

APPENDIX 2.3
2018 PLANNING APPLICATIONS EIA SCOPING CLARIFICATION
RESPONSES

Lucy Thatcher
Strategic Applications Manager (Richmond)
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Civic Centre
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Our ref: SJA/035353.00001

26 June 2017

Dear Lucy

Former Stag Brewery - draft scoping opinion

We act for Reselton Properties Limited in connection with the planning application for the Former Stag Brewery.

We reviewed the Environmental Impact Assessment Scoping Report (the **Scoping Report**) prepared by Waterman IE prior to its submission. We are aware that discussions have taken place between the London Borough of Richmond upon Thames (the **Council**) and our client's consultants and we have seen the draft scoping opinion (the **Draft Opinion**) prepared by the Council. The Council have stated that they are currently unable to finalise a scoping opinion as insufficient information has been provided.

The issues raised in the draft scoping opinion and the detail requested substantially exceeds that normally required. In particular:

- it covers areas of work and issues that are unlikely to raise significant likely environmental impacts; and
- it raises points of detail that do not need to be addressed in a Scoping Report.

Our advice to Reselton is that an EIA that reflects the Scoping Report would be legally compliant.

1 Legislative requirements

1.1 As the request for the scoping opinion was submitted before 16 May 2017, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the **2011 Regulations**) apply to this development.

1.2 Regulation 13(1) of the 2011 Regulations states that:

"A person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the information to be provided in the environmental statement (a "scoping opinion")"

- 1.3 Scoping is not a mandatory requirement. The procedure is designed, in part, to ensure that there is agreement about the broad topics that will be covered, allowing the parties to agree those areas where there are unlikely to be any significant likely environmental effects. It also allows consultees to highlight issues that may need to be covered.
- 1.4 Regulation 13(2) of the 2011 Regulations require that a scoping request include:
- "(a) in relation to an application for planning permission—*
- (i) a plan sufficient to identify the land;*
- (ii) a brief description of the nature and purpose of the development and of its possible effects on the environment; and*
- (iii) such other information or representations as the person making the request may wish to provide or make;"*
- 1.5 The 2011 Regulations do not specify that information that should be provided on baseline surveys, how receptors will be valued, the criteria against which significance of effects will be evaluated, methods to predict significance/magnitude of effects, definition of levels of significance of effects, indication of likely effects and types of mitigation, as requested by the Council in the Draft Opinion.
- 1.6 Regulation 13(6) of the 2011 Regulations states:
- "Before adopting a scoping opinion the authority shall take into account—*
- (a) the specific characteristics of the particular development;*
- (b) the specific characteristics of development of the type concerned; and*
- (c) the environmental features likely to be affected by the development."*
- 1.7 The Planning Practice Guidance sets out that environmental impact assessments *"should limit the scope of assessment to those aspects of the environment that are likely to be significantly affected"* (Paragraph: 002 Reference ID: 4-002-2014030). Some of the information requested in the Draft Opinion appears to exceed a consideration of the significant likely environmental effects of the proposed development.
- 1.8 We note that the Scoping Opinion notes general requirements for Environmental Statements in several places. Schedule 4 of the 2011 Regulations sets out in detail the information which is required for the full Environmental Statement. This information is not required at the scoping request stage.
- 1.9 Our client is keen to note that this is a high threshold, and that the intention is to prepare a thorough Environmental Statement which addresses the likely significant effects, and meets the statutory requirements.
- 1.10 As an Environmental Statement will be prepared to meet these requirements, we do not anticipate that any requests for further information will be needed. We consider that some of the information specified in the Draft Opinion is not necessary to consider the likely significant effects of the proposed development, and we would resist requests for such information.


1.11 We note that some of the points raised are sensible planning issues, but do not relate to significant environmental effects. These will be dealt with in the other planning application documents, as set out in detail in the Waterman IE response.

2 Proposed approach

- 2.1 There is no requirement in the 2011 Regulations for a scoping opinion. Our client has sought to cooperate with the Council to agree the scope of the Environmental Statement, but it has not been possible for the Council to issue a scoping opinion despite substantial joint efforts and several extensions of time.
- 2.2 On this basis our client intends to progress the Environmental Statement without a scoping opinion from the Council. The relevant points of the Draft Opinion will be taken into account in preparing the Environmental Statement. Waterman IE have considered the points which they consider to be relevant in their response.
- 2.3 Our clients are willing to apply to the Secretary of State for a scoping direction if that would provide comfort to the Council. They will, in the meantime, continue to develop proposals for the site and to prepare the Environmental Statement. Gerald Eve will contact you to discuss this option.

Please let us know if it would assist to discuss. As noted above, Waterman IE are preparing a separate response to these issues.

Yours sincerely


Stephen Ashworth
Partner
Dentons UKMEA LLP

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Our Ref: WIE10667-101.170626_EIAScope
Your Ref:

Date: 26th June 2017

Ms. Lucy Thatcher
Environment Directorate
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Dear Lucy,

RE: The Stag Brewery - EIA Scoping Matters

Thank you for your draft comments on Environmental Impact Assessment (EIA) Scoping matters received thus far set out with the 'draft EIA Scoping Opinion' and for meeting with Waterman Infrastructure & Environment (Waterman IE) on Wednesday 14th June 2017 to discuss. Having considered matters further with the Applicant team including the Applicant's Planning Lawyers (Dentons UKMEA LLP), and noting that EIA Scoping is **not** a mandatory requirement of The Town and Country Planning (Environmental Impact Assessment) Regulations, 2011, as amended (the EIA Regulations, 2011, as amended) we will progress with the EIA work-stream in the absence of an EIA Scoping Opinion.

Although we consider the request for a formal EIA Scoping Opinion (including an EIA Scoping Report) provides sufficient information for London Borough of Richmond Upon Thames (LBRuT) to form a formal Scoping Opinion (further details are set out later within this letter), if LBRuT are still concerned regarding the level of detail provided at this stage, it is suggested that the matter should be directed to the Secretary of State for an independent assessment. We have nevertheless agreed to an extension of time for a response on the request for a formal EIA Scoping Opinion until Tuesday 27th June, in order to allow the LBRuT sufficient time to consider this letter and also the correspondence from Dentons UKMEA LLP.

For the avoidance of doubt, a request for a formal EIA Scoping Opinion was made on 30th March 2016. Under the transitional arrangement stated in The Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations, 2017) the Applicant's EIA can (and should) progress in line with the EIA Regulations, 2011, as amended. Although it has been verbally confirmed LBRuT's comments to date have been made in line with the EIA Regulations, 2011, this is not clear and wording in what is referred to as the 'draft Scoping Opinion' contradicts this. This is an important point as the requirements of the EIA Regulations, 2011, as amended and the EIA Regulations, 2017 differ. We wish to re-iterate that in this case, only the EIA Regulations, 2011, as amended apply.

The draft Scoping Opinion concludes that a formal Scoping Opinion cannot be provided as not enough detail is provided in our EIA Scoping request (including an EIA Scoping Report) in relation to:

- Detailed baseline surveys.
- Detail on exactly how receptors will be valued.
- Details on demolition and construction timing sequencing.

- Details on topic specific significance criteria.
- Details on mitigation.

As discussed on 14th June 2017, it is Waterman IE's view that none of the above are required 'in detail' to inform an EIA Scoping Opinion (insofar as the 2011 Regulations, as amended apply); this is tried and tested through many years of experience on some of the largest property related projects in the UK and is also the opinion of Dentons. Whilst some EIA Scoping Reports may provide this information to some degree, it is not a legal requirement and one must always aim to be pragmatic and proportional. Furthermore, at the EIA Scoping stage, it is unusual for such detail to exist. Certainly, we are not at a stage where we can provide detail in relation to many of the above points. What is requested is more akin to what is required in the final Environmental Statement (ES) and should not preclude a Local Planning Authority (LPA) from forming a robust EIA Scoping Opinion. Rest assured, the final ES will provide details on all the above.

Turning to the requests / comments made in relation to each environmental topic area, these appear to fall into three categories:

1. **Items that are requested which are already accounted for in our proposed scope:** We are pleased to observe that these are many in example.
2. **Items that are requested and have a place in the suite of planning application documents, but not the ES:** For example, as was verbally agreed at the meeting of 14th June 2016, the following separate stand-alone documents will be prepared to support the planning applications and do not need to be duplicated in the ES:
 - A Planning Statement (dealing with the point requesting justification for the proposed land uses, their quantum and density).
 - A Design and Access Statement (dealing with Computer Generated Images (GCIs) of 'internal' views within the Development).
 - A Design Code (associated with the Outline Planning Application).
 - A Retail Impact Assessment (RIA).
 - A Health Impact Assessment (HIA).

In addition, whilst not discussed at the meeting of 14th June 2016, the following additional separate stand-alone documents will be prepared to support the planning applications out-with the ES:

- Framework Construction Management Statement (incorporating Transport for London's Construction Logistics Plan).
 - Waste Management Plan (during the demolition, alteration, refurbishment and construction works and during operation of the Development).
3. **Items that are requested which Waterman IE believe are not required as they would be unlikely give rise to 'likely' or 'significant' effects:** Just one example (not exhaustive) is the request to assess the effects of tree removal and replacement planting on noise. However, the removal and planting of trees will not have any material impact upon noise. It has been proven that it takes a dense tree standing of 100m thick to reduce noise levels by 0.1dBA. The human ear can only detect an audible 'change' in noise at the 3dBA level. As such, one can see the removal and re-planting of trees likely to be proposed by the Development will not impact noise levels.

Waterman IE and Denton's concern with this type of request is that if we were to concede, we would not be fulfilling the requirements of the EIA Regulations 2011, as amended i.e. to identify the "...likely significant environmental effects..." of a project; not every possible effect that may or may not result which has been advised against in the courts on the basis that this approach would not allow a

determining authority to “...see the wood from the trees...” in relation to environmental matters and therefore hinder sensible and pragmatic planning decisions.

Notwithstanding the above, we clarify the following which were raised as particular issues in the draft EIA Scoping Opinion.

- **Description of the Development:** A concern noted in the draft Scoping Opinion relates to the lack of detail regarding the proposals at Chalkers Corner. As per our EIA Scoping Report, it can be confirmed the ‘Development’ for the purposes of the EIA will include the full content of the outline and detailed planning applications, including the proposals at Chalkers Corner. Currently, the latter envisages the following improvements to Chalkers Corner Junction:
 - The realignment of Lower Richmond Road as it approaches Chalkers Corner Junction.
 - Creation of an additional lane for turning left onto Clifford Avenue.
 - Provision of an extended left turn lane from Clifford Avenue into Lower Richmond Road.
 - Enhancement to pedestrian and cycle facilities.
 - Reconfiguration of small car park on south west corner of Lower Richmond Road arm to include new planting.

The proposed scope of the EIA would not be materially affected by the proposals at Chalkers Corner. However, it is confirmed that the geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for the topic areas of transport and access, noise and vibration, air quality, surface water drainage and flood risk, ecology and townscape and visual effects.

- **Significance Criteria:** The likely significant environmental effects associated with the Development will be assessed with reference to definitive standards and legislation, where available. Where it is not possible to quantify the likely significant effects, qualitative assessments will be carried out, based on available knowledge and professional judgement. Where professional judgement is to be used, or where uncertainty exists, this will be stated in the ES.

The significance of the predicted likely significant effect will be determined with reference to assessment criteria for each environmental topic considered in the ES. The criteria aim to apply a common EIA approach of classifying effects according to whether they are substantial, moderate, minor or insignificant and whether the effects are considered to be adverse or beneficial.

Specific criteria for each environmental topic will be developed, giving due regard to the following factors:

- Extent and magnitude of the effect.
- Duration of the effect (whether short, medium or long-term).
- Nature of the effect (whether direct or indirect, reversible or irreversible).
- Likelihood of the effect to occur.
- Whether the effect occurs in isolation, is cumulative or interactive.
- Performance against environmental quality standards or other relevant pollution control thresholds.
- Sensitivity of the receptor.
- Compatibility with environmental policies, as relevant.

To provide a consistent approach to expressing the outcomes of the various assessments undertaken as part of the EIA, the following terminology will be used throughout the ES:

- Beneficial effect of major significance.

- Beneficial effect of moderate significance.
- Beneficial effect of minor significance.
- Insignificant effect: No significant effect (either adverse or beneficial) to an environmental resource or receptor.
- Adverse effect of minor significance.
- Adverse effect of moderate significance.
- Adverse effect of major significance.

In the ES the following terminology will be used to define the temporal and spatial scale of the effects:

- 'Short' to 'medium-term' effects will be those associated with the demolition, alteration, refurbishment and construction works.
- 'Long-term' effects will be those associated with the completed and operational Development.
- 'Local' effects will be those affecting neighbouring receptors.
- 'District' effects will be those which are likely to occur to receptors within LBRuT.
- 'Sub-regional' effects are those affecting Boroughs adjacent to LBRuT.
- 'Regional' effects will be those affecting receptors across Greater London.
- 'National' effects will be those that affecting receptors within the UK.

Regional and National effects are unlikely to result.

- **Assessment of 'Timeslices':** As stated in the EIA Scoping Report, the ES will assess and identify the likely significant effects of the demolition, alteration, refurbishment and construction works, in addition to the likely significant effects of the completed and operational Development. With respect to the former, if the Development is to be implemented and occupied in a phased manner, then 'interim receptors' present on the Site when construction works are underway (for example residents of the Development) will be appropriately considered in the assessments. Such assessments will focus on worst-case effects.
- **Cumulative Assessment:** The draft EIA Scoping Opinion disagrees with the well tried and tested criteria proposed for identification of 'other schemes' to be considered in the cumulative assessment. No reasonable alternative method is provided. However, as discussed on 14th June 2017, Waterman IE together with Gerald Eve, undertook a thorough search of valid planning permission within 1km of the Site. As requested by LBRuT, major schemes within LBRuT and the London Borough of Hounslow (LBH), and below the cumulative criteria threshold set out in the EIA Scoping Report, were reviewed. It was concluded that from this exercise, 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. The additional cumulative search exercise and further justification for scoping out type 2 cumulative effects is provided in **Annex 1**.

In addition, we will consider points made within the draft EIA Scoping Opinion where Waterman IE and Dentons consider them to be appropriate and / or of benefit regarding timescale issues. These will likely include:

- **Use of the Wetland Centre air quality monitoring station:** It can be confirmed that data from this monitoring station, together with data from diffusion tubes located at Lower Richmond Road (DT51) and Sheen Lane (DT51) will be used to verify the air quality model.
- **Water Framework Directive:** Waterman IE will liaise with the Environment Agency (EA) regarding the need to undertake a Water Framework Directive Assessment (WFDA). It is considered likely a WFD Screening document will be required to set out the Development in relation to water resources

issues ((i.e. the replacement of the flood defences and inclusion of new water outflows) and qualitatively discuss the potential effects upon aquatic ecology. The aim of the WFD Screening document will be to effectively state that there will be no effect on the Ecological Potential of the Upper Thames and therefore a full WFDA is not required.

- **Bat activity surveys:** As part of ecological surveys undertaken to date, Waterman IE completed a Preliminary Ecological Appraisal (PEA) in March 2016. This concludes “...*the Site offers limited potential for foraging and commuting bats and it is therefore not considered necessary to undertake bat activity surveys at the Site*”. However, Waterman IE did undertake evening emergence and pre-dawn re-entry surveys as part of a Protected Species Report (PSR) at certain buildings and trees on the Site to determine the presence or absence of roosting bats. No roosting bats were recorded.

During the evening emergence and pre-dawn re-entry surveys undertaken 20th July 2016, a suitably qualified surveyor was positioned outside The Ship public house. At this location, a single serotine commuting pass and one / two commuting and foraging noctule bats were recorded at a level and species one would expect given the existing light spill from the Site and existing street / road lighting. Other surveys at the buildings and trees on the Site recorded noctule, soprano and common pipistrelle bats, again with a level and species one would expect given the existing habitats and lighting on and adjacent to the Site. It is noted that none of the species recorded are sensitive to lighting, unlike bat species from the *myotis* and *plecotus* family.

As part of the PEA and PSR mitigation / compliance measures were made to inform the emerging design of the Development to both minimise / avoid significant effects to ecological features during the demolition, refurbishment and construction work, in addition to the completed and operational Development (i.e. to enhance the Site for bats). These measures included:

- The provision of a Construction Environmental Management Plan (CEMP) including ways to minimise and avoid impacts from light, noise and vibration during the demolition, alteration, refurbishment and construction works.
- The provision of a sensitive lighting strategy as part of the completed and operational Development, giving due regard to the recommendations set out in the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light 2011¹ and the Bat Conservation Trust’s 2009 publication on Bats and Lighting in the UK²
- The provision of enhanced foraging and commuting habitat across the Site including an area adjacent to the River Thames.
- The provision of enhanced roosting habitat.

There is the opportunity to enhance the Site for bats and to also minimise any noise and vibration impacts to foraging and commuting bats. However, whilst Waterman IE are aware of research papers that detail disturbance events at bat roosts from excessive noise and vibration, we are not aware of any proven disturbance to foraging and commuting bats. This is therefore not assessed to be a likely effect of the Development, as is suggested in draft Scoping Opinion. Given that an EIA only need consider the “...*likely significant effects*...” of the Development this issue is not deemed necessary to consider in the assessment work or as part of the EIA.

With regards to lighting, with the provision of no night-time working during the demolition, alteration, refurbishment and construction works, and a sensitive lighting strategy, it is considered reasonable to assume that there would be insignificant effects to foraging and commuting bats; this reasonable argument being strengthened by the species of commuting bat recorded at the Site which are well

¹ Institute of Lighting Professionals (2011) 'GN 01 Guidance notes for the reduction of obstructive light'.

² BCT (2009) 'Bats and Lighting in the UK. Version 3'. Bats and the Built Environment Series. Bat Conservation Trust.

adapted to the urban environment and are more than likely already commuting between one well-lit area to another. Again, it is for this reason that it is our opinion that lighting associated with the Development would not give rise to any significant effects to commuting bats.

Irrespective of the above the ES will reasonably assume the presence of commuting bats (based upon the observations noted above regarding the bat passes witnessed), and Waterman IE can provide an assessment akin to the above to explain why there would be no significant effect upon commuting bats. Our expert and professional view is that further bat activities would not give rise to any materially different conclusion and so are not required as an additional evidence base to inform the overall ecological assessment that will form part of the ES.

If this above is still deemed unacceptable, the Applicant may be minded to undertake additional bat activity surveys to move the applications forward without undue delay. We suggest bat activity surveys would be best undertaken adjacent to the river Thames only (Site side only) and based on best practice guidelines (Collins J, 2016), with three surveys undertaken in total (one in July, August and September). If safe to do so, Waterman IE could also deploy two automated (SM2) bat detectors adjacent to the River Thames (Site side only) to record for five consecutive nights.

We are currently liaising with Tasha Hunter, Ecology Policy and Planning Officer, LBRuT regarding this matter. As set out above, although it is considered the Development would not give rise to likely significant effect upon commuting bats, the ES will reasonably assume their presence (based upon the observations noted) to provide an assessment akin to the above to explain why there would be no significant effect upon commuting bats.

- **Wind microclimate:** A desk-based review of the emerging scheme by RWDI indicates the Development is expected to provide shelter to the north-east. As such, wind conditions on the towpath and in the river should be consistent or calmer when compared to the baseline conditions (albeit, unlikely to be considered as being significantly different). Nonetheless, as part of the wind tunnel testing exercise, RWDI will install probes at the towpath and in the river to demonstrate the conditions within these locations. This was always intended as part of the wind microclimate scope of work, albeit we recognised this highly specific detail was not stated in the EIA Scoping Report. Furthermore, where balconies and roof terraces are part of the detailed planning application these will be appropriately assessed within the wind tunnel.
- **Summary of likely residual effect and mitigation:** Although not required by statute, Waterman IE can provide a summary table of all likely residual effects of the Development and associated mitigation measures as part of the ES.

Yours sincerely



Hannah Fiszpan
Technical Director
For and On Behalf of Waterman Infrastructure & Environment Ltd

Annex 1 - Type 2 Cumulative Search Exercise

cc. Guy Duckworth - Dartmouth Capital Advisors.
Stephen Ashworth - Dentons.



Lucy McDonnell - Dentons.
Neil Henderson - Gerald Eve.
Kevin Watson - Gerald Eve.
Suzanne Robson - Gerald Eve.
Ros Boalch - Waterman IE.
Ellen Smith - Waterman IE.

Annex 1 – Type 2 Cumulative Search Exercise

Annex A – Further Type 2 Cumulative Search Exercise

Introduction

There are currently no established guidelines for assessing cumulative effects. The criteria set out in the EIA Scoping Report (30th March) is based on Waterman Infrastructure and Environments (WIE) professional judgement and is a tried and tested method of assessing cumulative effects throughout London.

For re-iteration, the criteria for Type 2 cumulative effects provided in the EIA Scoping Report is as follows:

- Schemes within 1km of the Site which have been granted planning permission where there is a net change in floorspace above 10,000m² Gross External Area (GEA) and which are considered likely to result in some type 2 cumulative effect; and
- Schemes close to the Site which have been granted planning permission which fall below the floorspace threshold stated above. These schemes will be considered where their proximity to the Site is such that the potential for cumulative effects with the Development cannot be ruled out.

Using the above criteria, no cumulative schemes were identified. Following the suggestion of London Borough of Richmond upon Thames (LBRuT)'s draft EIA Scoping Opinion (issued 25th May 2017), Waterman IE have undertaken an additional cumulative search of major schemes within 1km, within the LBRuT and within London Borough of Hounslow, including committed developments and schemes that have been submitted and are pending determination. A full list of schemes based on these criteria is provided in the tables below. A list of site allocations within the adopted and emerging Local Plan has not been included as there is currently limited information about such schemes and typically these would not be included as cumulative schemes. Despite this, site allocation schemes will be incorporated within the strategic traffic modelling which will form part of the Transport Assessment.

Schemes 'Close to the Site'

LBRuT's draft Scoping Opinion also queried the definition of 'close to the Site'. This is determined on a case-by-case basis, using professional judgement. As such, Waterman IE (in conjunction with Gerald Eve) have re-reviewed planning applications within 1 km of the Site (measured from the Site boundaries) that fall below EIA scoping report criteria and that provided by LBRuT. The following criteria has been used:

- Applications creating **any** new residential units;
- Applications creating over 1,000sqm new floorspace; and
- Applications with decisions issued since 1 January 2014.

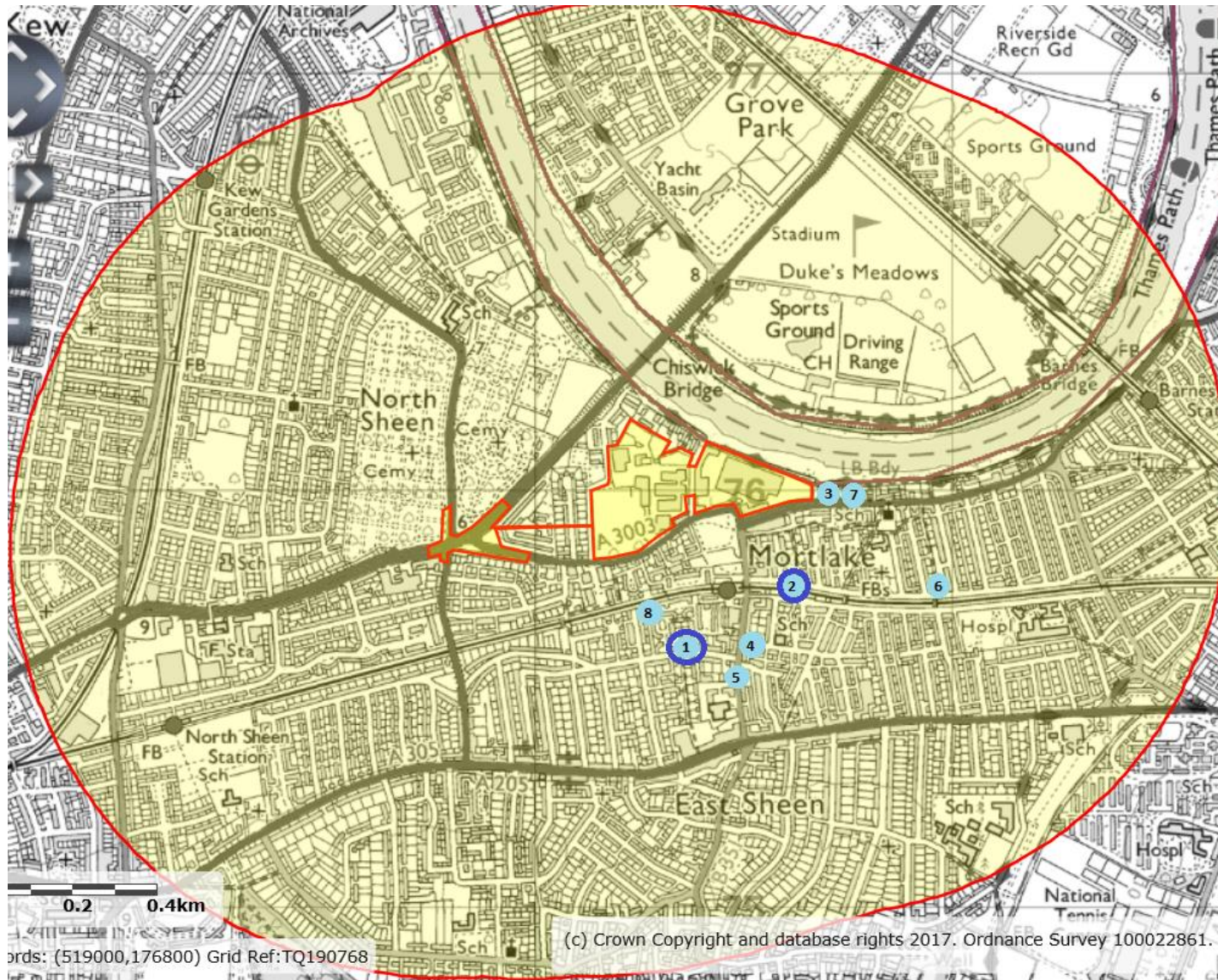
The results of the further cumulative search based on the above criteria and justification for scoping out these schemes is provided in **Table 1**. The location of these schemes is shown in **Figure 1**. Schemes that have not yet been approved or validated (1: 29 St Leonards Road and 2: Land Junction of North Worple Way and Wrights Walk) are circled in blue on **Figure 1**. From researching the schemes in **Table 1**, whilst they are located within 1km of the Site, all are relatively small (they would not require EIA in isolation and fall below the criteria stated in the EIA Scoping Report for consideration as a cumulative scheme), with the largest scheme involving a change of use to 14 residential units. Consequently, and based on our professional, expert opinion, we believe the likelihood of cumulative effects resulting from these schemes is unlikely. We therefore propose to exclude these schemes from the cumulative assessment and therefore a Type 2 cumulative assessment has been 'scoped out' of the EIA.

Table 1. Schedule of LBRuT planning applications within 1 km of the Site

Reference No.	Address	Description	Decision	Date of Decision	Notes / Latest status	Justification for exclusion as a cumulative scheme
Pending						
1 16/0203/FUL	29 St Leonards Road East Sheen London SW14 7LY	Conversion of existing 4 bedroom terrace house into 2 no. dwellings, new side extension, new gas, electric and water services to new unit, new wiring, plumbing and boilers.	Not validated	n/a	Pending – application not yet validated (received on 08/01/2016)	<ul style="list-style-type: none"> No new sensitive receptors; Two dwellings, previously existing as one 4-bedroom terrace house; Decision not validated.
2 16/4384/FUL	Land Junction Of North Worples Way And Wrights Walk Rear Of 31 Alder Road Mortlake London	Demolition of the existing garage and erection of a new partially sunken one-bedroom one-storey dwelling, incorporating a new boundary wall and entrance gate.	Pending	Target date: 07/02/2017	Assessment Stage	<ul style="list-style-type: none"> One-storey development, located within an area of pre-existing residential receptors. Net addition GIA floor space: 42m²
Determined						
3 16/4794/FUL	Boatrace House 63 Mortlake High Street Mortlake London	Erection of one additional storey to provide two residential units and alterations to the elevations of the building.	Decision Issued	Issued: 28/03/2017	Delegated Decision	<ul style="list-style-type: none"> One-storey extension development of two residential units, located within an area of pre-existing residential receptors; Total GIA floor space after demolition and extension: 2,597m².
4 16/3737/FUL	57 Sheen Lane East Sheen London SW14 8AB	Demolition of the rear part of 57 Sheen Lane to create a three-bedroom residential unit, including private external space.	Approved	13/01/2017	Delegated decision	<ul style="list-style-type: none"> One-storey development, located within an area of pre-existing residential receptors; Unlikely to have significant changes in sensitive receptors; Net additional GIA floor space to be added: 12.61m².

Reference No.	Address	Description	Decision	Date of Decision	Notes / Latest status	Justification for exclusion as a cumulative scheme
5 14/4793/FUL	42 Sheen Lane East Sheen London SW14 8LP	Refurbishment of existing shop and refurbishment and part extension of existing 1st floor flat to provide 2 new 1 and 2 bed flats. Refurbishment and part demolition of existing 2 storey barn to provide new 2 bed 2 storey dwelling.	Approved	11/11/2016	Delegated decision	<ul style="list-style-type: none"> • Unlikely to have significant changes in sensitive receptors; • Scheme consists of refurbishment and partial extension is to an existing 1st floor flat to provide additional 1 and 2 bed flats. The refurbishment and demolition of the existing 2 storey barn will be changed into residential use with minor changes to GIA. The new structure will remain at a two-storey level, minimising changes in elevation. • Net additional GIA floor space to be added: 92m².
6 16/2212/GPD15	59 North Worples Way Mortlake London	Change of use from B1(a) offices to C3 residential, as 2-bedroom apartment.	Approved	28/07/2016	Delegated decision	<ul style="list-style-type: none"> • Change of use to one 2-bedroom apartment (not redevelopment).
7 16/2087/GPD15	65 - 67 Mortlake High Street Mortlake London	Change of use of 1st, 2nd and 3rd floors from B1 (offices) to C3 (dwelling houses) providing 14 dwellings comprising 13 x 2 bed units and 1 x 1 bed unit.	Approved	19/07/2016	Delegated decision	<ul style="list-style-type: none"> • Change of use to 14 residential units (not redevelopment).
8 15/2757/FUL	Land Adjacent To 32 Bexhill Road East Sheen London	Erection of a single two-bedroom house and the demolition of three lock-up garages.	Approved	01/03/2016	Committee decision	<ul style="list-style-type: none"> • GIA to be lost by change of use/demolition: 54m²; • Scheme is within a residential area, therefore no new sensitive receptors. • Scheme is of only one residential unit.

Figure 1: Location of LBRuT planning applications within 1 km of the Stag Brewery site



Major Schemes in LBRuT

LBRuT defines a major application using the following criteria¹:

- A residential development of 10 or more homes;
- A residential development on a site of at least 0.5 hectares;
- Creation or change of use of a commercial development, where the floorspace is 1,000 square metres or more; and
- A non-residential development on a site of at least 1 hectare.

Table 2 below provides a list of major schemes within LBRuT, based on LBRuT's criteria and list of recent developments provided here:

http://www2.richmond.gov.uk/PlanData2/Planning_MajorDevelopments.aspx.

All major schemes within LBRuT are located more than 1km of the Site, with the exception of 1 - 9 Sandycombe Road, located approximately 715m west of Chalkers Corner (over 1 km from the Stag Brewery component of the Site). As set out above, Waterman IE do not consider 1-9 Sandcombe Road as a cumulative scheme as it only involves an additional 20 residential units within an established residential area. The location of the major schemes provided in **Table 2** are shown in **Figure 2**.

¹ http://www2.richmond.gov.uk/PlanData2/Planning_MajorDevelopments.aspx

Table 2: Major Schemes in the London Borough of Richmond Upon Thames

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
1 17/1843/VRC	Twickenham Rugby Football Union Stadium 200 Whitton Road Twickenham TW2 7BA	Structural alterations to, and extension of, the existing RFU Stadium East Stand, to accommodate additional floorspace for the provision of hospitality (corporate hospitality and debenture hospitality), conferencing and banqueting and other associated works and formation of new access on Rugby Road (namely minor design amendments to approved scheme).	Not within 1km
2 17/1446/LBC & 17/1445/FUL	Parkleys Parkleys Ham	Proposed change from single glazing to double glazing within the existing timber window frame sections/ profiles to all dwellings (excluding reeded bathroom windows and glazing to communal areas) at Nos 1-16 Brook Court, Nos 1-16 Byron Court, Nos 1-16 Coleridge Court, Nos 1-16 Drydon Court, Nos 1-12 Gray Court, Nos 1-12 Herrick Court, Nos 1-14 Marlowe Court, Nos 1-18 Milton Court, Nos 1-12 Pope Court, Nos 1-12 Shelley Court, Nos 1-18 Spenser Court and Nos 1-9 Tennyson Court.	Not within 1km
3 17/1269/FUL	All Saints Parish Church The Avenue Hampton TW12 3RG	Demolition of the existing Church Hall and the bungalow at No 44 The Avenue and erection of four dwellings (3 x 4 bedroom, 1 x 3 bedroom) (Use Class C3 Dwelling Houses); a new entrance lobby (Narthex) to All Saints' Church and a new Church Hall (Use Class D1: Non-Residential institutions) incorporating two flats (Use Class C3: Dwelling Houses).	Not within 1km
4 17/1286/VRC	Teddington Studios Broom Road Teddington	Variation of approved drawing nos attached to 14/0914/FUL to allow for the development of Block B as two blocks and an increase in the overall number of units from 220 to 235 and minor changes to the riverside walkway. To allow changes to the internal layout and the riverside walkway as shown on the submitted drawings.	Not within 1km
5 17/1033/FUL	Lockcorp House 75 Norcutt Road Twickenham TW2 6SR	Demolition of Lockcorp House; erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.	Not within 1km
6 16/4890/FUL & 16/4889/OUT	1 - 9 Sandycombe Road Richmond	Redevelopment of site to provide for a mixed use development of 535m ² of commercial space (B1 (a), (b) and (c) and B8 use) and 20 residential units, together with car parking and landscaping.	Within 1km Additional 20 residential units within an

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
			established residential area.
7 16/4747/RES	Richmond Upon Thames College Egerton Road Twickenham TW2 7SJ	Detailed Reserved Matters application including Appearance, Landscaping, Layout and Scale for Phase 1C (in part) and Phase 3A (in part) of the College Development Zone (in Part) including Building Zone 1 pursuant to Conditions U08027 and U08031 of Outline Planning Permission 15/3038/OUT dated 16.08.16 (Outline application for the demolition of existing college buildings, removal of hardsurfacing, site clearance and groundworks together with the redevelopment of the site to provide: 1) A new campus for education and enterprise purposes, comprising; Replacement College (Use Class D1) of up to 16,000sqm to accommodate up to 3,000 FTE day time students, as well as evening and weekend use; A Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100sqm; 2) A new Secondary School (D1 Use Class) of up to 7,000 sqm for up to 750 students; 3) A new Special Educational Needs (SEN) School (D1 Use Class) of up to 4,000sqm for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700sqm; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900sqm to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations to the A316 footbridge and minor realignment of Langhorn Drive, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping, and 9) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping).	Not within 1km
8 16/4553/FUL	63 - 71 High Street Hampton Hill	Demolition of existing buildings on site and erection of a group of part three, part four storey buildings around outer and inner landscaped courts comprising 8 townhouses and 31 apartments and two non-residential units on the High Street frontage (102.5m ² GIA) and (131.5m ² GIA) for use as A1(retail: non-food) and/or A3 (cafe) and/or B1 (offices) and/or D1 (clinics / creche / non-residential education and training centre) together with the formation of a basement to provide ancillary car parking (45 spaces) cycle storage (65 spaces) refuse storage rooms and plant rooms.	Not within 1km

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
9 16/3552/FUL	St Michaels Convent 56 Ham Common Ham Richmond TW10 7JH	Conversion and extension of the existing convent buildings (following demolition of some mid-20th century extensions), together with new build apartments and houses, to provide a total of 23 residential retirement units, an estate managers office and meeting rooms, parking and associated works within a landscaped site, with access via Ham Common (Revised Description).	Not within 1km
10 16/3506/FUL	Somerville House 1 Rodney Road Twickenham	Complete demolition of the existing building and erection of 21 residential units with associated external amenities, library/community space, cafe, refuse/storage, concierge office, and bicycle storage.	Not within 1km
11 16/3450/FUL	Land At 149 - 151 Heath Road Twickenham	Demolition of existing buildings and removal of advertising hoardings. Resiting of existing recycling bins. Erection of a part 3 storey part 4 storey building with commercial use (Flexible Use Class A1, A2 and/or B1a) on the ground floor with 10 flats (3 x 1 bed and 7 x 2 bed) on upper floors. Associated hard and soft landscaping, refuse, car and cycle parking.	Not within 1km
12 16/3353/FUL	Royal Botanic Gardens Kew Green Kew Richmond TW9 3AB	Development of a new Children's Garden at the north end of the existing Kew Gardens site (revised description).	Not within 1km
13 16/2777/FUL	Ryde House 391 Richmond Road Twickenham TW1 2EF	Demolition of existing building. Construction of a new mixed use development comprising a food store (1,123m ² sales area) and primary school with associated car parking (55 spaces allocated to foodstore and 1 space allocated to school); alterations to site entrance, landscaping, and associated works.	Not within 1km
14 16/2647/FUL	2 High Street Teddington TW11 8EW	Demolition of the existing office (B1a) building (395 sq.m) and the erection a part six / five-storey mixed-use building with a ground floor office / commercial unit (300 sq.m) and 22 (11 x 1 and 11 x 2 bed) affordable 'shared ownership' apartments above with 10 car parking provided at basement level including associated works.	Not within 1km
15 16/2352/FUL	4 - 6 Manor Road Teddington	Demolition of 6 Manor Road and erection of three storey building to create 12 additional two bedroom apartments, car parking spaces, bicycle storage, amenity space and related ancillary works. Erection of additional storey on 4 Manor Road for three two bedroom apartments and related ancillary works.	Not within 1km

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
16 16/0606/FUL	Police Station 60 - 68 Station Road Hampton	Retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bedroom, 12 x 2 bedroom, 10 x 3 bedroom and 2 x 4 bedroom) and associated access, servicing, cycle parking and landscaping (The proposal has been amended to include setting back the top floor away from the eastern boundary of the site; roof design on Plots 24 to 28 amended; and amendments to unit mix).	Not within 1km

Figure 2: Location of Major Schemes within the London Borough of Richmond upon Thames



Major Schemes within the London Borough of Hounslow

Chiswick Riverside and Chiswick Homefields are the only wards in the London Borough of Hounslow located within 1km of the Site. As shown in **Tables 3** and **4**, there are no major schemes within 1 km of the Site, apart from at Dukes Meadow, which involves the erection of a tennis hall to replace the existing dome. As this scheme is severed from the Site by the River Thames, does not involve the introduction of any sensitive receptors and involves replacing the existing structures on site with a new building of a similar sized massing, it is unlikely this scheme would result in any type 2 cumulative effects with the Development.

Table 3: Major Schemes in Chiswick Riverside

Address	Reference No.	Description	Decision	Within 1km of the Site?
Chiswick Community School Burlington Lane Chiswick London W4 3UN	P/2015/5458	Erection of a single storey extension to the hall and erection of a two storey teaching block.	Approved 03/03/2016	No
Chiswick House Grounds Chiswick London W4 2RP	P/2015/4063 P/2010/0686 P/2010/0693 P/2010/0694 P/2010/0690 P/2010/0696	Variation of condition 22 for renewal of the temporary marquee, condition 11 for extension by an additional hour and condition 23 to allow the marquee to be in place for six months from April to September following variation of condition 23 of planning permission 00176/E/P13 dated for the demolition of existing cafe and erection of a new cafe, temporary marquee area, children's play area, improved access and car parking with various tree and woodland management, erection and repair of built features (including walls and ornamental structures), repaving and replanting dated 17/12/2007 to extend the months of summer use of the marquee from three months to five months between May and September.	Approved 05/11/2015	No
The Conservatory Chiswick House Grounds Burlington Lane Chiswick London W4 2RP	P/2015/1330	Conversion of storage area in the east end of conservatory back sheds to provide additional office accommodation with minor amendments and reconfiguration of existing offices.	Approved 23/11/2015	No
Strand On The Green Junior & Infant School	P/2015/1128	Extension to a staff room at first floor level of north west block with a roof terrace.	Approved 15/06/2015	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
Thames Road Chiswick London W4 3NX				
Chiswick Community School 2 Burlington Lane Chiswick London W4 3UN	P/2014/3999	Erection of a three storey teaching facility located on hardstanding and grass areas adjacent to the existing teaching block known on site as Block B.	Approved 27/03/2015	No

Table 4: Major Schemes in Chiswick Homefields

Address	Reference No.	Description	Decision	Within 1km of the Site?
Dukes Meadows Tennis Dan Mason Drive Chiswick London W4 2SH	P/2017/1223	Erection of tennis hall to replace the existing air dome.	Pending Consideration	Yes
94-98 Chiswick High Road Chiswick London W4 1SH	P/2016/3850	Change of use, refurbishment and extension of the properties to provide a mixed use development comprising a five screen cinema including an ancillary restaurant/cafe (incorporating a roof terrace), 3 self contained flats on the upper floors and associated facilities.	In Progress	No
1 Burlington Lane Chiswick London W4 2RW	P/2016/0227	Demolition of existing office building and redevelopment to provide circa 15,903 square metres (GIA) of B1a office floorspace with associated car parking, motor-cycle parking, bicycle parking and bus shuttle service drop off provided at ground and basement level and with associated landscaping at ground level incorporating repaving and planting.	In Progress	No
Axis House Hogarth Business Centre Burlington Lane Chiswick London W4 2TH	P/2015/3592	Change Of Use From Office Use (B1a) To 162 bedroom hotel use (Clas C1) with external alterations, landscaping and associated works.	Approved with a Legal Agreement 17/11/2015	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
Hogarth Business Park Burlington Lane Chiswick London W4 2TH	P/2015/2282 P/2014/3273 P/2013/1706	Variation of Condition 2 (approved plans) with amendments to the approved development to 'consolidate the buildings to the southern boundary of the site to enable the building to frame a new square, adjust the position of the central apartment building in the eastern part of the site, consolidate two of the blocks into a single L-shaped apartment block of smaller massing, to improve separation distances between the apartment buildings, amend the communal garden spaces to create larger and more open spaces, addition of an extra setback storey to the northern element of this proposed consolidated block, provide gardens to the southern side of the eastern terrace houses; alterations to the basement car parking area to enable removal of on-street parking from the new terraced street and the creation of a pedestrianised linear park between the terraced houses, improve the deep planting zone available for the communal garden area; and amend materials and elevational treatment for more traditional elements of the local character', following planning permission approved under 00176/A/P63 dated 11/02/2014 for demolition of existing buildings and redevelopment of site to provide 173 new residential units, commercial floorspace (Use Class B1), together with basement and surface level car parking spaces, cycle parking, access, landscaping, boundary treatment and associated works. Amendments Proposed: Alter the floor plate, layout, scale and elevations block A and house plot 43.	Approved with a Legal Agreement 06/10/2015	No
Power Road Bridge Gunnersbury Avenue (North Circular Road) Chiswick London	P/2014/3130	Construction of utility service bridge to the west of the existing A406 road over the railway bridge at Power Road.	Approved 03/02/2015	No
Isokan Plus Turnham Green Terrace Mews Chiswick London W4 1QP	P/2014/1091	Redevelopment of site to provide B1 workspace accommodation with basement together with a new mews street and retention of existing boundary walls.	Approved with a Legal Agreement 23/12/2014	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
94-98 Chiswick High Road Chiswick London W4 1SH	P/2013/1466	Change of use, refurbishment and extension of the properties to accommodate a five screen cinema including two ancillary bars, a restaurant/cafe and associated facilities.	Approved with a Legal Agreement 17/12/2014	No
29 Chiswick High Road Chiswick London W4 2ND	P/2011/1188	Demolition of the existing building and the erection of a part four storey, part three storey mixed use building comprising of 447sq metres of commercial (Class A1, A2, A3, B1, D1) uses on the ground and lower ground floors, and the construction of nine residential units including two townhouses, three two-bedroom apartments, four three-bedroom maisonettes) with 9 car parking spaces at basement level.	Approved with a Legal Agreement 23/01/2012	No
104-108 CHISWICK HIGH ROAD CHISWICK LONDON W4 1PU	P/2010/3115 P/2009/2930	Demolition and reconstruction of existing building elevations to Chiswick High Road and Upham Park Road to provide a mixed use development comprising of commercial floor area (A1, A2 or B1 uses) to ground and basement with 7 apartments to three upper floors, erection of two new dwellinghouses to Upham Park Road and associated amenity space, basement car park and landscape area	Approved with a Legal Agreement 19/10/2011	No
North Block Turnham Green Terrace Mews Chiswick London W4 1QP	P/2009/0847	Renovation, alteration and insertion of mezzanine floor and change of use from warehouse/office to offices (B1).	Approved 18/06/2009	No
29 Chiswick High Road Chiswick London W4 2ND	P/2009/0401	Partial demolition of existing restaurant and redevelopment to create commercial retail use (A1, A2, A3, B1, D1) on ground & basement floor with 9 residential apartments and basement car parking.	Approved with a Legal Agreement 05/06/2009	No
Bristol Car Service Hogarth Centre Hogarth Lane Chiswick London W4 2QN	P/2009/0217	Partial retention of existing offices and alterations to create nine residential units, including balconies, landscaping and parking areas.	Approved with a Legal Agreement 03/09/2009	No

APPENDIX 2.3 EIA SCOPING CLARIFICATION RESPONSES

Lucy Thatcher
Strategic Applications Manager (Richmond)
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Our ref: SJA/035353.00001

26 June 2017

Dear Lucy

Former Stag Brewery - draft scoping opinion

We act for Reselton Properties Limited in connection with the planning application for the Former Stag Brewery.

We reviewed the Environmental Impact Assessment Scoping Report (the **Scoping Report**) prepared by Waterman IE prior to its submission. We are aware that discussions have taken place between the London Borough of Richmond upon Thames (the **Council**) and our client's consultants and we have seen the draft scoping opinion (the **Draft Opinion**) prepared by the Council. The Council have stated that they are currently unable to finalise a scoping opinion as insufficient information has been provided.

The issues raised in the draft scoping opinion and the detail requested substantially exceeds that normally required. In particular:

- it covers areas of work and issues that are unlikely to raise significant likely environmental impacts; and
- it raises points of detail that do not need to be addressed in a Scoping Report.

Our advice to Reselton is that an EIA that reflects the Scoping Report would be legally compliant.

1 Legislative requirements

1.1 As the request for the scoping opinion was submitted before 16 May 2017, the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the **2011 Regulations**) apply to this development.

1.2 Regulation 13(1) of the 2011 Regulations states that:

"A person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the information to be provided in the environmental statement (a "scoping opinion")"

- 1.3 Scoping is not a mandatory requirement. The procedure is designed, in part, to ensure that there is agreement about the broad topics that will be covered, allowing the parties to agree those areas where there are unlikely to be any significant likely environmental effects. It also allows consultees to highlight issues that may need to be covered.
- 1.4 Regulation 13(2) of the 2011 Regulations require that a scoping request include:
- "(a) in relation to an application for planning permission—*
- (i) a plan sufficient to identify the land;*
- (ii) a brief description of the nature and purpose of the development and of its possible effects on the environment; and*
- (iii) such other information or representations as the person making the request may wish to provide or make;"*
- 1.5 The 2011 Regulations do not specify that information that should be provided on baseline surveys, how receptors will be valued, the criteria against which significance of effects will be evaluated, methods to predict significance/magnitude of effects, definition of levels of significance of effects, indication of likely effects and types of mitigation, as requested by the Council in the Draft Opinion.
- 1.6 Regulation 13(6) of the 2011 Regulations states:
- "Before adopting a scoping opinion the authority shall take into account—*
- (a) the specific characteristics of the particular development;*
- (b) the specific characteristics of development of the type concerned; and*
- (c) the environmental features likely to be affected by the development."*
- 1.7 The Planning Practice Guidance sets out that environmental impact assessments *"should limit the scope of assessment to those aspects of the environment that are likely to be significantly affected"* (Paragraph: 002 Reference ID: 4-002-2014030). Some of the information requested in the Draft Opinion appears to exceed a consideration of the significant likely environmental effects of the proposed development.
- 1.8 We note that the Scoping Opinion notes general requirements for Environmental Statements in several places. Schedule 4 of the 2011 Regulations sets out in detail the information which is required for the full Environmental Statement. This information is not required at the scoping request stage.
- 1.9 Our client is keen to note that this is a high threshold, and that the intention is to prepare a thorough Environmental Statement which addresses the likely significant effects, and meets the statutory requirements.
- 1.10 As an Environmental Statement will be prepared to meet these requirements, we do not anticipate that any requests for further information will be needed. We consider that some of the information specified in the Draft Opinion is not necessary to consider the likely significant effects of the proposed development, and we would resist requests for such information.

1.11 We note that some of the points raised are sensible planning issues, but do not relate to significant environmental effects. These will be dealt with in the other planning application documents, as set out in detail in the Waterman IE response.

2 Proposed approach

- 2.1 There is no requirement in the 2011 Regulations for a scoping opinion. Our client has sought to cooperate with the Council to agree the scope of the Environmental Statement, but it has not been possible for the Council to issue a scoping opinion despite substantial joint efforts and several extensions of time.
- 2.2 On this basis our client intends to progress the Environmental Statement without a scoping opinion from the Council. The relevant points of the Draft Opinion will be taken into account in preparing the Environmental Statement. Waterman IE have considered the points which they consider to be relevant in their response.
- 2.3 Our clients are willing to apply to the Secretary of State for a scoping direction if that would provide comfort to the Council. They will, in the meantime, continue to develop proposals for the site and to prepare the Environmental Statement. Gerald Eve will contact you to discuss this option.

Please let us know if it would assist to discuss. As noted above, Waterman IE are preparing a separate response to these issues.

Yours sincerely


Stephen Ashworth
Partner
Dentons UKMEA LLP

Direct Tel: 020 7928 7888
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Our Ref: WIE10667-101.170626_EIAScope
Your Ref:

Date: 26th June 2017

Ms. Lucy Thatcher
Environment Directorate
London Borough of Richmond upon Thames
2nd Floor Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear Lucy,

RE: The Stag Brewery - EIA Scoping Matters

Thank you for your draft comments on Environmental Impact Assessment (EIA) Scoping matters received thus far set out with the 'draft EIA Scoping Opinion' and for meeting with Waterman Infrastructure & Environment (Waterman IE) on Wednesday 14th June 2017 to discuss. Having considered matters further with the Applicant team including the Applicant's Planning Lawyers (Dentons UKMEA LLP), and noting that EIA Scoping is **not** a mandatory requirement of The Town and Country Planning (Environmental Impact Assessment) Regulations, 2011, as amended (the EIA Regulations, 2011, as amended) we will progress with the EIA work-stream in the absence of an EIA Scoping Opinion.

Although we consider the request for a formal EIA Scoping Opinion (including an EIA Scoping Report) provides sufficient information for London Borough of Richmond Upon Thames (LBRuT) to form a formal Scoping Opinion (further details are set out later within this letter), if LBRuT are still concerned regarding the level of detail provided at this stage, it is suggested that the matter should be directed to the Secretary of State for an independent assessment. We have nevertheless agreed to an extension of time for a response on the request for a formal EIA Scoping Opinion until Tuesday 27th June, in order to allow the LBRuT sufficient time to consider this letter and also the correspondence from Dentons UKMEA LLP.

For the avoidance of doubt, a request for a formal EIA Scoping Opinion was made on 30th March 2016. Under the transitional arrangement stated in The Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations, 2017) the Applicant's EIA can (and should) progress in line with the EIA Regulations, 2011, as amended. Although it has been verbally confirmed LBRuT's comments to date have been made in line with the EIA Regulations, 2011, this is not clear and wording in what is referred to as the 'draft Scoping Opinion' contradicts this. This is an important point as the requirements of the EIA Regulations, 2011, as amended and the EIA Regulations, 2017 differ. We wish to re-iterate that in this case, only the EIA Regulations, 2011, as amended apply.

The draft Scoping Opinion concludes that a formal Scoping Opinion cannot be provided as not enough detail is provided in our EIA Scoping request (including an EIA Scoping Report) in relation to:

- Detailed baseline surveys.
- Detail on exactly how receptors will be valued.
- Details on demolition and construction timing sequencing.

- Details on topic specific significance criteria.
- Details on mitigation.

As discussed on 14th June 2017, it is Waterman IE's view that none of the above are required 'in detail' to inform an EIA Scoping Opinion (insofar as the 2011 Regulations, as amended apply); this is tried and tested through many years of experience on some of the largest property related projects in the UK and is also the opinion of Dentons. Whilst some EIA Scoping Reports may provide this information to some degree, it is not a legal requirement and one must always aim to be pragmatic and proportional. Furthermore, at the EIA Scoping stage, it is unusual for such detail to exist. Certainly, we are not at a stage where we can provide detail in relation to many of the above points. What is requested is more akin to what is required in the final Environmental Statement (ES) and should not preclude a Local Planning Authority (LPA) from forming a robust EIA Scoping Opinion. Rest assured, the final ES will provide details on all the above.

Turning to the requests / comments made in relation to each environmental topic area, these appear to fall into three categories:

1. **Items that are requested which are already accounted for in our proposed scope:** We are pleased to observe that these are many in example.
2. **Items that are requested and have a place in the suite of planning application documents, but not the ES:** For example, as was verbally agreed at the meeting of 14th June 2016, the following separate stand-alone documents will be prepared to support the planning applications and do not need to be duplicated in the ES:
 - A Planning Statement (dealing with the point requesting justification for the proposed land uses, their quantum and density).
 - A Design and Access Statement (dealing with Computer Generated Images (GCIs) of 'internal' views within the Development).
 - A Design Code (associated with the Outline Planning Application).
 - A Retail Impact Assessment (RIA).
 - A Health Impact Assessment (HIA).

In addition, whilst not discussed at the meeting of 14th June 2016, the following additional separate stand-alone documents will be prepared to support the planning applications out-with the ES:

- Framework Construction Management Statement (incorporating Transport for London's Construction Logistics Plan).
 - Waste Management Plan (during the demolition, alteration, refurbishment and construction works and during operation of the Development).
3. **Items that are requested which Waterman IE believe are not required as they would be unlikely give rise to 'likely' or 'significant' effects:** Just one example (not exhaustive) is the request to assess the effects of tree removal and replacement planting on noise. However, the removal and planting of trees will not have any material impact upon noise. It has been proven that it takes a dense tree standing of 100m thick to reduce noise levels by 0.1dBA. The human ear can only detect an audible 'change' in noise at the 3dBA level. As such, one can see the removal and re-planting of trees likely to be proposed by the Development will not impact noise levels.

Waterman IE and Denton's concern with this type of request is that if we were to concede, we would not be fulfilling the requirements of the EIA Regulations 2011, as amended i.e. to identify the "...likely significant environmental effects..." of a project; not every possible effect that may or may not result which has been advised against in the courts on the basis that this approach would not allow a

determining authority to “...see the wood from the trees...” in relation to environmental matters and therefore hinder sensible and pragmatic planning decisions.

Notwithstanding the above, we clarify the following which were raised as particular issues in the draft EIA Scoping Opinion.

- **Description of the Development:** A concern noted in the draft Scoping Opinion relates to the lack of detail regarding the proposals at Chalkers Corner. As per our EIA Scoping Report, it can be confirmed the ‘Development’ for the purposes of the EIA will include the full content of the outline and detailed planning applications, including the proposals at Chalkers Corner. Currently, the latter envisages the following improvements to Chalkers Corner Junction:
 - The realignment of Lower Richmond Road as it approaches Chalkers Corner Junction.
 - Creation of an additional lane for turning left onto Clifford Avenue.
 - Provision of an extended left turn lane from Clifford Avenue into Lower Richmond Road.
 - Enhancement to pedestrian and cycle facilities.
 - Reconfiguration of small car park on south west corner of Lower Richmond Road arm to include new planting.

The proposed scope of the EIA would not be materially affected by the proposals at Chalkers Corner. However, it is confirmed that the geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for the topic areas of transport and access, noise and vibration, air quality, surface water drainage and flood risk, ecology and townscape and visual effects.

- **Significance Criteria:** The likely significant environmental effects associated with the Development will be assessed with reference to definitive standards and legislation, where available. Where it is not possible to quantify the likely significant effects, qualitative assessments will be carried out, based on available knowledge and professional judgement. Where professional judgement is to be used, or where uncertainty exists, this will be stated in the ES.

The significance of the predicted likely significant effect will be determined with reference to assessment criteria for each environmental topic considered in the ES. The criteria aim to apply a common EIA approach of classifying effects according to whether they are substantial, moderate, minor or insignificant and whether the effects are considered to be adverse or beneficial.

Specific criteria for each environmental topic will be developed, giving due regard to the following factors:

- Extent and magnitude of the effect.
- Duration of the effect (whether short, medium or long-term).
- Nature of the effect (whether direct or indirect, reversible or irreversible).
- Likelihood of the effect to occur.
- Whether the effect occurs in isolation, is cumulative or interactive.
- Performance against environmental quality standards or other relevant pollution control thresholds.
- Sensitivity of the receptor.
- Compatibility with environmental policies, as relevant.

To provide a consistent approach to expressing the outcomes of the various assessments undertaken as part of the EIA, the following terminology will be used throughout the ES:

- Beneficial effect of major significance.

- Beneficial effect of moderate significance.
- Beneficial effect of minor significance.
- Insignificant effect: No significant effect (either adverse or beneficial) to an environmental resource or receptor.
- Adverse effect of minor significance.
- Adverse effect of moderate significance.
- Adverse effect of major significance.

In the ES the following terminology will be used to define the temporal and spatial scale of the effects:

- 'Short' to 'medium-term' effects will be those associated with the demolition, alteration, refurbishment and construction works.
- 'Long-term' effects will be those associated with the completed and operational Development.
- 'Local' effects will be those affecting neighbouring receptors.
- 'District' effects will be those which are likely to occur to receptors within LBRuT.
- 'Sub-regional' effects are those affecting Boroughs adjacent to LBRuT.
- 'Regional' effects will be those affecting receptors across Greater London.
- 'National' effects will be those that affecting receptors within the UK.

Regional and National effects are unlikely to result.

- **Assessment of 'Timeslices':** As stated in the EIA Scoping Report, the ES will assess and identify the likely significant effects of the demolition, alteration, refurbishment and construction works, in addition to the likely significant effects of the completed and operational Development. With respect to the former, if the Development is to be implemented and occupied in a phased manner, then 'interim receptors' present on the Site when construction works are underway (for example residents of the Development) will be appropriately considered in the assessments. Such assessments will focus on worst-case effects.
- **Cumulative Assessment:** The draft EIA Scoping Opinion disagrees with the well tried and tested criteria proposed for identification of 'other schemes' to be considered in the cumulative assessment. No reasonable alternative method is provided. However, as discussed on 14th June 2017, Waterman IE together with Gerald Eve, undertook a thorough search of valid planning permission within 1km of the Site. As requested by LBRuT, major schemes within LBRuT and the London Borough of Hounslow (LBH), and below the cumulative criteria threshold set out in the EIA Scoping Report, were reviewed. It was concluded that from this exercise, 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. The additional cumulative search exercise and further justification for scoping out type 2 cumulative effects is provided in **Annex 1**.

In addition, we will consider points made within the draft EIA Scoping Opinion where Waterman IE and Dentons consider them to be appropriate and / or of benefit regarding timescale issues. These will likely include:

- **Use of the Wetland Centre air quality monitoring station:** It can be confirmed that data from this monitoring station, together with data from diffusion tubes located at Lower Richmond Road (DT51) and Sheen Lane (DT51) will be used to verify the air quality model.
- **Water Framework Directive:** Waterman IE will liaise with the Environment Agency (EA) regarding the need to undertake a Water Framework Directive Assessment (WFDA). It is considered likely a WFD Screening document will be required to set out the Development in relation to water resources

issues ((i.e. the replacement of the flood defences and inclusion of new water outflows) and qualitatively discuss the potential effects upon aquatic ecology. The aim of the WFD Screening document will be to effectively state that there will be no effect on the Ecological Potential of the Upper Thames and therefore a full WFDA is not required.

- **Bat activity surveys:** As part of ecological surveys undertaken to date, Waterman IE completed a Preliminary Ecological Appraisal (PEA) in March 2016. This concludes “...*the Site offers limited potential for foraging and commuting bats and it is therefore not considered necessary to undertake bat activity surveys at the Site*”. However, Waterman IE did undertake evening emergence and pre-dawn re-entry surveys as part of a Protected Species Report (PSR) at certain buildings and trees on the Site to determine the presence or absence of roosting bats. No roosting bats were recorded.

During the evening emergence and pre-dawn re-entry surveys undertaken 20th July 2016, a suitably qualified surveyor was positioned outside The Ship public house. At this location, a single serotine commuting pass and one / two commuting and foraging noctule bats were recorded at a level and species one would expect given the existing light spill from the Site and existing street / road lighting. Other surveys at the buildings and trees on the Site recorded noctule, soprano and common pipistrelle bats, again with a level and species one would expect given the existing habitats and lighting on and adjacent to the Site. It is noted that none of the species recorded are sensitive to lighting, unlike bat species from the *myotis* and *plecotus* family.

As part of the PEA and PSR mitigation / compliance measures were made to inform the emerging design of the Development to both minimise / avoid significant effects to ecological features during the demolition, refurbishment and construction work, in addition to the completed and operational Development (i.e. to enhance the Site for bats). These measures included:

- The provision of a Construction Environmental Management Plan (CEMP) including ways to minimise and avoid impacts from light, noise and vibration during the demolition, alteration, refurbishment and construction works.
- The provision of a sensitive lighting strategy as part of the completed and operational Development, giving due regard to the recommendations set out in the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light 2011¹ and the Bat Conservation Trust’s 2009 publication on Bats and Lighting in the UK²
- The provision of enhanced foraging and commuting habitat across the Site including an area adjacent to the River Thames.
- The provision of enhanced roosting habitat.

There is the opportunity to enhance the Site for bats and to also minimise any noise and vibration impacts to foraging and commuting bats. However, whilst Waterman IE are aware of research papers that detail disturbance events at bat roosts from excessive noise and vibration, we are not aware of any proven disturbance to foraging and commuting bats. This is therefore not assessed to be a likely effect of the Development, as is suggested in draft Scoping Opinion. Given that an EIA only need consider the “...*likely significant effects*...” of the Development this issue is not deemed necessary to consider in the assessment work or as part of the EIA.

With regards to lighting, with the provision of no night-time working during the demolition, alteration, refurbishment and construction works, and a sensitive lighting strategy, it is considered reasonable to assume that there would be insignificant effects to foraging and commuting bats; this reasonable argument being strengthened by the species of commuting bat recorded at the Site which are well

¹ Institute of Lighting Professionals (2011) 'GN 01 Guidance notes for the reduction of obstructive light'.

² BCT (2009) 'Bats and Lighting in the UK. Version 3'. Bats and the Built Environment Series. Bat Conservation Trust.

adapted to the urban environment and are more than likely already commuting between one well-lit area to another. Again, it is for this reason that it is our opinion that lighting associated with the Development would not give rise to any significant effects to commuting bats.

Irrespective of the above the ES will reasonably assume the presence of commuting bats (based upon the observations noted above regarding the bat passes witnessed), and Waterman IE can provide an assessment akin to the above to explain why there would be no significant effect upon commuting bats. Our expert and professional view is that further bat activities would not give rise to any materially different conclusion and so are not required as an additional evidence base to inform the overall ecological assessment that will form part of the ES.

If this above is still deemed unacceptable, the Applicant may be minded to undertake additional bat activity surveys to move the applications forward without undue delay. We suggest bat activity surveys would be best undertaken adjacent to the river Thames only (Site side only) and based on best practice guidelines (Collins J, 2016), with three surveys undertaken in total (one in July, August and September). If safe to do so, Waterman IE could also deploy two automated (SM2) bat detectors adjacent to the River Thames (Site side only) to record for five consecutive nights.

We are currently liaising with Tasha Hunter, Ecology Policy and Planning Officer, LBRuT regarding this matter. As set out above, although it is considered the Development would not give rise to likely significant effect upon commuting bats, the ES will reasonably assume their presence (based upon the observations noted) to provide an assessment akin to the above to explain why there would be no significant effect upon commuting bats.

- **Wind microclimate:** A desk-based review of the emerging scheme by RWDI indicates the Development is expected to provide shelter to the north-east. As such, wind conditions on the towpath and in the river should be consistent or calmer when compared to the baseline conditions (albeit, unlikely to be considered as being significantly different). Nonetheless, as part of the wind tunnel testing exercise, RWDI will install probes at the towpath and in the river to demonstrate the conditions within these locations. This was always intended as part of the wind microclimate scope of work, albeit we recognised this highly specific detail was not stated in the EIA Scoping Report. Furthermore, where balconies and roof terraces are part of the detailed planning application these will be appropriately assessed within the wind tunnel.
- **Summary of likely residual effect and mitigation:** Although not required by statute, Waterman IE can provide a summary table of all likely residual effects of the Development and associated mitigation measures as part of the ES.

Yours sincerely



Hannah Fiszpan
Technical Director
For and On Behalf of Waterman Infrastructure & Environment Ltd

Annex 1 - Type 2 Cumulative Search Exercise

cc. Guy Duckworth - Dartmouth Capital Advisors.
Stephen Ashworth - Dentons.



Lucy McDonnell - Dentons.
Neil Henderson - Gerald Eve.
Kevin Watson - Gerald Eve.
Suzanne Robson - Gerald Eve.
Ros Boalch - Waterman IE.
Ellen Smith - Waterman IE.

Annex 1 – Type 2 Cumulative Search Exercise

Annex A – Further Type 2 Cumulative Search Exercise

Introduction

There are currently no established guidelines for assessing cumulative effects. The criteria set out in the EIA Scoping Report (30th March) is based on Waterman Infrastructure and Environments (WIE) professional judgement and is a tried and tested method of assessing cumulative effects throughout London.

For re-iteration, the criteria for Type 2 cumulative effects provided in the EIA Scoping Report is as follows:

- Schemes within 1km of the Site which have been granted planning permission where there is a net change in floorspace above 10,000m² Gross External Area (GEA) and which are considered likely to result in some type 2 cumulative effect; and
- Schemes close to the Site which have been granted planning permission which fall below the floorspace threshold stated above. These schemes will be considered where their proximity to the Site is such that the potential for cumulative effects with the Development cannot be ruled out.

Using the above criteria, no cumulative schemes were identified. Following the suggestion of London Borough of Richmond upon Thames (LBRuT)'s draft EIA Scoping Opinion (issued 25th May 2017), Waterman IE have undertaken an additional cumulative search of major schemes within 1km, within the LBRuT and within London Borough of Hounslow, including committed developments and schemes that have been submitted and are pending determination. A full list of schemes based on these criteria is provided in the tables below. A list of site allocations within the adopted and emerging Local Plan has not been included as there is currently limited information about such schemes and typically these would not be included as cumulative schemes. Despite this, site allocation schemes will be incorporated within the strategic traffic modelling which will form part of the Transport Assessment.

Schemes 'Close to the Site'

LBRuT's draft Scoping Opinion also queried the definition of 'close to the Site'. This is determined on a case-by-case basis, using professional judgement. As such, Waterman IE (in conjunction with Gerald Eve) have re-reviewed planning applications within 1 km of the Site (measured from the Site boundaries) that fall below EIA scoping report criteria and that provided by LBRuT. The following criteria has been used:

- Applications creating **any** new residential units;
- Applications creating over 1,000sqm new floorspace; and
- Applications with decisions issued since 1 January 2014.

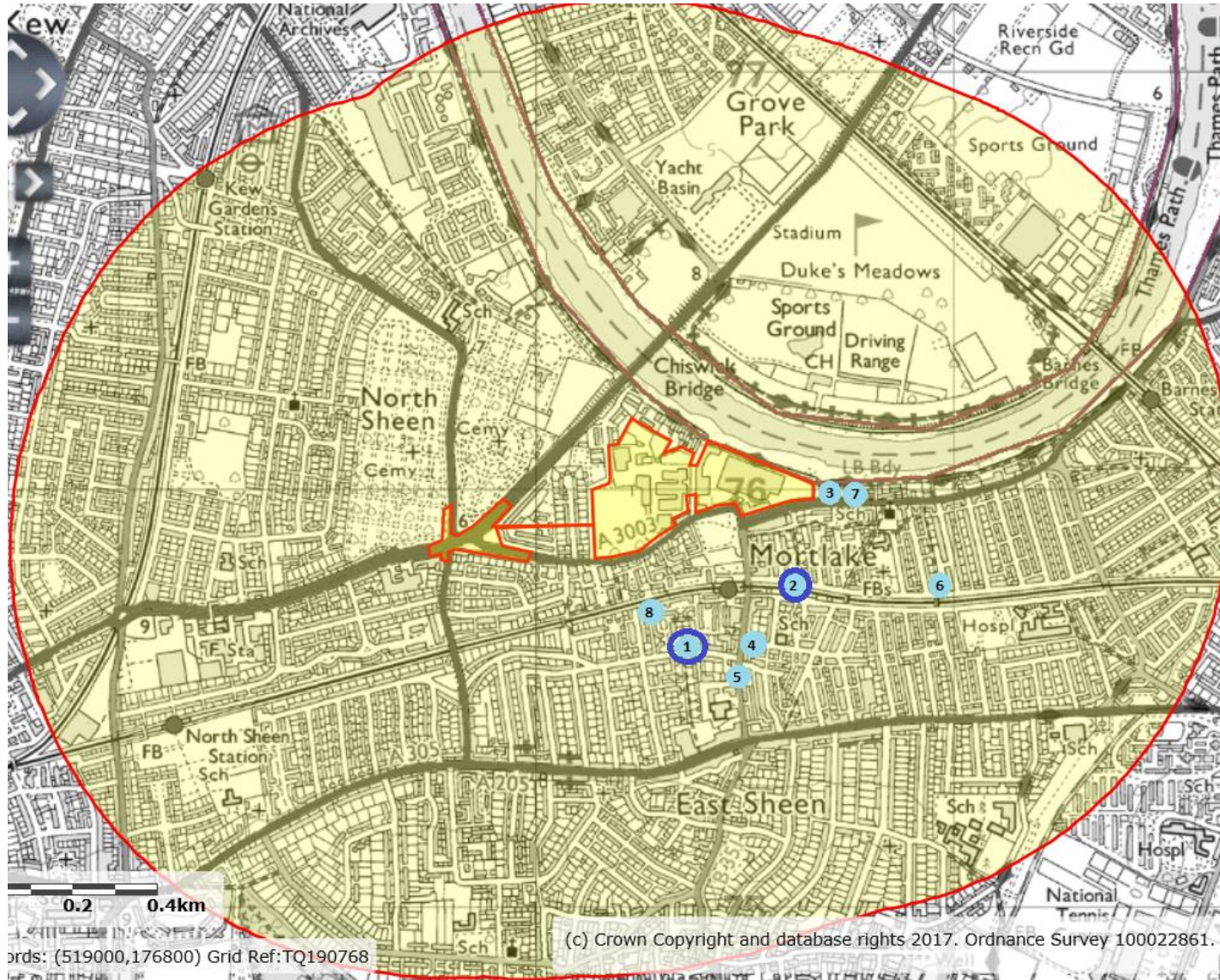
The results of the further cumulative search based on the above criteria and justification for scoping out these schemes is provided in **Table 1**. The location of these schemes is shown in **Figure 1**. Schemes that have not yet been approved or validated (1: 29 St Leonards Road and 2: Land Junction of North Worple Way and Wrights Walk) are circled in blue on **Figure 1**. From researching the schemes in **Table 1**, whilst they are located within 1km of the Site, all are relatively small (they would not require EIA in isolation and fall below the criteria stated in the EIA Scoping Report for consideration as a cumulative scheme), with the largest scheme involving a change of use to 14 residential units. Consequently, and based on our professional, expert opinion, we believe the likelihood of cumulative effects resulting from these schemes is unlikely. We therefore propose to exclude these schemes from the cumulative assessment and therefore a Type 2 cumulative assessment has been 'scoped out' of the EIA.

Table 1. Schedule of LBRuT planning applications within 1 km of the Site

Reference No.	Address	Description	Decision	Date of Decision	Notes / Latest status	Justification for exclusion as a cumulative scheme
Pending						
1 16/0203/FUL	29 St Leonards Road East Sheen London SW14 7LY	Conversion of existing 4 bedroom terrace house into 2 no. dwellings, new side extension, new gas, electric and water services to new unit, new wiring, plumbing and boilers.	Not validated	n/a	Pending – application not yet validated (received on 08/01/2016)	<ul style="list-style-type: none"> No new sensitive receptors; Two dwellings, previously existing as one 4-bedroom terrace house; Decision not validated.
2 16/4384/FUL	Land Junction Of North Worples Way And Wrights Walk Rear Of 31 Alder Road Mortlake London	Demolition of the existing garage and erection of a new partially sunken one-bedroom one-storey dwelling, incorporating a new boundary wall and entrance gate.	Pending	Target date: 07/02/2017	Assessment Stage	<ul style="list-style-type: none"> One-storey development, located within an area of pre-existing residential receptors. Net addition GIA floor space: 42m²
Determined						
3 16/4794/FUL	Boatrace House 63 Mortlake High Street Mortlake London	Erection of one additional storey to provide two residential units and alterations to the elevations of the building.	Decision Issued	Issued: 28/03/2017	Delegated Decision	<ul style="list-style-type: none"> One-storey extension development of two residential units, located within an area of pre-existing residential receptors; Total GIA floor space after demolition and extension: 2,597m².
4 16/3737/FUL	57 Sheen Lane East Sheen London SW14 8AB	Demolition of the rear part of 57 Sheen Lane to create a three-bedroom residential unit, including private external space.	Approved	13/01/2017	Delegated decision	<ul style="list-style-type: none"> One-storey development, located within an area of pre-existing residential receptors; Unlikely to have significant changes in sensitive receptors; Net additional GIA floor space to be added: 12.61m².

Reference No.	Address	Description	Decision	Date of Decision	Notes / Latest status	Justification for exclusion as a cumulative scheme
5 14/4793/FUL	42 Sheen Lane East Sheen London SW14 8LP	Refurbishment of existing shop and refurbishment and part extension of existing 1st floor flat to provide 2 new 1 and 2 bed flats. Refurbishment and part demolition of existing 2 storey barn to provide new 2 bed 2 storey dwelling.	Approved	11/11/2016	Delegated decision	<ul style="list-style-type: none"> Unlikely to have significant changes in sensitive receptors; Scheme consists of refurbishment and partial extension is to an existing 1st floor flat to provide additional 1 and 2 bed flats. The refurbishment and demolition of the existing 2 storey barn will be changed into residential use with minor changes to GIA. The new structure will remain at a two-storey level, minimising changes in elevation. Net additional GIA floor space to be added: 92m².
6 16/2212/GPD15	59 North Worples Way Mortlake London	Change of use from B1(a) offices to C3 residential, as 2-bedroom apartment.	Approved	28/07/2016	Delegated decision	<ul style="list-style-type: none"> Change of use to one 2-bedroom apartment (not redevelopment).
7 16/2087/GPD15	65 - 67 Mortlake High Street Mortlake London	Change of use of 1st, 2nd and 3rd floors from B1 (offices) to C3 (dwelling houses) providing 14 dwellings comprising 13 x 2 bed units and 1 x 1 bed unit.	Approved	19/07/2016	Delegated decision	<ul style="list-style-type: none"> Change of use to 14 residential units (not redevelopment).
8 15/2757/FUL	Land Adjacent To 32 Bexhill Road East Sheen London	Erection of a single two-bedroom house and the demolition of three lock-up garages.	Approved	01/03/2016	Committee decision	<ul style="list-style-type: none"> GIA to be lost by change of use/demolition: 54m²; Scheme is within a residential area, therefore no new sensitive receptors. Scheme is of only one residential unit.

Figure 1: Location of LBRuT planning applications within 1 km of the Stag Brewery site



Major Schemes in LBRuT

LBRuT defines a major application using the following criteria¹:

- A residential development of 10 or more homes;
- A residential development on a site of at least 0.5 hectares;
- Creation or change of use of a commercial development, where the floorspace is 1,000 square metres or more; and
- A non-residential development on a site of at least 1 hectare.

Table 2 below provides a list of major schemes within LBRuT, based on LBRuT's criteria and list of recent developments provided here:

http://www2.richmond.gov.uk/PlanData2/Planning_MajorDevelopments.aspx.

All major schemes within LBRuT are located more than 1km of the Site, with the exception of 1 - 9 Sandycombe Road, located approximately 715m west of Chalkers Corner (over 1 km from the Stag Brewery component of the Site). As set out above, Waterman IE do not consider 1-9 Sandcombe Road as a cumulative scheme as it only involves an additional 20 residential units within an established residential area. The location of the major schemes provided in **Table 2** are shown in **Figure 2**.

¹ http://www2.richmond.gov.uk/PlanData2/Planning_MajorDevelopments.aspx

Table 2: Major Schemes in the London Borough of Richmond Upon Thames

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
1 17/1843/VRC	Twickenham Rugby Football Union Stadium 200 Whitton Road Twickenham TW2 7BA	Structural alterations to, and extension of, the existing RFU Stadium East Stand, to accommodate additional floorspace for the provision of hospitality (corporate hospitality and debenture hospitality), conferencing and banqueting and other associated works and formation of new access on Rugby Road (namely minor design amendments to approved scheme).	Not within 1km
2 17/1446/LBC & 17/1445/FUL	Parkleys Parkleys Ham	Proposed change from single glazing to double glazing within the existing timber window frame sections/ profiles to all dwellings (excluding reeded bathroom windows and glazing to communal areas) at Nos 1-16 Brook Court, Nos 1-16 Byron Court, Nos 1-16 Coleridge Court, Nos 1-16 Drydon Court, Nos 1-12 Gray Court, Nos 1-12 Herrick Court, Nos 1-14 Marlowe Court, Nos 1-18 Milton Court, Nos 1-12 Pope Court, Nos 1-12 Shelley Court, Nos 1-18 Spenser Court and Nos 1-9 Tennyson Court.	Not within 1km
3 17/1269/FUL	All Saints Parish Church The Avenue Hampton TW12 3RG	Demolition of the existing Church Hall and the bungalow at No 44 The Avenue and erection of four dwellings (3 x 4 bedroom, 1 x 3 bedroom) (Use Class C3 Dwelling Houses); a new entrance lobby (Narthex) to All Saints' Church and a new Church Hall (Use Class D1: Non-Residential institutions) incorporating two flats (Use Class C3: Dwelling Houses).	Not within 1km
4 17/1286/VRC	Teddington Studios Broom Road Teddington	Variation of approved drawing nos attached to 14/0914/FUL to allow for the development of Block B as two blocks and an increase in the overall number of units from 220 to 235 and minor changes to the riverside walkway. To allow changes to the internal layout and the riverside walkway as shown on the submitted drawings.	Not within 1km
5 17/1033/FUL	Lockcorp House 75 Norcutt Road Twickenham TW2 6SR	Demolition of Lockcorp House; erection of a part four, part five-storey building comprising 9 no. student cluster flats (49 study/bedrooms in total); three car parking spaces including one disabled space, ancillary cycle and refuse storage and landscaping.	Not within 1km
6 16/4890/FUL & 16/4889/OUT	1 - 9 Sandycombe Road Richmond	Redevelopment of site to provide for a mixed use development of 535m2 of commercial space (B1 (a), (b) and (c) and B8 use) and 20 residential units, together with car parking and landscaping.	Within 1km Additional 20 residential units within an

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
			established residential area.
7 16/4747/RES	Richmond Upon Thames College Egerton Road Twickenham TW2 7SJ	Detailed Reserved Matters application including Appearance, Landscaping, Layout and Scale for Phase 1C (in part) and Phase 3A (in part) of the College Development Zone (in Part) including Building Zone 1 pursuant to Conditions U08027 and U08031 of Outline Planning Permission 15/3038/OUT dated 16.08.16 (Outline application for the demolition of existing college buildings, removal of hardsurfacing, site clearance and groundworks together with the redevelopment of the site to provide: 1) A new campus for education and enterprise purposes, comprising; Replacement College (Use Class D1) of up to 16,000sqm to accommodate up to 3,000 FTE day time students, as well as evening and weekend use; A Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100sqm; 2) A new Secondary School (D1 Use Class) of up to 7,000 sqm for up to 750 students; 3) A new Special Educational Needs (SEN) School (D1 Use Class) of up to 4,000sqm for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700sqm; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900sqm to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations to the A316 footbridge and minor realignment of Langhorn Drive, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping, and 9) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping).	Not within 1km
8 16/4553/FUL	63 - 71 High Street Hampton Hill	Demolition of existing buildings on site and erection of a group of part three, part four storey buildings around outer and inner landscaped courts comprising 8 townhouses and 31 apartments and two non-residential units on the High Street frontage (102.5m ² GIA) and (131.5m ² GIA) for use as A1(retail: non-food) and/or A3 (cafe) and/or B1 (offices) and/or D1 (clinics / creche / non-residential education and training centre) together with the formation of a basement to provide ancillary car parking (45 spaces) cycle storage (65 spaces) refuse storage rooms and plant rooms.	Not within 1km

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
9 16/3552/FUL	St Michaels Convent 56 Ham Common Ham Richmond TW10 7JH	Conversion and extension of the existing convent buildings (following demolition of some mid-20th century extensions), together with new build apartments and houses, to provide a total of 23 residential retirement units, an estate managers office and meeting rooms, parking and associated works within a landscaped site, with access via Ham Common (Revised Description).	Not within 1km
10 16/3506/FUL	Somerville House 1 Rodney Road Twickenham	Complete demolition of the existing building and erection of 21 residential units with associated external amenities, library/community space, cafe, refuse/storage, concierge office, and bicycle storage.	Not within 1km
11 16/3450/FUL	Land At 149 - 151 Heath Road Twickenham	Demolition of existing buildings and removal of advertising hoardings. Resiting of existing recycling bins. Erection of a part 3 storey part 4 storey building with commercial use (Flexible Use Class A1, A2 and/or B1a) on the ground floor with 10 flats (3 x 1 bed and 7 x 2 bed) on upper floors. Associated hard and soft landscaping, refuse, car and cycle parking.	Not within 1km
12 16/3353/FUL	Royal Botanic Gardens Kew Green Kew Richmond TW9 3AB	Development of a new Children's Garden at the north end of the existing Kew Gardens site (revised description).	Not within 1km
13 16/2777/FUL	Ryde House 391 Richmond Road Twickenham TW1 2EF	Demolition of existing building. Construction of a new mixed use development comprising a food store (1,123m ² sales area) and primary school with associated car parking (55 spaces allocated to foodstore and 1 space allocated to school); alterations to site entrance, landscaping, and associated works.	Not within 1km
14 16/2647/FUL	2 High Street Teddington TW11 8EW	Demolition of the existing office (B1a) building (395 sq.m) and the erection a part six / five-storey mixed-use building with a ground floor office / commercial unit (300 sq.m) and 22 (11 x 1 and 11 x 2 bed) affordable 'shared ownership' apartments above with 10 car parking provided at basement level including associated works.	Not within 1km
15 16/2352/FUL	4 - 6 Manor Road Teddington	Demolition of 6 Manor Road and erection of three storey building to create 12 additional two bedroom apartments, car parking spaces, bicycle storage, amenity space and related ancillary works. Erection of additional storey on 4 Manor Road for three two bedroom apartments and related ancillary works.	Not within 1km

Reference No.	Address	Description	Justification for exclusion as a cumulative scheme
16 16/0606/FUL	Police Station 60 - 68 Station Road Hampton	Retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bedroom, 12 x 2 bedroom, 10 x 3 bedroom and 2 x 4 bedroom) and associated access, servicing, cycle parking and landscaping (The proposal has been amended to include setting back the top floor away from the eastern boundary of the site; roof design on Plots 24 to 28 amended; and amendments to unit mix).	Not within 1km

Figure 2: Location of Major Schemes within the London Borough of Richmond upon Thames



Major Schemes within the London Borough of Hounslow

Chiswick Riverside and Chiswick Homefields are the only wards in the London Borough of Hounslow located within 1km of the Site. As shown in **Tables 3** and **4**, there are no major schemes within 1 km of the Site, apart from at Dukes Meadow, which involves the erection of a tennis hall to replace the existing dome. As this scheme is severed from the Site by the River Thames, does not involve the introduction of any sensitive receptors and involves replacing the existing structures on site with a new building of a similar sized massing, it is unlikely this scheme would result in any type 2 cumulative effects with the Development.

Table 3: Major Schemes in Chiswick Riverside

Address	Reference No.	Description	Decision	Within 1km of the Site?
Chiswick Community School Burlington Lane Chiswick London W4 3UN	P/2015/5458	Erection of a single storey extension to the hall and erection of a two storey teaching block.	Approved 03/03/2016	No
Chiswick House Grounds Chiswick London W4 2RP	P/2015/4063 P/2010/0686 P/2010/0693 P/2010/0694 P/2010/0690 P/2010/0696	Variation of condition 22 for renewal of the temporary marquee, condition 11 for extension by an additional hour and condition 23 to allow the marquee to be in place for six months from April to September following variation of condition 23 of planning permission 00176/E/P13 dated for the demolition of existing cafe and erection of a new cafe, temporary marquee area, children's play area, improved access and car parking with various tree and woodland management, erection and repair of built features (including walls and ornamental structures), repaving and replanting dated 17/12/2007 to extend the months of summer use of the marquee from three months to five months between May and September.	Approved 05/11/2015	No
The Conservatory Chiswick House Grounds Burlington Lane Chiswick London W4 2RP	P/2015/1330	Conversion of storage area in the east end of conservatory back sheds to provide additional office accommodation with minor amendments and reconfiguration of existing offices.	Approved 23/11/2015	No
Strand On The Green Junior & Infant School	P/2015/1128	Extension to a staff room at first floor level of north west block with a roof terrace.	Approved 15/06/2015	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
Thames Road Chiswick London W4 3NX				
Chiswick Community School 2 Burlington Lane Chiswick London W4 3UN	P/2014/3999	Erection of a three storey teaching facility located on hardstanding and grass areas adjacent to the existing teaching block known on site as Block B.	Approved 27/03/2015	No

Table 4: Major Schemes in Chiswick Homefields

Address	Reference No.	Description	Decision	Within 1km of the Site?
Dukes Meadows Tennis Dan Mason Drive Chiswick London W4 2SH	P/2017/1223	Erection of tennis hall to replace the existing air dome.	Pending Consideration	Yes
94-98 Chiswick High Road Chiswick London W4 1SH	P/2016/3850	Change of use, refurbishment and extension of the properties to provide a mixed use development comprising a five screen cinema including an ancillary restaurant/cafe (incorporating a roof terrace), 3 self contained flats on the upper floors and associated facilities.	In Progress	No
1 Burlington Lane Chiswick London W4 2RW	P/2016/0227	Demolition of existing office building and redevelopment to provide circa 15,903 square metres (GIA) of B1a office floorspace with associated car parking, motor-cycle parking, bicycle parking and bus shuttle service drop off provided at ground and basement level and with associated landscaping at ground level incorporating repaving and planting.	In Progress	No
Axis House Hogarth Business Centre Burlington Lane Chiswick London W4 2TH	P/2015/3592	Change Of Use From Office Use (B1a) To 162 bedroom hotel use (Clas C1) with external alterations, landscaping and associated works.	Approved with a Legal Agreement 17/11/2015	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
Hogarth Business Park Burlington Lane Chiswick London W4 2TH	P/2015/2282 P/2014/3273 P/2013/1706	Variation of Condition 2 (approved plans) with amendments to the approved development to 'consolidate the buildings to the southern boundary of the site to enable the building to frame a new square, adjust the position of the central apartment building in the eastern part of the site, consolidate two of the blocks into a single L-shaped apartment block of smaller massing, to improve separation distances between the apartment buildings, amend the communal garden spaces to create larger and more open spaces, addition of an extra setback storey to the northern element of this proposed consolidated block, provide gardens to the southern side of the eastern terrace houses; alterations to the basement car parking area to enable removal of on-street parking from the new terraced street and the creation of a pedestrianised linear park between the terraced houses, improve the deep planting zone available for the communal garden area; and amend materials and elevational treatment for more traditional elements of the local character', following planning permission approved under 00176/A/P63 dated 11/02/2014 for demolition of existing buildings and redevelopment of site to provide 173 new residential units, commercial floorspace (Use Class B1), together with basement and surface level car parking spaces, cycle parking, access, landscaping, boundary treatment and associated works. Amendments Proposed: Alter the floor plate, layout, scale and elevations block A and house plot 43.	Approved with a Legal Agreement 06/10/2015	No
Power Road Bridge Gunnersbury Avenue (North Circular Road) Chiswick London	P/2014/3130	Construction of utility service bridge to the west of the existing A406 road over the railway bridge at Power Road.	Approved 03/02/2015	No
Isokan Plus Turnham Green Terrace Mews Chiswick London W4 1QP	P/2014/1091	Redevelopment of site to provide B1 workspace accommodation with basement together with a new mews street and retention of existing boundary walls.	Approved with a Legal Agreement 23/12/2014	No

Address	Reference No.	Description	Decision	Within 1km of the Site?
94-98 Chiswick High Road Chiswick London W4 1SH	P/2013/1466	Change of use, refurbishment and extension of the properties to accommodate a five screen cinema including two ancillary bars, a restaurant/cafe and associated facilities.	Approved with a Legal Agreement 17/12/2014	No
29 Chiswick High Road Chiswick London W4 2ND	P/2011/1188	Demolition of the existing building and the erection of a part four storey, part three storey mixed use building comprising of 447sq metres of commercial (Class A1, A2, A3, B1, D1) uses on the ground and lower ground floors, and the construction of nine residential units including two townhouses, three two-bedroom apartments, four three-bedroom maisonettes) with 9 car parking spaces at basement level.	Approved with a Legal Agreement 23/01/2012	No
104-108 CHISWICK HIGH ROAD CHISWICK LONDON W4 1PU	P/2010/3115 P/2009/2930	Demolition and reconstruction of existing building elevations to Chiswick High Road and Upham Park Road to provide a mixed use development comprising of commercial floor area (A1, A2 or B1 uses) to ground and basement with 7 apartments to three upper floors, erection of two new dwellinghouses to Upham Park Road and associated amenity space, basement car park and landscape area	Approved with a Legal Agreement 19/10/2011	No
North Block Turnham Green Terrace Mews Chiswick London W4 1QP	P/2009/0847	Renovation, alteration and insertion of mezzanine floor and change of use from warehouse/office to offices (B1).	Approved 18/06/2009	No
29 Chiswick High Road Chiswick London W4 2ND	P/2009/0401	Partial demolition of existing restaurant and redevelopment to create commercial retail use (A1, A2, A3, B1, D1) on ground & basement floor with 9 residential apartments and basement car parking.	Approved with a Legal Agreement 05/06/2009	No
Bristol Car Service Hogarth Centre Hogarth Lane Chiswick London W4 2QN	P/2009/0217	Partial retention of existing offices and alterations to create nine residential units, including balconies, landscaping and parking areas.	Approved with a Legal Agreement 03/09/2009	No