Environment Directorate

LONDON BOROUGH OF RICHMOND UPON THAMES

PLANNING

Civic Centre, 44 York Street, Twickenham TW1 3BZ
tel: 020 8891 7300 text phone 020 8891 7120
fax: 020 8891 7789
email: envprotection@richmond.gov.uk
website: www.richmond.gov.uk

Our Reference: 14/0914/FUL

Contact: Miss A. Liu
Contact No.:020 8891 1411

Mr K. Goodwin
CgMs Ltd
140 London Wall
London
EC2Y 5DN

2 June 2014

Dear Mr Goodwin

Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
Town and Country Planning Act 1990 (as amended).
Town and Country Planning (General Development Procedure Order) 1995.
Teddington Studios, Broom Road, Teddington, Application Ref: 14/0914/FUL

On 14 March 2014 you submitted the above planning application on behalf of Haymarket Media. This application was accompanied by an Environmental Statement (ES).

The London Borough of Richmond Upon Thames has considered the Environmental Statement submitted with the application and, pursuant to Regulation 22 of the Town and Country Planning (Environmental Assessment) (England and Wales) Regulations 2011, is of the opinion that the document should contain additional information in order for it to be an Environmental Statement. This will require amendments to the Environmental Statement, its appendices and the non-technical summary as appropriate.

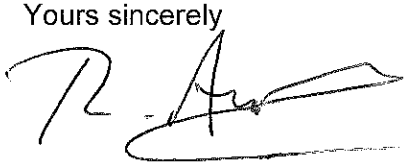
Whilst the application has been validated, I should advise that under Regulation 22 the Council is required to suspend determination of the Planning Application until the requested additional information has been received. Once the further information has been provided the London Borough of Richmond upon Thames will advertise the availability of the information. The advertisement will explain where the information can be viewed for a period of 2l days from the date of the advertisement. The London Borough of Richmond upon Thames will also write to statutory consultees notifying them that this information has been received and requesting comments within a 21 day period.

The information required under Regulation 22 (1) and (10) is detailed in the attached Detailed Comments on Environmental Statement and has in part been informed by the European Commission's Guidance on EIA - EIS Review Checklist (http://ec.europa.eu/environment/eia/eia-guidelines/g-review-full-text.pdf).

In addition the Greater London Authority has provided their Stage 1 Report, dated 29 May 2014, and it is advised that the relevant requests for clarification and further information should be addressed in the amended Environment Statement.

I look forward to hearing from you accordingly.

Yours sincerely



Robert Angus
Development Control Manager

Detailed Comments on Environmental Statement

Part 2: Project Information

- Not all relevant local plan policies, supplementary planning documents (SPD) / supplementary planning guidance (SPG), or site briefs have been identified in this chapter in terms of compliance with section 38(6) of the Planning and Compulsory Purchase Act 2004. No reference had made to Development Management policies SD3, SD7, SD10 OS5, OS11, OS12, HD7, HO2, TP1, TP2, TP3, TP6, TP7, TP9, DC3, DC4, DC5 and DC6, SPD: Affordable Housing, SPD: Car Club Strategy, SPD: Design Quality, SPD: Front Garden and other Off-Street Parking Standards, SPD: Residential Design Standards, SPD: Sustainable Construction Checklist, SPG: Contaminated Land, SPG: Design of Maximum Access, SPG: Nature Conservation and Development, SPG: Planning Obligations Strategy, SPG: Recycling for New Development, SPG: Security by Design, SPG: Trees, Landscape Design, Planting and Care, and Site Brief: Teddington Studios

- The PTAL of the site is not adequately described in the description of the site and surrounds, in particular how the site is split into 1b and 2 for the purposes of calculating planning obligations.

- The schedule of proposed residential accommodation does clearly set out total unit sizes, identification of shared ownership units, location of wheelchair units

- With regard to the 'No Development Alternative' it is not agreed that an adverse impact would occur as a result of this project not materialising. No baseline situation is set out and no identification of harm is expressed i.e. no description of harm from the continued use of the offices and studio or retention of site buildings although it is acknowledged that a negative description of the existing buildings is provided.

- It is noted that the preferred use, layout and scale and massing has been presented, but there is no exploration of continued employment use, mixed use (site brief), or riverside uses. As such, the consideration of alternative compared to that proposed is not fully addressed.

Part 3: Reports and Analysis

Chapter 1: Socio-Economic

Land Use

- No assessment has been provided on the impact of the loss of employment use which is required given that there is no marketing evidence to support lack of demand and the redevelopment of the site away from employment uses.

- No assessment on the impact of the loss of cultural, entertainment and creative industries i.e. related to Teddington Studios.

Economy

- No assessment on the impact on local economy, particularly retail, from the loss of employment and studio use.

Housing

- Section 1.5.28 states the addition of 219 new dwellings as an "insignificant addition" for the borough, which is not agreed with. Against a current annual target of 245 homes per annum the proposal would be a significant addition to housing delivery within the borough. This statement also conflicts with the Planning Statement (paragraph 6.19) which states the proposal will contribute significantly towards housing supply in both the Teddington area and the overall borough.

- Affordable housing is not referred to in the assessment of impacts which is considered necessary within a borough where land supply and the opportunity to meet local housing is limited, which is required to be addressed. A statement should be provided to demonstrate engagement with Registered Providers and justification of the lack of on-site rented units and the principle of a financial contribution towards off-site affordable housing, addressing how this reflects best value for money.

Education

- An assessment is required on the impact on tertiary education.

Health

- This section is currently being assessed and the London Borough of Richmond upon Thames reserves the right to offer further comment on this part of the chapter once this exercise has been completed.

Play Space

- It is expected that the child yield and play space, including the level of existing play spaces near the application site, be assessed within this socio-economic chapter which to date only includes an open space and sport provision assessment, but not an assessment of existing play space within 100m, 400m and 800m actual walking distance. It is noted that projected resident population has been assessed (Table 1.10); however, this does not provide an assessment of child yield and occupancy.

- It is not clear from the information provided to what extent all the other landscaped areas can be used as play space, in particular, it is unclear as to whether children will be allowed to play in the communal residents' gardens and the "riverside boulevard" areas.

Open Space

- No identification of any public open space with the exception of the public riverside walkway. A plan of the whole site should be submitted which clearly sets out what areas will be private, communal and public (including the public open space to be designated).

- A plan showing the details of the public walkway through the site and along the river should be supplied. Clarification on the access times from Broom Road through the site and the walkway along the frontage is required.

- The methodology used to assess the availability of nearby public open spaces and sports provision is considered to be incorrect. The assessment needs to use actual walking distances rather than 'as the crow flies'; in addition, distances should be provided in metres rather than miles. It also appears to be inaccuracies in where existing open spaces are situated; for example, the Ham Riverside Pitches are located near Ham House which is approximately 1.5-2km away, whereas it is stated that these are located only 0.379km away. Ham Common is almost 1.5km away rather than just 0.7km.

- Clarification required on why the assessment is to the level of open space within 4.8km, which does not to fit with the public open space categorisation as set out in the London Plan (table 7.2).

- The assessment also needs to take account of the size of the existing open spaces.

Chapter 4: Flood Risk

Flood Plain Storage

- The submitted FRA fails to demonstrate that adequate flood storage compensation can be provided on site. The broad approach is agreed, but the FRA requires further information to support the detail of the proposed compensation. A drawing similar to figure 4.12 to support the values in table 4.3 should be provided and it should be demonstrated that at every flood level after the works that floodwater can freely fill and drain. It is not considered adequate to excavate holes in the floodplain, create landlocked areas of lower ground even if connected to the main floodplain by channels or culverts or provide low level volumes to replace high level floodplains and vice versa.

- It is unclear if the proposed soil embankments indicated in section 4.3.2 is for flood protection or landscaping and clarification is required.

- Section 4.4.5 refers to a flow route and storage under both blocks B and D, but it is also stated that further voids could be incorporated under block B to provide flood storage. This discrepancy should be addressed.

Safe Access

- Whilst the finished floor levels in blocks A, B and C are set at 7.3m AOD, paragraph 4.2.1 indicates that the stairwell will be set at 6.0m AOD indicating flooding of around 1m in these areas. It is proposed that the stairwells are protected by demountable flood barriers, but these would be reliant on site management staff to erect and could fail. Clarification should be provided on how it will be ensured that site management staff are on site / can get to site at any time to erect these barriers.

- After descending the stairwell, evacuating residents would exit at ground level at 5.6m AOD, indicating flood of around 1.4m AOD for the design event in crossing the garden. As such, the access route is dangerous according to DEFRA/EA Technical Report FD2320: Flood Risk Assessment Guidance for New Development and would need to be addressed.

- The internal paths at the site will be at a minimum of 6.8m AOD, therefore sections of the path may be below the design event and flood up to a depth of 17cm. For a velocity of 1m/s the access route would be considered dangerous according to DEFRA/EA Technical Report FD2320: Flood Risk Assessment Guidance for New Development and would need to be addressed.

Finished Floor Levels

- The townhouses along Broom Road (Block E) are set at 6.2m AOD which is below the minimum requirements as set out in the SFRA. For this reason the statement in Appendix B: Flood Emergency Plan that all residential accommodation has been set a minimum of 0.3m above the design flood event and so is at an acceptably low risk of flooding is not considered to be accurate. An alternative design of the townhouses should be investigated to ensure the finished floor levels can be set at design event level. If it can be demonstrated that this is not feasible, the use of flood resistant/resilient measures and a flood emergency plan may be considered to provide an acceptable protection of these properties to the required level. Details would be required.

- The existing floor level of Weir Cottage is approximately 6.92m AOD. For this reason, the statement in Appendix B: Flood Emergency Plan that all residential accommodation has been set a minimum of 0.3m above the design flood event and so is at an acceptably low risk of flooding is not considered to be accurate. It is noted that flood resistant measures are proposed, but it is recommended a freeboard of 300mm above the design event should be demonstrated.

Deployment of Temporary Bridge

- Clarification on why a telescopic bridge has been proposed in comparison to the alternatives, and how it is considered safe to lead residents (including children, elderly and infirm people) to the source of flooding.

- Details on how the telescopic bridge takes into account the future need to raise the flood defences to the required TE2100 levels should be provided.

- Details of how the telescopic bridge would be connected to Teddington Footbridge os required.

- There is a reliance on site management staff to erect/deploy the temporary bridge from site to Teddington Lock. Clarification is required on how it will be ensured that on site management are on site / get to site at any time, areas of hardstanding for the likely route and position as it would be unacceptably risky to drive and manoeuvre a heavy duty machine over soft natural surfaces, how Flood Access Vehicle (FAV) will be moved into place, how the FAV will be maintained for the design life of the development, how access across the are between the site and Teddington Lock will be maintained in perpetuity and kept clear of trees etc.

- None of the submitted plans show a hardstanding route/area to the likely position of the place where the bridge will be deployed; given that heavy rainfall is likely to precede the need to deploy the bridge it should not manoeuvre over soft natural surfaces.

- It is considered that annual testing of the telescopic bridge is not frequent enough, especially when this is compared with weekly testing of fire alarms in other premises. Clarification is required on why this is deemed acceptable.

- The Design and Access Statement indicates that the technologies of the FAV or a 'Burg Buggy' are unproven and therefore clarification is sought.

- The FRA should indicate the expected length of the 'short walk' from Block E to the internal paths set above 6.8m AOD and the depth of the 'shallow flooding' that the 'short walk' goes through.

- Clarification is required on the level and expected flooding of the dedicated cottage walkway in the FRA.

Flood Flow Route around Tidal Defences

- The FRA indicates that the area is protected by the tidal river wall along the Thames built to a statutory level of 6.1m AOD, but the FRA and topographical survey fails to sufficiently consider the potential for a flood flow route around the end of the tidal defences. This has an impact on section 4.2.2 (b) and the need for level for level or volume for volume flood compensation up to 6.1m AOD.

Flood Risk of Parking Areas

- Consideration should be given to risk to people from floating cars and how they could be contained safely on site.

- The proposed 1m high flip-up barrier to protect the subterranean car park would be reliant on site management staff to erect and could fail. Passive protection to the car park such as bund that is not reliant on human action. Consideration should also be given to how people would be excluded from entering this area during as flood.

Changes to Tidal Defences

- Section 4.2.4 considers the realignment of the existing tidal defences along the river frontage. Further information should be provided to demonstrate the realignment proposed would not result in a loss of flood storage.

- A plan is required indicating the line of flood defence and how it will tie in with adjacent defences.

- Clarification is required on how defences will be maintained through demolition and construction.

- It should be demonstrated that the Thames tidal flood defences can be raised to 6.9m AOD in line with the Thames Estuary 2100 (TE2100) Plan requirement and the impact of raised walls on the development which may impact on wheelchair and pushchair access along the proposed riverside path should also be considered. This information is necessary to understand the EIA's proposed mitigation measures and how to deal with potential residual flood risks in the long-term and for the lifetime of the development.

Loss of Flow Paths

- Clarification on how the flow path between the site and Broom Road at the gatehouse will be maintained through a culvert given that the culvert and grills are liable to blockages and that the culvert has a fall smaller cross sectional area compared to the existing situation.

Opportunities for Development to Reduce Flood Risk

- No consideration has been provided in the FRA on the opportunity to provide access to the wider Broom Road community to safe access in combination with the proposed retractable bridge.

Surface Water Flooding

- A surface water strategy in accordance with the NPPF and Planning Practice Guidance is required to demonstrate that the proposed development will not create an increased risk of flooding from surface water.

Soakage Tests

- Soakage tests should be carried out in support of the soakaways design shown in figure 4.15

Surface Water Discharge Hierarchy

- Given that this is the least sustainable option in this location in the London Drainage hierarchy, clarification is required on why it is proposed to discharge to the Thames Water sewer system.

Surface Water Attenuation

- It has not demonstrated that the storage volume required to attenuate surface water run-off from the critical 1 in 100 change in any year storm event with an appropriate allowance for climate change can be provided on site. Surface water for up to the 1 in 100 change in any year storm event, including an allowance for climate change, must be safely contained on site.

- Section 4.3.3 indicates that half of the tank will be available for attenuation, but it is not considered safe to assume that 50% will be available. Further information in this regard is required.

- Detailed calculations of the surface water network together with a drawing indicating attenuation volumes is required to show the surface water system has been designed to ensure no flooding for the 100 year plus climate change event in the entire surface water system or no flooding for the 30 year event in the entire surface water system and that all surface water flooding can be safely contained on site for the 100 year plus climate change

Impact of Tidal Locking on Surface Water Discharge

- During high tides / flood events the water level in the Thames may be above the level of the outfall from the surface water system. Consideration should be given to the potential flood risk for these outfalls providing a route for floodwater to pass from the Thames to the site through the tidal wall.

- It is unclear from the information provided if the flap values from the detention tank and from the flood storage area behind the existing defences are new features. Further details of their location and design should be provided.

Flood Levels

- The breach modelling map as shown in figure 3.11 in the FRA includes in the key maximum flood extends for both 0.5% Annual Exceedance Probability (AEP) (1 in 200 year) 2005 and 0.5% AEP (1 in 200 year) 2017. However, the text on the map indicates that 'in the case of breaches downstream of the Thames Barrier, the 1 in 200 year plus climate change event (2017 epoch) was also modelled'. Therefore the map only indicates the extent of 2005 breach; the absence of the extent for 2017 does not show the breach would not occur in 2017; rather that modelling has not been undertaken. Clarification of the FRA is required in this respect.

Flood Emergency Plan

- Page 63: Although the site is elevated, there is the potential risk of an internal drainage failure on the site which has not been taken into account.

- Page 64: The Townhouses will not be at a safe level and only flood resistance and resilience measures will be provided for those (see comments re safe access/egress further above)

  Page 65/66: If Broom Road will be closed normal access/egress is proposed to be via Teddington Lock footbridge. Clarification is required on the practicalities and safety of the proposed "safe access" route to the opposite bank of the river at Ham. There is no assessment of a "safe" route from the opposite bank, i.e. Ham Lands, into flood zone 1, particularly as the Ham end of the bridge is also in both flood zones 3 and then 2.

- A Page 65/66: additional information is required to understand what the proposed informal shuttle arrangements" for tractors, trailers etc. will be; are these supposed to take residents over the bridge that is 'listed', consideration of its loading capabilities is required.

- Page 66: It is not agreed that there "are no special hazards" as this discounts the risk of manhole covers being displaced and any other underwater hazards and debris which may be invisible through dirty flood water.

- Page 67: Details on are the special provisions for the elderly/infirm residents to enable provision of food and access is required.

- Page 77: The RNLI station does not have 4 boats available; it only has space for two boats. In addition, the FEP should take account that the RNLI boats cannot and should not be relied upon to attend this site as they cover long distances of the river and they may be required elsewhere.

- Page 79: Rightly highlights the dangers of flood water, but the report mentions that people might have to use Broom Road under flood conditions to access the site. Details on warning notices, how many and where will they be placed on the site is required. The FEP refers to Business Continuity support; details are required on who will provide this.

Chapter 6: Ecology

- Clarification is required on who will manage the riverside walk.

- No examination on methods to enhance biodiversity by incorporating features into the design which are beneficial to wildlife such as green roofs and floating marginal vegetation to sheet piling on the river edge to improve the connectivity of the river for wildlife etc.

Chapter 8: Noise

- The information on noise is currently being assessed and the London Borough of Richmond upon Thames reserves the right to offer further comment on this part of the chapter once this exercise has been completed.

Chapter 9: Air Quality

- No assessment on dispersion of exhaust emission from boiler and CHP flues to existing or proposed residential units (receptors).

- No assessment on dispersion of exhaust emissions from mechanical ventilation for underground car park to existing or proposed residential units (receptors).

Chapter 10: Landscape, Townscape and Visual Quality

- No assessment on the potential impact on the adjacent/nearby Thames pathway National Trail has been undertaken. Appropriate mitigation measures should be incorporated for any adverse impacts.

- Further justification on the overall heights of the blocks, particularly the tallest block, is required.

- Further justification is required on the proposed massing and scale of Block C.

- A plan is required that highlighting where the proposed increase or decrease in volume would be in comparison with the existing massing and scale, accompanied with a breakdown representing the percentage change at each level.

- For the houses a breakdown of space per unit is required.

- While a number of key visual receptors have been identified (section 10.3.25) and assessed in written form, graphic representation is required to assess the impact. Outlines of the proposal superimposed on photographs of the existing situation would be sufficient.

Chapter 11: Transportation

- Details of the inter-visibility between vehicles from the garages belonging to the residential units fronting Broom Road and vehicles on the vehicle ramps are required.

- Confirmation on whether the garages to the residential units fronting Broom Road have doors, which would have implications on required dimension.

- The transport assessment states that there is a car club bay on site. This is not made clear in the plans nor has here been any evidence submitted that car club operators have agreed to this provision.

- Further details are required on how the publically accessible riverside walk connects with adjacent sites, whether cyclists can use the route, lighting, hours of access etc.

Chapter 12: Wind

- The final review on the wind assessment has not been issued by BRE and therefore the following comments may be subject to change.

- It is stated that a desk based study was considered sufficient to determine the likely effects on the wind environment. There is no information on what basis this decision was made on.

- In relation to Figure 12.2 from the Environment Statement (same as Figure 4 in Technical Report), Block A ground level passageway is shown as an area of yellow (Leisure Walking) near to the south of that block. It is agreed that windy conditions are likely to occur in this passageway for west winds, but not for the approaching wind direction as shown on the figure.

- The localised accelerated areas of flow shown as areas of yellow at some of the building corners are generally shown as emanating from the North and/or South corners of some buildings (namely Block D). There is no explanation given as to why these localised regions of wind occur. It is expected that the exposed South-West corners of the buildings to the South-West of the site to have accelerated wind conditions.

- In relation to the above, there are entrance-doors located at South-West corners of some of the Blocks (e.g. Block E to the South-East of the site). If such entrance doors are more windy then shown on the figure then this will probably change adversely the assessment of the doorway wind conditions. This in turn could affect the findings and conclusions of the Technical Report (e.g. Items 5 and 6 in the concluding remarks in the technical report) which link directly to the results presented in the Environment Statement

- Clarification is required on why an area of accelerated flow that is shown immediately to the South-East of Block E has been identified as a windy area.

- In the technical report or environment statement it is not stated whether the 'standard' surrounding upstream blockage (for all approaching directions) option of BREVe3 was used or whether the upstream blockage associated with the 'actual surroundings' was used. It is considered that 'actual surrounding' blockage should be used in wind assessments of this type as the difference can be significant, especially near to ground.

- Confirmation is required on the set back of the entrances to support the assertion that with the set-back conditions are expected to be suitable for an entrance in the windiest season. A distance of 1.5 (or 2 steps) is needed to ensure that an exiting person has sufficient time to adjust to the external wind conditions.

- Section 12.4.1 of the environment statement should be corrected from 'important' to 'importance'

- Section 6.1, para.1 of the technical report should read 'at head height above ground level'

Chapter 13: Daylight

- In the policy context, no reference is made to Development Management Plan policy DC5, SPD: Design Quality and SPD: Residential Design Standards.

- The sunlight and daylight report by Savills states that the scheme has changed since assessment, but the changes are not identified to establish whether re-assessment is justified.

- In the application of BRE guidelines the word 'aspirational' is used in the Savills report. Clarification is required to the context of the word in this application. While the BRE guidelines are not mandatory and have no statutory weight, the values quoted are minimum values.

- The report states that the BRE guidance uses Average Probable Sunlight Hours (APSH) as the methodology for calculating sunlight levels. This should read Annual Probable Sunlight Hours.

- The report seeks to exclude the Anglers Pub and Lensbury Lodge from consideration as dwellings. Valuation Office Agency records indicate that council tax is payable at both addresses, possibly for staff accommodation. It is not accepted that these properties should be excluded in consideration.

- Data is presented for loss of Average Daylight Factor (ADF) in external receptors, which is not an approach recommended by British Research Establishment (BRE) for assessing loss of light to existing properties and there is no guidance provided on how to use it in this context.

- A particular room and associated window appears to have a very low ADF compared to the other windows in the building and a substantial relative change in ADF given the moderate changes in VSC and no-sky line. It is recommended that calculations for room R2/520 and associated window W2/520 are checked or explanation given.

- The overshadowing summary suggest that if the centre of the amenity area can receive 2 hours of sunlight on March 21st that the space can be considered 'well lit'. The guidance relating to the centre point of a simple shape is given for when a detailed calculation cannot be carried out, therefore detailed calculations of the proportion of space receiving two hours of direct sun is required.

- The interior finishes used are stated to be light coloured, which give a best case scenario for ADF. However, the values are not given and it cannot be assumed that residents will continue to use them.

- The drawings for the proposals indicate that there will be balconies, and their contribution needs to be taken into account when assessing how much light the rooms within the building will receive. The discussion of balconies in the report is not presented as only relevant to existing properties, and the drawings containing the room diagrams show the following text: 'Internal ADF results, proposed scheme dated 12/12/13 without balconies'. The assessment for daylight provision therefore appears to have been carried out without the presence of balconies. Analysis excluding balcony impact is only recommended for loss of light to existing premises where the presence of balconies in some scenarios can make the relative loss of light appear worse by making the window heavily dependent on light from the lower part of the sky. Exclusion of balcony impact when assessing daylight provision in new buildings is not recommended by the BRE and balconies should be in place for this assessment in order to identify the amount of incoming daylight received by a

window (part of the calculation of ADF). ADF values presented for rooms where there are balconies planned in the vicinity are therefore considered incorrect.

- With respect to sunlight, all windows have been analysed for sunlight, when only main living room windows facing within 90° of due south would have been required. However, the additional data does no harm. One window on the first floor of Building A does not achieve the recommendation of 5% of winter sunlight hours. One window failing to achieve the guideline for winter hours but receiving plenty of year round sunlight is not unreasonable in a development of this size. However, can clarification on why the window does not achieve the guideline when the ground floor window in the same position below it does?

Chapter 14: Sustainability

- The green roofs on Buildings A and D are very limited in comparison to the overall roof surfaces. Demonstration on why more green roofs cannot be provided on the development site, including combining green roofs and PV panels, as they can be used together; living roofs increase the efficiency of solar photovoltaic panels by regulating temperature. Evidence and justification is required if no further green roofs will be incorporated into this proposal.

- Clarification is required on the regulated emissions at each stage of the energy hierarchy expressed either as a site-wide total or in terms of CO2/M2

- Further details on the solar PV panels: a) total capacity of panels (kWp) and b) Electricity generated by panels (kWh)

- Clarification on the proposed location of the cycle storage is required to achieve the credits awarded in the Code for Sustainable Homes pre-assessment. An amended site drawing demonstrating this would be sufficient

- No consideration of other sources of information alongside the BRE's Green Guide such as the Greenspec PASS endorsement and natureplus has been submitted