

APPENDIX 2.6

KEY ISSUES RAISED DURING THE EIA SCOPING PROCESS

Appendix 2.6: Key Issues Raised During the EIA Scoping Process

Key Issue Raised	Commentary and / or Where Addressed in the ES
<ul style="list-style-type: none"> The 'Development Proposal' section of the Scoping Report does not seem to detail the proposals for the 'Chalker's Corner' element of the Site. 	ES Volume 1 - Chapter 5: The Proposed Development.
<ul style="list-style-type: none"> The authority recommends under each chapter of key issues to be addressed, the relevant sensitive receptors are clearly identified. 	ES Volume 1 - Chapters 7 - 19 inclusive.
<ul style="list-style-type: none"> It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification. 	ES Volume 1 - Chapter 2: EIA Methodology and Chapter 7-19 inclusive.
<ul style="list-style-type: none"> To accord with the EIA regulations and statutory guidance, the ES should provide an outline of the main alternatives studied by the Applicant and design team with an indication of the reasons for the choices made, taking into account the environmental effects. 	ES Volume 1 - Chapter 4: Alternatives.
<ul style="list-style-type: none"> The ES should include in the Description of Development in line with (Schedule 4) and Regulation 18(3) of the EIA Regulations. 	ES Volume 1 - Chapter 5: The Proposed Development.
<ul style="list-style-type: none"> The Authority recommend, in line with Schedule 4 1 (b), to include: <ul style="list-style-type: none"> Description of requisite demolition works and excavation; and How waste will be removed. 	ES Volume 1 - Chapter 6: The Development Programme, Demolition, Alteration, Refurbishment and Construction.
Socio-Economics	
<ul style="list-style-type: none"> Include the impact from direct and indirect employment generation arising the construction stage and the operational development. 	
<ul style="list-style-type: none"> Add the long-term employment opportunities from the proposed community, health, hotel, leisure and education uses. 	
<ul style="list-style-type: none"> How the provision of new homes, including affordable homes, address local priority needs. (In relation to the affordable element these must be genuinely affordable in relation to the Council's Tenancy Strategy and Intermediate Housing Policy). 	
<ul style="list-style-type: none"> Impact on education provision resulting from the new secondary school with sixth form. 	ES Volume 1 - Chapter 7: Socio-Economics.
<ul style="list-style-type: none"> Implications of the new secondary school (pupils); commercial, community and leisure uses on all open, public, children's play space, playing fields and towpath. 	
<ul style="list-style-type: none"> Impact arising from the loss of and partial replacement of the playing field. 	
<ul style="list-style-type: none"> Impacts on crime. 	
<ul style="list-style-type: none"> Impacts on well-being and health as a result of loss of or provision of open space, children's playspace, playing fields, soft landscaping and trees. 	Not applicable. The Planning Applications are supported by a standalone

Key Issue Raised	Commentary and / or Where Addressed in the ES
	Health Impact Assessment (HIA) in line with the London Borough of Richmond upon Thames's (LBRuT's) planning checklist.
<ul style="list-style-type: none"> Impact of the proposal on neighbouring centres and parades of local importance and establish whether the proposal might draw trade away from centres and thus have potentially negative effects. 	Not applicable. The Planning Applications are supported by a standalone Retail Impact Assessment in line with LBRuT's planning checklist.
Transport and Access	
<ul style="list-style-type: none"> Impact of traffic flows upon the local road network and associated effects on driver journey times through key junctions as a result of the cumulative impacts of the Works and operational development, through each phase of the proposed Development. 	
<ul style="list-style-type: none"> When considering the effect on traffic flows associated with the Works on the local road network, this should include construction traffic, buses, pedestrians and cyclists. 	
<ul style="list-style-type: none"> Temporary effects on public transport through the Works. 	ES Volume 1 - Chapter 8: Transport and Access.
<ul style="list-style-type: none"> Impacts on public transport as a result of the cumulative impacts of the Works and the operational development, through each phase of the proposed Development - This will include train travel, and for passengers trying to board trains further up the train line travelling towards London. 	ES Volume 3 - Appendix 8.1: Transport Assessment.
<ul style="list-style-type: none"> When considering the effects of completed and operational Development upon public transport, this should include train travel, and for passengers trying to board trains further up the train line travelling towards London. 	
<ul style="list-style-type: none"> Impacts on pedestrian and cycle routes through and around the development, as a result of the cumulative impacts of the Works and the operational development, through each phase of the proposed Development 	
Noise and Vibration	
<ul style="list-style-type: none"> Temporary noise and vibration effects to existing sensitive receptors surrounding the Site as a result of noise generated by the demolition and construction processes. 	
<ul style="list-style-type: none"> Temporary vibration effects to retained Buildings of Townscape Merit within the Site as a result of demolition/construction processes. 	
<ul style="list-style-type: none"> Temporary noise effects arising from changes in traffic flows associated with the demolition/construction works. 	ES Volume 1 - Chapter 9: Noise and Vibration.
<ul style="list-style-type: none"> Change in road traffic noise levels at existing sensitive receptors as a result of the Development once completed and operational; 	
<ul style="list-style-type: none"> Noise generated from new proposed building services plant, any commercial, sports and educational. 	

Key Issue Raised	Commentary and / or Where Addressed in the ES
<ul style="list-style-type: none"> Operations and proposed public space forming a part of the completed and operational Development on existing noise sensitive receptors surrounding the Site. Impacts from noise, vibration and dust from excavation, earthworks, waste handling and storage. Temporary vibration effects on nearby listed buildings as a result of the Works. Mitigation measures such as sound proofing should be considered. 	
Air Quality	
<ul style="list-style-type: none"> Need to assess PM2.5. When considering the air quality effects from generation of dust arising from the Works; traffic emissions during the Works and operational development; effects from plant emissions / energy centre - In addition to surrounding sensitive receptors, this should include effects on the temporary workforce and future residents, employees and visitors, depending on the phasing of the Development. Air Quality Neutral - Requirements as set out in LBRUT's draft Air Quality SPD 6.1 Air Quality Neutral should be followed. This development should be Air Quality neutral or better. Use data from the Authorities own automatic urban background site at the Wetland Centre for background readings. The ES should provide details of the potential mitigation measures that will be required to safeguard the health and amenity of residents, students, employees, visitors and site workers on and around the site, pre, post and during the Works. 	<p>ES Volume 1 - Chapter 10: Air Quality.</p>
Ground Conditions	
<ul style="list-style-type: none"> Consider any asbestos on-site. Potential health and safety and surface water contamination during the Works must also be considered on the future users / occupiers of the Site Impact on soil and ground conditions / contamination from waste storage during Works. Impact on sensitive receptors (including biodiversity) from exposure to contaminated soil, groundwater, airbourne dust, ground gasses, vapours and UXO. (from waste). A contaminated Land Report is required to accompany the ES. 	<p>ES Volume 1 - Chapter 11: Ground Conditions and Contamination. ES Volume 3 - Appendix 11.1: Preliminary Environmental Risk Assessment.</p>
Surface Water Drainage and Flood Risk	
<ul style="list-style-type: none"> Impact on surface water drainage, run off and flood risk both on and off site, and whether this can be met– during Works, completed operational and cumulatively through phasing. Impact on ground / surface water, and potential flood risk from waste soil stockpiles and other waste storage areas during Works. 	<p>ES Volume 1 - Chapter 12: Surface Water Drainage and Flood Risk. ES Volume 3 - Appendix 12.1: Flood Risk</p>

Key Issue Raised	Commentary and / or Where Addressed in the ES
<ul style="list-style-type: none"> Impact on flooding as a result of loss of soft landscaping / trees. 	<p>Assessment and Drainage Strategy.</p>
<ul style="list-style-type: none"> Implications on the River Thames flood infrastructure (and flooding) during the Works. 	
<ul style="list-style-type: none"> The impact on demand for water supply and network infrastructure both on and off site and whether this can it be met– during Works, completed operational and cumulatively through phasing. 	
<ul style="list-style-type: none"> The impact on demand for Sewage Treatment and network infrastructure both on and off site and whether these can it be met - during Works, completed operational and cumulatively through phasing. 	
<ul style="list-style-type: none"> Impact on utility services as a result of piling. 	
<ul style="list-style-type: none"> Impact on the Development on increasing flood risk (and zone) elsewhere. 	
<ul style="list-style-type: none"> The FRA will need to be carried out in line with NPPF and NPPG policies and guidance on flood risk, the Council’s Core Strategy, Development Management Plan, and Local Plan and informed by the Council’s updated SFRA, 2016. 	
<ul style="list-style-type: none"> A site-specific emergency evacuation plan should be developed. 	
<ul style="list-style-type: none"> A Surface Water Drainage Strategy will be required. 	
<ul style="list-style-type: none"> Water consumption: It will need to be demonstrated that the development complies with policies DM SD 9 and LP 22, which set out the minimum mandatory targets for water consumption to be achieved for the different types of developments 	
<ul style="list-style-type: none"> Thames Water requests evidence that water & waste water capacity exists to serve the development and where it doesn’t how this will be addressed is included in the evidence submitted as part of the planning application. In line with policy DM SD 10 and LP 23 the applicant is required to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. 	
Ecology	
<ul style="list-style-type: none"> The ES should consider bats may pass along the river on the northern site boundary/Ships Lane and therefore light/noise/vibrations and disturbance may affect their movement. These effects may be permanent depending upon the duration of the effect and the resulting environment. Therefore the scope of the surveys increased to cover commuting bats using the whole site. 	<p>ES Volume 1 - Chapter 13: Ecology. ES Volume 3 - Appendix 13.1: Preliminary Ecological Appraisal (PEA). ES Volume 3 - Appendix 13.2: Protect Species Report (PSR).</p>
<ul style="list-style-type: none"> The ES should reflect the principles established by the England Biodiversity Strategy published by Defra and identify how the development’s effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. 	
<ul style="list-style-type: none"> The NPPF requires that the planning system should contribute to the enhancement of the natural environment “by establishing coherent ecological networks that are more resilient to current and future pressures” (NPPF Para 109), which should be demonstrated through the ES. 	

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<ul style="list-style-type: none"> The sensitive receptors will include (but not limited to), trees, other soft landscaping (plants / grasses); birds, river, bats, reptiles, hedgehogs, invertebrates. 	
<ul style="list-style-type: none"> Effects should consider disturbance to bat commuter routes during Works and from the layout and height of the proposed Development. 	
<ul style="list-style-type: none"> Impact on the movement of species / population as a result of the Works and Development. 	
<ul style="list-style-type: none"> The ES needs to consider the long term change and impact on protected species, habitat type, ecological value on site and adjacent to the site – during works, operational development and cumulatively through the phases of development. 	
<ul style="list-style-type: none"> The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). 	
<ul style="list-style-type: none"> Disturbance to riverside areas, which benefit both people and wildlife. 	
<ul style="list-style-type: none"> Impact on ecological value of site as a result of: Loss of landscaping / trees; dust; air quality; lighting; water quality and run off; works; increased recreational pressure (on and off site – for example Mortlake Green); and noise. 	
<ul style="list-style-type: none"> Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment. 	
Archaeology (Buried Heritage)	
<ul style="list-style-type: none"> The Authority recommends the Archaeological Environmental Statements Chapter should be supported by a desk-based assessment and archaeological evaluation. The applicants must consult the appropriate specialist bodies, Historic England and the Greater London Archaeological Advisory Service (GLAAS) with regards to archaeological matters and methodology. 	<p>ES Volume 1 - Chapter 14: Archaeology.</p> <p>ES Volume 3 - Appendix 14.1: Archaeological Desk-Based Assessment.</p>
Above Ground Built Heritage	
<ul style="list-style-type: none"> Potential impact on the structural stability of Listed Buildings and BTMs during the Works, including demolition, excavation and piling. 	<p>ES Volume 1 - Chapter 6: The Development Programme, Demolition, Alteration, Refurbishment and Construction.</p>
<ul style="list-style-type: none"> Temporary changes to the character, appearance and setting of the conservation area and adjacent conservation area during the Works. 	
<ul style="list-style-type: none"> Add Long term change to the setting of the adjacent conservation area as a result of the Proposed Development once completed and operational. 	<p>ES Volume 1 - Chapter 15: Built Heritage.</p> <p>ES Volume 3 - Appendix 15.1: Built Heritage Statement.</p>
<ul style="list-style-type: none"> Impact on the listed boundary wall between Reid Court in Williams Lane and the Site. 	
<ul style="list-style-type: none"> Impact on the site boundary walls to north and south during Works, operational development, and phasing. 	<p>ES Volume 1 - Chapter 6: The Development Programme, Demolition,</p>

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<ul style="list-style-type: none"> Impact on railway tracks and river moorings/ granite paving, during Works, operational development, and phasing. 	Alteration, Refurbishment and Construction.
<ul style="list-style-type: none"> Impact on memorial plaques during Works, operational development, and phasing. 	
<ul style="list-style-type: none"> Impact on Watney Gates adjacent to Williams Lane, during Works, operational development, and phasing. 	
<ul style="list-style-type: none"> The Built Heritage Assessment should refer to Conservation Area Statements / Studies; Village Plan; and Planning Brief. 	
<ul style="list-style-type: none"> The Built Heritage Assessment should include: <ul style="list-style-type: none"> Significance of any heritage affected, including any contribution made by their setting. The Assessment should identify what public benefits are of the Proposed Development, in order for the LPA to balance these up where the proposed Development will lead to less than substantial harm, substantial harm to or total loss of significance of a designated heritage asset. 	
<ul style="list-style-type: none"> Provision of photomontages demonstrating how the character, appearance and setting of designated and non-designated heritage assets and their significance may be affected. 	
<ul style="list-style-type: none"> The EIA also needs to consider the impact on the remaining pub on the corner of Richmond Road and Ship Lane that may not be included in the development. 	
Townscape and Visual Effects	
<ul style="list-style-type: none"> Consider impacts on the role of the Maltings as a key landmark. 	ES Volume 1 - Chapter 16: Townscape and Visual.
<ul style="list-style-type: none"> Impact on Thames Policy Area, river, footpath. 	
<ul style="list-style-type: none"> Impact on daylight / night-time environment. 	
<ul style="list-style-type: none"> Impact on visual amenity; footpaths and roads. 	
<ul style="list-style-type: none"> The Scoping Report does not outline how the 'field survey' will be undertaken. 	
<ul style="list-style-type: none"> Refer to Supplementary Planning Guidance; Supplementary Planning Documents; Village Plans; Conservation Area Statements and Studies; Thames Strategy – Kew to Chelsea and Site Planning Brief; CABE 'By Design'. 	
<ul style="list-style-type: none"> Agree scoping with LPA for views / vistas through the Site. 	
<ul style="list-style-type: none"> The consideration of landscape impacts should reflect the approach set out in the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the Landscape Character Assessment Guidance for England and Scotland (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. 	
<ul style="list-style-type: none"> The assessment should refer to the relevant National Character Areas which can be found on our website. 	

Key Issue Raised	Commentary and / or Where Addressed in the ES
Wind Microclimate	
<ul style="list-style-type: none"> The Authority requires the proposed Development to have ‘acceptable’ Lawson comfort conditions. 	
<ul style="list-style-type: none"> Whilst the report states the safety and comfort of pedestrians using the site will be a key issue, it is not stated whether or not balcony or roof terrace wind conditions will be considered (balconies and roof terraces are now frequently being considered as amenity space). Such areas should be included. 	
<ul style="list-style-type: none"> Need to include impact on cycling and road safety on and off site. 	
<ul style="list-style-type: none"> Need to consider the cumulative impact during the phasing of the works and Operational Development. 	ES Volume 1 - Chapter 17: Wind Microclimate.
<ul style="list-style-type: none"> The wind tunnel testing should be undertaken in an appropriate boundary layer simulation, and that the level of detail of the model is sufficient that it models the effects of small-scale features. Furthermore the testing should be undertaken for at least 12 approaching wind directions. 	ES Volume 3 - Appendix 17.1: Wind Microclimate Assessment.
<ul style="list-style-type: none"> Statements about the location and provenance of the long-term wind data used in the analysis, and the method by which this data is transformed to the Stag Brewery site, also need to be provided. 	
<ul style="list-style-type: none"> Which Lawson Criteria will be used? There are at least three “Lawson Criteria” that have been published. How will these criteria be interpreted with regards to seasonality? 	
Daylight, Sunlight, Overshadowing and Light Pollution	
<ul style="list-style-type: none"> Impacts on overshadowing on surrounding residential properties and gardens, the river and towpath. 	ES Volume 1 - Chapter 5: The Proposed Development.
<ul style="list-style-type: none"> Light pollution from the Works – on sensitive receptors, including existing residential properties and gardens, views along and across the River Thames, Mortlake Green, businesses and ecology / biodiversity. 	ES Volume 1 - Chapter 6: The Development Programme, Demolition, Alteration, Refurbishment and Construction.
<ul style="list-style-type: none"> Light pollution from the operational development – flood lights, and internal and external light sources on sensitive receptors, including existing residents, businesses and ecology / biodiversity. 	ES Volume 1 - Chapter 13: Ecology.
<ul style="list-style-type: none"> 	ES Volume 1 - Chapter 16: Townscape and Visual Effects.
<ul style="list-style-type: none"> In addition there may be a small number of non-domestic buildings for which loss of light could be an issue. These could include the nursery’s, schools and day care on Lower Richmond Road and Mortlake High Street. They should be analysed as well if they could be affected by the proposed development. Retail and office buildings are not normally analysed unless they have a particular requirement for daylight. 	ES Volume 1 - Chapter 18: Daylight, Sunlight, Overshadowing and Light Pollution. Volume 3 - Appendix 18.1: Daylight, Sunlight and Overshadowing Assessment. Volume 3 - Appendix 18.2: Light Pollution Assessment.

Key Issue Raised	Commentary and / or Where Addressed in the ES
Cumulative Effects	
<ul style="list-style-type: none"> • Type 1 Effects: Combined effects resultant from the Development upon a set of defined sensitive receptors (noise, dust, visual effects). The cumulative and inter-related impacts must be considered and structured compliance. <hr/> <ul style="list-style-type: none"> • Following submission of the EIA Scoping Clarification letter, LBRuT accept that <i>“there are still no other schemes within 1km of the Site that would give rise to significant environmental effects owing to their small scale and location within established residential areas. Therefore propose to exclude these schemes from the cumulative assessment and therefore a Type 2 cumulative assessment have been scoped out.”</i> However, it is recommended that the developments at Richmond upon Thames College, Egerton Road; and residential development at Hogarth Business Park, Burlington Lane, Chiswick are taken into account and included within the strategic traffic modelling within the Transport Assessment. 	<p>ES Volume 1 - Chapter 19: Cumulative Effects.</p> <p>ES Volume 3 - Appendix 2.3: EIA Scoping Clarification Letter.</p> <p>ES Volume 3 - Appendix 8: Transport Assessment.</p>
Insignificant Issues - Waste	
<ul style="list-style-type: none"> • The ES will include: <ul style="list-style-type: none"> – Likely effects arising from the transportation of waste materials will be considered within the transport and access component of the ES. – Noise and vibration, and air quality assessment will inherently consider the likely indirect effects of these vehicle trips on noise level and ambient air quality. – A Framework for the management of waste arising from the Site as a result of the Works will be set out in Chapter 6: The Development Programme, Demolition, Alteration, Refurbishment and Construction (the ‘Works’) of the ES. This framework will inform a Construction Environmental Management Plan for the Works. – Waste Management proposal will be described within Chapter 5: The Proposed Development of the ES. <hr/> • On the basis of the above, and with the following included in the ES, the Authority has no objection to waste being Scoped out: <ul style="list-style-type: none"> – The Sustainability Statement must set out clearly how waste will be managed during the works and once the development is completed and operational. – Trips by barge to export waste must be explored. – This should include impacts on air quality, noise, vibration and dust from waste handling and storage. – The ‘surface water drainage and flood risk’ section should include impacts on surface and ground water and potential flood risk, resulting from waste soil stockpiles and other waste storage areas during Works. – The ‘ground conditions and contamination’ section should include potential impacts on soil and ground conditions / contamination, resulting from waste storage during Works. 	<p>ES Volume 1 - Chapter 5: The Proposed Development, Chapter 6: Development Programme, Demolition, Refurbishment and Construction, Chapter 8: Transport and Access; Chapter 9: Noise and Vibration; Chapter 10: Air Quality; Chapter 11: Ground Conditions and Contamination; Chapter 12: Surface Water Drainage and Flood Risk.</p> <p>The Planning Applications are supported by a standalone Waste Management Plan and Sustainability Statement in line with LBRuT’s planning checklist.</p>

Key Issue Raised	Commentary and / or Where Addressed in the ES
Insignificant Issues - Solar Glare	
<ul style="list-style-type: none"> The Waterman scoping report advises that the buildings will be brick, and other materials such as stone and metal cladding would be incorporated into the design of the new building and it is anticipated that these would be orientated in such a way to fracture any reflected solar light. Therefore given the palette of materials, there is unlikely to be significant instances of solar glare and therefore it is scoped out. Notwithstanding this, the presentation material provided in March and April, indicate large areas of glazing on blocks 1, 2 and 8 (and potentially the school building). Therefore, this issue will only become clear at the final design stage. So a reasonable approach would be to agree for this to be scoped out of the EIA at the current time. However, if the materials change, then this would trigger another review of the EIA scoping report to fully address the potential impacts. 	<p>ES Volume 1 - Chapter 2: EIA Methodology.</p>
Insignificant Issues - Vibration (associated with the completed and operational Development)	
<ul style="list-style-type: none"> No objection to scoping out. 	<p>ES Volume 1 - Chapter 2: EIA Methodology.</p>
Insignificant Issues - Archaeology (Buried Heritage) (associated with the completed and operational Development)	
<ul style="list-style-type: none"> No objection to scoping out. 	<p>ES Volume 1 - Chapter 2: EIA Methodology.</p>
Insignificant Issues - Odour	
<ul style="list-style-type: none"> No objection to scoping out. 	<p>ES Volume 1 - Chapter 2: EIA Methodology.</p>
Insignificant Issues - Telecommunications	
<ul style="list-style-type: none"> Effects on telecommunications should be considered during the EIA Scoping. 	<p>ES Volume 1 - Chapter 2: EIA Methodology.</p>
Insignificant Issues - Utilities	
<ul style="list-style-type: none"> Effects on utilities should be considered during the EIA Scoping. 	<p>ES Volume 1 - Chapter 6: The Development Programme, Demolition, Alteration, Refurbishment and Construction. ES Volume 1 - Chapter 12: Surface Water Drainage and Flood Risk.</p>
Water Framework Directive (WFD)	
<ul style="list-style-type: none"> A Water Framework Directive (WFD) Assessment will be required: Development close to rivers should help to deliver the objectives of the Water Framework Directive (WFD) to improve riverside environments. This includes applying mitigation measures (improvements to the river) identified in the river basin management plan (RBMP). The EIA should ensure that there is no deterioration in the water quality of any designated WFD waterbodies that may be impacted by the proposed development. 	<p>ES Volume 1 - Chapter 13: Ecology and ES Volume 3 – Appendix 13.3: WFD Screening Request and Response.</p>

Key Issue Raised	Commentary and / or Where Addressed in the ES
<ul style="list-style-type: none">A table summarising measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.	ES Volume 1 - Chapter 20: Summary of Mitigation Measures and Likely Residual Effects.