup>2</sup> )	Building C (GIA m <sup>2</sup> )	Building D (GIA m <sup>2</sup> )	Building E7 (GIA m <sup>2</sup> )	Houses (GIA m <sup>2</sup> )	Total
Ground	1,002	825	1,665	739	385	281	4,897
First	1,098	825	1,665	750	394	291	5,036
Second	1,098	838	1,665	750	397	282	5,010
Third	915	838	1,665	651	0	0	4,069
Fourth	600	838	1,481	506	0	0	3,425
Fifth	0	838	1,192	0	0	0	2,030
Sixth	0	551	0	0	0	0	551
<b>Total</b>	<b>4,713</b>	<b>5,566</b>	<b>9,333</b>	<b>3,396</b>	<b>1,156</b>	<b>854</b>	<b>25,018</b>



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### ***Car and Cycle Parking***

- 5.9 There will be parking spaces at surface level but the majority will be in the basement, accessed via a ramp. There would be 258 spaces for residents. Of these 10% will be for disabled users and 20% will feature electricity charging points.
- 5.10 There are spaces for secure cycle parking.

### ***External Amenity***

- 5.11 All units have been provided with private terraces/balconies all of which are over 5m<sup>2</sup>. In addition there is the communal amenity space and landscaped space forming the new public realm.
- 5.12 One of the original design concepts of the project was to remove the existing built bulk and create a residential development which cultivated a sense of openness and permeability. As such, the scheme has been carefully designed to maximise on the green, open areas between Broom Road and the River.

### ***Orientation and Height***

- 5.13 With the exception of the six houses that define a new frontage onto Broom Road and Building E7, each of the proposed blocks has a north-south orientation in order to maximise on views and vistas towards the river, throughout the site. The pavilions are set back significantly from all boundaries in order to respect the character of the neighbouring conservation area, to optimise access to and views towards the river and to maximise on the feeling of openness. Surface level parking has been kept to a minimum in line with this concept of permeability.
- 5.14 In line with the concept of openness and permeability, the scheme has been designed to appear as slender as possible – substantially more so than the overly bulky buildings that currently exist on site. Green space features heavily

and further, the blocks ranging from part three storey through to part seven storeys have been staggered in towards their upper floors.

### ***Design***

#### *Materials*

- 5.15 The blocks utilise different materials and colours in order to break up the facades and ensure the development as a whole would not be detrimental to the character of the nearby conservation area and given its riverside setting has a warehouse feel. The use of green open spaces further helps tie the scheme into the context, alongside the existing substantial Metropolitan Open Land that is within close proximity to the site. The nature of the materials used is presented in the drawings and the submitted Design and Access Statement.

#### *Crime*

- 5.16 The scheme has been designed with crime prevention in mind. The open spaces are all overlooked by windows of the accommodation and electric lighting is in place for use at night. There are no “wasted” or obscured areas where crime or incivility can occur and ground level car parking kept to a minimum in order to maximise on transparency throughout the site. Space ownership throughout the site is well defined with the use of low walls and markers such as planting and fencing.

### ***Wheelchair Accessibility and Lifetime Homes***

- 5.17 All residential units in the development would comply with the principles of Lifetime Homes with a further 10% being wheelchair capable of being adapted for wheelchair accessibility in the future.
- 5.18 The landscaping is largely flat with ramps and dropped curbs in place where there are level changes. Lifts serve each floor of every block and also go down to the basement car park level.

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**Access**

- 5.19 Vehicular access to the site will be maintained from Broom Road in the form of two entry points, situated either side of Block D. These two roads provide access/egress to the ramps that serve the basement level parking and also provide access around Blocks A and C serving the small number of car parking spaces on ground level.
- 5.20 Due to the open nature of the centre of the site, pedestrians and cyclists are free to access from the Broom Road side to the south through the central areas. Tree lined walkways provide further pedestrian access to the entry points of Blocks A, B and C.

**Affordable Housing**

- 5.21 There will be a total of 219 units on site, 12 of which will be affordable. This is the maximum level of affordable housing that can be provided and is supported by a viability assessment.

**Sustainability**

- 5.22 The proposal provides for green roofs, although two areas have been set aside to take solar panels to provide renewable energy. The shape and orientation of the blocks means there are no units that face directly north and all units will receive good light and aspect. There will also be grey water recycling.

## 6.0 PLANNING POLICY AND ALTERNATIVES

### Introduction

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the development plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise.

6.2 The current Development Plan material to the proposed redevelopment of the application site comprises:

- London Plan 2011 with Minor Amendments 2013;
- LB Richmond upon Thames Unitary Development Plan (adopted March 2005) – Saved Policies (March 2008);
- LB Richmond upon Thames Core Strategy (adopted April 2009); and
- LB Richmond Development Management Plan (adopted November 2011).

6.3 In addition to the above, the National Planning Policy Framework (NPPF) (published March 2012) and the emerging Site Allocations DPD represent material considerations in the determination of the planning application.

6.4 The Planning Statement that accompanies the planning application provides a more detailed assessment of the proposed development against relevant policies. This chapter of the ES provides a summary of the key planning issues from national policy, the Development Plan and other supplementary documents that are material to the proposed development. Policies relevant to a specific EIA topic are identified in the relevant topic chapters of this ES.

### National Policy

6.5 The National Planning Policy Framework (NPPF) was published on 27th March 2012. Paragraph 13 confirms that it constitutes guidance for local planning authorities (LPAs) and decision-takers and a material consideration in the

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determination of planning applications. The following makes reference to the relevant sections in respect of the proposed development.

- 6.6 The NPPF replaces a raft of previous national guidance, including planning policy guidance (PPGs), planning policy statements (PPSs) and circulars, with one consolidated statement of national planning policy. A small number of earlier national guidance documents remain in force and these are referred to below if relevant.
- 6.7 For a period of 12 months from the date of publication of the NPPF, policies within development plan documents written since 2004 can continue to be given weight by decision makers even if there is a small degree of conflict with policies of the NPPF.

#### Achieving Sustainable Development

- 6.8 Paragraph 7 of the NPPF states that there are three dimensions to sustainable development - economic, social and environmental and these give rise to the need for the planning system to perform a number of roles:
- An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time, to support growth and innovation; and by identifying and co-ordinating development requirements, including the provision of infrastructure;
  - A social role – supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment with accessible local services that reflect the community’s needs and support, its health, social and cultural wellbeing; and
  - An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this helping to improve biodiversity, using natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

6.9 Paragraph 8 confirms that these roles should not be undertaken in isolation because they are mutually dependant and to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

6.10 Paragraph 14 confirms that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking, this means:

- Approving development proposals that accord with the Development Plan without delay; and
- Where the Development Plan is absent, silent or relevant policies are out-of date, granting permission unless:
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
- Specific policies in this Framework indicate development should be restricted.

6.11 Paragraph 17 confirms that, within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. Relevant extracts from these principles in respect of the proposed development include:

- Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places the country needs.
- To take account of market signals, such as land prices and housing affordability, and setting out a clear strategy for allocating sufficient land which is suitable for development, taking account of the residential and business communities.
- Encouraging the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- Support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

6.12 Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regarded to market signals and the relative need for different land uses to support sustainable local communities.

#### Promoting Sustainable Transport

6.13 Paragraph 29 confirms that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Paragraph 32 confirms that all developments which generate significant amounts of movement should be supported by a Transport Statement/Assessment and that planning decisions should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 6.14 Paragraph 34 states that planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

#### Requiring Good Design

- 6.15 Paragraph 56 states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development.

#### Promoting Healthy Communities

- 6.16 Paragraph 69 confirms that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Paragraph 70 goes on to state that planning policies should plan positively for the provision of community facilities including cultural buildings.

#### Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 6.17 Paragraph 93 confirms that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

- 6.18 Paragraph 96 states that when determining planning applications, LPAs should expect new development to:

- Comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and



- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

6.19 Paragraph 99 states that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

6.20 Paragraph 100 confirms that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Paragraph 103 goes on to state that when determining planning applications, LPAs should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment.

#### Conserving and Enhancing the Natural Environment

6.21 Paragraph 109 confirms that the planning system should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, geological conservation interests and soils;
- Recognising the wider benefits of ecosystem services;
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and

- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

6.22 Paragraph 118 states that when determining planning applications, LPAs should aim to conserve and enhance biodiversity by applying the following principles (summarised as relevant to the proposed development):

- Opportunities to incorporate biodiversity in and around developments should be encouraged; and
- Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

6.23 Paragraph 121 confirms that when making planning decisions it should be ensured that:

- The site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;
- After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- Adequate site investigation information, prepared by a competent person, is presented.

6.24 Paragraph 123 states that planning decisions should aim to:

- Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; and

- Mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.

### Conserving and Enhancing the Historic Environment

- 6.25 Paragraph 128 confirms that when determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 6.26 Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
- 6.27 Paragraph 139 confirms that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to policies for designated heritage assets.

### **London Policy**

#### The Development Plan

- 6.28 There are number of policies within the London Plan (2011) which relate to the site and the development proposals and these are covered in details in the Planning Statement, with a summary of most relevant policies provided below.

- 6.29 Policy 2.7 Outer London: Economy sets out a framework for economic matters. In the related “Table 1.1 Employment projections 2007-2031 by Borough”, employment in Richmond is only forecast to grow by 2.6% up to 2031, with growth only in the last 5 years of the Plan period.
- 6.30 Policy 3.4 Optimising Housing Potential confirms that new development should optimise housing output in accordance with the density matrix in Table 3.2 and Policy 3.11 Affordable Housing Targets seeks the maximum amount of affordable housing subject to viability and a 60:40 social rent/intermediate tenure split.
- 6.31 Policy 5.2 Minimising Carbon Dioxide Emissions confirms that development proposals should make the fullest contribution to minimising CO2 emissions in accordance with the energy hierarchy of Be Lean (use less energy), Be Clean (supply energy efficiently) and Be Green (use renewable energy). It also expects all new development from 2010 to achieve Code for Sustainable Homes (CfSH) Level 4 based on a 25% reduction in CO2 emissions over 2010 Building Regulations.
- 6.32 Policy 7.7 Location and Design of Tall and Large Buildings states that such buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. The policy continues by advising that applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in the policy.

### **Local Policy**

LB Richmond upon Thames Core Strategy (adopted April 2009)

- 6.33 Policy CP1 confirms that residential development should achieve a CfSH Level 3 rating and commercial development should seek to achieve BREEAM excellent rating. Policy CP2 deals with Reducing Carbon Emissions and achieving higher targets for on site renewables.

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- 6.34 Policy CP3 deals with climate change including food risk from the River Thames. Policy CP4 encourages the enhancement of existing biodiversity sites.
- 6.35 Policy CP7 states that all new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:
- Are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity; and
  - Connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.
- 6.36 Policy CP11 deals with the River Thames Corridor and protecting and safeguarding its unique historic landscape.
- 6.37 Policy CP14 requires all new housing to be 'Lifetime Homes' compliant with 10% designed to wheelchair standards. It also expects a minimum of 25% of market housing to be small (1- bed) units but this should rise to 75% in town centre locations.
- 6.38 Policy CP15 sets a baseline affordable housing target of 50% of all new units, with a tenure mix of 40% housing for social rent and 10% immediate housing, on sites capable of ten or more units gross.
- 6.39 Policy CP19 (A) states a diverse and strong local economy will be supported by retaining land in employment uses for business, industrial and storage with Clause (B) requiring employment development that generates significant amounts of traffic to be located in accessible locations.

LB Richmond Development Management Plan (adopted November 2011)

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- 6.40 Policy SD1 confirms that new development should meet or exceed the requirements of CfSH Level 3 but this will be based on achieving 25% reduction in CO2 emissions over 2010 Building Regulations. This changed from 2013 with a 40% reduction now being sought.
- 6.41 Policy SD2 expects development to maximise opportunities for securing some form of renewable/low carbon decentralised energy network in new development and Policy SD4 requires new development to take into and account higher temperatures and the need for cooling, through layout, energy efficient design and reduced reliance on comfort cooling.
- 6.42 Policy SD5 expects that living roofs should be incorporated into new developments where technically feasible (expectation that 70% of roof plat would be used). Policy SD6 relates to Flood Risk and the application of the Sequential and Exception Test and Policy SD8 to the safeguarding of flood defences.
- 6.43 Policy OS7 confirms that new developments should provide appropriate play provision onsite where there would be child occupancy of 10 or more. Where this cannot be met on-site the Council will seek an equivalent off-site contribution.
- 6.44 Policy HD1 relates to the protection of conservation areas and Policy HD2 to the setting of listed buildings. Policy HD3 relates to the preservation and enhancement of Buildings of Townscape Merit.
- 6.45 Policy HO4 expects a mix of housing appropriate to location and encourages family sized accommodation outside of town centres and to comply with Policy CP14. It also confirms that appropriate external private and/or communal amenity space is provided to meet the needs of the development.
- 6.46 Policy HO6 confirms that the Council will expect the maximum amount of affordable housing on residential schemes having regard to Policy CP15 and site specific circumstances.

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- 6.47 Policy EM2 requires a marketing campaign or other evidence to support loss of employment floorspace or the provision of suitable alternative evidence. The policy confirms that when developing employment sites for residential use the maximum amount of affordable housing should be delivered, justified by a viability appraisal.
- 6.48 Policy TP8 confirms that all new developments should meet proposed maximum car parking standards unless the applicant can demonstrate there would be adverse impact upon the area as a result of on-street car parking. The supporting text also suggests car free development in town centres to be appropriate.
- 6.49 Policy DC1 confirms new development must be of high architectural and urban design quality. It must respect local character and be compatible in terms of scale, height, massing, proportions and form.

#### Other Material Considerations

#### Draft Site Allocations DPD (2013)

- 6.50 This was published for consultation in October/November 2013. The draft plan states:

**“TD 4 Teddington Studios, Broom Road, Teddington**

**Proposal**

Subject to re-provision of offices redevelopment for residential, including affordable units, open space and riverside walk”.

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## Consideration of Alternatives

### *Introduction*

- 6.51 The EIA Regulations require an ES to include an outline of the main alternatives considered by the applicant, indicating the main reasons for the choice made, taking into account the environmental effects.
- 6.52 This legal requirement is expressed in very general and in high-level terms, requiring only the inclusion of an "outline" of "main" alternatives and an "indication" of "main" reasons.
- 6.53 Although a full description of alternatives and a full assessment of their likely environmental effects are not required, sufficient detail should be provided to allow for a meaningful comparison between the alternatives and the proposed development.
- 6.54 It is a matter for the applicant to decide which alternatives it intends to consider. The EIA Regulations do not expressly require that an applicant considers alternatives, although it is widely encouraged at the policy level, both European and domestic, and is a feature of EIA best practice.
- 6.55 The consideration of alternatives in this ES explains how alternatives were identified and why the proposed development was chosen in preference to them, although mainly that the client occupies this site has informed some decisions.
- 6.56 Paragraph 83 of Circular 02/99 provides the following national policy guidance on the consideration of alternatives in EIA: "...consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice, and resulting in a more robust application for planning permission. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered." This policy guidance has been taken into account when preparing this ES.



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- 6.57 Alternatives should only be considered where they are feasible, realistic and genuine. This may depend on various factors, including planning policy, land ownership, financial viability, technical feasibility and design quality. Options which are unlikely to be acceptable or deliverable are not realistic alternatives and so do not need to be considered.
- 6.58 Whilst environmental effects are relevant when choosing between alternatives, other factors are also relevant. The main selection criteria which the applicant has used when choosing between the alternatives which it has considered include: planning policy, viability, design quality, market requirements, site constraints and opportunities and environmental effects.
- 6.59 The following provides an outline of the main alternatives considered in relation to the Teddington Studios site and the main reasons for choosing the proposed development in preference to them.

*No Development & Alternative Sites*

- 6.60 The site is currently occupied in the minority by Pinewood Studios and in the majority by Haymarket Media. The studio use will cease this year (2014) and this space will then become vacant. The applicant is the owner of the whole site.
- 6.61 The relocation of Haymarket's staff from Hammersmith to Teddington was always seen as a short term measure pending development of new facilities locally. Development of the site, that has been considered previously, would meet the objectives of developing new purpose built facilities for the applicant and bringing the site into active residential use with public access to the riverside for the first time.
- 6.62 In the absence of these proposals the potential of the site to contribute to the Teddington area and the Borough will remain unfulfilled in its present state. The piecemeal development of the site over the years has lead to an unattractive series of buildings that could be replaced with a far more pleasing high quality design.

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- 6.63 However, it is clear that there is an expectation to maximise the benefits from redevelopment opportunities. The site has been promoted for redevelopment by Richmond in the current draft site allocations for residential development.
- 6.64 Richmond's emerging Site Allocations DPD identifies the site "Subject to re-provision of offices redevelopment for residential, including affordable units, open space and riverside walk"
- 6.65 Therefore Haymarket Media have not considered a 'no development' alternative for the site, or the 'development of an alternative site' rather than this site, as one of the main alternatives to the proposed development, for the reasons stated above (i.e. planning policy) and because no development would only lead to the further deterioration of buildings on the site and a worsening of the local townscape (i.e. adverse environmental effects).

#### *Extent of the Site*

- 6.66 The application site includes the full area of the applicant's ownership from Broom Road to the River Thames. To the north is the successful Anglers Public House and its garden, whilst to the south is the Lensbury Club, within MOL.
- 6.67 The application site is therefore the full extent of land available for development with the retention of Weir Cottage as the only asset of merit worthy of retention.

#### *Proposed Use*

- 6.68 The applicant is a media company whose present occupation of the site is for media related businesses. They have had a long standing relationship with Teddington and Richmond Borough having previously had offices in Hampton Road and nearby locations.
- 6.69 They have temporarily relocated staff from their former Hammersmith properties to the site pending development of a new single location facility elsewhere. The

existing buildings do not provide adequate long term accommodation for their staff.

- 6.70 By relocating elsewhere within the Borough Haymarket can both retain employment in Richmond and release this site for much need housing.
- 6.71 Development of the site for residential development will provide for a range of unit sizes, some affordable housing and public access to the River Thames for the first time.
- 6.72 A key consideration in the initial stages of the design process was the potential to open up the riverside for public access something appreciated by those who attended the two consultation events in 2013. This could only be achieved through sensitive development of the application site with gaps between the buildings.
- 6.73 The proposed quantum and mix of residential accommodation has been identified on behalf of the applicant by their advisors to reflect market demand and in accordance with relevant planning policy and refined through discussion. This ensures that the proposed development remains viable and allows for the redevelopment of this previously developed site.
- 6.74 Therefore, the applicant is promoting the preferred development in preference to alternative uses of the site for the reasons stated above (i.e. planning policy, market demand), along with maximising the public realm benefits.

#### *Site Layout*

- 6.75 The proposed development layout is the result of a process of community consultation and pre-application discussions with officers of Richmond Council and to reflect relevant design policies from the Development Plan and the sites relationship to heritage assets and the River Thames. Through this design process a number of potential layouts, heights and orientations for development of the site have been explored. The development of the scheme from its early

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concept to the application scheme is explained in the Design and Access statement.

- 6.76 From the outset the orientation of development between Broom Road and the River was seen as the most appropriate layout form, with frontage development to Broom Road. This will achieve the best orientation for the proposed residential units and allow for views through the site in the direction of the river. It would also provide for the most direct route at ground level for the public to access the new river walkway.
- 6.77 Alternative options would have meant rotating the building to be parallel to the road but this would have provided poor aspect and be an impediment to physical and visual access to the river frontage.
- 6.78 Providing a broad area of open space alongside the river in addition to the riverside walk will provide an appropriate setting for the development when viewed from the river or across the river.
- 6.79 The existing access to the site is from Broom Road and through rationalisation of the access points this will remain the case, there being no alternatives.

#### Scale & Massing

- 6.80 In terms of scale and massing of the proposed development, the heights of the buildings have been the subject of considerable discussion through the public consultation and with the Council. Regard has been had to the existing building heights. The storey heights reflect a transition from Broom Road to the River and to the adjoining site boundaries, also having regard to the existing building heights.
- 6.81 The application proposals therefore form the preferred development in preference to alternative scale and massing for the reasons stated above (i.e. setting, planning policy, planning brief) and the detailed discussions held.

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### Construction Phasing

6.82 It is proposed that the construction of the development will be undertaken in three phases as set out below:

- Phase 1: E7, C and essential basement, plant, flood protection
- Phase 2: B & D
- Phase 3: E1-6 inclusive and A.

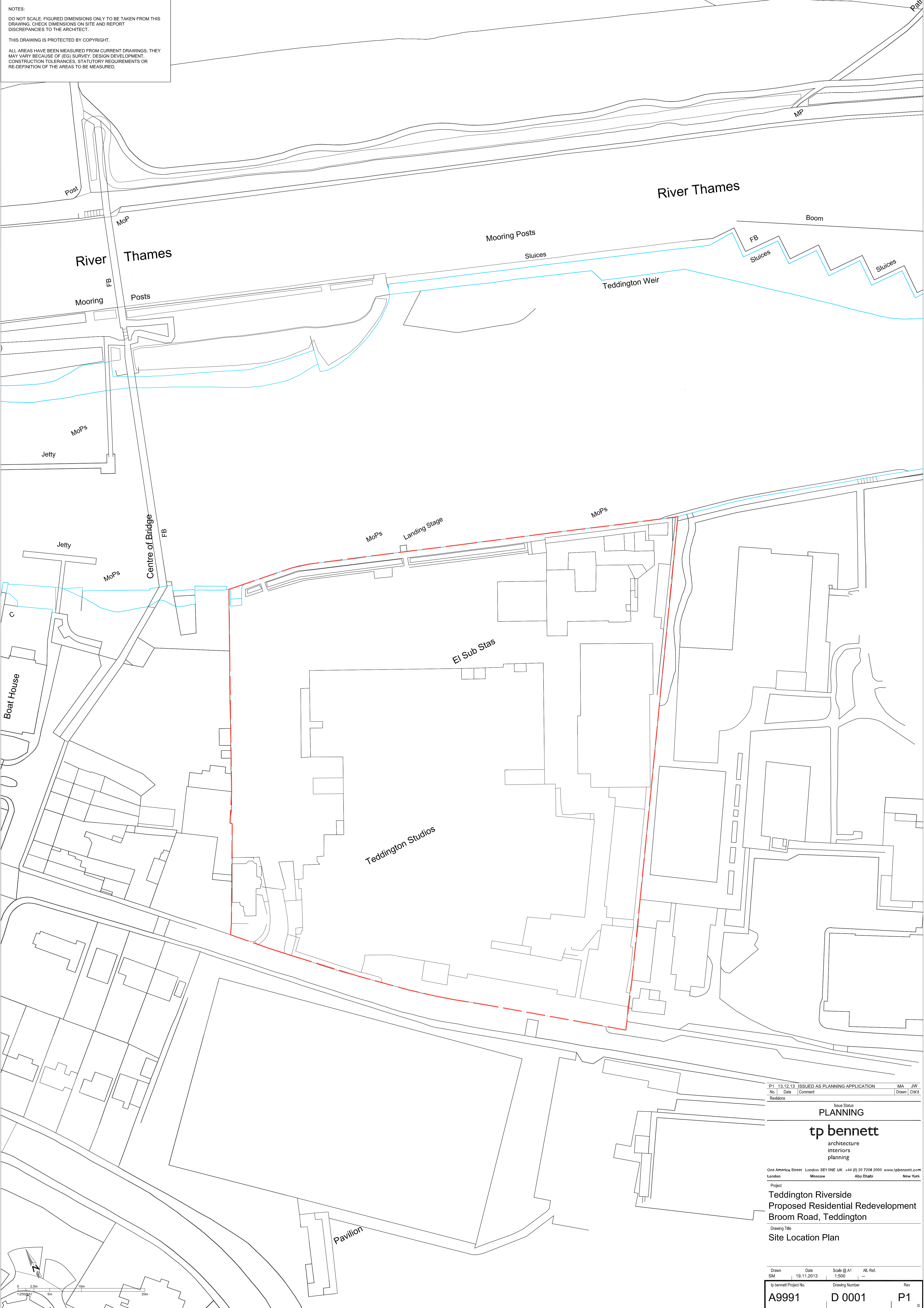
6.83 This approach to construction has been adopted as it provides the most efficient approach to delivering a development of this size over a time period.

### Conclusion

6.84 As set out above, alternatives have been considered as part of the design phase of the proposed development. These alternatives have been considered in the context of local planning policy and the opportunities and constraints of the site and surrounding area and the active discussions with the Council and the wider community. It is considered that the proposed development best achieves the requirements of local planning policy, bringing the site forward for development and providing access to the river frontage.

**APPENDIX 1**  
**LOCATION PLAN**

NOTES:  
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P1	13.12.13	ISSUED AS PLANNING APPLICATION	MA	JW
No.	Date	Comment	Drawn	CHK'd
Revisions				

Issue Status  
**PLANNING**

**tp bennett**  
 architecture  
 interiors  
 planning

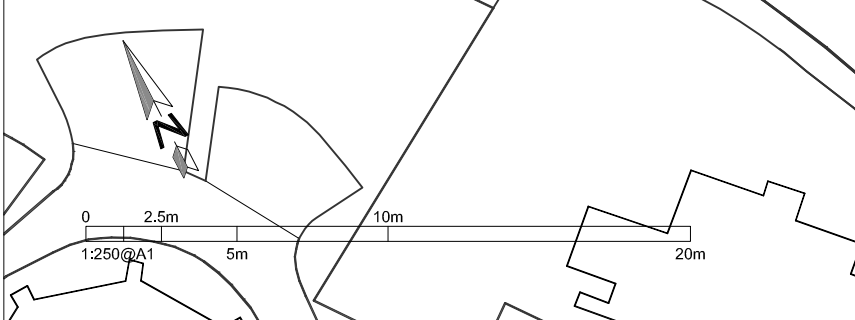
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Project  
**Teddington Riverside  
 Proposed Residential Redevelopment  
 Broom Road, Teddington**

Drawing Title  
**Site Location Plan**

Drawn	Date	Scale @ A1	Alt. Ref.
SM	19.11.2013	1:500	--

tp bennett Project No.	Drawing Number	Rev
<b>A9991</b>	<b>D 0001</b>	<b>P1</b>



**APPENDIX 2**  
**SCREENING OPINION**



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Mr Kevin Goodwin  
CGMS Consulting  
140 London Wall  
London  
EC2Y 5DN

12 August 2013

Dear Mr Goodwin,

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 –  
Regulation 5 Screening Opinion.

**Teddington Studios, Broom Road, Teddington: Redevelopment of the site  
including demolition of all buildings and erection of buildings comprising up to  
250 units.**

Thank you for your letter dated 22 July 2013 requesting a formal screening opinion of  
the Local Planning Authority under the provisions of the Town and Country Planning  
(Environmental Impact Assessment) Regulations 2011 in respect of the  
aforementioned development proposals.

Preamble

I can confirm that the local planning authority is of the view that the redevelopment  
proposals would be an Urban Development Project as defined in part 10 of Schedule  
2 of the Regulations. The site is identified in your letter as 1.86ha, I can confirm that  
the area outlined on the site plan is in excess of 1.8ha and that the proposed scheme  
therefore constitutes Schedule 2 development for the purposes of the 2011  
Regulations.

Schedule 3 of the Regulations requires the consideration of three matters in  
screening Schedule 2 developments, as follows:

- Characteristics of development
- Location of development
- Characteristics of the potential impact

### Characteristics of Development

Having regard to the criteria set out in (a) to (f) of this part of Schedule 3, in particular (a) the size of development (compared with and notwithstanding the existing development on site), (d) in relation to the production of waste resulting from demolition and (e) pollution and nuisances, it is considered that the proposed development is of sufficient size to potentially have significant effects on the environment.

With respect to the above, it is noted that paragraph A.18 of Circular 02/99 (Environmental Impact Assessment) states that 'particular consideration should be given to the potential increase in traffic, emissions and noise' and it is considered in respect to the size of the redevelopment that the development is on a 'significantly greater scale' than existing and that 'the type of impact would be markedly different in nature'.

### Location of Development

Criteria (c) (vii) and (viii) from this part of the schedule are of relevance in this case. The area surrounding the site, is relatively densely populated and whilst I agree that the proposal site does not lie within or adjacent to a 'sensitive area' as defined in Part I, the proposed development is in an environmentally sensitive location, designated an Archaeological Priority Zone, lying within the Thames Policy Area and Flood Zone 3a (a high probability of flooding) and adjacent to the River Thames (designated Metropolitan Open Land and an Other Site of Nature Importance) and bounded to the south east, north west (in part) and south west (albeit bisected by Broom Road) by Metropolitan Open Land. Teddington footbridge is a Grade II listed structure and designated as a landmark on the Proposals Map (July 2013) and the site lies adjacent to the Teddington Lock Conservation Area.

It is noted that paragraph 39 of Circular 02/99 (Environmental Impact Assessment) states that in certain cases other statutory and non statutory designations which are not included in the definition of 'sensitive areas', but which are nonetheless environmentally sensitive, may also be relevant in determining whether an EIA is required.

### Characteristics of the Potential Impacts

Having regard to the above factors, the development, both during its construction and future operation, could have a significant impact upon a number of areas of acknowledged interest. Broadly speaking these would include visual impact, air quality and noise pollution, traffic generation, land contamination, flood risk, socio economics and the wildlife corridor/habitat. Some of these potential impacts would not be reversible and would not be limited to the immediate locality, potentially affecting a significant number of people.

### Conclusions

For the reasons above, the local planning authority consider that the proposed redevelopment would potentially have significant effects on the environment and that the proposal does require an Environmental Statement, under the terms of the EIA Regulations 2011, to accompany any future planning application.

The proposed scale and massing of the new buildings, their impact with surrounding development and the impact on traffic, in particular during the construction phase, will be the major factors which need to be evaluated.

The EIA process will provide an opportunity to test these impacts in a more rigorous fashion and in so doing contribute to the bringing forward of an appropriate and beneficial form of development.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Chadwick', written in a cursive style.

**Paul Chadwick**  
Director of Environment