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# Addendum: Update to Health Impact Assessment Manor Road, Richmond

An Addendum by Hatch Regeneris  
November 2019

# Avanton Richmond Development Ltd.

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# 1. Introduction

- 1.1 This Addendum presents an update to the submitted Health Impact Assessment (HIA). It has been prepared by Hatch Regeneris on behalf of Avanton Richmond Development Ltd (the Applicant) in response to proposed scheme changes for the comprehensive redevelopment of the former Homebase and Pets at Home site on Manor Road (the Site) within the London Borough of Richmond upon Thames (LBRuT).
- 1.2 Details of the Site in terms of its size, accessibility and current occupiers remain as described in the submitted HIA.

## Proposed Development and Planning History

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- 1.3 On behalf of Avanton Richmond Development Ltd, a detailed planning application (ref. 19/0510/FUL) was submitted to the London Borough of Richmond Upon Thames (LBRuT) in February 2019 for the redevelopment of the Homebase store at 84 Manor Road, North Sheen.
- 1.4 The application was considered at LBRuT Planning Committee on 3 July 2019 and was recommended for refusal by LBRuT officers. The Planning Committee resolved that they were minded to refuse the Application in line with the officer's recommendation for six reasons relating to affordable housing; design; residential amenity; living standards; energy; and absence of a legal agreement.
- 1.5 On 29 July 2019 the Mayor issued a Direction pursuant to Article 7 of the Town and Country Planning (Mayor of London) Order 2008 and powers conferred by Section 2A of the Town and Country Planning Act (1990) that he would act as the LPA for the purposes of determining the Application.
- 1.6 Further to the Mayor's direction to take over the Planning Application for his determination, the Applicant, in consultation with the GLA and TfL, has taken the opportunity to review the scheme with the principle aim of increasing the delivery of affordable housing through additional density and addressing other issues raised in the Mayor's Stage 2 Report.
- 1.7 The Amended scheme now proposes a residential-led redevelopment of five buildings of between three and ten storeys. The development will provide 433 residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), a police facility (Use Class B1), a bus layover with driver facilities (Sui Generis Use), car and cycle parking, landscaping, public and private open spaces and other necessary enabling works.
- 1.8 The proposed changes necessitate an amendment to the Applications description of development. The revised description of development is as follows:
- 1.9 Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), a police facility (Use Class B1), a bus layover with driver facilities (Sui Generis Use), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.
- 1.10 The amended scheme is referred as the 'Amended Proposed Development' and its previous iteration that was considered at LBRuT Planning Committee in 3 July 2019, is referred to as the 'Original Proposed Development'.

## Policy Background

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- 1.11 Since the submission of the original HIA (May 2019), the revised National Planning Policy Framework (NPPF) has been published. This retains the relevant priorities identified in the earlier HIA, but there have been slight changes in document references:
- The NPPF states clearly that sustainable development should promote a social objective that includes supporting ‘strong, vibrant and healthy communities’ (para. 8b). It states also at paragraph 8b that the social objective of the planning system is to foster ‘a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being’.
- 1.12 The NPPF (2019) includes specific aims for the promotion of healthy and safe communities, the most relevant of which are:
- The promotion of social interaction through the design of neighbourhoods and accessibility within them;
  - Safe and accessible places which minimise the adverse effects of crime, disorder and the fear of crime on community cohesion;
  - Places which enable and support healthy lifestyles, particularly where this would address identified local health and well-being needs, referring to green infrastructure, sports facilities, shops, access to healthy foods, allotments and layouts to encourage walking and cycling (para. 91).
- 1.13 At the London level, the current London Plan (2016, Policy 3.2 Improving health and addressing health inequalities) indicates that the Mayor will take account of the potential impact of development proposals on health and health inequalities within London and that ‘*the impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA)*’. The Draft London Plan was issued in July 2019 with changes resulting from the Examination in Public. Health priorities are set out in Policy GG3 (Creating a Healthy City) which specifies that:
- ‘the potential impacts of development proposals and development plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments’.*
- 1.14 There has been no further update to Richmond’s Local Plan. This states (see **Policy LP30: Health and Wellbeing**) that a Health Impact Assessment must be submitted with all major development proposals. According to the Local Plan, a HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative health impacts as well as measures for enhancing any potential positive impacts.

## Assessment Methodology

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- 1.15 The assessment methodology remains as stated in the submitted HIA with any relevant updates to reports and assessments prepared as part of the application process having been considered.

## Local Context

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- 1.16 The Site of the Proposed Development is located within the North Richmond ward in the London Borough of Richmond upon Thames (LBRuT). The original HIA (May 2019)

provided a brief outline of the key socio-economic characteristics of the population in North Richmond ward (the relevant small statistical area in which the site is located) and compared this with LBRuT and London. It set the baseline conditions against which the health impacts of the proposed development were assessed.

1.17 Since completion of the HIA, there have been a number of new data releases which do not fundamentally change the baseline position, but which have been updated as follows:

- Updated data from the Office for National Statistics<sup>1</sup> (ONS) indicates that there are around 11,750 people living in North Richmond in 2018. This is an increase of 250 compared with the 2017 figure described in the original HIA. It represents an increase of 8% in the ward's population since 2012, compared with an increase of 6% to 2017. This is higher growth than that of either LBRuT (4%) and London (7%) over the same period. The latest data suggest that the ward has seen a higher growth rate to 2018 compared with London than was the case in 2017 when the two rates were identical. The LBRuT growth rate was 3% from 2012-17.
- The 2018 data show that North Richmond continues to have a similar demographic profile to the LBRuT. There is no change in the proportion of the ward's population of working age (ie. aged 16-64) when compared with the London average (64% vs 68%). The 2018 data shows that 14% of the ward's residents are aged 65 and over, making its population slightly older than the London average (with 12% of residents aged 65 and over). These are also the same figures that applied in 2017.
- The original HIA referred to the GLA's population projections (central trend). It showed that that LBRuT's population was expected to grow, albeit at a slower rate than the average seen across the capital. The projections indicated that the population of LBRuT was expected to increase by +10% between 2016 and 2032, whilst that of population London will grow by +13% over the same period. No new population projections have been released so this baseline information continues to apply.
- The same conclusion applies to the assessment of projected change in the working age population. The original HIA showed that this was set to grow over the 2016-32 period by 6% with London at 9%. In addition, it showed also that the borough's population aged 65 and over was expected to increase at a slower rate than the London average (+43% compared with +47% across London).
- In 2018 the economic activity rate in LBRuT was 80% compared with 79% in the May 2019 HIA. This continues to be slightly higher than the London average (at 78%). The unemployment rate in the borough (at 3.7%) remains slightly below the London average (of 5.0%). This compares with 4.1% and 5.1% respectively at the time the May 2019 HIA was prepared.
- The latest skills data shows that qualifications levels in LBRuT are significantly above the London average with almost 68% of the economically active working age population qualified to degree level (or above) compared with 53% of London's population. This compares with 65% and 51% in the May 2019 HIA suggesting that the LBRuT has seen a further increase in its resident population qualified to degree level or higher. The latest data shows 72% of the borough's resident population is employed in managerial, professional and associate professional occupations compared to 58% for London. This compares with 71%

<sup>1</sup> Office for National Statistics (2018), 'Mid-Year Population Estimates'.

and 56% in the May 2019 HIA, pointing to a slight increase in the proportion of residents of LBRuT in these occupational categories.

1.18 No new Joint Strategic Needs Assessment (JSNA) for the LBRuT has been issued since the May 2019 HIA. The key data used in the original HIA, and the areas for improvement the JSNA identifies, continue to be:

- Life expectancy at birth is 81.9 (1.9 years higher than London) in LBRuT for men and 85.9 (1.87 years higher than London) for women;
- LBRuT is the safest borough in London for violent crime and 4<sup>th</sup> safest out of 32 boroughs for crime overall;
- LBRuT has above average level of green space per head of population and is 2<sup>nd</sup> out of 33 boroughs for bike journeys per day;
- The borough has the highest rate of volunteering in London; and
- Above average levels of education attainment and skills;

1.19 Despite this positive performance, the JSNA identifies areas where improvements are required, such as:

- **Maximising prevention opportunities** - the estimated number of people in LBRuT with unhealthy behaviours is substantial;
- **Reducing health inequalities** - issues include lower levels of life expectancy for men, high levels of child poverty, variations in educational attainment with ethnicity and those on free school meals, high health costs of the homeless and the high number of unpaid carers in the community;
- **Minimising harms and threats to health** - issues include maternal health, vaccination coverage, family context, sexual health, well-being and mental health, cancer screening levels, air quality and noise pollution; and
- **Planning for demographic change and promoting independence** - issues include the ageing population, prevalence of long-term health conditions, growth in young people and associated demand for school places and preventable emergency hospital admissions.

## 2. Health Impact Assessment

2.1 This section presents an updated version of the assessment within the submitted HIA. Where there have been no changes to the details and evidence and assessment of potential health impacts this has been stated.

**Table 2.1 Housing Quality and Design**

Assessment criteria	Relevant?	Details/ evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	Yes	The Design and Access Statement (DAS) prepared by Assael Architecture Limited confirms that the design of the Proposed Development meets design criteria of the Lifetime Homes Standards and Building Regulation requirements with 90% of the proposed units compliant with M4(2) and 10% compliant with M4(3). These standards meet GLA and Local Plan requirements.	Neutral	No further mitigation or enhancement measures required.
Does the proposal address the housing needs of older people, ie. extra care housing, lifetime homes and wheelchair accessible homes?	Yes	As per the Mayor of London’s Housing Supplementary Planning Guidance (SPG), 10% of the residential units within the development are proposed to be wheelchair accessible and range in size and tenure.  The DAS also highlights the fact that all users (including the disabled and people requiring wheelchair access) will be able to access the same areas and use the same entrances without the need for any detours.	Positive	No further mitigation or enhancement measures required.
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	Yes	The principle of providing flexible accommodation which meets the lifetime needs of older and disabled people has informed the evolution of the design for the Proposed Development to date and will continue to do so. As noted previously, the DAS confirms that in line with the Mayor’s SPG, 10% of residential units will be adapted for wheelchair users, and that the whole development will be accessible to all users without the need for any detours.	Neutral	No further mitigation or enhancement measures required.
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes	The DAS confirms that the Proposed Development promotes and adheres to good design standards as set out in national and local policy (incl. London Plan Housing SPG). Typical flat layouts presented in the DAS show that units will have generous window provision, private amenity space off the living room space, in	Neutral	No further mitigation or enhancement measures required.



		addition to ample storage and generous wardrobe space.		
		The Design Justification Statement (April 2019) prepared by Assael Architecture Ltd confirms that each stage of the design process has been reviewed by a trained WELL member of staff and assessed against WELL building standards aiming to improve the health and human experiences.		
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes	The Amended Proposed Development includes the provision of 433 dwellings ranging from one to three-bedroom apartments. In total, around 66% of all units will have two or more bedrooms aligning the Amended Proposed Development with local policy requirements for family-sized dwellings.  Furthermore, the Amended Proposed Development includes provision for 40% affordable homes by habitable room, with the tenures split 50/50 between affordable rent and intermediate tenures.	Positive	No further mitigation or enhancement measures required.
Does the proposal contain homes that are highly energy efficient (eg. a high SAP rating)?	Yes	The design principles behind the Proposed Development have been inspired by energy efficient principles, including the Mayor of London's Energy Hierarchy (ie. Be Lean, Be Clean, Be Green), SAP10 guidance and BREEAM standards (targeting for 'excellent' whenever feasible).  The revised Energy Strategy prepared by Hoare Lea confirms the principal target is to achieve 'zero carbon' for the new build residential aspects, corresponding to a 100% reduction in regulated CO2 emissions beyond the requirements of the Building Regulations Part L (2013), and a 35% reduction for commercial areas, as set out in the London Plan (2016) and set out in the LBR Local Plan (2018). In addition, the Amended Proposed Development is targeted to achieve 11.6% carbon emission reduction for residential areas at the Be Lean stage, in line with targets set within the Draft London Plan (2018).  The strategic approach to the design of the Amended Proposed Development seeks to maximise the energy efficiency of all residential units through the incorporation	Neutral	No further mitigation or enhancement measures required.

of passive design-led solutions, such as:

- An Efficient building fabric;
- Optimised glazing performance; and
- Efficient space heating and low energy lighting.

In addition, the revised Energy Strategy states an assessment was carried out to determine likely implications of centralised energy distribution at the development and it is proposed to include full trenching between all buildings, with space allocation made for future district heating pipework. Space allocation has also been made for future plate heat exchangers at the ground floor to each building, and the pipework in all risers has been sized to be able to serve each building bottom-up in future, in addition to the current top-down arrangement. A further space allocation has been made for a plate heat exchanger at the ground floor near to the site entrance, so that a future potential district energy network would only require one connection point.

The revised Energy Strategy prepared by Hoare Lea also confirms a series of measures that can be used to educate future building users on how they can reduce their day-to-day energy use by making user guides and/ or tenant fit-out guides available to them. This approach would seek to reduce the adverse effects of unregulated emissions (ie. from small-power electricity use associated with appliances and home-use energy consumption).

Overall, the Energy Strategy has found that the Proposed Development will result in a highly efficient, low carbon scheme.

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**Table 2.2 Access to Healthcare Services and Other Social Infrastructure**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal retain or re-provide existing social infrastructure?	No	The Site of the Amended Proposed Development is currently occupied by retail uses (Homebase and Pets at Home). The new masterplan proposes a mixed-use development consisting of 433 residential units (use class C3), 490 m <sup>2</sup> (GIA) of flexible retail, community and/or office space (use classes A1-A3, D2 or B1) and improvements to the public realm.	Neutral/ Adverse	Community Infrastructure Levy (CIL) contributions may be sought to address the effects of the additional residents on the increased demand for community facilities. This may include contribution towards the co-location of the library with other facilities in nearby Kew.
Does the proposal assess the impact on healthcare services?	Yes	An updated assessment of the potential impact of the Amended Proposed Development on primary healthcare services was undertaken as part of this Addendum (see updated Appendix 1). The updated assessment finds that the ratio of registered patients to FTE GP's within the local catchment area is below the HUDU benchmark of 1,800 and there is likely therefore some capacity to absorb additional patients. With a population yield of 930 new residents, the Amended Proposed Development is anticipated to increase the number of registered patients per FTE GP's by 3% which will still remain below the HUDU benchmark. In addition, not all of the residents living at the Amended Proposed Development will be additional as some may already be living within the catchment, which means that overall demand would be lower than the anticipated.	Neutral	No further mitigation or enhancement measures required.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal assess the capacity, location and accessibility of other social infrastructure, eg. schools, social care and community facilities?	Yes	This Addendum has also provided an updated assessment of the existing capacity and impact of the Amended Proposed Development on early years, primary and secondary education providers (Appendix 1). Using the GLA's Population Calculator and the Amended Proposed housing mix (as outlined in the Planning Statement) the assessment found that the Amended Proposed Development will yield 54 primary school children (aged five to 11), and 32 secondary school children (aged 12+).	Neutral	No further mitigation or enhancement measures required.

	An assessment of capacity at both primary and secondary schools within the various catchments from the Site of the Amended Proposed Development (see Appendix 1) confirms that there is sufficient capacity to accommodate additional demand.
Does the proposal explore opportunities for shared community use and co-location of services?	The updated assessment remains as stated in the submitted HIA.

**Table 2.3 Access to Open Space and Nature**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal retain and enhance existing open and natural spaces?		The updated assessment remains as stated in the submitted HIA.		
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal provide a range of play spaces for children and young people?	Yes	<p>The updated Landscape DAS confirms that allocation has been made within each courtyard, including the public central space, for provision of play facilities and a playable landscape treatment incorporating a range of furniture and play elements for children aged from 0-11yrs. The designated areas (as recommended by SPG 'Shaping Neighbourhoods: Play and Informal Recreation') have been distributed across the site to suit current unit numbers and mix.</p> <p>In addition, the DAS also confirms that 0-3 Play is fully catered for on site at the required 10 sq m per child, and that the design includes the recommended play space for the 4-11 age group within the site distributed in private courtyards and common spaces.</p> <p>The Proposed Development does not make provision for any play space for children aged 12-years and over due to restrictions on in available site area and the intent to</p>	Neutral/ Positive	<p>Community Infrastructure Levy (CIL) contributions may be sought to address shortfall in on-Site play space capacity for children aged 12-years and over. This could include contributions towards the provision of new play/ adventure facilities within existing parks.</p> <p>A financial contribution to playspace maintenance and management will be secured by S106 Agreement.</p>

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	cater for a more organised sports form of recreation for this age group, as well as casual gathering spaces and informal play activities. However, the updated DAS identifies several suitable locations for play space within the recommended 10-minute/ 800-metre walk from the Site of the Amended Proposed Development which combined with any CIL contributions will be sufficient in meeting requirements for this age group.
Does the proposal provide links between open and natural spaces and the public realm?	The updated assessment remains as stated in the submitted HIA.
Are the open and natural spaces welcoming and safe and accessible for all?	The updated assessment remains as stated in the submitted HIA.
Does the proposal set out how new open space will be managed and maintained?	The updated assessment remains as stated in the submitted HIA.

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**Table 2.4 Air Quality and Noise**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes	<p>The Sustainability Strategy prepared as part of the application process confirms that, during construction, the emissions of dust and exhaust gases will be controlled through the use of suitable mitigation measures implemented through a Construction Environmental Management Plan and a Dedicated Dust Management Plan. Furthermore, the Proposed Development will seek to minimise any construction-related impacts by achieving a high practice score on the Considerate Constructors Scheme.</p> <p>The Air Quality Assessment (prepared by Hoare Lea) carried out a risk assessment of the potential impacts of the construction phase of the development. Mitigation measures were identified consistent with the GLA's SPG and IAQM guidance. Providing these are implemented the residual impacts are considered to be not significant.</p>	Neutral	<p>Implementation via Planning Condition of a Construction Environmental Management Plan and Dust Management Plan prior to start of construction phase.</p> <p>Achieve a high practice score on the Considerate Constructors Scheme.</p>
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes	<p>The Air Quality Assessment (prepared by Hoare Lea) has determined that the operational air quality impacts of the Proposed Development are judged to be not significant. The development achieves the Air Quality Neutral (AQN) benchmarks for building and transport emissions according to the GLA's benchmarking assessment methodology. The proposed Development discourages private vehicle use by being a car-free development. Furthermore, the Transport Assessment (prepared by Sanderson Associates Ltd.) confirms that the proposed uses will result in fewer car trips, thereby resulting in an overall improvement in air quality.</p> <p>The Proposed Development also seeks to reduce air pollution by reducing its overall demand on energy (ie. as practically and economically possible) by seeking to implement energy efficiency measures (such as an efficient building fabric, optimised glazing, efficient space heating and low energy lighting) before applying renewable energy generating measures. Once completed, the Proposed Development is anticipated to</p>	Neutral	No further mitigation or enhancement measures required.

Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	<p>have solar PV cells installed on the roof of several buildings, in addition to air source heat pumps (ASHP).</p> <p>The Sustainability revised Strategy states that the Amended Proposed Development will seek to reduce noise at source and then design noise out of the scheme to reduce the need for mitigation measures. The proposed design includes three residential courtyards – the north and central courtyards are protected from external noise via the planted buffer zone, and the south courtyard is slightly more exposed. This will be mitigated via other design measures at a later stage.</p>	Neutral	Implementation of mitigation measures identified throughout construction period. Identification of mitigation measures at detailed design stage to mitigate noise.
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**Table 2.5 Accessibility and Active Travel**

Assessment criteria	Relevant?	Details/evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes	<p>In principle, the proposal is for a predominantly car-free development with no standard car-parking spaces provided.</p> <p>The updated Transport Assessment has suggested that once the scheme is operational, traffic movements within the Site will fall below current levels. In addition, the updated Transport Assessment indicates that the need for pedestrian infrastructure has influenced the design process.</p> <p>Revised Travel Plans for the Amended Proposed Development have been prepared by Sanderson Associates Ltd. It identifies actions and targets for promoting sustainable modes of travel which include walking, cycling and the use of public transport services. As part of this plan, a site-wide Travel Plan Co-ordinator (TPC) will be appointed implement the travel plan, and each commercial area will have an appointed Travel Plan Representative (TPR) reporting to the TPC. The Travel Plan highlights the importance of walking for health and well-being, and commits to the promotion of walking to local services and facilities for residents and workers.</p>	Positive	Implementation and monitoring of Travel Plan.

		The Design and Access Statement (DAS) refers to the Amended Proposed Development as a 'low traffic space' with a 'neighbourhood street' providing both shared access for pedestrians and cyclists to the main body of the site, and additional play space for children.		
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes	<p>The Amended Proposed Development will encourage cycling to and from the area. The updated Transport Assessment considers cycling as having a very important role to play in reducing congestion and air pollution as well as improving accessibility. Furthermore, the bicycle (being more affordable than the car) also has a role in promoting social equity benefits.</p> <p>To promote cycling, the updated Transport Assessment notes that 798 long-stay cycle parking spaces will be provided, the vast majority within spaces in the buildings together with two secure containers within communal courtyards. Short stay spaces (40 in total) would be located throughout the open spaces on the site. The total of 798 would exceed the Cycle Parking minimum standards set out in the draft New London Plan which implies a requirement for 791 long term cycle parking spaces.</p> <p>The updated Travel Plan notes that cycle friendly routes and cycle parking are provided throughout the Proposed Development site. The TPC will promote the physical benefits of cycling to overall health and wellbeing, whilst also offering advice on connectivity with the wider cycling infrastructure.</p>	Positive	Implementation and monitoring of Travel Plan.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes	The Amended Proposed Development is very well connected with its surroundings and areas farther afield. The DAS Addendum confirms that cycling will be well integrated within the Site, which will in turn be integrated with the wider local and sub-regional cycling network. The Site is within the vicinity of several quiet cycle routes as defined by TfL Cycling Guides. This includes Manor Road, Manor Grove, Lower Richmond and Lower Mortlake Road).	Positive	Implementation and monitoring of Travel Plan.
Does the proposal include traffic management and calming measures to help	Yes	The Amended Proposed Development is planned as a car-free development, prioritising walking and cycling. In addition, the DAS Addendum confirms that on-Site	Positive	Implementation and monitoring of Travel Plan.



reduce and minimise road injuries?		parking will be limited, and two car park spaces for car club users will be included.		
		<p>Safety is a key priority across the Amended Proposed Development, and the Applicant will work with TfL and the Local Highways Authority to prioritise road safety and make improvements to the highway in the surrounding area of the Amended Proposed Development. The updated Transport Assessment confirms that the Amended Proposed Development will encourage travel by both active (ie. walking and cycling) and sustainable (ie. public transport) modes.</p> <p>Furthermore, by providing a range of complementary/ essential amenities within the Site, it will reduce the need for residents to travel off-Site to access these services elsewhere. This will be expected to result in fewer car journeys, reducing not only air pollution but also the risk of personal injury.</p>		
Is the proposal well connected to public transport, local services and facilities?	Yes	<p>The TA points to a PTAL level of five (ie. very good) based on the online WebCAT tool. The Site is considered to be highly accessible by and to public transport, and to a wide range of services and facilities, many of which are located within a 1km radius of the site including bus stops, stations, nursery, primary and secondary schools, sports facilities, health facilities, supermarkets and other retail.</p> <p>The DAS Addendum confirms that the Bus Layover will be reprovided under Block E which has standing for four buses and provision of passive electrical vehicle charging. The Transport Assessment confirms that the Site is served by ten day-time and/ or night-time bus routes, many of which have frequencies of 15 minutes or less. The closest stops to the site are located at Manor Road, only 170-180 metres from the site.</p> <p>The Site is located around 180 metres from the nearest Mainline Station (North Sheen) which connects the area to Chiswick, London Waterloo, Wimbledon, Putney and other local destinations. In addition, the Site is also located around 1.5 km from Richmond Mainline Station</p>	Positive	Implementation and monitoring of Travel Plan.

		(ie. within the recommended walking distance of up to 2km) which is served by both London Overground and Underground services.		
		The updated Travel Plan describes initiatives to provide comprehensive information about public passenger transport routes and destinations, service frequencies, bus stop locations and other travel information in a Travel Information Pack for residents and workers. The TPC will be responsible for maintaining and disseminating up-to-date information about public transport provision.		
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes	As mentioned previously, the Amended Proposed Development is planned as a car-free development, and the updated Transport Assessment indicates that no standard car parking spaces will be provided for private vehicles. That being said, 14 parking spaces for disabled users will be included so that the Amended Proposed Development is in line with planning policy and equivalent to 3%. To reduce the need for private vehicles, two electric car club parking spaces for current and new residents will be provided. A Car Club scheme will be operated with the manager of the scheme to be confirmed. The design also allows for future expansion of accessible parking provision to 10% of units to comply with Draft London Plan (2019) policy.	Positive	Implementation and monitoring of Travel Plan.  Implementation of car club proposal.
		The updated Transport Assessment has found that the Amended Proposed Development will result in a reduction in car borne trips when compared with the current baseline, and that reductions in the number of vehicle movements are anticipated in both AM and PM peaks.		
		The updated Travel Plan recognises that the site is highly accessible to the highway network. However, initiatives including the promotion of cycling and walking, promotion of the use of public transport, the promotion of car sharing scheme based on a Travel Survey, the potential for car clubs and the potential for employers to permit home working are all identified as a initiatives which would contribute to limiting and reducing car use.		

		Options for sustainable travel will be included in a Travel Information Pack available to all prospective tenants and residents, and residents will be kept up-to-date with changes identified in reviews through mailshots.		
Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes	<p>The design of the Amended Proposed Development has been influenced by the principles set out in Building Regulations (part M), the Lifetime Homes Standards and the Equalities Act 2010. In addition, it has also been influenced by the Mayor of London's Housing SPG which states that 90% of new-build housing should be accessible and adaptable, with the rest being wheelchair accessible.</p> <p>In practice, this means that the design of the Proposed Development considers the access and circulation needs of a wide range of people, including those of parents with young children, the elderly, physically disabled and wheelchair users. The DAS confirms that within the Site, people with disability will not be segregated, but will be able to move around (as well as up and down) and gain access to the same entrances, corridors and rooms as everyone else without the need of any detours. The Proposed Development has been designed to be as inclusive as possible and will include the appropriate use of textured surfaces to assist the visually impaired. The external landscape is designed to be fully accessible to all users with path widths and gradients designed to comply with Building Regulations Part M Volume 2.</p>	Positive	No further mitigation or enhancement measures required.

**Table 2.6 Crime Reduction and Community Safety**

Assessment criteria	Relevant?	Details/evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal incorporate elements to help design out crime?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes	The submitted DAS confirms that the masterplan proposes the development of a series public, semi-public and semi-private spaces throughout the Site. In addition, the updated also confirms that all residential	Neutral	No further mitigation or enhancement measures required.

		<p>entrances are adjacent to public realm. The submitted DAS sets out a series of design techniques that will be implemented to help people living, working and/ or visiting the Proposed Development feel safe. Some of these include:</p> <ul style="list-style-type: none"> <li>• Limiting the number of units accessed from cores;</li> <li>• The potential for separating/ limiting access per floor;</li> <li>• The provision of secure and lockable bike storage;</li> <li>• Lighting designed to be sensitive to wayfinding, but discouraging to anti-social behaviour and rough sleeping; and</li> <li>• Access to private properties.</li> </ul> <p>In addition to the above, the Amended Proposed Development includes provision of a police facility within the ground floor of Block E, which will increase the safety and security of the Site.</p>		
Does the proposal include attractive, multi-use public spaces and buildings?	Yes	<p>The Amended Proposed Development will promote a mix of retail, community and/ or commercial uses (A1-A3, D2 or B1) in addition to residential uses (use class C3). A key focus of the Amended Proposed Development will be a new, multi-functional public courtyard created at the centre of the Site allowing interaction between residents and commercial users, with potential to host farmers markets, exhibitions promoting local makers and creative industries, outdoor film viewings, Christmas tree lightings and other celebrations, and gatherings of local residents.</p>	Positive	<p>No further mitigation or enhancement measures required. Define uses for flexible floorspace at reserved matters stage.</p>
Has engagement and consultation been carried out with the local community?	Yes	<p>The Applicant has had several pre-submission meetings with LBRuT, the GLA, and TfL. In addition, a series of pre-application public consultation events were held in November and December 2018. The Statement of Community Involvement submitted with the Application identifies two key aims for pre-application consultation, namely:</p> <ul style="list-style-type: none"> <li>• To inform local residents and other stakeholders about the Applicant's aspirations to introduce a high quality residential-led scheme on-Site; and</li> <li>• To gain an understanding of local views of the Applicant's proposals, engage with the local and wider community and use these views to inform proposals, identify concerns and opportunities</li> </ul>	Positive	<p>No further mitigation or enhancement measures required.</p>

wherever possible.

**Table 2.7 Access to Healthy Food**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal facilitate the supply of local food, ie allotments, community farms and farmers' markets?		The updated assessment remains as stated in the submitted HIA.		
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes	The Amended Proposed Development consists of 490 m <sup>2</sup> of flexible retail, community and/ or commercial floorspace (use classes A1-A3, D2 or B1) which will enable the scheme to better respond to local demand. At this stage it is not possible to determine the exact on-Site uses, and will seek to complement the current retail offer in the local area, which includes a well-established food store (Sainsbury's).	Neutral	No further mitigation or enhancement measures required.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area		The updated assessment remains as stated in the submitted HIA.		

**Table 2.8 Access to Work and Training**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	The Amended Proposed Development will comprise of a flexible mix of 490 m <sup>2</sup> of commercial floorspace (use class A1- A3, D2 or B1) and 433 residential units. Based on this, it is estimated that it has the potential to support between 10-25 permanent jobs and generate around £7 million in additional annual household expenditure on	Positive	Preparation and implementation of Local Employment Plan prior to start of construction and demolition phase.  Measures to target local employment (both during construction and operation) to be

		<p>food and drink, household goods and services, and recreation<sup>2</sup>. A number of the new jobs would be expected to be taken by LBRuT residents, whilst a proportion of the increased household expenditure is anticipated to be captured by businesses located in the borough.</p> <p>The Amended Proposed Development will also generate employment opportunities during its demolition and construction phase. A Local Employment Plan will be prepared and implemented by the selected contractor to ensure that the development contributes towards local employment opportunities and skills improvements (incl. apprenticeships) in LBRuT.</p>		secured through S106 agreement.
Does the proposal provide childcare facilities?	No	<p>The Amended Proposed Development does not currently include provision to build childcare facilities. An assessment of current childcare facilities within 1km of the Proposed Development identified ten early years facilities which together have capacity to accommodate 28 additional children. Based on an updated assessment of the additional demand for early years provision generated by the Amended Proposed Development, it is anticipated that 75 early years children are yielded. As such, the demand for childcare facilities arising from the Amended Proposed Development is anticipated to result in added pressure on childcare facilities within the local catchment area despite a healthy vacancy rate across the borough.</p>	Adverse	Community Infrastructure Levy (CIL) may be sought to address the effects of increased pressure on capacity for childcare facilities as per LBRuT's Regulation 123 List.
Does the proposal include managed and affordable workspace for local businesses?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal include opportunities for work for local people via local procurement arrangements?		The updated assessment remains as stated in the submitted HIA.		

<sup>2</sup> This is based on total annual household expenditure in London of around £29,000 and c. £16,400 per household per annum on food and drink, household goods and services and recreation, and is derived from data from the ONS 'Detailed household expenditure by countries and regions – UK, financial year ending 2016 to financial year ending 2018'.

Table 2.9 Social Cohesion and Lifetime Neighbourhoods				
Assessment criteria	Relevant?	Details/evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal connect with existing communities, ie. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal include a mix of uses and a range of community facilities?	Yes	The Amended Proposed Development consists of a mix of flexible retail, community and/ or commercial (use classes A1-A3, D2 or B1) uses, in addition to 433 residential units. At this stage, flexibility on the non-residential uses is being sought, which means that a portion, or all 490 m <sup>2</sup> of non-residential space could be allocated to (use class D2) community uses.  Furthermore, the Amended Proposed Development includes the creation of a new court yard that can be used for community events, in addition to parking spaces for the proposed car club that will be available to both current and future residents.	Neutral	No further mitigation or enhancement measures required.
Does the proposal provide opportunities for the voluntary and community sectors?	No	N/A	N/A	N/A
Does the proposal address the principles of Lifetime Neighbourhoods?		The updated assessment remains as stated in the submitted HIA.		

Table 2.10 Minimising Use of Resources				
Assessment criteria	Relevant?	Details/evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal make best use of existing land?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal encourage recycling (including building materials)?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal incorporate		The updated assessment remains as stated in the		

sustainable design and construction techniques?	submitted HIA.
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**Table 2.11 Climate Change**

Assessment criteria	Relevant?	Details/evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal incorporate renewable energy?		The updated assessment remains as stated in the submitted HIA.		
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, ie ventilation, shading and landscaping?	Yes	<p>The Proposed Development seeks to optimise the health and well-being of residents, staff and visitors to the Site by achieving good levels of internal daylight levels, thermal comfort, in addition to safety and security.</p> <p>The Energy Strategy confirms that the London Plan hierarchy has been followed to limit the effect of heat gains in summer.</p> <p>The Energy Strategy identifies several passive design measures that will be adopted to ensure that buildings and public spaces are designed to respond to summer and winter temperatures, these include:</p> <ul style="list-style-type: none"> <li>• Efficient mechanical ventilation with heat recovery which will limit the need for space heating in winter months, aid the mitigation of high internal temperatures in summer months, and maintain good indoor air quality.</li> <li>• The use of energy efficient lighting with low heat outputs;</li> <li>• Reduced water circulation temperatures;</li> <li>• High levels of insulation and low fabric air permeability minimising heat losses and heat gains;</li> <li>• Optimising glazing performance to ensure good daylight to the spaces whilst limiting solar gains;</li> <li>• Energy-efficient heating through ASHP; and</li> </ul> <p>The DAS indicates that overall, the Proposed Development also performs well in daylight and sunlight terms. 59% of units are dual aspect which increases to 68% when apartments with bay windows are included. 6% of units are triple aspect. 100 of the units are north facing,</p>	Positive	No further mitigation or enhancement measures required.



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	80 of which are dual aspect and 11 are triple aspect.
Does the proposal maintain or enhance biodiversity?	The updated assessment remains as stated in the submitted HIA.
Does the proposal incorporate sustainable urban drainage techniques	The updated assessment remains as stated in the submitted HIA.

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### 3. Summary/ Conclusions

- 3.1 The updated Health Impact Assessment (HIA) has indicated that there have been no changes to the outcome of the assessment of potential health impacts and all impacts (positive/neutral/adverse) remain as stated in the submitted HIA with the exception of impact on health care provision (Section 2.2). The updated assessment of the impact on health care services (GP capacity, Appendix 1) has shown there is likely to be sufficient capacity within the local catchment to accommodate any additional residents yielded from the Amended Proposed Development. As such, the impact has been revised from Adverse to Neutral.
- 3.2 For completeness, an updated assessment of the key positive or neutral health impacts is set out below:
- **Housing:** the Amended Proposed Development will provide a mix of residential (use class C3) and flexible retail, community and/ or commercial uses (use classes A1-A3, D2 or B1). The new homes created will be of various sizes and tenures and will make a contribution to LBRuT's annual housing target. It is anticipated that around 40% (by habitable rooms) of the 433 dwellings delivered on Site are either provided at affordable rent and/ or Shared Ownership.
  - **Social and community infrastructure:** an updated assessment of the Amended Proposed Development's effects on social and community infrastructure indicates that the additional demand for primary and secondary schools generated can be accommodated by current capacity. However, the analysis has found that the Amended Proposed Development may have an adverse impact on early years provision.
  - **New and improved public realm:** the Site is currently home to a large retail unit and its corresponding car parking facilities. The Amended Proposed Development seeks to change this by creating new public, semi-public and semi-private spaces, in addition to connecting the Site with the wider surrounding area. The new public realm created will be accessible to all users (incl. disabled and wheelchair users) and will include sufficient play space capacity for children aged under 12.
  - **Accessibility, Pedestrian and cycling activity:** the Amended Proposed Development is being promoted as a car-free development, with the masterplan confirming that no car parking facilities will be provided for private vehicles (with the exception of 14 disabled car parking spaces (equivalent to 3%) as per policy requirements). A Travel Plan to promote walking and cycling will be implemented, and users will be encouraged to make use of the transport connectivity available at the Site (which at PTAL five is considered to be very good). IN addition, the bus layover is being reprovided at Block E which will have standing for four buses as well as passive electric vehicle charging provision.
  - **Access to work and increased local expenditure:** the Amended Proposed Development will comprise of a flexible mix of retail, community and/ or commercial floorspace (use classes A1-A3, D2 or B1) in addition to 433 residential units. As a result, the Amended Proposed Development will have potential to support 10-25 permanent jobs and generate around £7 million in additional annual household expenditure on food and drink, household goods and services and recreation. A proportion of this spend could be expected to be captured by businesses in LBRuT. Finally, the Proposed Development will also generate employment opportunities during its demolition and construction phase by generating employment opportunities (incl. apprenticeships) and contributing to skills improvements in construction in LBRuT.

- **Good use of existing land:** the masterplan has been designed to respond to the context in which the Amended Proposed Development sits, and to make the Site accessible to a wide range of users. The Proposed Development will be entirely built on previously-developed land and will replace low density retail uses with a potential range of flexible retail, community and/ or commercial uses (use classes A1-A3, D2 or B1) in addition to 433 residential (use class C3) units. As a result, the Site will have better and improved density and be better integrated with other locations in the surrounding area.
- **Energy efficient development:** research undertaken as part of the application process has shown that at this stage there are no district energy networks to which the Site could be connected. However, space for a potential future connection has been included as part of the proposed design. The Amended Proposed Development includes a number of on-Site renewable generation measures such as the inclusion of solar photo-voltaic panels (PV) and air source heat pumps (ASHP), which together are anticipated to result in a 46% reduction in energy consumption when compared with traditional a gas boiler alternative.
- **Health and Well-being:** The design process has been reviewed at each stage by a trained WELL member of staff and assessed against WELL building standards aiming to improve the health and human experiences of those interacting with the development. The Design Justification Statement (April 2019) highlights several examples of where these standards are evidence in the design including through active design and dementia friendly design concepts.

3.3 The HIA has also identified a number of mitigation or enhancement measures which should be considered during the determination period of the planning application(s), including:

- The implementation of Secured by Design principles to ensure that both crime and anti-social behaviour are minimised, and local residents feel secure within the Proposed Development;
- A detailed estates management plan that needs to be agreed and finalised, including consideration of how open space and the public realm will be managed;
- Community Infrastructure Levy (CIL) contributions may be sought to improve capacity issues of existing early years education, a shortfall in on-site play space capacity for children aged 12-years and over, in addition to the creation of additional social and community infrastructure, such as support for the co-location of the library with other facilities in nearby Kew.
- Further consideration on how new homes will meet the Lifetime Home Standards;
- Measures that seek to target local employment opportunities and skills development (incl. apprenticeships) during demolition, construction and operational phases of the Proposed Development. This includes preparation of a Local Employment Plan by the contractor undertaking demolition and construction works;
- Consideration of how the Proposed Development will promote opportunities for work for local people via local procurement arrangements;
- Collaboration with local community and voluntary groups to identify ways in which these groups could benefit from any opportunities generated by the Proposed Development (such as potential access to affordable workspace, use of the new public square, etc.); and

- Implementation of all embedded mitigation and mitigation measures proposed in the various reports and assessments prepared as part of the application process (such as the Construction Environmental Management Plan, Dust Management Plan, etc.);
- Implement a monitoring plan to track temporary and permanent health impacts.

# Appendix A - Supply and Demand for Social & Community Infrastructure

- A.1 This appendix presents an update to supply and future demand data presented in the submitted HIA for social and community infrastructure resulting from the Amended Proposed Development. This assessment is based on best practice and research which draws on evidence from the NHS<sup>3</sup> and the Department for Education<sup>4</sup>.

## Early Years Provision

- A.2 Pre-school education facilities for children under five years of age are provided through a range of resources including local authority children centres as well as private-run nurseries.
- A.3 The LBRuT School Place Planning Strategy suggests that demand for Early Years places across the District as a whole is very high. According to the Strategy, 20 of the 40 infant and primary schools in LBRuT have attached maintained nurseries, and there is one stand-alone nursery school. Between them there are a total of 1,148 places and each of the maintained nurseries is oversubscribed with applications that far exceed the number of available places.
- A.4 Almost three quarters of the nursery places (3,931) within the District are within the private, voluntary and independent sector and therefore not free of charge. The latest available Child Care Sufficiency Assessment (September 2018) sets out there is a total of 382 childcare providers in LBRuT with 8,979 places. These include child minders, nursery school places, private, voluntary and independent nurseries, pre-school and out of school providers. According to the Assessment, there were a total of 1,125 vacant places across these providers, representing a vacancy rate of 12.44% which the Assessment deems to be a *'healthy occupancy rate for the sustainability of providers whilst allowing for some vacancies and movement for parents who are looking to access or change childcare provider'*.
- A.5 A review of data from the Ofsted website indicates that there are ten nurseries within 1km of the Proposed Development, with capacity for 406 children. Overall, the evidence indicates that 436 children are registered, which means that currently there is spare capacity for 28 children.

## Primary School Provision

- A.6 Summary information on primary school provision within a catchment area of 1.6-mile radius from the Proposed Development is presented in the table below. Overall, there are a total 15 primary schools in the surrounding of the Proposed Development. Admissions data from these schools suggests that there is a surplus of 1,074 places across all primary schools within this catchment area with none having an under-supply.

<sup>3</sup> NHS, 'Find GP Services' [Available at: <https://www.nhs.uk/Service-Search/GP/LocationSearch/4>, Accessed on: 11.01.19].

<sup>4</sup> Department for Education, 'Get information about schools' [Available at: <https://get-information-schools.service.gov.uk/?SelectedTab=Establishments&SearchType=Location>, Accessed on 11.01.19].

Primary Schools within 1.6-mile catchment of Proposed Development			
School Name	Capacity	Number of Pupils	Surplus/ Under-supply
Worple Primary School	210	192	+18
Darell Primary and Nursery School	420	290	+130
East Sheen Primary School	630	538	+92
The Russell Primary School	262	243	+19
Sheen Mount Primary School	630	536	+94
The Vineyard School	630	538	+92
Holy Trinity Church of England Primary School	450	438	+12
St Mary Magdalen's Catholic Primary School	262	260	+2
St Elizabeth's Catholic Primary School	308	298	+10
St Stephen's CofE Primary School	400	351	+49
The Queen's Church of England Primary School	420	412	+8
Kew Riverside Primary School	210	189	+21
Marshgate Primary School	500	478	+22
Thomson House School	336	208	+128
Deer Park School	420	43	+377
<b>Total</b>	<b>6,088</b>	<b>5,014</b>	<b>+1,074</b>

Source: Department for Education

## Secondary School Provision

- A.7 Summary information on secondary school provision is set out in the table below. In total, there are 28 secondary schools within a 3.4-mile radius from the Proposed Development, with enough capacity to accommodate 30,756 secondary school children. Together, these schools have 22,111 registered pupils, which means that there is currently capacity for 8,645 secondary school places.

Secondary schools within 3.4-mile catchment of Proposed Development			
School Name	Capacity	Number of Pupils	Surplus/ Under-supply
Gunnorsbury Catholic School	1168	1188	-20
Christ's Church of England Comprehensive Secondary School	750	802	-52
Elthorne Park High School	1260	1167	+93
Richmond Park Academy	1110	762	+348
The Tiffin Girls' School	1056	1042	+14
West London Free School	840	710	+130
Twyford Church of England High School	1450	1462	-12
Chiswick School	1446	1275	+171
Gumley House RC Convent School, FCJ	1292	1075	+217
Isleworth and Syon School for Boys	979	969	+10
Teddington School	1200	1305	-105
Waldegrave School	1000	1314	-314
Orleans Park School	1000	1195	-195
Ark Putney Academy	1200	515	+685
Grey Court School	1363	1263	+100

Brentford School for Girls	949	793	+156
St Richard Reynolds Catholic High School	750	594	+156
Kingsley Academy	1000	792	+208
Fulham College Boys' School	855	412	+443
Nishkam School West London	1400	234	+1166
The Green School for Girls	940	876	+64
The Kingston Academy	1188	324	+864
Turing House School	1050	225	+825
Ealing Fields High School	840	119	+721
The Richmond upon Thames School	750	268	+482
The Green School for boys	1260	236	+1024
Bolder Academy	1260	150	+1110
Ark Acton Academy	1400	1044	+356
Total	30,756	22,111	+8,645

Source: Department for Education

### Demand for Education Facilities

- A.8 The table below provides a summary of child yield resulting from the Proposed Development for early years, as well as primary and secondary school provision. This assessment is based on the Greater London Authority's (GLA) Population Yield Calculator<sup>5</sup> and draws on the Amended proposed housing mix.

Child yield from Proposed Development	
	Number of Children
0-4 years of age	75
5-11 years of age	54
12-17 years	32
Total children	161

Source: GLA Population Calculator V3.2, June 2019.

- A.9 It is estimated that the Amended Proposed Development would result in an early years' yield (ie. children aged under five years) of 75 children. Not all of these children will require nursery places. Evidence from LBRuT suggests that whilst demand for early years providers is high across the borough there is a healthy borough-wide vacancy rate. However, the analysis presented above suggests that there are around 28 vacancies within the Amended Proposed Development's catchment area and it is unlikely therefore this will be sufficient to accommodate the early years child yield.
- A.10 The table above also shows that the Proposed Development will yield 54 children aged five to 11, or primary school-aged children. The analysis of current provision presented above indicates that at present there is a surplus in capacity of primary school places within the Proposed Development's catchment. Based on this, the additional demand on primary school capacity within a 1.6-mile radius from the Proposed Development could be expected to be absorbed by local schools.

<sup>5</sup> GLA Population Yield Calculator, V3.2, June 2019.

- A.11 In terms of Secondary school pupils, the analysis presented above shows that the Proposed Development is expected to yield 32 children aged 12 and over. The analysis of secondary school capacity within 3.4 miles from the Site has shown that there is more than sufficient capacity to accommodate the additional demand resulting from the Proposed Development.
- A.12 It should also be noted that in reality not all of these children will be additional to the area and some may already reside or attend schools considered in the catchment.

#### **Primary Health Care Provision**

- A.13 Summary information on GP provision is set out in the table below. Based on the data from the NHS, there are currently three GP surgeries within a one-mile radius from the Proposed Development. Together, these practices provide 23 GPs (or the equivalent of 18.4 FTE GPs), and have over 29,716 registered patients.
- A.14 According to the NHS, there is no recommended number of patients per FTE GP per practices. This recognises the differing needs of the registered patients of GP practices. However, the NHS London Healthy Urban Development Unit (HUDU) use a standard figure of 1,800 patients per FTE GP to benchmark capacity.
- A.15 Based on this it is estimated that the average number of registered patients per FTE GP within a one-mile radius from the Proposed Development is around 1,615. This indicates that at the local level, patient levels are slightly lower than the HUDU benchmark.

#### **Demand on Health Care Provision**

- A.16 The Amended Proposed Development is anticipated to include a housing mix of different-sized dwellings and tenures. According to the GLA's Population Calculator and the Amended proposed housing mix, the Amended Proposed Development will yield an overall population of 930 people. The analysis presented above shows that the average number of registered patients per FTE GP is around 1,615 which is lower than HUDU's suggested benchmark.
- A.17 The additional 919 residents living within the Amended Proposed Development are anticipated to add further pressure on local healthcare services. Overall, it is estimated that the Amended Proposed Development will increase the number of registered patients per FTE GP to 1,665 which is still below the HUDU benchmark of 1,800. Based on this analysis it is likely that existing GP's can cater for the population yield resulting from the Amended Proposed Development. Furthermore, it is likely that some of the residents within the Proposed Development already live within the current catchment of local health services which would result in lower demand on local healthcare services than stated above.





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