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**Manor Road / Richmond**  
Addendum: Update to Health Impact Assessment

# Addendum Update: May 2023

19<sup>th</sup> May 2023

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**Appendix A -**

**SCI Supply and Demand**

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# 1. Introduction

- 1.1 This Addendum Update presents an update to the submitted Health Impact Assessment (HIA) (2019) and HIA Addendum (2020). It has been prepared by Hatch on behalf of Avanton Richmond Development Ltd ('the Applicant') in response to proposed minor scheme changes for the comprehensive redevelopment of the former Homebase and Pets at Home site on Manor Road ('the Site') within the London Borough of Richmond upon Thames (LBRuT).
- 1.2 Details of the Site in terms of its size, accessibility and current occupiers remain as described in the originally submitted HIA (2019).

## Proposed Development and Planning History

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- 1.3 A planning application for the redevelopment of the Site was submitted to London Borough of Richmond Upon Thames (LBRuT) in February 2019 (ref. 19/0510/FUL) (the 'Original Proposed Development') and was considered at LBRuT Planning Committee on 3 July 2019. The Planning Committee resolved that they were minded to refuse the Application, however on 29 July 2019 it was confirmed that the Mayor of London would act as the local planning authority for the purposes of determining the application.

### Proposed Amendments

- 1.4 Following review of LBRuT's reasons for refusal and discussions with Officers at the Greater London Authority (GLA) and Transport for London (TfL), the Applicant sought to review the scheme, with the principle aim of increasing the delivery of affordable housing through additional density and addressing other issues raised in the Mayor's Stage 2 Report. Initial scheme amendments were submitted in November 2019 ('the November 2019 Amendments') and increased the overall number of units by 48, primarily through the introduction of a new residential building known as Block E.
- 1.5 Following further discussions with TfL and the GLA, it was subsequently agreed that further revisions should be explored in order to deliver an improved scheme, without the need for this additional block.
- 1.6 The proposed changes are described in detail in the accompanying Design and Access Statement Addendum (July 2020 and November 2021), however, of particular note is the increase in residential units from 385 within the Original Proposed Development to 453 within the Amended Proposed Development. This increases the total number of affordable units by 39 to a total of 173 affordable homes (40% by habitable room taking account of grant funding, increased from 35% as originally submitted). This increase in units and the higher affordable housing provision has been principally achieved through amendments to the height and internal layout in appropriate locations across the Site.
- 1.7 The proposed changes necessitate an amendment to the Application's description of development. The revised description of development (hereafter referred to as the 'Amended Proposed Development') is as follows:

*Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.*

1.8 As a result of the proposed changes, the submitted Health Impact Assessment was updated (HIA Addendum 2020) in order to assess the Amended Proposed Development. By way of summary:

- **Housing Quality and Design:** The Proposed Development will provide 453 high quality new homes of varying size and tenure contributing to LBRuT and GLA annual housing targets as well as helping to meet local demand for family housing and affordable housing, encouraging a vibrant resident community. Residents will benefit from functional, comfortable and energy efficient living including accessible units for mobility impaired and older users.
- **Access to Open Space and Nature:** It should be noted that provision of open space in the Proposed Development is below the overall policy requirement and does not include direct provision for 12-18 year olds. However, the provision is a positive change and includes communal outdoor amenity and 1,234m<sup>2</sup> of children’s play space across a range of settings and for different age groups. A half ball court has been included as meantime use before the potential future increase of DDA parking from 3% to 10% is required. The changes encourage physical activity and help to maintain or improve mental well-being.
- **Crime Reduction and Community Safety:** The Proposed Development promotes multi-use of public spaces and natural surveillance and will help to reduce fear of crime. The proposals have been developed in consultation with a Designing Out Crime officer and community engagement has taken place which help foster a sense of ownership and empowerment.
- **Access to Work and Training:** The Proposed Development will provide flexible retail and commercial space generating up to 10-25 FTE jobs providing opportunities for employment, including for local residents. In addition, during the demolition and construction phase, temporary employment opportunities will be generated.
- **Social Cohesion:** The Proposed Development connects well to the wider area and provides multi-use communal space which will provide an area in which the local community can interact.
- **Pedestrian and Cycling Activity:** The Proposed Development has strong public transport links and prioritises pedestrian and cycling modes of travel, both in terms of accessing the Site and within the Site itself thereby encouraging and promoting active travel and exercise.
- **Minimising the use of natural resources:** The Site meets the principle of paragraph 119 of the NPPF by reusing land that has previously been developed to deliver a mix of uses and will enhance the amenity value of the Site for occupiers and the local community. It incorporates sustainable design and construction techniques and will be highly energy efficient.
- **Incorporation of Renewable Energy:** The Proposed Development includes Air Source Heat Pumps and Photo Voltaic helping to mitigate against climate change impacts and reduce potential for fuel poverty.

1.9 A revised planning application was submitted in July 2020 and in October 2020 the Mayor of London resolved to grant planning consent, subject to conditions and a Section 106 Agreement.

1.10 Subsequent to the approval of the July 2020 scheme by the Mayor, a number of additional minor scheme amendments have been required in November 2021 and November 2022 as a result of

legal review of the ownership boundary, additional flood mitigation requirements and changes in fire regulations. A summary of these changes includes:

- amendments to the affordable housing tenure split in relation to Policy H6 of the London Plan 2021;
- minor realignment of the application red line boundary to better reflect the existing title plans, resulting in a slight decrease in the overall site area (768.7 sqm.); and
- consequential amendments to the GF landscaping/layout plan to reflect the realigned boundary, including the relocation of the proposed car club spaces and bin holding area.
- Minor changes to site levels to ensure that the proposal does not lead to detrimental impacts off-site in regards to surface water flooding by revisiting surface water flow routes through the site and incorporating flood resilience measures across the site;
- Subsequent minor reductions to the maximum AOD heights of the proposed buildings, in part achieved through reductions to the floor to ceiling heights within the buildings to address the site level changes (building heights across the site remain at or below the levels previously considered in 2020);
- Associated revisions to the landscaping to accommodate the proposed surface water drainage strategy and to maximise the Urban Greening Factor of the Proposal;
- Minor changes to internal ground floor layouts to respond to update Fire Safety regulations; and
- An updated Energy Strategy for the site in line with the GLA's energy hierarchy i.e. 'lean, clean and green'. In residential elements this includes 50% reduction in regulated carbon emissions and minimum 35% reduction in regulated carbon emissions within non-residential elements beyond part L 2021-

## Policy Background Updates

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- 1.11 There have been minor updates to the policy background following the HIA Addendum 2020, these are set out below.
- 1.12 The national Planning Practice Guidance (PPG) states that local planning authorities should ensure that the healthcare infrastructure implications of any relevant proposed local development are considered. The PPG also refers to Health Impact Assessment (HIA) as a useful tool to assess and address the impacts of development proposals (paragraph ref 53-004-20140306).
- 1.13 The NPPF (2021) includes specific aims for the promotion of healthy, inclusive and safe communities, the most relevant of which are:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
  - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

1.14 At the regional level, the London Plan 2021 (see **Policy GG3: Creating a healthy city**) indicates that the Mayor will take account of the potential impact of development proposals on health and health inequalities within London and those involved in planning and development must ‘*assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments*’.

1.15 Policy 48 of the draft LBRuT local plan (Regulation 19 Plan) states that a Health Impact Assessment must be submitted with all development proposals incorporating 10 or more residential units. According to the draft Local Plan, a HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative health impacts as well as measures for enhancing any potential positive impacts. Although LBRuT’s emerging Local Plan is acknowledged, it carries limited weight at this time.

### **Assessment Methodology**

1.16 There has been a minor update to the assessment methodology since the submission HIA and HIA Addendum to reflect updated HIA Guidance from the Healthy Urban Development Unit (HUDU)<sup>1</sup>. This reflects the introduction of the healthy Streets indicators assessment in Table 2.5, as well as the addition of needs assessment and community engagement at Table 2.9. The assessment has been updated to include these additions.

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

## **Local Context**

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1.18 The Site of the Proposed Development is located within the North Richmond ward in the London Borough of Richmond upon Thames (LBRuT). The original HIA (May 2019) provided a brief outline of the key socio-economic characteristics of the population in North Richmond ward (the relevant small statistical area in which the site is located) and compared this with LBRuT and London. It set the baseline conditions against which the health impacts of the proposed development were assessed.

1.19 This baseline was subsequently updated for the HIA Addendum 2020. There have been a number of new data releases since the 2020 HIA Addendum, which do not fundamentally change the baseline position, but which have been considered in the current update to the HIA for robustness and completeness as follows:

- The latest Census (2021) provides the most recent population data, however, the data does not cover ward level data. Therefore, the MSA<sup>2</sup> (Middle Super Output Area) that

<sup>1</sup> Source: HUDU Rapid Impact Assessment Tool, October 2019, Fourth Edition

<sup>2</sup> MSA is Richmond Upon Thames 004 (E02000787)

the proposed development is located in has been considered for this analysis. The updated data from the latest Census (2021)<sup>3</sup> indicates that there are around 12,097 people living in the MSOA that the proposed development is located in. The population living in the MSOA has increased by 12.3% since the previous census (2011) (+1,329 people), which is greater than the Richmond and London increases (+4.4% and +7.7% respectively).

- North Richmond's working age population has a similar demographic profile to the LBRuT – the latest data uses MSOA level data which shows that 67% of the population are of working age which is slightly lower than the London wide average of 69%. Both have experienced a reduction in the working age population since the previous census, however, the MSOA has experienced a greater rate of reduction (-2.2% and -0.3% respectively). In line with the previous HIA the proportion of the residents located in closer proximity to the proposed site that are over the age of 65 is higher than the London average in 2021 (12.7% and 11.9% respectively).
- The submitted HIA referred to the GLA's population projections (central trend). It showed that LBRuT's population was expected to grow, albeit at a slower rate than the average seen across the capital. The projections indicated that the population of LBRuT was expected to increase by +10% between 2016 and 2032, whilst the population London will grow by +13% over the same period. There have been no new population projections released so this baseline information continues to apply.
- The same conclusion applies to the assessment of projected change in the working age population. The original HIA showed that this was set to grow over the 2016-32 period by 6% with London at 9%. In addition, it showed also that the borough's population aged 65 and over was expected to increase at a slower rate than the London average (+43% compared with +47% across London).
- The most recent available data (July 2021 – June 2022) shows that the economic activity rate is 78.8% in LBRuT which is lower than the rate in the previously submitted HIA and HIA Addendum 2020. In 2018 the economic activity rate in LBRuT was 80% compared with 82% in Dec 2019. This has typically been higher than the London average, however, both 2021 and the 2022 data shows that wider London now has a higher economic activity rate. The original HIA referred to a very low unemployment rate in the borough for 16-64-year olds (at 1.1%) which was below the London average (of 4.6%) according to 2019 data. More recent data<sup>4</sup> shows that unemployment in the borough has increased to 4.3%, and while it is still below the London average (4.7%), the gap has decreased significantly.
- The original HIA highlighted a large disparity between the borough and London in terms of skills data shows that qualifications levels in LBRuT were significantly above the London average with almost 65% of the economically active working age population qualified to degree level (or above) compared with 54% of London's population. This compares with 65% and 51% in the May 2019 HIA. The latest release of data shows that this trend is still present with 70% of the working aged population in the borough having at least degree level qualification, compared to 59% across wider London.

<sup>3</sup> Census (2021)

<sup>4</sup> ONS (2022) Annual Population Survey July 2021 – June 2022



- Following the trend of the skills data the latest data shows 79% of the borough's population is employed in managerial, professional and associate professional occupations compared to 63% for London. Both areas have seen an increase since the original HIA which showed that 71% of the borough's resident population were employed in high value occupations compared to 58% across London. This compares with 71% and 56% in the May 2019 HIA, pointing to a slight increase in the proportion of residents of LBRuT in these occupational categories.

1.20 The Joint Strategic Needs Assessment (JSNA) for the LBRuT was updated in 2021 following the submission HIA and 2020 Addendum. Key messages include:

- Life expectancy at birth is 82.5 years of age in LBRuT for men and 86.3 years of age for women. Over the past two decades Richmond has consistently had a life expectancy at birth which was 2 years higher than the London average<sup>5</sup>;
- LBRuT has the lowest crime rate (60) per 1,000 out of all 32 London Boroughs<sup>6</sup>;
- LBRuT has above average level of green space per head of population and is 2<sup>nd</sup> out of 32 boroughs for bike journeys per day<sup>7</sup>;
- Above average levels of education attainment, 65% of 16-64 year olds have a degree level education or above<sup>8</sup>.

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

- **Maximising prevention opportunities** - the estimated number of people in LBRuT with unhealthy behaviours is substantial;
- **Reducing health inequalities** - issues include lower levels of life expectancy for men, high levels of child poverty, variations in educational attainment with ethnicity and those on free school meals, high health costs of the homeless and the high number of unpaid carers in the community;
- **Minimising harms and threats to health** - issues include maternal health, vaccination coverage, family context, sexual health, well-being and mental health, cancer screening levels, air quality and noise pollution;
- **Planning for demographic change and promoting independence** - issues include the ageing population, prevalence of long-term health conditions, growth in young people and associated demand for school places and preventable emergency hospital admissions;
- **Unequal COVID-19 impact on different groups** – risks of developing serious COVID increase progressively with increase in BMI. COVID-19 was 2 x higher for people from the poorest areas vs. people in the wealthiest areas, obesity as a risk factor<sup>9</sup>.

<sup>5</sup> Richmond Upon Thames JSNA Life Expectancy at Birth ([richmond\\_jsna\\_people.pdf](#))

<sup>6</sup> Richmond Upon Thames JSNA Crime and Community Safety (<https://www.datarich.info/crime-and-community-safety/>)

<sup>7</sup> Richmond Upon Thames JSNA 'The Richmond Story' (<https://www.datarich.info/wp-content/uploads/2018/04/Richmond-Story-2017-18.pdf>)

<sup>8</sup> Richmond Upon Thames JSNA Children and Young People ([Children and Young People - UTLA | Richmond upon Thames | Report Builder for ArcGIS \(datarich.info\)](#))

<sup>9</sup> Richmond JSNA Infographic ([https://www.richmond.gov.uk/media/25389/jsna\\_richmond\\_infographics.pptx](https://www.richmond.gov.uk/media/25389/jsna_richmond_infographics.pptx)).

## 2. Health Impact Assessment

2.1 This section presents an updated version of the assessment within the submitted HIA and HIA Addendum 2020. Where there have been no changes to the details and evidence and assessment of potential health impacts this has been stated.

Table 2.1 Housing Quality and Design				
Assessment criteria	Relevant?	Details/ evidence	Potential health impact	Recommended mitigation or enhancement measures
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?		The updated assessment remains as stated in the HIA Addendum (2020)		
Does the proposal address the housing needs of older people, i.e., extra care housing, lifetime homes and wheelchair accessible homes?		The updated assessment remains as stated in the HIA Addendum (2020)		
Does the proposal include homes that can be adapted to support independent living for older and disabled people?		The updated assessment remains as stated in the HIA Addendum (2020)		
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes	The DAS confirms that the Proposed Development promotes and adheres to good design standards as set out in national and local policy (incl. London Plan Housing SPG). Typical flat layouts presented in the DAS show that units will have generous window provision, private amenity space off the living room space, in addition to ample storage and generous wardrobe space. There is only one due north facing single aspect unit and windows are designed to have Juliet balconies allowing for openable area and secure night ventilation and all windows to be centrally located. Where noise levels are highest balconies have been substituted for winter gardens. Services and bathrooms pushed to the back of the plan to minimise deep plan arrangements.	Neutral	No further mitigation or enhancement measures required.

<p>Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?</p>	<p>Yes</p>	<p>The Amended Proposed Development includes the provision of 453 dwellings ranging from one to three-bedroom apartments. In total, around 61.8% of all units will have two or more bedrooms aligning the Amended Proposed Development with local policy requirements for family-sized dwellings.</p> <p>Furthermore, the Amended Proposed Development includes provision for 40% affordable homes by habitable room, with the tenures split 61/39 between London Affordable Rent and intermediate tenures.</p>	<p>Positive</p>	<p>No further mitigation or enhancement measures required.</p>
<p>Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?</p>	<p>Yes</p>	<p>The design principles behind the Proposed Development have been inspired by energy efficient principles, including the Mayor of London’s Energy Hierarchy (i.e. Be Lean, Be Clean, Be Green and Be Seen).</p> <p>The revised Energy Statement prepared by Chapman BDSP confirms the principal target is to achieve ‘zero carbon’ for the new build residential aspects, corresponding to a 63% reduction in regulated CO2 emissions beyond the requirements of the Building Regulations Part L (2021), and a 35% reduction for commercial areas, as set out in the London Plan (2021) and set out in the LBR Local Plan (2018) requirements. In addition, the Amended Development is expected to meet the carbon emission reduction for residential areas at the Be Lean stage in line with the London Plan (2021).</p> <p>The strategic approach to the design of the Amended Proposed Development seeks to maximise the energy efficiency of all residential units through the incorporation of passive design-led solutions, such as:</p> <ul style="list-style-type: none"> <li>• An Efficient building fabric;</li> <li>• Optimised glazing performance; and</li> </ul>	<p>Neutral</p>	<p>No further mitigation or enhancement measures required.</p>

		<ul style="list-style-type: none"> <li>• Efficient space heating and low energy lighting.</li> </ul> <p>In addition, the revised Energy Strategy states an assessment was carried out to determine likely implications of centralised energy distribution at the development and it is proposed to include full trenching between all buildings, with space allocation made for future district heating pipework. Space allocation has also been made for future plate heat exchangers at the ground floor to each building, and for future installation of pipework in the risers to rise to the top of the risers and connect in.</p> <p>The revised Energy Strategy prepared by Chapman BDSP also confirms a series of measures that can be used to educate future building users on how they can reduce their day-to-day energy use by making user guides and/or tenant fit-out guides available to them. This approach would seek to reduce the adverse effects of unregulated emissions (i.e. from small-power electricity use associated with appliances and home-use energy consumption).</p> <p>Overall, the Energy Strategy has found that the Proposed Development will result in a highly efficient, low carbon scheme.</p>		
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**Table 2.2 Access to Healthcare Services and Other Social Infrastructure**

Does the proposal retain or re-provide existing social infrastructure?	No	The Site of the Amended Proposed Development is currently occupied by retail uses (Homebase and Pets at Home). The proposed Development consists of 453 residential units (use class C3), 495 m <sup>2</sup> (GIA) of flexible Use Class E floorspace and improvements to the public realm.	Neutral/Adverse	Community Infrastructure Levy (CIL) contributions will be sought to address the effects of the additional residents on the increased demand for community facilities. CIL contributions may include contribution towards the co-location of the library with other facilities
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				in nearby Kew, if applicable with Regulation 123 List / Annual Infrastructure Funding statement.
Does the proposal assess the impact on healthcare services?	Yes	An updated assessment of the potential impact of the Amended Proposed Development on primary healthcare services was undertaken as part of this Addendum (November 2022) (see updated Appendix 1). The updated assessment finds that the ratio of registered patients to FTE GP's within the local catchment area is below the HUDU benchmark of 1,800 and there is therefore likely some capacity to absorb additional patients. With a population yield of 904 new residents, the Amended Proposed Development is anticipated to increase the number of registered patients per FTE GP by 1.2% to 1,681 which will still remain below the HUDU benchmark of 1,800. In addition, not all of the residents living at the Amended Proposed Development will be additional as some may already be living within the catchment, which means that overall demand may be lower than the anticipated.	Neutral	No further mitigation or enhancement measures required.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. primary, secondary and post-19 education needs and community facilities?	Yes	This Addendum (November 2022) has also provided an updated assessment of the existing capacity and impact of the Amended Proposed Development on early years, primary and secondary education providers (Appendix 1). Using the GLA's Population Calculator and the Amended Proposed housing mix as outlined in the DAS (Nov 2021), the assessment found that the Amended Proposed Development will yield 52 primary school children (aged five to 11), and 26 secondary school children (aged 12-17). An assessment of capacity at both primary and secondary schools within the various catchments from the Site of the Amended Proposed Development (see Appendix 1)	Neutral	No further mitigation or enhancement measures required.

		confirms that there is sufficient capacity to accommodate additional demand, particularly when it is considered that not all of the demand will be net additional.		
Does the proposal explore opportunities for shared community use and co-location of services?		The updated assessment remains as stated in the original HIA (2019).		

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

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal retain and enhance existing open and natural spaces?		The updated assessment remains as stated in the original HIA (2019).		
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal provide a range of play spaces for children and young people?	Yes	The play space provision has increased since the original proposed development in February 2019 to reflect the 5% affordable housing increase and accord to the latest GLA play space calculator. The Landscape DAS confirms that allocation has been made within each courtyard, including the public central space, for provision of play facilities and a playable landscape treatment incorporating a range of furniture and play elements for children aged from 0-11yrs. The designated areas (as recommended by SPG ‘Shaping Neighbourhoods: Play and Informal Recreation’) have been distributed across the site to suit current unit numbers and mix. In addition, the DAS also confirms that 0-3 Play is fully catered for on site at the required 10 sq. m per child, play space for 5-11-year olds is maximised in the fully accessible central	Neutral/ Positive	Community Infrastructure Levy (CIL) contributions will be sought to address shortfall in on-Site play space capacity for children aged 12-years and over. This could include contributions towards the provision of new play/ adventure facilities within existing parks, if applicable with Regulation 123 List / Annual Infrastructure Funding statement. A financial contribution to play space maintenance and management will be secured by S106 Agreement.

		<p>courtyard, therefore minimising the requirement for roof level play for this age group.</p> <p>The Proposed Development includes a half ball-court in the southwest corner of the site to increase amenity provision and cater for a more organised sport. For 11+ year olds, the updated DAS identifies several suitable locations for play space within the recommended 10-minute/ 800-metre walk from the Site of the Amended Proposed Development which, combined with any CIL contributions, will be sufficient in meeting requirements for this age group.</p> <p>The DAS Landscape Addendum (Nov 2022) indicates that design and character of the proposed play space meets GLA requirements for 0-4 years and 5-11 years. The relocation of the refuse holding area impacts on doorstep play provision along the western access and this is re-provided through reconfiguration of the south eastern courtyard meaning no overall change in play provision from the previous submission.</p>		
Does the proposal provide links between open and natural spaces and the public realm?		The updated assessment remains as stated in the original HIA (2019).		
Are the open and natural spaces welcoming and safe and accessible for all?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal set out how new open space will be managed and maintained?		The updated assessment remains as stated in the original HIA (2019).		

Table 2.4 Air Quality and Noise

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



		building fabric, optimised glazing, efficient space heating and low energy lighting) before applying renewable energy generating measures. Once completed, the Proposed Development is anticipated to have solar PV cells installed on the roof of several buildings, in addition to air source heat pumps (ASHP).		
Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes	The Sustainability Strategy states that the Amended Proposed Development will seek to reduce noise at source and then design noise out of the scheme to reduce the need for mitigation measures. The proposed design includes three residential courtyards – the north and central courtyards are protected from external noise via the planted buffer zone, and the south courtyard is slightly more exposed. This will be mitigated via other design measures at a later stage.	Neutral	Implementation of mitigation measures identified throughout construction period. Identification of mitigation measures at detailed design stage to mitigate noise.

**Table 2.5 Accessibility and Active Travel**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal address the Ten Healthy Streets Indicators?	Yes	<p>The development is predominantly car free and will encourage travel by active and sustainable modes of transport. There is ample cycle parking and two electric car club vehicle spaces. A detailed active travel zone assessment has been undertaken in line with strategies incorporated within the London Plan 2021. The area assessed performed well in relation to Healthy Street Indicators.</p> <p>The scheme includes public spaces with seating where people can relax, rest and seek share and shelter in a safe environment. The footway at the front of the site is being improved for disabled access including drop crossing and tactile paving.</p>	Positive	Implementation and monitoring of Travel Plan.

		<p>The development will improve lighting and planting on Manor Road plus will include a new public courtyard that can be used for community events.</p> <p>The scheme includes a Vision Zero Action Plan in line with strategies incorporated into the London Plan 2021 to reduce the number of people killed or seriously injured on London's streets. The development will create permeable links to all parts of the site and contribute to improvements at Manor Circus which will benefit pedestrians and cyclists.</p>		
<p>Does the proposal prioritise and encourage walking (such as through shared spaces?)</p>	<p>Yes</p>	<p>In principle, the proposal is for a virtually car-free development with no standard car-parking spaces provided.</p> <p>The Transport Assessment (November 2021) has suggested that once the scheme is operational, traffic movements within the Site will fall below current levels. In addition, the Transport Assessment indicates that the need for pedestrian infrastructure has influenced the design process.</p> <p>Revised Travel Plans (2021) for the Amended Proposed Development have been prepared by Sanderson Associates Ltd. They identify actions and targets for promoting sustainable modes of travel which include walking, cycling and the use of public transport services. As part of this plan, a site-wide Travel Plan Co-ordinator (TPC) will be appointed to implement the travel plan, and each commercial area will have an appointed Travel Plan Representative (TPR) reporting to the TPC. The Travel Plan highlights the importance of walking for health and well-being and commits to the promotion of walking to</p>	<p>Positive</p>	<p>Implementation and monitoring of Travel Plan.</p>

		<p>local services and facilities for residents and workers.</p> <p>The Design and Access Statement (DAS) refers to the Amended Proposed Development as a 'low traffic space' with a 'neighbourhood street' providing both shared access for pedestrians and cyclists to the main body of the site, and additional play space for children.</p>		
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes	<p>The Amended Proposed Development will encourage cycling to and from the area. The updated Transport Assessment (November 2021) considers cycling as having a very important role to play in reducing congestion and air pollution as well as improving accessibility. Furthermore, the bicycle (being more affordable than the car) also has a role in promoting social equity benefits.</p> <p>To promote cycling, the Transport Assessment (November 2021) notes that 817 long-stay cycle parking spaces will be provided, the vast majority within spaces in the buildings together with two secure containers within communal courtyards. Short stay spaces (37 in total) would be located throughout the open spaces on the site. The total of 817 spaces would exceed the Cycle Parking minimum standards set out in the London Plan (2021), which requires 791 long stay cycle parking spaces.</p> <p>The updated Travel Plan notes that cycle friendly routes and cycle parking are provided throughout the Proposed Development site. The TPC will promote the physical benefits of cycling to overall health and wellbeing, whilst also offering advice on connectivity with the wider cycling infrastructure.</p>	Positive	Implementation and monitoring of Travel Plan.
Does the proposal connect public realm and internal routes to local	Yes	<p>The Amended Proposed Development is very well connected with its surroundings and</p>	Positive	Implementation and monitoring of Travel Plan.

<p>and strategic cycle and walking networks?</p>		<p>areas farther afield. The DAS Addendum confirms that cycling will be well integrated within the Site, which will in turn be integrated with the wider local and sub-regional cycling network. The Site is within the vicinity of several quiet cycle routes as defined by TfL Cycling Guides. This includes Manor Road, Manor Grove, Lower Richmond and Lower Mortlake Road).</p>		
<p>Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?</p>	<p>Yes</p>	<p>The Amended Proposed Development is planned as a car-free development, prioritising walking and cycling. In addition, the DAS Addendum confirms that on-Site parking will be limited, and two car parking spaces for car club users will be included.</p> <p>Safety is a key priority across the Amended Proposed Development, and the Applicant will work with TfL and the Local Highways Authority to prioritise road safety and make improvements to the highway in the surrounding area of the Amended Proposed Development. The Transport Assessment (November 2021) confirms that the Proposed Development will encourage travel by both active (i.e. walking and cycling) and sustainable (i.e. public transport) modes.</p> <p>Furthermore, by providing a range of complementary/ essential amenities within the Site, it will reduce the need for residents to travel off-Site to access these services elsewhere. This will be expected to result in fewer car journeys, reducing not only air pollution but also the risk of personal injury.</p>	<p>Positive</p>	<p>Implementation and monitoring of Travel Plan.</p>
<p>Is the proposal well connected to public transport, local services and facilities?</p>	<p>Yes</p>	<p>The November 2021 Transport Assessment notes a revised PTAL rating of four (i.e. very good) based on the online WebCAT tool and reductions in bus services.</p> <p>The latest PTAL assessment (Nov 2021) takes account of the alterations to bus services that</p>	<p>Positive</p>	<p>Implementation and monitoring of Travel Plan.</p>

		<p>came into effect on 12<sup>th</sup> December 2020 including the reduction in services on four routes. It should be noted that TfL remain satisfied that there is sufficient spare capacity on the bus network to accommodate the uplift in bus demand generated by the development.</p> <p>South Western Railway has proposed adding a train service during peak times (becomes five trains an hour during peak times) and removing two trains during off-peak services (becomes two trains per hour during off peak times). The transport assessment confirms the PTAL rating of the site will not be reduced, and peak provision will in fact be improved.</p> <p>The Travel Plans (2021) describe initiatives to provide comprehensive information about public passenger transport routes and destinations, service frequencies, bus stop locations and other travel information in a Travel Information Pack for residents and workers. The TPC will be responsible for maintaining and disseminating up-to-date information about public transport provision.</p>		
<p>Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?</p>	<p>Yes</p>	<p>As mentioned previously, the Amended Proposed Development is planned as a car-free development, and the Transport Assessment (2021) confirms that no standard car parking spaces will be provided for private vehicles. That being said, 14 parking spaces for disabled users will be included so that the Proposed Development is in line with planning policy and equivalent to 3%. To reduce the need for private vehicles, two electric car club parking spaces for current and new residents will be provided. A Car Club scheme will be operated with the manager of the scheme to be confirmed. The design also allows for future expansion of accessible parking provision to 10% of units to comply with London Plan (2021) policy.</p>	<p>Positive</p>	<p>Implementation and monitoring of Travel Plan. Implementation of car club proposal.</p>

		<p>The Transport Assessment (November 2021) confirms the Amended Proposed Development will result in a reduction in car borne trips when compared with the current baseline, and that reductions in the number of vehicle movements are anticipated in both AM and PM peaks.</p> <p>The Travel Plans (2021) recognise that the site is highly accessible to the highway network. However, initiatives including the promotion of cycling and walking, promotion of the use of public transport, the promotion of car sharing scheme based on a Travel Survey, the potential for car clubs and the potential for employers to permit home working are all identified as initiatives which would contribute to limiting and reducing car use. Options for sustainable travel will be included in a Travel Information Pack available to all prospective tenants and residents, and residents will be kept up to date with changes identified in reviews through mailshots.</p>		
<p>Does the proposal allow people with mobility problems or a disability to access buildings and places?</p>	<p>Yes</p>	<p>The design of the Amended Proposed Development has been influenced by the principles set out in Building Regulations (part M), the Lifetime Homes Standards and the Equalities Act 2010. In addition, it has also been influenced by the Mayor of London’s Housing SPG which states that 90% of new-build housing should be accessible and adaptable, with the rest being wheelchair accessible.</p> <p>In practice, this means that the design of the Proposed Development considers the access and circulation needs of a wide range of people, including those of parents with young children, the elderly, physically disabled and wheelchair users. The DAS confirms that within the Site, people with disability will not be segregated, but will be able to move around (as well as up and</p>	<p>Positive</p>	<p>No further mitigation or enhancement measures required.</p>

		down) and gain access to the same entrances, corridors and rooms as everyone else without the need of any detours. The Proposed Development has been designed to be as inclusive as possible and will include the appropriate use of textured surfaces to assist the visually impaired. The external landscape is designed to be fully accessible to all users with path widths and gradients designed to comply with Building Regulations Part M Volume 2.		
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**Table 2.6 Crime Reduction and Community Safety**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal incorporate elements to help design out crime?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?		The updated assessment remains as stated in the HIA Addendum (2020).		
Does the proposal include attractive, multi-use public spaces and buildings?	Yes	The Amended Proposed Development will promote a mix of retail, community and/ or commercial uses (Use Class E) in addition to residential uses (use class C3). A key focus of the Amended Proposed Development will be a new, multi-functional public courtyard created at the centre of the Site allowing interaction between residents and commercial users, with potential to host farmers markets, exhibitions promoting local makers and creative industries, outdoor film viewings, Christmas tree lightings and other celebrations, and gatherings of local residents.	Positive	No further mitigation or enhancement measures required. Define uses for flexible floorspace at reserved matters stage.
Has engagement and consultation been carried out with the local community?	Yes	The Applicant has had several pre-submission meetings with LBRuT, the GLA, and TfL leading into the final submission in 2020. Furthermore, discussions have been ongoing thereafter.	Positive	No further mitigation or enhancement measures required.

		<p>In addition, a series of pre-application public consultation events were held in November and December 2018. The Statement of Community Involvement submitted with the Application identifies two key aims for pre-application consultation, namely:</p> <ul style="list-style-type: none"> <li>• To inform local residents and other stakeholders about the Applicant’s aspirations to introduce a high quality residential-led scheme on-Site; and</li> <li>• To gain an understanding of local views of the Applicant’s proposals, engage with the local and wider community and use these views to inform proposals, identify concerns and opportunities wherever possible.</li> </ul>		
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**Table 2.7 Access to Healthy Food**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers’ markets?		The updated assessment remains as stated in the original HIA (2019).		
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes	The Amended Proposed Development consists of 495 m <sup>2</sup> of flexible retail, community and/ or commercial floorspace (Use Class E) which will enable the scheme to better respond to local demand. At this stage it is not possible to determine the exact on-Site uses, but they will complement the current retail offer in the local area, which includes a well-established food store (Sainsbury’s).	Neutral	No further mitigation or enhancement measures required.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area		The updated assessment remains as stated in the original HIA (2019).		



**Table 2.8 Access to Work and Training**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes	<p>The Amended Proposed Development will comprise of a flexible mix of 495 m<sup>2</sup> of commercial floorspace (Use Class E) and 453 residential units. Based on this, it is estimated that it has the potential to support between 10-25 permanent jobs and generate around £7 million in additional annual household expenditure on food and drink, household goods and services, and recreation<sup>10</sup>. A number of the new jobs would be expected to be taken by LBRuT residents, whilst a proportion of the increased household expenditure is anticipated to be captured by businesses located in the borough.</p> <p>The Amended Proposed Development will also generate employment opportunities during its demolition and construction phase. A Local Employment Plan will be prepared and implemented by the selected contractor to ensure that the development contributes towards local employment opportunities and skills improvements (incl. apprenticeships) in LBRuT.</p>	Positive	<p>Preparation and implementation of Local Employment Plan prior to start of construction and demolition phase.</p> <p>Measures to target local employment (both during construction and operation) to be secured through S106 agreement.</p>
Does the proposal provide childcare facilities?	No	<p>The Amended Proposed Development does not currently include provision to build childcare facilities. Based on an updated assessment of the additional demand for early years provision generated by the Amended Proposed Development, it is anticipated that 75 children of early years age are yielded. As such, the demand for childcare facilities arising from the Amended Proposed Development is anticipated to result in added pressure on childcare facilities</p>	Adverse	<p>Community Infrastructure Levy (CIL) may be sought to address the effects of increased pressure on capacity for childcare facilities as per LBRuT's Regulation 123 List.</p>

<sup>10</sup> This is based on total annual household expenditure in London of around £29,000 and c. £16,400 per household per annum on food and drink, household goods and services and recreation, and is derived from data from the ONS 'Detailed household expenditure by countries and regions – UK, financial year ending 2016 to financial year ending 2018'.

		within the local catchment area, although not all of these children will require early years childcare facilities. A review of childcare provision in LB RuT (Appendix 1) indicates broadly sufficient provision across the borough.		
Does the proposal include managed and affordable workspace for local businesses?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal include opportunities for work for local people via local procurement arrangements?		The updated assessment remains as stated in the original HIA (2019).		

**Table 2.9 Social Cohesion and Lifetime Neighbourhoods**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal consider health inequalities by addressing local needs through community engagement?	Yes	The Applicant has had several pre-submission meetings with LBRuT, the GLA, and TfL leading into the final submission in 2020 followed by on-going discussions thereafter . In addition, a series of pre-application public consultation events were held in November and December 2018 to gain an understanding of local views of the Applicant’s proposals, engage with the local and wider community and use these views to inform proposals, identify concerns and opportunities wherever possible.	Neutral	No further mitigation or enhancement measures required.
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?		The updated assessment remains as stated in the original HIA (2019).		
Does the proposal include a mix of uses and a range of community facilities?	Yes	The Amended Proposed Development consists of a mix of flexible retail, community and/ or commercial (Use Class E) uses, in addition to 453 residential units. At this stage, flexibility on the non-residential uses is being sought, which means that a portion, or all 495 m <sup>2</sup> of non-	Neutral	No further mitigation or enhancement measures required.

		<p>residential space could be allocated to (use class D2) community uses.</p> <p>Furthermore, the Amended Proposed Development includes the creation of a new courtyard that can be used for community events, in addition to parking spaces for the proposed car club that will be available to both current and future residents.</p>		
Does the proposal provide opportunities for the voluntary and community sectors?	No	N/A	N/A	N/A
Does the proposal take into account issues and principles of inclusive and age-friendly design	Yes	<p>The Proposed Development addresses the following principles:</p> <ul style="list-style-type: none"> <li>– multiple pedestrian and cycling routes will be provided throughout the site enabling residents to get out and about, and connect with people and services provided on-Site and beyond. Pedestrian access within the Site has been designed to meet the needs of disabled people and wheelchair users by creating a barrier-free environment;</li> <li>– the Proposed Development aspires to meet Secured by Design standards by providing safe and welcoming environments, by creating new public, semi-public and semi-private places to promote social interaction and active lifestyles;</li> <li>– the Proposed Development will include a mix of house types and sizes, a proportion of which could be expected to be affordable, in addition to being adaptable to accommodate residents' special needs.</li> <li>- apartments are designed to be open plan with clear internal way-finding assisting those with dementia and the inclusion of highly landscape areas with free-flowing looped paths encouraging outside activity and promoting biodiversity</li> </ul>	Positive	<p>Planning conditions will specify in more detail how the Proposed Development addresses the principles of lifetime neighbourhoods, specifically ensuring that:</p> <ul style="list-style-type: none"> <li>• The Proposed Development will be in accordance with the principles of Secured by Design;</li> <li>• There is safe and affordable access to key amenities (such as banks, shops and key employment centres); and</li> <li>• Specify the provision of affordable housing by tenure.</li> </ul>

**Table 2.10 Minimising Use of Resources**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal make best use of existing land?	Yes	The Proposed Development will be entirely built on previously-developed land and will replace retail uses and car parking space with a potential range of mix of uses (incl. use Class E) in addition to 453 homes (use class C3). As a result, the Proposed Development will result in improved density and promote a better integration of the Site with other locations in the surrounding area.	Positive	No further mitigation or enhancement measures required.
Does the proposal encourage recycling (including building materials)?	Yes	Sustainable waste management practices will be promoted during both construction and operational phases of the Proposed Development.  The Sustainability Strategy confirms that a construction waste resource efficiency benchmark of less than and/ or equal to 6.5 tonnes per 100 m <sup>2</sup> will be targeted. Furthermore, a target of 80% non-demolition waste and 90% demolition waste (by weight) is to be diverted from landfill. The main contractor will also be required to implement an Environmental Management System and Site Waste Management Plan.	Positive	Implementation and monitoring of Environmental Management System and Site Waste Management Plan by main contractor.
Does the proposal incorporate sustainable design and construction techniques?		The updated assessment remains as stated in the original HIA (2019).		

**Table 2.11 Climate Change**

<b>Assessment criteria</b>	<b>Relevant?</b>	<b>Details/evidence</b>	<b>Potential health impact</b>	<b>Recommended mitigation or enhancement measures</b>
Does the proposal incorporate renewable energy?	Yes	The Proposed Development includes a number of on-Site, renewable generation measures. Solar photo-voltaic panels (PV) and air source heat pumps (ASHP) have been included in the design. Overall, it is anticipated that on-site	Positive	No further mitigation or enhancement measures required.

		<p>renewable measures along could result in an overall reduction of around 52% in regulated carbon emissions when compared with a gas boiler alternative.</p>		
<p>Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p>	<p>Yes</p>	<p>The Proposed Development seeks to optimise the health and well-being of residents, staff and visitors to the Site by achieving good levels of internal daylight levels, thermal comfort, in addition to safety and security.</p> <p>The Energy Strategy confirms that the London Plan hierarchy has been followed to limit the effect of heat gains in summer.</p> <p>The Energy Strategy identifies several passive design measures that will be adopted to ensure that buildings and public spaces are designed to respond to summer and winter temperatures, these include:</p> <ul style="list-style-type: none"> <li>• Optimising glazing to limit solar gains, maintain fabric performance, and encourage the benefits of daylighting</li> <li>• High levels of thermal insulation for opaque elements, reducing heat loss.</li> <li>• Thermal bridging mitigated in design detailing wherever possible to limit heat loss.</li> <li>• High levels of airtightness, reducing heat loss and mitigating drafts</li> </ul> <p>The DAS indicates that overall, the Proposed Development also performs well in daylight and sunlight terms. To maximise internal daylight and minimise over heating the following principles have been applied to the design of the apartments.</p> <ul style="list-style-type: none"> <li>• Windows centrally located within rooms</li> <li>• Services and bathrooms pushed to the back of the plan to minimise deep plan arrangements</li> <li>• Maximising single aspect apartments</li> <li>• All windows designed to have Juliet balconies</li> </ul>	<p>Positive</p>	<p>No further mitigation or enhancement measures required.</p>

		<p>allowing for large an openable area and secure night ventilation.</p> <ul style="list-style-type: none"> <li>• Where noise levels are highest balconies have been substituted for winter gardens.</li> </ul> <p>55% of units are dual aspect which increases to 61% when apartments with bay windows are included. 5% of units are triple aspect. 176 of the units are north / North East or North West facing, 134 of which are dual aspect and 17 are triple aspect. There is only one North facing single aspect unit.</p>		
Does the proposal maintain or enhance biodiversity?		<p>A Habitat Survey (undertaken by Tyler Grange) was undertaken and confirmed that the Site is of negligible ecological value. However, the Sustainability Strategy confirmed that as a minimum, the Proposed Development will explore opportunities to protect and enhance Site's biodiversity. The site's urban greening has been optimised following a thorough review of the soft landscaping by the design team. The UGF has been calculated in line with the latest GLA Guidance and has increased from 0.31 to 0.36. The UGF increases to 0.4 when the bus waiting area and Manor Road footway are excluded from the net site area demonstrating that greening across the wider site has been maximised towards meeting the target as per policy guidance.</p>	Positive	No further mitigation or enhancement measures required.
Does the proposal incorporate sustainable urban drainage techniques		<p>The updated assessment remains as stated in the original HIA (2019).</p>		

### 3. Summary / Conclusion

- 3.1 This updated Health Impact Assessment (HIA) has indicated that there have been no changes to the outcome of the assessment of potential health impacts and all impacts (positive/neutral/adverse) remain as stated in the submitted HIA and HIA Addendum with the exception of additional indicators assessed at sections 2.5 (Healthy Streets) and 2.9 (local needs analysis)
- 3.2 For completeness, an updated assessment of the key positive or neutral health impacts is set out below:
- **Housing:** The Amended Proposed Development will provide a mix of residential (use class C3) and flexible retail, community and/ or commercial uses (Use Class E). The new homes created will be of various sizes and tenures and will contribute to LBRuT's annual housing target. It is anticipated that around 40% (by habitable rooms) of the 453 dwellings delivered on Site are either provided at London Affordable Rent and/ or intermediate tenures.
  - **Social and community infrastructure:** an updated assessment of the Amended Proposed Development's effects on social and community infrastructure indicates that the additional demand for primary and secondary schools generated can be accommodated by current capacity. However, the analysis has found that the Amended Proposed Development may have an adverse impact on early years provision.
  - **New and improved public realm:** The Site is currently home to a large retail unit and its corresponding car parking facilities. The Amended Proposed Development seeks to change this by creating new public, semi-public and semi-private spaces, in addition to connecting the Site with the wider surrounding area. The new public realm created will be accessible to all users (incl. disabled and wheelchair users) and will include sufficient play space capacity for children aged under 12.
  - **Accessibility, Pedestrian and cycling activity:** The Amended Proposed Development addressed the London Plan Healthy Streets indicators and is being promoted as a car-free development, with the masterplan confirming that no car parking facilities will be provided for private vehicles (with the exception of 14 disabled car parking spaces (equivalent to 3%) as per policy requirements). A Travel Plan to promote walking and cycling will be implemented, and users will be encouraged to make use of the transport connectivity available at the Site (which at PTAL four is considered to be very good). The bus layover will remain in the same location, with space for four parked buses.
  - **Access to work and increased local expenditure:** The Amended Proposed Development will comprise of a flexible mix of retail, community and/ or commercial floorspace (use Class E) in addition to 453 residential units. As a result, the Amended Proposed Development will have potential to support 10-25 permanent jobs and generate around £7 million in additional annual household expenditure on food and drink, household goods and services and recreation. A proportion of this spend could be expected to be captured by businesses in LBRuT. Finally, the Proposed Development will also generate employment opportunities during its demolition and construction phase by generating employment opportunities (incl. apprenticeships) and contributing to skills improvements in construction in LBRuT.

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

- The implementation of Secured by Design principles to ensure that both crime and anti-social behaviour are minimised, and local residents feel secure within the Proposed Development;
- A detailed estates management plan that needs to be agreed and finalised, including consideration of how open space and the public realm will be managed;
- Community Infrastructure Levy (CIL) contributions will be sought to improve capacity issues of existing early years education, a shortfall in on-site play space capacity for children aged 12-years and over, in addition to the creation of additional social and community infrastructure, such as support for the co-location of the library with other facilities in nearby Kew. CIL contributions will be used in accordance with the Regulation 123 List and Annual Infrastructure Funding Statement.
- Further consideration on how new homes will meet the Lifetime Home Standards;
- Measures that seek to target local employment opportunities and skills development (incl. apprenticeships) during demolition, construction and operational phases of the Proposed Development. This includes preparation of a Local Employment Plan by the contractor undertaking demolition and construction works;
- Consideration of how the Proposed Development will promote opportunities for work for local people via local procurement arrangements;
- Collaboration with local community and voluntary groups to identify ways in which these groups could benefit from any opportunities generated by the Proposed Development (such as potential access to affordable workspace, use of the new public square, etc.); and
- Implementation of all embedded mitigation and mitigation measures proposed in the various reports and assessments prepared as part of the application process (such as the Construction Environmental Management Plan, Dust Management Plan, etc.);
- Implement a monitoring plan to track temporary and permanent health impacts.



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

A.1 This appendix presents an update to supply and future demand data presented in the submitted HIA Addendum 2020 for social and community infrastructure resulting from the Amended Proposed Development. This assessment is based on best practice and research which draws on evidence from the NHS<sup>11</sup> and the Department for Education<sup>12</sup>.

### Early Years Provision

A.2 Pre-school education facilities for children under five years of age are provided through a range of resources including local authority children centres as well as private-run nurseries.

A.3 The HIA Addendum (2020) highlighted that across LBRuT<sup>13</sup> demand for Early Years places across the District as a whole was very high. According to the LBRuT School Place Planning Strategy (2018), 20 of the 40 infant and primary schools in LBRuT have attached maintained nurseries, and there is one stand-alone nursery school. The latest Strategy<sup>14</sup> has since been published which gives an updated overview on the position across the borough. There has been a slight reduction in the number of early year school places which now stands at 1,083, which is 65 less than the stated in the previous assessment.

A.4 Almost three quarters of the nursery places (3,694) within the District are within the private, voluntary and independent sector and are therefore not free of charge. The latest available Childcare Sufficiency Assessment (February 2020)<sup>15</sup> sets out there is a total of 356 childcare providers in LBRuT with 9,083 places. These include child minders, nursery school places, private, voluntary and independent nurseries, pre-school and out of school providers. According to the Assessment at the time of writing, *'there is broadly sufficient childcare availability in Richmond with continual changes of models available within the childcare market so that most families can access a suitable model that meets their needs'*.

### Primary School Provision

A.5 Summary information on primary school provision within a catchment area of 1.6-mile radius from the Proposed Development is presented in the table below. Overall, there are a total 20 primary schools in the surrounding of the Proposed Development. Admissions data from these schools suggests that there is a surplus of 1,020 places across all primary schools within this catchment area. This is a substantial increase from the previously submitted HIA Addendum

<sup>11</sup> NHS, 'Find GP Services' [Available at: <https://www.nhs.uk/Service-Search/GP/LocationSearch/4>, Accessed on: 24.11.22].

<sup>12</sup> Department for Education, 'Get information about schools' [Available at: <https://get-information-schools.service.gov.uk/?SelectedTab=Establishments&SearchType=Location>, Accessed on 24.11.22].

<sup>13</sup> School Place Planning Strategy February 2018

<sup>14</sup> School Place Planning Strategy December 2019

<sup>15</sup> Childcare Sufficiency Assessment Richmond Upon Thames, Feb 2020 [https://5f2fe3253cd1dfa0d089-bf8b2cdb6a1dc2999fecbc372702016c.ssl.cf3.rackcdn.com/uploads/ckeditor/attachments/7064/final\\_CSA\\_RICHMOND\\_2019-20.pdf](https://5f2fe3253cd1dfa0d089-bf8b2cdb6a1dc2999fecbc372702016c.ssl.cf3.rackcdn.com/uploads/ckeditor/attachments/7064/final_CSA_RICHMOND_2019-20.pdf)

which assessed that there was a surplus of 560 school places across 15 primary schools. The number of surplus spaces has therefore increased by 460 spaces.

School Name	Capacity	Number of Pupils	Surplus/ Under-supply
Grove Park Primary School	446	436	10
Strand-on-the-Green Junior School	360	329	31
Strand-on-the-Green Infant and Nursery School	357	313	44
Worple Primary School	239	213	26
The Blue School CofE Primary	468	474	-6
St Paul's CofE Primary School	446	317	129
Darell Primary and Nursery School	420	208	212
East Sheen Primary School	630	562	68
The Russell Primary School	236	219	17
Sheen Mount Primary School	630	580	50
The Vineyard School	630	600	30
Holy Trinity Church of England Primary School	472	410	62
St Mary Magdalen's Catholic Primary School	210	207	3
St Elizabeth's Catholic Primary School	270	248	22
St Stephen's C E Primary School	420	412	8
The Queen's Church of England Primary School	420	371	49
Kew Riverside Primary School	210	137	73
Marshgate Primary School	420	412	8
Thomson House School	420	360	60
Deer Park School	420	296	124
<b>Total</b>	<b>8,124</b>	<b>7,104</b>	<b>1,020</b>

Source: Department for Education

### Secondary School Provision

- A.6 Summary information on secondary school provision is set out in the table below. In total, there are 30 secondary schools within a 3.4-mile radius from the Proposed Development, with enough capacity to accommodate 31,990 secondary school children. Together, these schools have 28,587 registered pupils, which means that there is currently capacity for 3,403 secondary school places – this includes non-state funded schools. This is anticipated to change on the 30<sup>th</sup> November 2022 with the closure of St Richard Reynolds Catholic High School, which would reduce the surplus places to 2,389. The surplus in secondary school places has changed since the submitted HIA Addendum (2020) assessment which assessed a surplus of 5,671 places.

School Name	Capacity	Number of Pupils	Surplus/ Under-supply
West Thames College			0
Richmond-upon-Thames College			0

Gunnersbury Catholic School	1228	1205	23
Christ's Church of England Comprehensive Secondary School	930	971	-41
Elthorne Park High School	1487	1537	-50
Richmond Park Academy	1100	926	174
The Tiffin Girls' School	1001	1229	-228
West London Free School	890	893	-3
Twyford Church of England High School	1372	1570	-198
Chiswick School	1300	1392	-92
Gumley House RC Convent School, FCJ	1220	1125	95
Isleworth and Syon School for Boys	979	1107	-128
Teddington School	1350	1180	170
Waldegrave School	1246	1461	-215
Orleans Park School	1260	1349	-89
Ark Putney Academy	1200	903	297
Grey Court School	1398	1509	-111
Brentford School for Girls	949	872	77
St Richard Reynolds Catholic High School	1080	1014	66
Kingsley Academy	1050	857	193
Fulham Cross Academy	720	474	246
Nishkam School West London	1400	1053	347
The Green School for Girls	940	936	4
The Kingston Academy	1180	1169	11
Ealing Fields High School	840	671	169
The Richmond upon Thames School	750	740	10
The Green School for Boys	1260	647	613
Bolder Academy	1260	684	576
Ark Acton Academy	1400	937	463
Ark Soane Academy	1200	176	1024
<b>Total</b>	<b>31,990</b>	<b>28,587</b>	<b>3,403</b>

### Demand for Education Facilities

- A.7 The table below provides a summary of child yield resulting from the Proposed Development for early years, as well as primary and secondary school provision. This assessment is based on the Greater London Authority's (GLA) Population Yield Calculator<sup>16</sup> and draws on the Amended proposed housing mix.

	Number of Children
0-4 years of age	75
5-11 years of age	52
12-17 years	26

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

- A.8 It is estimated that the Amended Proposed Development would result in an early years' yield (i.e. children aged under five years) of 75 children. Not all of these children will require nursery places. Evidence from LBRuT suggests that whilst demand for early years providers is high across the borough there is a healthy borough-wide vacancy rate, which should be able to accommodate the additional 75 pupils.

<sup>16</sup> GLA Population Yield Calculator, V3.2, June 2019.

- A.9 The table above also shows that the Proposed Development will yield 52 children aged five to 11, or primary school-aged children. The analysis of current provision presented above indicates that at present there is a surplus in capacity of primary school places within the Proposed Development's catchment. Based on this, the additional demand on primary school capacity within a 1.6-mile radius from the Proposed Development could be expected to be absorbed by local schools.
- A.10 In terms of Secondary school pupils, the analysis presented above shows that the Proposed Development is expected to yield 26 children aged 12 and over. The analysis of secondary school capacity within 3.4 miles from the Site has shown that there is more than sufficient capacity to accommodate the additional demand resulting from the Proposed Development.
- A.11 It should also be noted that in reality, not all of these children will be additional to the area and some may already reside or attend schools considered in the catchment

### **Primary Health Care Provision**

- A.12 Based on the data from the NHS, there are currently Seven GP surgeries within a one-mile radius from the Proposed Development. Together, these practices provide 44 FTE GPs, and have over 73,088 registered patients. There is only a slight change in since the submitted HIA Addendum 2020, which stated that there were 43 FTE GPS and 72,724 registered patients.
- A.13 According to the NHS, there is no recommended number of patients per FTE GP per practice. This recognises the differing needs of the registered patients of GP practices. However, the NHS London Healthy Urban Development Unit (HUDU) use a standard figure of 1,800 patients per FTE GP to benchmark capacity.
- A.14 Based on this, it is estimated that the average number of registered patients per FTE GP within a one-mile radius from the Proposed Development is 1,661 – which is lower than the submitted HIA Addendum 2020 assessment of 1,712. This indicates that at the local level, patient levels per FTE GP would be lower than the HUDU benchmark.

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

- A.15 The Amended Proposed Development is anticipated to include a housing mix of different-sized dwellings and tenures. According to the GLA's Population Calculator and the Amended proposed housing mix, the Amended Proposed Development will yield an overall population of 904 people. The analysis presented above shows that the average number of registered patients per FTE GP is around 1,239 which is lower than HUDU's suggested benchmark of 1,800.
- A.16 Based on this analysis it is likely that existing GP's can cater for the population yield resulting from the Amended Proposed Development. Furthermore, it is likely that some of the residents within the Proposed Development already live within the current catchment of local health services which would result in lower demand on local healthcare services than stated above.



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London: 0207 336 6188 Manchester: 0161 234 9910