

APPENDIX 2.4
2018 PLANNING APPLICATIONS FORMAL EIA SCOPING OPINION

**FORMAL SCOPING OPINION UNDER REGULATION 13 OF THE
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) REGULATIONS 2011 (AS AMENDED)**

In respect to:

The redevelopment of the former Stag Brewery site. To facilitate the development, the majority of the buildings and structures within the site would be demolished. However, the façade of the former Bottling Plant would be retained and the Maltings and the former hotel would be retained, altered and refurbished. The development would comprise new buildings, ranging in height from 3 to 8 storeys and would accommodate approximately 1000 residential units, and also provide retail, office, hotel, leisure, community, education and healthcare uses, and areas of public and private open spaces.

Located at:

Stag Brewery, Mortlake and Chalkers Corner, Richmond

Adopted by:

London Borough of Richmond upon Thames

Date: 30/06/2017

EXECUTIVE SUMMARY

This opinion has been prepared by the London Borough of Richmond upon Thames (LBRuT) as LPA with all reasonable skill, care and diligence.

It is based on the information contained in the 'Environmental Impact Assessment Scoping Report' (March 2017) (Scoping Report) provided to LBRuT on behalf of the Applicant by Waterman Infrastructure & Environment Limited (Waterman IE), and the comments and opinions resulting from consultation with consultees prior to adopting this opinion.

This opinion is made freely available to members of the public. The LBRuT accept:

- No responsibility whatsoever for comments made by third parties whom this opinion references.
- No responsibility whatsoever to third parties to whom this opinion, or any part thereof, is made known. Any such party relies upon the opinion at their own risk.

The fact that LBRuT has given this opinion shall not preclude them from subsequently requiring the Applicant to submit further information in connection with any submitted development application to the Council.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (hereafter referred to as 'the EIA Regulations'), Part 4, Regulation 13 'Scoping opinions of the local planning authority' states:

- (2) A request under paragraph (1) of Regulation 13 shall 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;*

The Scoping Report, prepared by Watermans IE, was accompanied with the information required under Regulation 13 (a) (i) and (ii). However, following a review of published guidance (including, EC Guidance on EIA Scoping; the Planning Inspectorate Advice note on EIA Screening, Scoping and Preliminary Environmental Information; Tower Hamlets Council – EIA Scoping Guidance), it is evident that that a number of other matters are often incorporated, including:

1. alternatives which should be considered;
2. baseline surveys and investigations which should be carried out;
3. identification of the potentially significant effects of the development
4. methods and criteria to be used for prediction and evaluation of effects;
5. mitigation measures which should be considered;
6. organisations to be consulted during the environmental studies;
7. the structure, content and length of the environmental information (or EIS).

The LBRuT has a number of concerns with the Scoping Report, which are outlined in this response. These include, but are not limited to:

- Lack of detail on all baseline surveys
- How receptors will be valued

- The criteria against which the significance of effect will be evaluated - It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification
- Methods used to predict significance / magnitude of effects
- Definition of the level of significance of effects
- Broad indication of the likely effects
- Types of mitigation

The LPA can, under Regulation 13 (3), request additional information. Watermans IE submitted additional information, received on 26th June, and these points are summarised in red within this Scoping Opinion. Notwithstanding such, it remains unclear whether there is agreement regarding:

- Whether the applicant agree with the additional alternatives to consider
- Whether the applicants agree with the additional sensitive receptors
- What the potential significant effects are in each of the topic areas.
- The baseline surveys
- The criteria used for significance
- The methodology used to assess the effects.

On the basis of the above, it is recommended that the LPA and the Applicant continue to work in consultation to address outstanding issues contained in this opinion.

SECTION 1 - INTRODUCTION

CONTEXT

The EIA Regulations require that for certain planning applications, an Environmental Impact Assessment (EIA) must be undertaken. The term EIA is used to describe the procedure that must be followed for certain projects before they can be granted planning consent. The procedure is designed to draw together an assessment of the likely environmental effects (alongside economic and social factors) resulting from a proposed development. These are reported in a document called an Environmental Statement (ES). The process ensures that the importance of the predicted effects, and the scope for reducing them, are properly understood by the public and the LPA before it makes its decision. This allows environmental factors to be given due weight when assessing and determining planning applications.

Schedule 1 of the EIA Regulations lists developments that always require an EIA, and Schedule 2 lists developments that may require an EIA if it they exceed the thresholds set out in Schedule 2 and are considered that they could give rise to significant environmental effects by virtue of factors such as its nature, size or location. The proposals do not fall within the descriptions of development set out in Schedule 1; however they do exceed the threshold of 150 dwellings and 5ha for urban development projects in Schedule 2.

Schedule 3 of the EIA Regulations sets out the screening criteria in relation to the Schedule 2 developments, drawing attention to the character and complexity of effects resulting from the scheme as well as a range of issues relating to the sensitivity of sites.

The Proposed Development is considered an EIA development as it falls within the description and thresholds in Schedule 2 10(b) of the EIA Regulations as an 'urban development project' which has the potential to have significant effects on the environment. In accordance with Schedule 2, Categories 10(b) (urban development projects) of the EIA Regulations and owing to the location, scale and nature and of the Development, the Applicant recognises the need for an EIA.

'Scoping' is an early and important component of the EIA process. Scoping enables the identification of the key issues to be addressed as part of the EIA process and the scope of the various technical studies to be undertaken to inform the EIA process. Where a proposed development is determined to be an EIA development the Applicant can ask the relevant planning authority for advice on the scope of the EIA (an EIA Scoping Opinion).

An EIA Scoping Report (Document Reference: WIE10667-101-1-3-4-RB and Project Number: WIE 10667) was submitted to the LBRuT as the 'relevant planning authority' by Waterman IE on behalf, Reselton Properties Limited, (the Applicant) on 30 March 2017. The Report requested an EIA Scoping Opinion (under Regulation 13 of the EIA Regulations) for a proposed development at the former Stag Brewery, an approximately 8.6 hectare parcel of land, together with an approximately 1.4ha of highway referred to as Chalker's Corner Junction. Together, the site of the former Stag Brewery and Chalkers Corner Junction comprise 'the Site'.

Additional information was submitted by Waterman IE on 26 June 2017.

This Scoping Opinion response will have the following structure:

1. The remainder of this section (**Section 1**) deals with:
 - (a) Background to EIA Scoping and Scoping Opinions; and

- (b) Consultation.
2. **Section 2** details the LBRuT's understanding of the Proposed Development.
 3. **Section 3** reviews the overall approach to the EIA in the context of prevailing EIA legislation and guidance
 4. **Section 4** provides a review of the proposed scope and approach to assessment of each of the following EIA topics:
 - 4.1 Introduction
 - 4.2 Alternatives
 - 4.3 The Proposed Development
 - 4.4 Development Programme, Demolition, Alteration, Refurbishment and Construction
 - 4.5 Socio-Economics
 - 4.6 Transport and access
 - 4.7 Noise and vibration
 - 4.8 Air Quality
 - 4.9 Ground conditions and contamination
 - 4.10 Surface water drainage and flood risk
 - 4.11 Ecology
 - 4.12 Archaeology (Burier Heritage)
 - 4.13 Above ground built heritage
 - 4.14 Townscape and visual effects
 - 4.15 Wind microclimate
 - 4.16 Daylight, sunlight, overshadowing and light pollution
 - 4.17 Cumulative effects
 5. **Section 5** reviews the 'Insignificant issues', which the Applicant intends to be scoped out of the EIA, including:
 - a. Waste
 - b. Solar glare
 - c. Vibration (associated with the completed and operational development)
 - d. Archaeology (Buried Heritage) (Associated with the completed and operational development)
 - e. Odour
 - f. Type 2 Cumulative Effects
 6. **Section 6** sets out the conclusions of this EIA Screening Opinion.
 7. **Appendix A** - Consultees contacted by LBRuT during the EIA Scoping Process
 8. **Appendix B** - A summary of the comments received from consultee
 9. **Appendix C** - Comments from other interested parties

1.1 Background to Scoping and Scoping Opinion

Regulation 13 of the EIA Regulations allows applicants to request from the LPA a written statement, ascertaining their opinion as to the scope of information to be provided in the ES. Whilst not a statutory requirement of the EIA process, requesting a Scoping Opinion clarifies the content and methodology of the EIA between the LPA and the Applicant.

The EIA Scoping process should aim to identify only the issues which have the potential to lead to significant effects, not an assessment of every single possible effect.

This EIA Scoping Opinion outlines the LPA's opinion on the proposed scope of the ES, and identifies any suggested amendments and/or concerns.

In line with Regulation 13(6) of the EIA Regulations, this Scoping Opinion has been informed by the information provided in the EIA Scoping Report, and other Consultee and third party responses, and takes into account:

- a. The specific characteristic of the particular development
- b. The specific characteristic of development of the type concerned.
- c. The environmental features likely to be significantly affected by the development

The issuing of this EIA Scoping Opinion does not prevent the LPA from requesting further information at a later stage under Regulations 13(9) of the EIA Regulations.

No indication of the likely success of an application for the proposed development is implied in the expression of this EIA Scoping Opinion.

The Applicants intend to submit a hybrid application, with an element of the scheme consisting of Outline only. Outline planning permission would require multi-stage consent, and therefore, the LPA would need to consider whether EIA Screening would be required at later stages of the planning process e.g. reserved matters and / or the discharge of conditions. The requirements for screening for EIA for such 'subsequent applications' are set out in Regulations 4-6 of the EIA Regulations.

The LBRuT acknowledges that EIA Screening would only be required where proposed development would be likely to have significant environmental effects which were not anticipated when any initial planning permission was granted.

It is recommended that the Applicant should assess each environmental impact (construction, operational, cumulative) on the basis of a **worse-case scenario** for development on a site wide basis, with all assessments taking into account the construction phases and occupancy phases and the consequential impacts. Of particular importance is the matter of timing of the phase which needs to be crystal clear.

1.2 Consultation

The EIA Regulations require that the LBRuT consults 'consultation bodies' prior to issuing an EIA Scoping Opinion, including:

- Adjoining planning authorities (London Borough of Hammersmith & Fulham; London Borough of Wandsworth; and London Borough of Hounslow)
- Greater London Authority (GLA)
- Transport for London (TfL)
- Natural England
- The Environment Agency

- Other bodies designated by statutory provision as having specific environmental responsibilities and which the planning authority considers are likely to have an interest in the application.
 - Historic England
 - GLAAS Historic England
 - Port of London
 - Sport England
 - Local Highway Authority

In addition, the following consultees and interested groups were consulted regarding the receipt of the Scoping Report:

- Southwest Trains
- Network Rail
- Thames Water
- Richmond Biodiversity Partnerships
- Southwest London Environment Network
- LBRuT Ecology Officer
- LBRuT Arboricultural Officer
- LBRuT Environmental Health Specialist Pollution
- LBRuT Commercial Environment Health, Consumer Protection
- LBRuT Scientific Officer
- LBRuT Housing Development Officer
- Crime Prevention Officer
- Metropolitan Police
- Barnes Town Centre Manager
- Richmond CCG
- Achieving for Children
- LBRuT – Public Health
- Mortlake Brewery Community Group
- Barnes Community Association
- Barnes and Mortlake History Society
- Mortlake Community Association
- Mortlake and East Sheen Society
- Sheen Conservation Group
- Rowing clubs
 - Quintin Boat Club
 - Tideway Scullers School
 - Barnes Bridge Ladies Rowing Club

All external consultees contacted by LBRuT during the EIA Scoping process are listed at **Appendix A**. A summary of the comments received are provided in full at **Appendix B**. The responses from internal consultees within the London Borough of Richmond upon Thames are also detailed. It should be noted that these comments were based on the original description of Proposed Development and Site.

Appendix C lists the comments received from other interested parties, who were not formally consulted on the Scoping Opinion Report.

The Applicant is strongly recommended to consult further with consultees as appropriate throughout the EIA process as the Proposed Development evolves. It is thereby recommended all consultee / interested party responses are reviewed by the Applicants.

SECTION 2 - THE SITE AND PROPOSALS

2.1 Site, Location and Setting

The Scoping Report identifies the Site as incorporating two components, and in line with Regulation 13 (2) (a) (i), the Site is identified in Figures 1 and 2:

1. The former Stag Brewery estate, including 16 industrial buildings, hard standing, three non-statutorily designated Buildings of Townscape Merit (BTM) and Watney's Sports Ground playing fields.
2. Chalker's Corner Junction, including:
 - a. The highways junction with the A316 (Clifford Avenue); A3003 (Lower Richmond Road) and A205 (South Circular);
 - b. Footways including cycle paths adjacent to the highways junction;
 - c. An area of informal car parking adjacent to the Lower Richmond Road; and
 - d. A grassed area adjacent to the Lower Richmond Road and Chertsey Court.

The Scoping Report identifies the site is:

- within an Archaeological Priority Area
- within defended Flood Zones 2 and 3
- within a borough wide Air Quality Management Area (AQMA) designated by LBRuT owing to high levels of nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀); and
- partially within Mortlake Conservation Area, which covers an area within the east of the site, which includes the Maltings, the (former) Hotel and (former) Bottling Hall.

The report then goes on to describe the land uses surrounding the site.

The Authority recommends the following amendments:

- a. Replace 'Buildings of Local Townscape Merit' with 'Buildings of Townscape Merit'
- b. Include the designation of Watney Playing Field as Other Open Land of Townscape Merit.
- c. Include the designation of part of Chalkers Corner junction as Other Open Land of Townscape Importance
- d. Include the Tree Preservation Orders on the Site (Stag Brewery element).

Watermans IE additional information received on 26 June confirm that the geographical extent of assessment has been extended to account of the proposal at Chalkers Corner. This is particularly the case of the topic areas of transport and access; noise and vibration; air quality; surface water drainage and flood risk; ecology and townscape; and visual effects.

LPA Response: Noted

2.2 The Surrounding Area:

This should:

- a. Include, the River Thames as designated Metropolitan Open Land and Other Site of Nature Importance.

- b. Include Mortlake Green as designated Other Open Land of Townscape Merit
- c. Outline that the site is partially within the Thames Special Policy Area.
- d. Detail the Tree Preservation Orders within the setting of the site
- e. Describe some of the other surrounding land uses.

2.3 The Development Proposals:

Regulation 13(2) (a) (ii) of the EIA Regulations require Scoping Reports to include “a brief description of the nature and purpose of the development, and of its possible effects on the environment”.

The Scoping Report recognises that the design of the proposed Development is still evolving, however, sets out:

- a. To facilitate the development, the majority of buildings and structures within the Site would be demolished. However, the façade of the (former) Bottling Plant would be retained whilst The Maltings and the (former) Hotel, would be retained, altered and refurbished.
- b. The development would comprise new buildings, ranging in height from 3 to 8 storeys and would be built over the majority of the site.
- c. The Development would accommodate approximately 1,000 residential units located throughout the Site and ranging from 1bed to 4-bed units.
- d. The development would provide retail, office, hotel, leisure, community, education and healthcare uses, including approximately:
 - i. 7,700m2 Gross Internal Area (GIA) of retail uses
 - ii. 5,500m2 GIA of hotel uses
 - iii. 2,000m2 GIA of leisure uses
 - iv. 3,400m2 GIA of office space
 - v. 900m2 GIA of community uses – and could include a museum or boat house, which would be situated adjacent to the River Thames and towpath
 - vi. 900m2 of healthcare provision
 - vii. A new secondary school
 - viii. An area for a playing field would be provided for the school, which would also provide community use.
- e. Area of public and private open space is proposed together with playspace.
- f. Pedestrian and cycle routes
- g. New vehicular routes, together with car, motorcycle and cycle parking. It is envisaged the majority of parking would be provided within basement area.
- h. Including of heating and energy plan.

Feedback

The ‘Development Proposal’ section of the Scoping Report does not seem to detail the proposals for the ‘Chalkers Corner’ element of the site.

The Development does not mention

- a. The removal of the existing playing fields
- b. The size of the secondary school / number of pupils
- c. Works to Chalkers Corner.

Watermans IE submitted further comments on 26 June 2017, acknowledging the concern in the draft Scoping Opinion regarding the lack of detail regarding the proposals at

Chalkers Corner. It was 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 works to Chalkers Corner Junction:

1. The realignment of Lower Richmond Road as it approaches Chalkers Corner Junction.
2. Creation of an additional lane for turning left onto Clifford Avenue.
3. Provision of an extended left turn lane from Clifford Avenue into Lower Richmond Road.
4. Enhancement to pedestrian and cycle facilities.
5. Reconfiguration of small car park on south west corner of Lower Richmond Road arm to include new planting.

2.4 Potentially Sensitive Receptors:

Section 2.4 identifies the potentially sensitive receptors; however, it is recommended these are expanded to include:

- a. Existing residents:
 - i. Add residents along South Circular Road, Chertsey Court, Clifford Avenue, Kingsway – Potentially impacted by the Chalkers Corner site.
 - ii. Add residential properties within Varsity Row and Wadham Mews
 - iii. Add residential properties living in cul de sacs close to the site on Lower Richmond Road – Including, Hanson Close, Langdon Place, Rosemary Land and gardens, Waldeck Road, Cromwell Place, Vineyard Path
1. Existing commercial properties:
 - i. Add the employees / children at the nursery schools / day care on Lower Richmond Road.
 - ii. Add commercial properties within Barnes Local Centre; East Sheen District Centre; and with White Hart Lane, a parade of local Importance
2. Add community facilities, including:
 - i. Schools, nursery's, health facilities.
3. Future occupants:
 - i. Add patients of future healthcare provision
4. Possible archaeological remains:
 - i. Add effects on the setting of nearby assets
5. Conservation areas:
 - i. Add setting of Sheen Lane Conservation Area.
6. Views:
 - i. Add all those listed in Watermans IE Viewpoint locations, formally agreed with the LPA
7. Add microclimate effects on proposed streets and other publically accessible open spaces in and around the site.

8. Users of local facilities
9. Add other open spaces, including, but not limited to, children's playgrounds, River Thames towpath, playing fields
10. Add users of other public open spaces, public rights of way, cycle routes, towpath

The authority recommends under each chapter of key issues to be addressed, the relevant sensitive receptors are clearly identified. The LPA will continue to work with the Applicants to agree the relevant receptors.

SECTION 3 - CONSULTATIONS

Section 3 recognises that consultations have been and will continue to be undertaken as part of the design and EIA process, and will include (but not necessarily be limited to) the following organisations:

1. LBRuT;
2. London Borough of Hounslow (LBH);
3. London Borough of Wandsworth (LBW);
4. London Borough of Hammersmith and Fulham (LBHF);
5. Greater London Authority (GLA);
6. Environment Agency (EA);
7. Natural England (NE);
8. Historic England (HE);
9. Southwest Trains;
10. Transport for London (TfL);
11. Port of London Authority (PLA);
12. Sport England;
13. Thames Water; and
14. Community groups.

The Applicant is strongly recommended to continue to consult with the above consultees as appropriate throughout the EIA process as the Development evolves, and for other consultees / interest groups are added, including, but not limited to:

1. Lead Local Flood Authority
2. Network Rail
3. Metropolitan Police and Crime Prevention Officer
4. Barnes Town Centre Manager
5. Richmond Biodiversity Partnerships
6. Southwest London Environment Network
7. Richmond CCG
8. Mortlake Brewery Community Group
9. Barnes Community Association
10. Barnes and Mortlake History Society
11. Mortlake Community Association
12. Mortlake and East Sheen Society
13. Sheen Conservation Group
14. Barnes Eagles Football Club
15. Richmond Housing Partnership
16. Rowing clubs
 - a. Quintin Boat Club
 - b. Tideway Scullers School
 - c. Barnes Bridge Ladies Rowing Club

SECTION 4 – KEY ISSUES TO BE ADDRESSED IN THE EIA

Review of Section 4.1 - Introduction

The Authority recommends:

- a. The contents of the ES will need to meet the legal minimum requirements as set out in Regulation 18 (3 – 5) and Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017)
- b. Whilst the Scoping Report may set out what it perceives to be the likely significant environmental issues arising from the development, there is concern the Scoping Report does not set out how 'significance' effects in the context of the EIA Regulations are determined as part of the EIA, and described in the Scoping Report, not does the Scoping Report provide a broad indication of the likely scale of effect. It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification:
 - i. Set out the criteria to be used for evaluating the significance of impacts (Significance criteria). Questions to be considered when doing this may include:
 - Will there be a change?
 - Will it be out of scale to existing environment?
 - Will the effect be unusual / complex?
 - Will the effect extend over a large area?
 - Will many people be affected?
 - Will many receptors be affected?
 - Will valuable / scarce features / resources be affected?
 - Will environmental standards be breached or risk of breach?
 - Is there a risk that protected sites / features be affected?
 - Is there a high probability of the effect occurring?
 - Will the effect continue for a long time?
 - Will the effect be permanent rather than temporary?
 - Will the impact be continuous or intermittent?
 - If intermittent, will it be frequent rather than rare?
 - Will the impact be reversible?
 - Will it be difficult to avoid, reduce, repair or compensate for the effect?
 - ii. Define the level of significance of effects, for example:
 - Major adverse
 - Moderate adverse
 - Minor adverse
 - Negligible
 - Minor beneficial
 - Moderate beneficial
 - Major beneficial

The above points need to be clarified.

Watermans IE letter dated 28 June confirms:

1. The likely significant environmental effects will be assessed with reference to definitive standards and legislation, where available.
2. 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.
3. 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.
4. 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.
5. To provide a consistent approach, 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.
6. 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.

Review of Section 4.2 - Alternatives

The EIA process provides an opportunity to consider alternative development options, as well as their respective environmental, social and economic implications, before a final design freeze is fixed. To accord with the EIA regulations and statutory guidance, the ES should provide an outline of the main alternatives studied by the Applicant and design team with an indication of the reasons for the choices made, taking into account the environmental effects.

'Do Nothing Scenario' – It is recommended this includes:

- a. a description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed.
- b. The implications on transport, traffic and road network if the Chalker's Corner element of the Proposed Development is not implemented.
- c. Details of the quantum of development required on the former Stag Brewery element of the site to necessitate the highway work at the Chalker's Corner element of the Site.

Alternative design and uses - The Authority recommends the 'Alternative design and uses', include:

- a. A Planning Brief compliant layout – I.e:
 - i. Location of the School within the area zoned identified for 'Primary School and community use' within the Planning Brief.
 - ii. Location of the School outside the playing field
 - iii. No buildings within the Green Space identified within the Planning Brief.
- b. Bus stand:
 - i. Location of the bus stand outside the playing fields , and in an area that would reduce potential bus delays / costs?
- c. Health:
 - i. Section 2.3 describes the development proposals and indicates that approximately 900m² of healthcare provision would be provided. The report does not indicate how this provision, as mitigation of the development impact, has been calculated, or whether there are alternatives, for example increasing the capacity of existing healthcare premises.
- d. Extra care:
 - i. It is noted that the Scoping Report does not identify extra care housing as part of the Proposed Development. Should there be any subsequent scheme or revision to the proposal that incorporate extra care housing, then this would trigger another review of the EIA scoping report to fully address the potential impacts and whether this addresses local priority needs.
- e. Transport:
 - i. Using the river Thames to transport waste / materials during the Works

f. Environment Agency:

- i. Incorporation of tidal terracing and set back flood defences in line with the Estuary Edges guidance to increase the amount of natural river bank, currently only 2% of the tidal banks are natural across the estuary. Increasing natural riverbanks will have a significant positive ecological impact on the river and will help restore fish stocks and manage flood risk
<http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf>

The EIA Scoping Report states that the existing, modified and new flood defences will have to last the lifetime of the development (100 years), be raised as part of the TE2100 Plan and have adequate access for statutory maintenance purposes. The EIA should also consider the benefits of retreating the Thames Tidal defences away from the River and providing buffer between the defences and the new development. New flood defences should not extend riverward of the existing defences as this would result in a loss of flood storage.

Development on the riverside edge is contrary to the new emerging Local Planning Policy LP18 River corridors. This seeks to protect and enhance the natural environment of the river corridors by setting development back from river and requiring that development contributes to improvements and enhancements to the river environment.

The Policy states that the Council, in conjunction with the Environment Agency, will require a buffer zone of eight metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames.

The Environment Agency normally requires a buffer zone of 16 metres between any new development and landward side of the Thames Tidal Flood Defences. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall.

Where development is proposed next to the river the Environment Agency recommends that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, the Environment Agency normally seeks that it is established. This is a key way in which they carry out their legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and the Environment Agency takes the view that it is reasonable to expect that any new development should go some way to redress the balance.

Given the significant number of properties and therefore disturbance to riverside areas we expect to see significant ecological enhancements along there riverside area and throughout the development to mitigate for these impacts. Opportunities to introduce an improved riverside environment at this site for example new tidal terracing should be considered.

This is in line with the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and

enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

Other matters:

The last paragraph under para. 4.3 states, "...the Site is in the ownership of the Applicant". It is the LPA understanding the Chalkers Corner element of the Site is not in the ownership of the Applicant

Review of Section 4.3 – The Proposed Development

The ES should include in the Description of Development in line with (Schedule 4) and Regulation 18(3) of the EIA Regulations 2017. It is recommended the following is included in such description:

- a. The removal of the playing fields
- b. The type of playing fields / pitches that will be re-provided.
- c. Provision of external light / floodlighting
- d. Provision of roof terraces / balconies / raised terraces
- e. Proposed hours of use for the commercial / community buildings

- f. Description of the location of the Proposed Development
- g. Details of the phasing of the development, including but not limited to:
 - i. Delivery of affordable housing
 - ii. Energy centres / sustainability credentials
 - iii. Highway works
- h. Description of the main characteristics of the operational phase of the Proposed Development (Schedule 4, 1 (c))
- i. An estimate, by type and quantity, of expected residues and emissions (Schedule 4, 1(d))

- j. The ES should confirm whether the 7700m² gross (GIA) of retail floor space relates to A1 uses in entirety, or whether this also includes other A uses.
- k. Housing density

Review of Section 4.4 – Development Programme, Demolition, Alteration, Refurbishment and Construction

The Authority recommend, in line with Schedule 4, 1 (b) of the EIA Regulations 2017, to include:

- a. Description of requisite demolition works and excavation is included.

- b. How waste will be removed.
 - i. The West London Waste Plan was adopted in 2015, and will need to be taken into account when assessing the impacts of waste and producing the Waste Strategy.

- ii. A Site Waste Management Plan (SWMP) must be prepared for the Development prior to commencement of the Works.
- iii. The implementation of a SWMP should ensure that good site management practice will lead to a minimisation of waste creation and enable the reuse or recycling of waste materials that arise from the works where practicable. The Sustainability Statement must set out clearly how waste will be managed during the works and once the development is completed and operational.

Review of Section 4.5 – Socio-Economics

Under Key Issues: - the authority recommends the ES considers:

- a. Site: No mention of the part of the site at Chalkers Corner, what this is used as / for and its value.
- b. Housing: Whilst the residential units may contribute to housing targets, there is no mention of units addressing local priority needs
- c. Community: The quality, quantity and availability of the on-site facilities to the community (health care, community buildings, gym, cinema, sports pitch, open space) etc.) needs to be clearly explained as part of the assessment, including broad terms and conditions of use, to enable the LPA understand the actual contribution and benefit the new development will deliver to the local community.
- d. Employment: Given the shortage of industrial land throughout the borough, the site has been identified as suitable for light industrial B1c. The site is a former employment site and therefore we would expect small scale, flexible re-provision of employment floor space of benefit to the local economy, and job opportunities for local people. Consider what provision is being made for start-ups and what other spin-off benefits would the scheme provide for the local economy?

Under likely effects: - It is recommended this is expanded to include:

- a. Employment:
 - i. Include the impact from direct and indirect employment generation arising the construction stage and the operational development.
 - ii. Add the long-term employment opportunities from the proposed community, health, hotel, leisure and education uses.
 - iii. Impact on provision of small scale, flexible, affordable office space.
- b. Housing
 - i. How the provision of new homes, including affordable homes, address local priority needs. (In relation to the affordable element these must be genuinely affordable in relation to the Council's Tenancy Strategy and Intermediate Housing Policy)
- c. Education:
 - i. Impact on education provision resulting from the new secondary school with sixth form.
- d. Open space (children's playspace, public towpath, and playing fields):
 - i. Implications of the new secondary school (pupils); commercial, community and leisure uses on:
 - o All open, public, children's play space, playing fields and towpath.
 - ii. Impact arising from the loss of and partial replacement of the playing field
 - iii. Impact on the existing and wider green infrastructure network, including how the proposed development could impact upon it
 - iv. Effects upon public rights of way and its enjoyment through recreation.
 - v. Impact on landscape and visual effects on open access land, whether direct or indirect
 - vi. Impact of the development through phases of Works, taking into account the cumulative effects of the Works and the completed Operational Development.

- e. Community facilities:
 - i. Potential individual and cumulative impacts on local services and amenities, such as the provision of, and public access to, community facilities within and outside the Site, including local playgrounds, sport facilities, playing fields, school places, healthcare and allotments.
- f. Health:
 - i. The overall impact on well-being and health.
 - ii. Impacts on well-being and health as a result of loss of or provision of open space, children's playspace, playing fields, soft landscaping and trees
- g. Retail:
 - i. The Stag Brewery Planning Brief (2011) refers to the creation of small retail units and goes on to state that the retail element should not compete with East Sheen District Centre or other centres, and that retail should be ancillary to the uses on the site. Although retail is accepted as a potential land use on the Brewery Site, the amount proposed is far in excess of that set out in the Planning Brief.
 - o It is estimated that in 2016 East Sheen District Centre had approximately 16,000m² (gross) of retail floorspace (convenience and comparison) and therefore this proposal is a very significant amount. Currently Mortlake High Street, with its limited retail presence, is not considered a centre in the borough's centre hierarchy as set out in 7.1.1 of the emerging Local Plan and indeed there is no designated shopping frontage. This amount of retail floorspace (assuming A1 convenience, comparison & A1 service) would easily make the new centre a "local centre" in the borough hierarchy in terms of scale if considered as such.
 - ii. Impact of the proposal on neighbouring centres and parades of local importance and establish whether the proposal might draw trade away from centres and thus have potentially negative effects. There might potentially be positive spin-offs to centres through spending generated from new residents and workers, and the impact of that expenditure should also be covered (in relation to the centres).
- h. Crime:
 - iii. Impacts on crime.

Under Approach and Methodology

- a. The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - i. Criteria for determining the value of the receptors
 - ii. Significance criteria and how will this be measured
 - iii. Definition of the level of significance of effects
 - iv. List of all sources that will be used to establish baseline
 - v. List of modelling techniques
- b. Housing:
 - i. The socio-economic assessment should include an assessment of the range of housing choices being offered, in terms of the mix of housing sizes, types, taking account of needs of different groups, and this includes affordable housing. In particular, the LPA expects the scheme to provide for mixed and

balanced communities, in terms of tenure and household income, and this should foster social diversity which will help to create successful and integrated neighbourhoods. Therefore, should the proposal involve segregation by housing tenure, particularly where this could potentially lead to gated communities, then the impacts of this have to be fully analysed and assessed as part of the EIA.

- ii. The density of the proposed scheme is a potential concern and therefore the EIA should include a full assessment in relation to the density, taking account of the setting (i.e. urban) and the PTAL. Whilst the setting and PTAL are some of the factors to consider when determining an appropriate density for a scheme, other factors include the context and character of the surrounding area and proximity to facilities. In general, local adopted policy encourages higher density development in the more sustainable locations, such as main centres of the borough and areas better served by public transport, subject to compatibility with established character.

c. Health:

- i. It is noted that the Health Impact Assessment will be a standalone document. The scoping of this should be agreed in advance with the LPA, LBRuT's Public Health Team and CCG.
- ii. The EIA must still consider impacts on health and link this to the Health Impact Assessment (HIA)
- iii. The approach to assess the impact, as outlined in paragraph 4.5.3 of the report, refers to establishing a baseline position using published data, including the 2011 Census and NHS data. It is unclear what NHS data is to be used. It is also refers to an appraisal of the likely effects of the additional population on existing primary healthcare facilities, but it is unclear how this will be assessed. The Applicants must consult Richmond CCG on the approach and methodology to be used, including data sources when establishing a baseline position in advance.
- iv. Section 2.3 describes the development proposals and indicates that approximately 900m² of healthcare provision would be provided by the development. The report does not indicate how this provision, as mitigation of the development impact, has been calculated.
- v. It is noted that the Stag Brewery Planning Brief Supplementary Planning Document (July 2011) supports the provision of education and community uses and facilities within the scheme (paragraph 5.19), but also recognises that appropriate financial contributions could be sought to increase local capacity (paragraph 5.20). The Council's Planning Obligations Supplementary Planning Document (July 2014) supports the use of s106 obligations to mitigate the impact of development on infrastructure that is not planned for delivery through the Community Infrastructure Levy (CIL). It states that s106 contributions may be financial or 'in kind' and where provision in kind is made as part of a development, contributions will be secured for reasonable fitting out costs and provided at nominal rents (paragraph 5.2). It is noted that healthcare is not included on the Council's CIL Regulation 123 List as a potential recipient of CIL so appropriate mitigation would be via s106

Watermans IE additional comments received on 26 June confirm that a Health Impact Assessment will be submitted.

d. Retail:

- i. Under 4.5.3 - Provide details of what is meant by the "local retail assessments" referred to in 4th bullet point – 4th subsection of.

- ii. It is noted that a standalone Retail Impact Assessment (RIA) Report is to be submitted to assess the impact on East Sheen, Mortlake and Barnes. It is requested the scoping is agreed in advance with the LPA (in line with policy LP25). When considering this:
 - (a) Attention is drawn to para. 26 of the NPPF
 - (b) The assessment should also incorporate a Sequential Test as the site is not a recognised centre in the borough's centre hierarchy
 - (c) The impact on White Hart Lane is assessed
- ii. A1 retail floorspace should be assessed separately to A3/A4/A5 uses. Assessment should refer to the Council's Retail Capacity produced by Consultant's Nathaniel Lichfield & Partners.
http://www.richmond.gov.uk/richmond_retail_study_november_2014.pdf

Watermans IE additional comments received on 26 June confirm that a Retail Impact Assessment will be submitted.

- e. Playing fields / recreation facilities:
 - i. The EIA should include a baseline assessment of the current provision of recreational facilities (including the playing fields) within the local area, along with any deficiencies or surplus capacity in such provision. The Council's Playing Pitch Strategy and the accompanying assessment report can be used as a starting point in this regard.
 - ii. The applicant should note that an artificial grass pitch may accommodate more intensive uses in comparison to a natural grass pitch; however, if it is smaller in size, it may not be able to accommodate those sports for which there is an identified demand. The EIA therefore needs to assess and compare the different pitches in terms of quantity and quality (existing and proposed), and analyse which benefits an "upgraded" (potentially artificial) pitch would bring in comparison to the detriment of the loss of the natural (large) pitch, taking account of supply and demand in the local area.
 - iii. The methodology for the EIA should follow the guidance and methodology contained within:
 - The "Playing Fields Policy - A Sporting Future for the Playing Fields of England": <https://www.sportengland.org/media/121630/document-5-a-sporting-future-for-the-playing-fields-of-england-planning-policy-statement-pdf> and <http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/>
 - iv. Sport England and the LPA should also be consulted on the scoping report when considering the impact on playing fields and involved in any future discussions, in advance.
 - v. Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 73 and 74, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.
- f. Playspace:
 - i. The EIA proposes an estimation of the new residential site population and child yield arising from the development, and that child yields will be calculated using the GLA Population Yield Calculator and LBRuT SPD on Planning Obligations. In line with the Council's Local Plan LP 31, the play and child occupancy assessment, the Council's child yield calculator as set out in the Planning Obligations SPD should be used – this is different to the GLA's population yield calculator.

- ii. It is expected that the EIA will incorporate a child yield/occupancy and play space needs and provision assessment (including with a breakdown for the different age groups). The EIA will therefore need to provide an assessment of needs arising from the new development and follow the London Plan benchmark standard of 10sqm per child. When assessing needs and play space requirements, consideration can be given to nearby existing play areas, but it should be noted that appropriate facilities would need to be in actual walking distance in line with the Mayor's SPG, i.e. within 100m for under 5 year olds, within 400m for 5-11 year olds and 800m for 12+ age group. New major development, such as the Stag Brewery, should be integrated within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space will need to be made publicly accessible.
- g. Green / open space and green infrastructure:
 - i. The Council requires all major development proposals in the borough to meet the Public Open Space needs arising out of the development. The EIA should also include an assessment of open space provision in the local area, in line with policy DM OS 6 (Public Open Space). This should be based on actual walking distances rather than as the crow flies. The methodology should follow the public open space categorisation as set out in the London Plan (table 7.2) and relevant Local Plan policies (see LP 12).
- h. Crime:
 - i. Obtain a crime analysis of the local area, and demonstrate the scheme meets Secured by Design. (It is recommended the Applicants consult with the Metropolitan Police Service – Designing out Crime Officer).

Watermans IE confirmed in their letter dated 26 June 2017:

1. A Planning Statement will be submitted providing justification for the proposed land uses, their quantum and density).

Review of Section 4.6 – Transport and Access

Under Key Issues – Recommendations:

- a. Ensure the correct PTAL rating is listed – currently shown as PTAL 1 and 2.
- b. It is recommended that the Transport and Access section of the ES considers the potential for the River Thames to be utilised for the delivery of construction materials to and waste materials away from the Site during the Works.
- c. The key issues do not mention;
 - i. Parking implications of the Works, operational development, and cumulative impact on both.
 - ii. Implications on cycle and pedestrian routes
- d. A key issue will be the phasing of the development, including
 - i. When highway improvement works will be triggered, and their impacts before and after
 - ii. When public transport improvements will be triggered, and their impacts before and after

Under Likely Effects – It is recommended this is expanded to include:

- a. Traffic flows:
 - i. Impact of traffic flows upon the local road network and associated effects on driver journey times through key junctions as a result of the cumulative impacts of the Works and operational development, through each phase of the proposed Development
 - ii. When considering the effect on traffic flows associated with the Works on the local road network, this should include construction traffic, buses, pedestrians and cyclists.
- b. Public transport:
 - i. Temporary effects on public transport through the Works
 - ii. Impacts on public transport as a result of the cumulative impacts of the Works and the operational development, through each phase of the proposed Development - This will include train travel, and for passengers trying to board trains further up the train line travelling towards London.
 - iii. When considering the effects of completed and operational Development upon public transport, this should include train travel, and for passengers trying to board trains further up the train line travelling towards London.
- c. Pedestrians and cyclists:
 - i. Impacts on pedestrian and cycle routes through and around the development, as a result of the cumulative impacts of the Works and the operational development, through each phase of the proposed Development (including public rights of way)
 - ii. Conflict between pedestrians and cyclists during the Works in and around the Site.
 - iii. For clarity, 'cycle facilities' includes routes.

Under Approach and Methodology:

- a. The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - i. Significance criteria and how will this be measured

- ii. Criteria for determining the value of the receptors
- iii. Definition of the level of significance of effects
- b. The Transport Assessment:
 - a. Must be in accordance with TfL's Transport Assessment Guidance.
 - b. The applicants shall agree the Scoping of the Transport Assessment (TA) with the LPA in advance, in consultation with the local highway authority and Transport for London.
 - c. Consultees have requested this to include:
 - (a) Potential journey to work areas
 - (b) Quantifying in detail the likely impact on the rail network:
 - o From the works
 - o From the completed and operational development
 - o From the cumulative impact of both the Works and operational development – through difference phasing of the implementation
 - o Confirmation that any rail improvements necessitated should be funded by the Applicant.
 - d. Prior agreement with the LPA in consultation with the local highway authority and TFL of the key junctions for assessment
 - c. The EIA and TA must include a multi-model impact assessment including baseline and future car, bus, rail and pedestrian and cycle trips and mode share.
 - d. Parking surveys should inform the TA, in line with a survey previously agreed with the LPA and local highway authority.
 - e. Measures such as Electric Vehicle Charging Points and Car Clubs should be included.
 - f. Provision of a Draft Construction Logistics Plan
 - g. A framework residential and workplace travel plan will be required and should include information on servicing and deliveries. This must be produced in accordance with TfL's Travel Planning best practice guidance and provide details of enforceability of the Travel Plans should be provided
 - h. Access for service / maintenance vehicles in and around the development will need to be considered.

Watermans IE submitted further comments on 26 June 2017 confirming:

1. The geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for transport and access.
2. A Framework Construction Management Statement (including Transport for London's Construction Logistic Plan)

Review of Section 4.7 – Noise and Vibration

Under Key Issues:

The Authority agrees that the key issues that have been identified include;

a. Construction Phase

- i. Temporary noise and vibration effects to existing sensitive receptors surrounding the Site as a result of noise generated by the demolition and construction processes,
- ii. Temporary vibration effects to retained Buildings of Townscape Merit within the Site as a result of demolition/construction processes;
- iii. Temporary noise effects arising from changes in traffic flows associated with the demolition/construction works;

b. Operational Phase

- i. Change in road traffic noise levels at existing sensitive receptors as a result of the Development once completed and operational; and
- ii. Noise generated from new proposed building services plant, any commercial, sports and educational
- iii. Operations and proposed public space forming a part of the completed and operational Development on existing noise sensitive receptors surrounding the Site.

It is accepted that internal noise design does not have to be dealt with as part of the EIA process. However internal noise requirements are detailed within Section 5 of the Noise SPD and the Authority expects as a minimum that this process and design principles are followed.

Under Likely Effects: The Authority makes the following recommendations:

- a. The likely effects do not list the sensitive receptors. When considering the noise and vibration effects (whether temporary or when the development is operational), the sensitive receptors should include (but not be limited to) –
 - i. Temporary workforce
 - ii. Existing residents and occupiers surrounding the site
 - iii. Future residents, employees, visitors, students – depending on the phasing of the development
 - iv. Ecology and biodiversity
- b. The impacts should consider the cumulative noise impacts of the Works and operational development, through each phase of the development on sensitive receptors.
- c. Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses. This should be considered.
- d. Impacts from noise, vibration and dust from excavation, earthworks, waste handling and storage
- e. Trees / landscaping absorb noise – need to consider the impacts on noise levels as a result of loss of trees / soft landscaping.
- f. Temporary vibration effects on nearby listed buildings as a result of the Works

Under Approach and methodology:

- a. The Scoping Report does not:
 - i. Set out the sensitive receptors
 - ii. How receptors will be valued
 - iii. The assessment methodology and criteria
 - iv. Set out the significance criteria for:
 - o Noise arising from works, operational and cumulative.
 - o Vibration

All the above are essential to the Scoping Report, and need to be agreed in advance with the LPA.

- b. The scoping of the Noise Assessment is agreed with the LPA in advance, and takes into account the following planning policy and environmental air quality guidelines:
 - a. Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 13 2011 (As Amended) and Amendment Regulations 2015
 - b. National Planning Policy Framework (NPPF) 2010
 - c. National Planning Policy Guidelines (NPPG) 2014
 - d. LBRuT Draft SPD - Development Control for Noise Generating and Noise Sensitive Development
- c. Figure 1 - Noise measurement locations: This is out of date, in particular the west of the site. Does not show bus stop
- d. Noise generating development including mechanical services plant, deliveries & collection, leisure activities should be designed to achieve the requirements set in section 6 of the Draft Noise SPD.
- e. A Demolition and Construction Management Statement (DCMS) and Noise and Vibration Management Plan (NVMP) should be submitted as part of the application.
- f. The assessment of the likely effect of changes in road traffic noise levels as a result of traffic generated by the completed and operational development shall include the application of the Institute of Environmental Management and Assessment (IEMA) Guidelines for Noise Impact Assessment 2014 and not the draft version as indicated in the Scoping Report. We expect that the IEMA approach to be fully applied and not just a simple single figure change indicator.
- g. The application of good acoustic design principles should form an integral part of the design. Ideally separation of noise sensitive receptors, such as schools, away from noise generating sources such as main roads. The use of innovative noise and air quality mitigation such as green barriers and soundproofing is also encouraged.
- h. Mitigation measures such as sound proofing should be considered.

Following the response from Thames Water and the potential impact on water mains and sewers by vibration as a result of piling, they request further information on foundation design be submitted for detailed consideration. This will include –

- the methods to be used
- the depths of the various structures involved
- the density of piling if used
- details of materials to be removed or imported to site.

Should the Applicant wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921

Watermans IE submitted further comments on 26 June 2017 confirming:

1. The geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for noise and vibration
2. Disagree that loss of trees / landscaping will cause significant noise impacts.

LPA response:

- Following review the Watermans IE information, point 2 is accepted

Review of Section 4.8 – Air Quality

The site is located within a borough wide Air Quality Management Area (AQMA) designated by LBRuT owing to high levels of nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀). Further, the site borders the GLA Air Quality Focus Area for 2016/18. Air Quality needs to be a consideration in this development. There is concern on the impact of the development, its location and the nature of the development.

There is potential for significant adverse environmental impact to existing residents, business users and new occupiers of the development.

Under Key Issues:

- a. Air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity.
- b. This should also consider any asbestos on Site
- c. No mention of PM_{2.5} and nano particles.
- d. Need to consider the impact on the Air Quality Focus Area.
- e. Consider the use of the river for transportation of materials / waste during Works.

Under Likely Effects: Add:

- a. The impact on air quality and health should be considered against the 'Potential Sensitive Receptors' listed in Section 2.4
 - o During the Works
 - o The completed operational development
 - o Cumulative impact – during phasing of works and with completed operation development.
- b. When considering the air quality effects from generation of dust arising from the Works; traffic emissions during the Works and operational development; effects from plant emissions / energy centre - In addition to surrounding sensitive receptors, this should include:
 - i. Temporary workforce
 - ii. Future residents, employees, visitors – depending on the phasing of the development
 - iii. biodiversity / ecological resources.
- c. Need to consider impact of:
 - i. PM_{2.5} and nano particles
 - ii. Asbestos
 - iii. Waste handling and storage

Approach and methodology:

- a. The Scoping Report does not:
 - i. Set out the sensitive receptors
 - ii. How receptors will be valued
 - iii. Set out the significance criteria for dust impacts for the sensitive receptors – including population and ecological value
 - iv. Detail how the dust impacts will be measured and where from (on site, distance from site, transport routes for Works and operation)
 - v. When the baseline conditions will be taken

- vi. What the qualitative assessment will include
- b. The Air Quality Assessment should include a qualitative assessment of air quality effects resulting for the works; operational development and cumulative impact of both during phasing of the development.
- c. The Scoping of the Air quality Assessment must be agreed in advance with the LPA and takes into account the following planning policy and environmental air quality guidelines:
 - o Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 13 2011 (As Amended) and Amendment Regulations 2015
 - o National Planning Policy Framework (NPPF) 2010
 - o National Planning Policy Guidelines (NPPG) 2014
 - o LBRuT Draft SPD – Air Quality
- d. Design –Requirements as set out in LBRUT’s draft Air Quality SPD 5.3 Development Design should be followed with particular reference to sensitive receptors such as schools which should not be sited near busy roads.
- e. Traffic reduction - Requirements as set out in LBRUT’s draft Air Quality SPD 5.3 Traffic Reduction should be followed with particular reference to the promotion of active travel infrastructure (cycling and walking) within the development and to car parking. This should be sited near the entrance to the development to reduce pollution to the development and encourage walking and cycling within the development. The installation of EVCP as per London Plan March 2016 will be required as will car club parking bays. Individual car parking spaces on drives is to be discouraged.
- f. As a minimum a Construction Logistics Plan (CLP) should be submitted as part of the application. It should consider the delivery of construction materials by boat.
- g. All NRMM must be registered and compliant
- h. Air Quality Neutral - Requirements as set out in LBRUT’s draft Air Quality SPD 6.1 Air Quality Neutral should be followed. This development should be Air Quality neutral or better. It is within an AQMA and borders the GLA Air Quality Focus area for 2016/18 which runs along the South Circular down Clifford Avenue to Chalkers Corner on the A316. LBRUT has a duty to reduce NO2 emissions along this route. This site must play its part in reducing such levels. Any addition to NO2 will require a section 106 payment towards the Council’s air quality monitoring and work to improve air quality in the area.
- i. Use data from the Authorities own automatic urban background site at the Wetland Centre for background readings
- j. Impact on ecological resource: The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.
- k. Add a monitoring station at Chalkers Corner in front of Chertsey Court.
- l. The ES should provide details of the potential mitigation measures that will be required to safeguard the health and amenity of residents, students, employees, visitors and site workers on and around the site, pre, post and during the Works.

Watermans IE submitted further comments on 26 June 2017 confirming:

1. The geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for air quality.

2. Further data from the Wetlands Centre air quality 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.

LPA's response: The above is noted and agreed. However, the use of additional diffusion tube locations is recommended. It is suggested the Applicant contacts the LPA to discuss and agree, in consultation with the Environmental Health Specialist Pollution Officer.

Review of Section 4.9 – Ground Conditions and Contamination

Under Likely effects:

- a. Given the development will be phased there is a likelihood that Works will be taking place at the same time as operational development. Therefore potential health and safety and surface water contamination during the Works must also be considered on the future users / occupiers of the Site.
- b. Impact on soil and ground conditions / contamination from waste storage during Works.
- c. Impact on sensitive receptors (including biodiversity) from exposure to contaminated soil, groundwater, airbourne dust, ground gasses, vapours and UXO. (from waste).

Under Approach and Methodology:

- a. How receptors will be valued
- b. What is the significance criterial and how will this be measured?
- c. A contaminated Land Report is required to accompany the ES.

Review of Section 4.10 – Surface Water Drainage and Flood Risk

According to the Environment Agency (EA's) flood maps, the majority of the site is located within defended Flood Zones 2 and 3. It is also within the Flood Zone 3a High Probability of flooding as identified in the Council's updated Strategic Flood Risk Assessment (SFRA, 2016).

Under Key Issues:

The redevelopment of this former industrial site offers an excellent opportunity for improving a brownfield riverside site and improving the environment, tidal flood defences and Thames Path in line with TE2100 plan actions and improve linkages to Mortlake and Barnes.

Under Likely Effects: The assessment should include:

- a. Impact on surface water drainage, run off and flood risk both on and off site, and whether this can be met– during Works, completed operational and cumulatively through phasing.
 - i. Impact on ground / surface water, and potential flood risk from waste soil stockpiles and other waste storage areas during Works.
 - ii. Impact on flooding as a result of loss of soft landscaping / trees
- b. Implications on the River Thames flood infrastructure (and flooding) during the Works
- c. The impact on demand for water supply and network infrastructure both on and off site and whether this can it be met– during Works, completed operational and cumulatively through phasing.
- d. The impact on demand for Sewage Treatment and network infrastructure both on and off site and whether these can it be met – during Works, completed operational and cumulatively through phasing.
 - i. Impact on utility services as a result of piling
- e. Whether the infrastructure can be delivered ahead of occupation - Build – out / phasing details.
- f. Impact on the Development on increasing flood risk (and zone) elsewhere.

Under Approach and Methodology:

- a. The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - i. Significance criteria and how will this be measured
 - ii. Criteria for determining the value of the receptors
 - iii. Baseline assessment.

The Authority welcomes that the Flood Risk Assessment (FRA) will be informed by detailed consultation with the Environment Agency, Thames Water, the PLA and LBRuT. However, the LPA require the ES to incorporate and address the following:

- b. The FRA will need to be carried out in line with NPPF and NPPG policies and guidance on flood risk, the Council's Core Strategy, Development Management Plan, and Local Plan and informed by the Council's updated SFRA, 2016.
- c. A site specific emergency evacuation plan should be developed.
- d. A Surface Water Drainage Strategy will be required

- e. Water consumption: It will need to be demonstrated that the development complies with policies DM SD 9 and LP 22, which set out the minimum mandatory targets for water consumption to be achieved for the different types of developments
- f. Thames Water:
- i. Advises the Applicants to consult with Thames Water at the earliest opportunity.
 - ii. Thames Water requests evidence that water & waste water capacity exists to serve the development and where it doesn't how this will be addressed is included in the evidence submitted as part of the planning application.
 - iii. Foul sewerage in particular could potentially lead to significant impacts on- and off-site if there is not sufficient capacity in the public sewerage network (e.g. overloading of infrastructure, foul water flooding etc). In line with policy DM SD 10 and LP 23 the applicant is required to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. The developer will be required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation from Thames Water Utilities.
 - iv. Advises the developer needs to ensure that any solutions address both on and off site issues and they are strategic in nature not piecemeal related to individual phases. The strategy needs to cover the
 - What – What is required to serve the site
 - Where – Where are the assets / upgrades to be located
 - When – When are the assets to be delivered (phasing)
 - Which – Which delivery route is the developer going to use s104 s98 s106 etc
 - v. It is also unclear as to how buildings & structures will be constructed; Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses. Therefore, Thames Water requests that further information on foundation design be submitted for detailed consideration. This will include –
 - the methods to be used
 - the depths of the various structures involved
 - the density of piling if used
 - details of materials to be removed or imported to site.
 - vi. Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921
- b. Environment Agency:
- i. Encourages early pre-application discussions
 - ii. Flood Risk Activity Permit [FRAP]: Under the Environmental Permitting (England and Wales) Regulations 2016, you must submit plans to the Environment Agency and apply for a FRAP if you want to do work:
 - In, over or under a main river
 - Within 16m of the bank of a tidal main river
 - Within 16m of any flood defence structure

Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment.

 - A Water Framework Directive (WFD) Assessment will be required: Development close to rivers should help to deliver the objectives of the Water Framework Directive (WFD) to improve riverside environments. This includes applying mitigation measures (improvements to the river) identified in the river basin management plan (RBMP).

- The EIA should ensure that there is no deterioration in the water quality of any designated WFD waterbodies that may be impacted by the proposed development. Information on WFD and the current status of water bodies can be found in the Thames River Basin Management Plan <https://www.gov.uk/government/collections/river-basin-management-plans-2015>

Watermans IE submitted further comments on 26 June 2017 confirming:

1. The geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for surface water drainage and flood risk.
2. 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.

Review of Section 4.11 – Ecology

Under Key Issues: Expand to include:

- a. The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.
- b. The LPA agrees with the majority of the Applicants comments in section 4.11, however, although the Applicant has carried out bat surveys and discounted them roosting on site; the ES should consider bats may pass along the river on the northern site boundary/Ships Lane and therefore light/noise/vibrations and disturbance may affect their movement. These effects may be permanent depending upon the duration of the effect and the resulting environment. Therefore the scope of the surveys increased to cover commuting bats using the whole site.
- c. Consider the impacts on the Chalkers Corner element of the site.
- d. The section of the Thames path along the boundary of the site is in a poor state of repair and has the potential to benefit both people and wildlife. Given the size of the site, scale of the development, there is a high probably of disturbance to riverside areas.
- e. Climate Change Adaptation: The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained.
- f. The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" (NPPF Para 109), which should be demonstrated through the ES.
- g. It is recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.
- h. The sensitive receptors will include (but not limited to), trees, other soft landscaping (plants / grasses); birds, river, bats, reptiles, hedgehogs, invertebrates

Under Likely Effects: Add

- a. Habitat fragmentation:
 - i. Disturbance to bat commuter routes during Works and from the layout and height of the proposed Development.
 - ii. Impact on the movement of species / population as a result of the Works and Development.
- b. The ES needs to consider the long term change and impact on protected species, habitat type, ecological value on site and adjacent to the site – during works, operational development and cumulatively through the phases of development.
- c. The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP)
- d. Disturbance to riverside areas, which benefit both people and wildlife.

- e. Impact on ecological value of site as a result of:
 - i. Loss of landscaping / trees
 - ii. Dust
 - iii. Air quality
 - iv. Lighting
 - v. Water quality and run off
 - vi. Works
 - vii. Increased recreational pressure (on and off site – for example Mortlake Green)
 - viii. Noise

Under Approach and Methodology: Add:

- a. The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - i. Significance criteria and how will this be measured
 - ii. Criteria for determining the value of the receptors
 - iii. Baseline assessment

- a. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.
- b. The ES should assess the impact of all phases of the proposal on protected species
- c. Consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.
- d. The scope of the bat surveys should be increased to cover commuting bats using the whole site.
- e. A Preliminary Ecological appraisal will be necessary for the Chalkers Corner element of the Site.
- f. The final ES must include all necessary information as outlined in Regulations 4(2) and Schedule 4 of the EIA Regulations 2017
- g. Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.
- h. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.
- i. BAP: The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as ‘Habitats and Species of Principal Importance’ within the England Biodiversity List, recently published under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication ‘Guidance for Local Authorities on Implementing the Biodiversity Duty’. Natural England advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be

included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

- j. The ES should assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS).

Watermans IE submitted further comments on 26 June 2017 confirming:

1. 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 ecology.
2. Bat activity surveys - As part of ecological surveys undertaken to date, the following findings can be made:
 - Evening emergence and pre-dawn re-entry surveys as part of a Protected Species Report (PSR) at certain buildings and trees on the Site showed no roosting bats.
 - During the evening emergence and pre-dawn re-entry surveys outside The Ship public house, a single serotine commuting pass and one / two commuting and foraging noctule bats were recorded.
 - Other surveys at the buildings and trees on the Site recorded noctule, soprano and common pipistrelle bats,
3. Mitigation / compliance measures were made. These measures included:
 - The provision of a Construction Environmental Management Plan (CEMP)
 - The provision of a sensitive lighting strategy
 - 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.
4. 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.
5. 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.
6. 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.
7. 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.

8. 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.

LPA response: Whilst the LPA support the 4 measures that the applicant is proposing:

- The LPA still need to understand the bat activity on site to be able to assess the impact of the proposed development on bats.
- There may be a couple of years between the 2016 survey and the actual build therefore the survey will need to be repeated to be up to date.
- A single bat emergence / re-entry survey is only a snap shot and within that snap shot 4 species were seen which is not insignificant bearing in mind this is London and that the nearby Wetland Centre has 8 species

Review of Section 4.12 – Archaeology (Buried Heritage)

Under likely effects:

The site is identified within an Archeologically Priority Area, is very large in scale and has five key areas of archaeological interest:

1. Palaeoenvironmental/Prehistoric potential;
2. A medieval church and cemetery, although evidence of this does appear to be limited
3. The Archbishop of Canterbury's Palace (potentially of national significance);
4. A house associated with Thomas Cromwell (again, potentially of national significance)
5. The historic development of the Stag Brewery whose origins I believe may date back to the 15th-century.

The Scoping Report confirms that an archeologically assessment will be completed, based upon a desk-based archaeological assessment that will be prepared in accordance with the NPPF and Chartered Institute of Archeologic (ClfA) and Historic England guidance. This will:

- Establish the significance and value of know archaeological assets relevant to the Site and it surrounds, and the potential for the presence of unknown buried heritage assets.
- Include consultation with the Greater London Historic Environment Record will be consulted.
- Include a qualitative assessment will be undertaken to assess the significance of likely effects
- Include consultation with LBRuT and their archaeological advisors
- Include, if necessary, an archaeological mitigation strategy

Under Approach and Methodology:

- a. The Scoping Report does not include the following, which must be agreed in advance with the LPA:
 - i. Significance criteria and how will this be measured
 - ii. Criteria for determining the value / effect – baseline and impact

The Authority recommends the Archaeological Environmental Statements Chapter should be supported by the following:

- b. Desk-based assessment, which should:
 - i. Describe the significance of heritage assets
 - ii. Identity the likely effects of the development on the significance of heritage assets, including new discoveries and effects on the setting on nearby assets.
 - iii. The assessment may lead onto further evaluation and/ or mitigation measures.
- c. Archaeological Evaluation, which should:
 - i. Involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. (The level of

investigation in the western part of the site is very limited and further pre-determination evaluation is recommended, for example to determine the exact location of the original Cromwell House. Further, the sports fields appear never to have been developed - this could be related to the local of the original Cromwell House).

- ii. A field evaluation report to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy
 - iii. If archaeological safeguards do prove necessary, the evaluation should detail design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development
- d. The applicants must consult the appropriate specialist bodies, Historic England and the greater London Archaeological Advisory Service (GLAAS – The Boroughs archaeological advisers) with regards to archaeological matters and methodology for 1 and 2.
 - e. Should refer to the Museum of London – London Archaeological Archive (there is a site record SBY95 – 1995)

Review of Section 4.13 – Above Ground Built Heritage

Under Key Issues: The Authority advises:

- a. The Scoping report states that the “*Development proposes the retention, alteration and refurbishment of the existing Buildings of Townscape Merit within the Site*”. However, Section 2.3 states only *the “façade of the (former) Bottling Plant would be retained”*. The ES will need to accurately describe works – façade retention is not deemed as ‘retention’. Suggest partially retained?
- b. Paragraph 4.13.1: Refers to the BTMs within the site, however there are other built heritage elements that need to be considered in the ES:
 - i. Boundary wall between Reid Court in Williams Lane and the site is listed;
 - ii. Site boundary walls to north and south;
 - iii. Railway tracks and river moorings/ granite paving;
 - iv. Memorial plaques

Under Likely Effects: Add:

- a. Potential impact on the structural stability of Listed Buildings and BTMs during the Works, including demolition, excavation and piling.
- b. Temporary changes to the character, appearance and setting of the conservation area and adjacent conservation area during the Works
- c. Add Long term change to the setting of the adjacent conservation area as a result of the Proposed Development once completed and operational.
- d. Impact on the listed boundary wall between Reid Court in Williams Lane and the Site;
- e. Impact on the site boundary walls to north and south during Works, operational development, and phasing.
- f. Impact on railway tracks and river moorings/ granite paving, during Works, operational development, and phasing.
- g. Impact on memorial plaques during Works, operational development, and phasing.
- h. Impact on Watney Gates adjacent to Williams Lane, during Works, operational development, and phasing.

Under Approach and Methodology:

- a. There are no details of the criteria that is being used to determine the value of the sensitive receptor?
- b. There is no detail of the criteria that is being applied to determine the impact / magnitude of change?
- c. The Built Heritage Assessment should refer to:
 - i. Conservation Area Statements / Studies
 - ii. Village Plan
 - iii. Planning Brief
- d. The Built Heritage Assessment should include:
 - i. Significance of any heritage affected, including any contribution made by their setting.
 - ii. The Assessment should identify what public benefits are of the Proposed Development, in order for the LPA to balance these up where the proposed Development will lead to less than substantial harm, substantial harm to or total loss of significance of a designated heritage asset.

- e. Provision of photomontages demonstrating how the character, appearance and setting of designated and non-designated heritage assets and their significance may be affected. The scope of these views to be agreed in advance with the LPA.

Review of Section 4.14 – Townscape and Visual Effects

Under Key Issues: Recommend this includes

- a. Under first bullet point, add at end: “*and any potential impacts on the role of the Maltings as a key landmark*”
- b. The Scoping Report makes no references to the Playing Fields and the site at Chalkers Corner, both of which are designated Other Open Land of Townscape Importance (OOLTI), nor the existing streets and landscaping.
- c. The landscape and visual effects on Open Access land, whether direct or indirect
- d. The impact on Mortlake Green OOLTI
- e. Ensure the sensitive receptors include, impact on trees; open space (on and off site) character of the area; river and its setting; daylight / nighttime environment; visual amenity; views; and users of footpaths, open spaces, roads

Under Likely Effects: Expand to include:

- a. Add design to the third bullet point.
- b. Consider impacts on the role of The Maltings as a key landmark
- c. Consider views / vista through the site – for example, to the Maltings landmark.
- d. Impact on open space and OOLTI – on and off site
- e. Impact of soft landscaping and trees (of which there are individual and group TPO on the Stag Brewery site).
- f. Impact on Thames Policy Area, river, footpath
- g. Impact on daylight / night-time environment;
- h. Impact on visual amenity; footpaths and roads

Under Approach and Methodology: The Authority recommends:

- a. The Scoping Report does not outline the how receptors will be valued
- b. The Scoping Report does not outline the ‘field survey’ will be undertaken
- c. How will townscape features be evaluated – criteria for significance?
- d. There are no details of how the significance of impacts will be measured
- e. There are no details of the qualitative assessment
- f. Refer to Supplementary Planning Guidance; Supplementary Planning Documents; Village Plans; Conservation Area Statements and Studies; Thames Strategy – Kew to Chelsea and Site Planning Brief; CABE ‘By Design’.
- g. Para. 4.14.3 States, ‘*Consultation is currently underway with LBRUT to agree views to be assessed*’. However, it is the Authorities understanding external views towards the site were agreed some time ago but maybe this refers also to further views within the site?
- h. Provision of a Design Code for the Outline element ✓
- i. Agree scoping with LPA for views / vistas through the site.
- j. Other Open Land of Townscape Importance:
 - i. Assessment on the impact on OOLTI – on its openness, character, views into and out of, and the contribution they make to the distinctive character of the area.
 - ii. Assessment on re-provision - This must be of equivalent or improved in terms of quantum, quality and openness.
 - iii. The following criteria are taken into account when defining OOLTI:
 - Contribution to the local character and / or streetscene, by virtue of its size, position and quality.
 - Value to local people for its presence and openness.

- Immediate or longer views into and out of the site, including from surrounding properties.
 - Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.
 - Value for biodiversity and nature conservation.
- i. Landscape:
- ii. The consideration of landscape impacts should reflect the approach set out in the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the Landscape Character Assessment Guidance for England and Scotland (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice.
 - iii. The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Watermans IE submitted further comments on 26 June 2017 confirming:

1. The geographical extent of assessments has been extended to account for the proposals at Chalkers Corner, as necessary. This is particularly the case for townscape and visual effects.
2. A Design Code will be submitted and be associated to the Outline Planning Application
3. CGIs will be covered in the Design and Access Statement

Review of Section 4.15 – Wind Microclimate

Under Key Issues: The Authority recommends this is expanded to include:

- a. Speed and direction of wind as it moves on the river.
- b. Impacts on cycling / roadway conditions
- c. Section 4.15.1 of the Scoping Report states “*This is of particular importance to the need to create pedestrian environments of the highest quality.....*”. In the wind engineering community wind conditions that are “suitable” for their intended activity are those conditions that are defined as being having either “acceptable” or “tolerable” Lawson wind comfort criteria conditions. If a scheme has the “highest quality” wind conditions, this would suggest to me that the scheme has “acceptable” wind conditions everywhere. That is, “tolerable” wind conditions (which people will think are windy, but will tolerate) are not of the “highest quality”. Therefore, for clarity, the Authority requires the proposed Development to have ‘acceptable’ Lawson comfort conditions.

Under Likely Effects: Include the following:

- a. Impact on river sports / users (including sailors, rowers, boaters etc.) from change in wind conditions, during Works, operational development, and phases through the development.
- b. Whilst the report states the safety and comfort of pedestrians using the site will be a key issue, it is not stated whether or not balcony or roof terrace wind conditions will be considered (balconies and roof terraces are now frequently being considered as amenity space). Such areas should be included.
- c. Need to include impact on cycling and road safety on and off site.
- d. Need to consider the cumulative impact during the phasing of the works and Operational Development.

Under Approach and Methodology:

- a. How will receptors be valued?
- b. When considering impact ‘adjacent to the site’ – how is this defined?
- c. The criteria for significance is not provided.
- d. The method used to assess “significance” of the wind impact is not stated.
- e. The evaluation of “significance”: The significance criteria to be used must be given in the Scoping Report, to allow the Authority an opportunity to decide whether we agree with the approach suggested.
- f. There are important details about the test methodology that are not defined. The Scoping Report needs to state that the wind tunnel testing will be undertaken in an appropriate boundary layer simulation, and that the level of detail of the model is sufficient that it models the effects of small-scale features. Furthermore the testing should be undertaken for at least 12 approaching wind directions.
- g. Statements about the location and provenance of the long-term wind data used in the analysis, and the method by which this data is transformed to the Stag Brewery site, also need to be provided.
- h. The Scoping Report states that the Lawson Criteria will be used. However:
 - i. This does not say which Lawson Criteria are to be used? There are at least three “Lawson Criteria” that have been published.
 - ii. How will these criteria be interpreted with regards to seasonality?
- i. There must be prior agreement with the LPA, over which Lawson Criteria (wind comfort) is to be used, and which Lawson wind safety criteria are to be used.

- j. The Scoping Report does not address seasonality - the “amenity space” should have suitable wind conditions throughout the year (including the worst-case season).
- k. The Scoping Report must state explicitly that the wind impact of the wind conditions are evaluated by comparing the wind conditions before and after the scheme is built. This comparison should be made
 - i. based upon the wind conditions themselves, and
 - ii. by considering the wind impact based upon the intended usage of the site.

Watermans IE submitted further comments on 26 June 2017:

1. A desk-based review of the emerging scheme by RWDI indicates 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).
2. 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.
3. Where balconies and roof terraces are part of the detailed planning application these will be appropriately assessed within the wind tunnel

Review of Section 4.16 – Daylight, Sunlight, Overshadowing and Light Pollution

Under Likely Effects:

- a. Impacts on overshadowing on surrounding residential properties and gardens.
- b. Light pollution from the Works – on sensitive receptors, including existing residential properties and gardens, views along and across the River Thames, Mortlake Green, businesses and ecology / biodiversity
- c. Light pollution from the operational development – flood lights, and internal and external light sources on sensitive receptors, including existing residents, businesses and ecology / biodiversity.
- d. Cumulative impact of light pollution and impacts on daylight, sunlight and overshadowing from the Works and operational development on sensitive receptors – through each phase of development.
- e. In addition there may be a small number of non-domestic buildings for which loss of light could be an issue. These could include the nursery's, schools and day care on Lower Richmond Road and Mortlake High Street. They should be analysed as well if they could be affected by the proposed development. Retail and office buildings are not normally analysed unless they have a particular requirement for daylight.
- f. Impact on sunlight and daylight on the surroundings of the Site, include along the river and towpath.

Under Approach and Methodology: The Authority recommends:

- a. The Scoping Report:
 - i. Needs to outline the criteria for measuring the significance.
 - ii. Need to outline how will the effects be classified.
 - iii. Need to detail the baseline assessment
- b. Assess non-domestic buildings surrounding the site.
- c. Ensure the correct document is referred to 'Building Research Establishment - Site Layout Planning for Daylight and Sunlight, a guide to good practice' not 'British Research Establishment'. Ensure this includes:
 - i. On existing buildings:
 - ii. The vertical sky component (VSC) on the window wall.
 - iii. Distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its baseline value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit.
 - iv. For existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. Access to sunlight should be calculated for the main window of each of the above rooms which faces within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former baseline value, and more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected.
 - v. Sunlight in outdoor spaces: Ensure this includes the Thames towpath area and private gardens to the north to dwellings off Thames Bank and the northern section of Williams Lane. The BRE Report recommends that no more

- than half of such an area should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. Where a number of private gardens are affected by a proposed development, each garden is normally considered separately for the purposes of assessment. Where baseline assessment indicates that sunlight to the existing open space is already in short supply (below or just above the BRE guideline), the loss of sun is significant if the area receiving two hours direct sunlight on March 21 is reduced to less than 0.8 times its previous value
- vi. For a large development like this one, shadow plotting would be recommended to show the times of day when outdoor areas are overshadowed, especially the Thames Path. For this development, an assessment could include shadow plots on an hourly basis on March 21. Additional shadow plots for the summer (eg June 21) could also be helpful.
- d. Light pollution:
- i. The Scoping Report mentions light pollution, however, not how it would be analysed (the two guidance documents cited, the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' and BRE Digest 350, do not address light pollution). Guidance on suitable lighting levels to limit obtrusive light is contained within four key documents:
 - Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light GN01:2011
 - BS EN 12464-2:2014
 - CIE Guide on the limitation of the effects of obtrusive light from outdoor lighting installations
 - BRE Digest 529 'Obtrusive light from proposed developments'.
 - ii. There is generally good agreement between the numerical criteria on obtrusive light contained in the key documents above, except in the case of upward light, where BS EN 12464-2:2014 is less stringent than the other documents. The key documents above give various recommendations covering:
 - limiting vertical illuminances on windows of neighbouring dwellings;
 - limiting values for light source intensity, in a potentially obtrusive direction such as towards a house or garden, or in this case across or along the River Thames;
 - limits on the luminance of floodlit buildings;
 - limits on upward light ratio from the installation, in order to reduce upward light that causes sky glow, making it difficult to see the stars.
 - iii. The concept of a curfew is also introduced, where lighting is switched off or reduced at set times (guidance suggests between 2300 and dawn) to save energy and limit spill light when lighting is not actually needed. Different guidelines are given before and after curfew hours. The limits depend on the location of the site (for example whether it is an urban or rural site).
 - iv. The Institution of Lighting Professionals also give separate guidance on the brightness of illuminated signs, which could be particularly relevant to the hotel, cinema buildings and commercial buildings.
 - v. In a light pollution study, baseline assessment normally involves on-site night time measurement of light spill in key directions (for example near to existing houses and gardens), together with luminance measurements of floodlit buildings, if any. Upward light ratio is difficult or impossible to measure on site, and usually has to be estimated from a consideration of luminaire type.
 - vi. For the proposed development, key areas for consideration include the rear gardens and rear facades of dwellings (they may currently be unaffected by road lighting), the views along and across the River Thames, and Mortlake Green, opposite the proposed cinema.

- vii. At the EIA stage, two approaches to evaluation of the proposed lighting are possible. Where a full lighting design is available, it can be assessed directly against the criteria in the guidance documents. This is the preferred approach. However a detailed lighting design may not be available. In this case it is acceptable to provide a qualitative assessment of the overall lighting strategy, on the basis that proposed lighting will be designed in order to comply with the published guidelines. This will normally require further calculations of light pollution at the detailed design stage in order to show that the guidelines have been met for key sensitive receptors. A planning condition may be imposed to require this.

Other Matters: The authority makes the following comments / recommendations:

- a. Daylight and sunlight in new dwellings and proposed open spaces: The Scoping Report states such issues will not be dealt with as part of the EIA process, as they do not concern impacts on an existing environment. However, the detailed planning application will be accompanied by separate stand-alone reports in relation to 'internal' daylight, sunlight and overshadowing issues. This is a reasonable approach.
- b. Daylight and sunlight provision to the proposed dwellings should be evaluated using the recommendations in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' (mentioned in the scoping report) and the British Standard 8206-2:2008 'Code of Practice for Daylighting' (not mentioned). The Standard contains guidance on daylight and sunlight for new dwellings, including recommended minimum values for Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH). As well as for individual private dwellings, the guidance should also be applied to residential care accommodation if this is to be provided.
- c. For daylight in new dwellings, the main criterion is the average daylight factor (ADF), which is a measure of the amount of daylight within a room. The ADF depends on the room and window dimensions, the reflectances of interior surfaces and the type of glass, as well as the obstructions outside. Appendix F of the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' explains that 'it is an appropriate measure to use in new buildings because most of these factors are within the developer's control'.

The British Standard recommends the following minimum values for ADF:

- Bedrooms 1.0%
- Living rooms 1.5%
- Kitchens 2.0%

Where a room has a shared use, the British Standard states that the higher minimum value should apply. However, local authorities frequently accept the living room standard for a shared kitchen/living room, as a small kitchen would not be considered as a habitable room. This is a practical approach, as it is seldom in the final resident's interest to have a closed off, small kitchen which is completely artificially lit in order to force compliance with the Standard for the living room. In these circumstances it could be considered acceptable to have living/kitchen/diners which meet the lower living room recommendation of 1.5%.

Assumptions used in the average daylight factor calculation should be stated. Unrealistic assumptions, for example the use of very high internal reflectances, should not be used.

The British Standard and BRE Report also give guidance on sunlight in new dwellings. This is based on living rooms receiving 25% of annual probable sunlight hours, including 5% in the winter.

- d. The new development is a large one, and it may not be necessary to analyse every dwelling to obtain a picture of the overall daylight and sunlight provision within it. An acceptable approach would be to analyse a subset of dwellings in worst case locations, for example on the lower floors and close to other obstructing buildings, particularly tall ones.
- e. Guidance on sunlight provision in proposed open spaces is given in 'Site layout planning for daylight and sunlight: a guide to good practice'. Here the same guideline is used as for existing open spaces, that no more than half the space should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. This should be assessed for proposed courtyards and other gardens, plazas, squares, outdoor café areas and playgrounds, including the proposed school playground. Street and walkway areas that are primarily used for circulation need not be assessed, unless they contain significant seating or garden areas.
- f. For a large development like this one, shadow plotting would be recommended to show the times of day when outdoor areas are overshadowed. For this development, an assessment could include shadow plots on an hourly basis on March 21. Additional shadow plots for the summer (eg June 21) could also be helpful

Review of Section 4.17 – Cumulative Effects

Key Issues:

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

Likely impacts: No further comments:

Approach and methodology:

- a. *Type 1 Effects: Combined effects resultant from the Development upon a set of defined sensitive receptors (noise, dust, visual effects)*
 - i. The cumulative and inter-related impacts must be considered and structured compliance.
 - ii. It is recommended that the Applicants undertake a series of 'time-slice' assessments, which is agreed in advance with the LPA:
 - i. Throughout the project lifespan, which would enable various worse-case scenarios (with regards to both on and off-site receptors) be assessed.
- b. *Type 2 Effects: Combined effects arising from the Development together with other reasonably foreseeable schemes:*
 - i. The Scoping Report states that likely type 2 cumulative effects are to be 'scoped out' of the EIA. The Authority objects to this:
 - a. The threshold for schemes over 10,000m² is too high. This should be lowered to all major schemes within 1km, within the LBRuT and within London Borough of Hounslow, and include:
 - i. Committed developments
 - ii. Schemes that have been submitted and awaiting consent
 - iii. Site Allocations with the adopted and emerging Local Plan
 - b. Need to define 'close to the Site' – This Scope should be agreed with the Authority.

Watermans IE provided the following additional information in their letter dated 26 June:

1. Re-iteration that the criteria for Type 2 cumulative effects is as provided in the Scoping Report.

2. An additional search of major schemes within 1km (both within the LBRuT and LB Hounslow), including committed developments and schemes pending determination has been undertaken.
3. Site allocation plans will not be included, however, these will be included within the strategic traffic modelling within the Transport Assessment.
4. In terms of 'definition of 'close to site', 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 LB of Hounslow (LBH), and below the cumulative criteria threshold set out in the EIA Scoping Report (any new residential development; schemes over 1000m²; and decisions issued since January 2014), 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. Therefore propose to exclude these schemes from the cumulative assessment and therefore a Type 2 cumulative assessment have been scoped out.

LPA response: This is accepted. However, it is recommended that the developments at Richmond upon Thames College, Egerton Road; and residential development at Hogarth Business Park, Burlington Lane, Chiswick are taken into account and included within the strategic traffic modelling within the Transport Assessment.

SECTION 5 – INSIGNIFICANT ISSUES

This Section addresses issues that are intended to be ‘scoped out’ in that the potential for significant effects has been deemed unlikely.

Review of Section 5.1 – Waste:

- a. The planning application will be accompanied with:
 - i. Once operational – Designing the Development to optimise good waste management practices, such as facilitating the segregation of waste, would minimise effects from waste disposal. The planning application will demonstrate the sustainability credential of the Development, including good waste management.
 - ii. A Sustainability Statement will be submitted with the application and cover waste management during the Works and once the Development is completed and operational.

- b. It is understood prior stating any work:
 - i. A site Waste Management Plan will be prepared
 - ii. Will ensure good Site management practice will lead to a minimisation of waste creation

- c. The ES will include:
 - i. Likely effects arising from the transportation of waste materials will be considered within the transport and access component of the ES
 - ii. Noise and vibration, and air quality assessment will inherently consider the likely indirect effects of these vehicle trips on noise level and ambient air quality.
 - iii. A Framework for the management of waste arising from the Site as a result of the Works will be set out in Chapter 6: Development Programme, Demolition, Refurbishment and construction of the ES. This framework will inform a Construction Environmental Management Plan for the Works.
 - iv. Waste Management proposal will be described within Chapter 5: The Proposed Development of the ES.

On the basis of the above, and with the following included in the ES, the Authority has no objection to waste being Scoped out:

- a (ii) - The sustainability Statement must set out clearly how waste will be managed during the works and once the development is completed and operational.
- c (i) - Trips by barge to export waste must be explored.
- c (ii) – This should include impacts on air quality, noise, vibration and dust from waste handling and storage
- The ‘surface water drainage and flood risk’ section should include impacts on surface and ground water and potential flood risk, resulting from waste soil stockpiles and other waste storage areas during Works.
- The ‘ground conditions and contamination’ section should include potential impacts on soil and ground conditions / contamination, resulting from waste storage during Works.

When considering waste impacts during the relevant sections of the ES, appropriate mitigation measures should be outlined. This may include, but not be limited to

- Design / careful location of stockpiles /storage areas;

- segregation of waste
- On-site recycling plant;
- use of sheeting, screening, damping
- control and treatment of runoff from stockpiles;
- minimising storage periods;
- minimising haulage distances and consideration of the use of alternatives to road transport – for example river; and
- sheeting of vehicles.

Review of Section 5.2 – Solar Glare

Solar glare, or dazzle, can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users outside and the occupants of adjoining buildings. Solar glare is more of a problem which there are large areas of glazing or reflective cladding, or where there are areas of sloping glazing which can reflect high angle sun.

The Waterman scoping report advises that the buildings will be brick, and other materials such as stone and metal cladding would be incorporated into the design of the new building and it is anticipated that these would be orientated in such a way to fracture any reflected solar light. Therefore given the palette of materials, there is unlikely to be significant instances of solar glare and therefore it is scoped out.

Notwithstanding this, the presentation material provided in March and April, indicate large areas of glazing on blocks 1, 2 and 8 (and potentially the school building). Therefore, this issue will only become clear at the final design stage. So a reasonable approach would be to agree for this to be scoped out of the EIA at the current time. However, if the materials change, then this would trigger another review of the EIA scoping report to fully address the potential impacts

Review of Section 5.3 – Vibration (Associated with the completed and operational development) – Scoped out.

- No objection

Review of Section 5.4 – Archaeology (Buried Heritage) (Associated with the completed and operation development) – Scoped out.

- No objection

Review of Section 5.5 – Odour – Scoped out

- No objection.

Review of Section 5.6 – Type 2 Cumulative Effects

The Scoping Report states that likely type 2 cumulative effects are to be ‘scoped out’ of the EIA. The Authority objects to this:

- c. *The threshold for schemes over 10,000m² is too high. This should be lowered to all major schemes within 1km, within the LBRuT and within London Borough of Hounslow, and include:*
 - i. Committed developments
 - ii. Schemes that have been submitted and awaiting consent
 - iii. Site Allocations with the adopted and emerging Local Plan

- a. *Need to define 'close to the Site' – This Scope should be agreed with the Authority.*

Watermans IE provided the following additional information in their letter dated 26 June:

1. Re-iteration that the criteria for Type 2 cumulative effects is as provided in the Scoping Report.
2. An additional search of major schemes within 1km (both within the LBRuT and LB Hounslow), including committed developments and schemes pending determination has been undertaken.
3. Site allocation plans will not be included, however, these will be included within the strategic traffic modelling within the Transport Assessment.
4. In terms of 'definition of 'close to site', 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 LB of Hounslow (LBH), and below the cumulative criteria threshold set out in the EIA Scoping Report (any new residential development; schemes over 1000m²; and decisions issued since January 2014), 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. Therefore propose to exclude these schemes from the cumulative assessment and therefore a Type 2 cumulative assessment have been scoped out.

LPA response: This is accepted. However, it is recommended that the developments at Richmond upon Thames College, Egerton Road; and residential development at Hogarth Business Park, Burlington Lane, Chiswick are taken into account and included within the strategic traffic modelling within the Transport Assessment.

Other matters:

A number of issues are omitted from the Scoping Report and require consideration at Scoping stage. These include:

- a. Sustainability measures.

- It will be expected that the applicant submits the relevant pre-assessments as well as an Energy Statement and the Sustainable Construction Checklist as part of any forthcoming planning application; this does not need to be part of the EIA report.
 - In addition, the Local Plan (LP 22) makes it clear that development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). As this is such a large development site, the Authority would expect on-site DE and CHP.
- b. Telecommunications
- c. Utilities
- The Authority encourages pre-application discussions with the relevant statutory undertakers to ensure infrastructure is adequate.

SECTION 6 – PROPOSED STRUCTURE OF THE ENVIRONMENTAL STATEMENT

The ES should be able to read as a standalone document with no significant reliance on external documents. Large ESs can be split into volumes for ease of use.

Section 6 of the Scoping Report outlines the proposed structure of the ES. Whilst the LPA has no objections to the structure, this must also include:

- a. Within the Non-Technical Summary: A non-technical summary of the information provided under Regulation 18 (3) (a-d) and paragraphs 1-8 in Schedule 4 of the EIA Regulations 2017.
- b. The ES should set out how ‘significance’ effects in the context of the EIA Regulations are determined as part of the EIA, and described in the ES. It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification.
 - i. This should define the criteria against which the significance of effect will be evaluated
 - ii. This should define the level of significance of effects
 - iii. Should cover direct effects, and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.
- c. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement shall be included.
- d. It is recommended that the Applicants undertake a series of ‘time-slice’ assessments, which is agreed in advance with the LPA:
 - ii. With no development
 - iii. Throughout the project lifespan, which would enable various worst-case scenarios (with regards to both on and off-site receptors) be assessed.
 - iv. An operational scenario, when all mitigation measures will have achieved full effect, which typically tends to be 15 years after opening. The operation assessment year allows time for mitigation to establish itself – for example screen planting to mature and become effective.

Watermans IE confirmed on 26 June that the ES will assess and identify the likely significant effects of the demolition, alteration, refurbishment and construction works, in addition to effects of the completed and operational development. If development is implemented and occupied in a phased manner, then interim receptors on the site when construction works are underway will be considered.

LPA comments: Sensitive receptors will not just be onsite, and therefore it is recommended the scope of this be agreed.

- e. In line with Regulation 18 (3) of the EIA Regulations 2017, a table summarising measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely

significant adverse effects on the environment. This may include, but not be limited to:

Employment	<ul style="list-style-type: none"> ○ The use of local employment agreements and skills plans
Transport	<ul style="list-style-type: none"> ○ Draft Construction Logistics Plans ○ Framework Travel Plan – workplace, school and residential with appropriate bonds ○ Transport improvements / highway works – S106 / S278
Noise and Vibration	<ul style="list-style-type: none"> ○ Demolition and Construction Management Statement (DCMS) ○ Noise and Vibration Management Plan (NVMP)
Air quality	<ul style="list-style-type: none"> ○ Provision of Electric Vehicle Charging Points ○ Provision of a Construction Logistics Plan
Surface Water Drainage and Flood Risk	<ul style="list-style-type: none"> ○ Flood Risk Assessment ○ Site Specific Emergency Evacuation Plan ○ A surface water drainage strategy ○ Foundation design strategy
Ecology	<ul style="list-style-type: none"> ○ Ecological enhancements along the Thames Path, riverside area and throughout the development to mitigate impacts.
Archaeology	<ul style="list-style-type: none"> ○ Archaeological desk based assessment, field evaluation, mitigation strategy and interpretation.

Watermans IE confirmed on 26 June that the ES will provide a summary of residual effects and associated mitigation measures.

- f. In accordance with Regulations 18 (5), any future Environmental Statement must be prepared by competent experts, and consequently should be accompanied by a statement outlining the relevant expertise or qualifications of such experts.

SUMMARY:

This opinion has been prepared by the LBRuT as LPA with all reasonable skill, care and diligence.

It is based on the information contained in Scoping Report provided to LBRuT on behalf of the Applicant by Waterman IE, additional letter from Watermans IE dated 26 June 2017, and the comments and opinions resulting from consultation with consultees prior to adopting this opinion.

Whilst the Scoping Report was accompanied with the information required under Regulation 13 (a) (i) and (ii), the LBRuT has a number of concerns, which include, but are not limited to:

- Lack of detail on all baseline surveys
- Lack of detail how the criteria against which the significance of effect will be evaluated - It is important to ensure that the way in which significance has been determined is transparent and repeatable, and also clearly states what constitutes a significant environmental effect, with clear justification
- Methods used to predict significance / magnitude of effects
- Definition of the level of significance of effects
- Broad indication of the likely effects
- Types of mitigation

Whilst a number of these issues are not mandatory requirements, as outlined in guidance and advice notes, requests for such matters to be included in Scoping Reports are not uncommon.

The LPA can, under Regulation 13 (3), request additional information. Watermans IE submitted additional information, received on 26th June, and these points have been summarised in red within this Scoping Opinion. Notwithstanding such, it remains unclear as to what the applicants deem relevant, and there is still concern there is a lack of agreement as to:

- Whether the applicant agree with the additional alternatives to consider
- Whether the applicants agree with the additional sensitive receptors
- What the potential significant effects are in each of the topic areas.
- The baseline surveys
- The criteria used for significance
- The methodology used to assess the effects.

In addition to the above:

- The phasing of the proposed development (i.e. duration of demolition, construction and operation works) has not been set out in the EIA Scoping Report. The LBRuT expects the phasing to be adequately assessed in the EIA, and a detailed explanation of the proposed project timescales included in the ES.
- For the Outline element of the Proposed Development, parameter plans should be provided, specifying clearly the 'maximums and minimums' to allow an outline planning application be assessed in the EIA. The Applicant needs to ensure that the 'worst case' parameter is assessed in the EIA in relation to all topics and receptors and this may not be as simple as assessing all the proposed tallest, or all the proposed shortest buildings, but instead may be a complex mix of scenarios. It is also necessary to acknowledge that the worst case scenario may be different for different environmental disciplines. The ES will need to clearly

demonstrate how the worst case scenario has been determined, and assessed for each individual environmental topic.

On the basis of the above, it is recommended that the LPA and the Applicant continue to work in consultation to address outstanding issues contained in this opinion.

Finally:

- The Authority would expect the final Environmental Statement (ES) to include all necessary information as outlined in Regulations 18 (3-5) and Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017.
- The fact that LBRuT has given this opinion, the Authority shall not be precluded from requiring additional information to supplement the Environmental Statement, where it is necessary to reach a reasoned conclusion on the likely significant effects of the development, in connection with an application for planning permission for the same development.

Appendix A

Consultees contacted by LBRuT during the EIA Scoping Process

1. Adjoining planning authorities
 - a. London Borough of Hammersmith & Fulham
 - b. London Borough of Wandsworth
 - c. London Borough of Hounslow)
2. Greater London Authority (GLA)
3. Transport for London (TfL)
4. Natural England
5. The Environment Agency
6. Historic England
7. GLAAS Historic England
8. Port of London
9. Sport England
10. Lead Local Flood Authority
11. Local Highway Authority
12. Southwest Trains
13. Network Rail
14. Thames Water
15. Richmond Biodiversity Partnerships
16. Southwest London Environment Network
17. LBRuT Planning Policy and Design
18. LBRuT Ecology Officer
19. LBRuT Arboricultural Officer
20. LBRuT Environmental Health Specialist Pollution
21. LBRuT Commercial Environment Health, Consumer Protection
22. LBRuT Scientific Officer
23. LBRuT Delivery and Development Manager, Housing and Regeneration Directorate
24. Crime Prevention Officer
25. Metropolitan Police
26. Barnes Town Centre Manager
27. Richmond CCG
28. Achieving for Children
29. LBRuT – Public Health
30. BRE – To provide a Scoping Report Review on Wind Microclimate

31. BRE – To provide a Scoping Report Review on daylight, sunlight, overshadowing and light pollution
32. Mortlake Brewery Community Group
33. Barnes Community Association
34. Barnes and Mortlake History Society
35. Mortlake Community Association
36. Mortlake and East Sheen Society
37. Sheen Conservation Group
38. Rowing clubs
 - a. Quintin Boat Club
 - b. Tideway Scullers School
 - c. Barnes Bridge Ladies Rowing Club

Appendix B

A summary of the comments received from consultees

1. Adjoining planning authorities

a. London Borough of Hammersmith & Fulham;

EIA Scoping The redevelopment of the former Stag Brewery site. To facilitate the development, the majority of the buildings and structures within the site would be demolished. However, the façade of the former Bottling Plant would be retained and the Maltings and the former hotel would be retained, altered and refurbished. The development would comprise new buildings, ranging in height from 3 to 8 storeys and would accommodate approximately 1000 residential units, and also provide retail, office, hotel, leisure, community, education and healthcare uses, and areas of public and private open spaces.

This Council raises no objection to the proposed development.

b. London Borough of Wandsworth - - **No representation received.**

c. London Borough of Hounslow - Hounslow does not wish to comment

2. Greater London Authority (GLA) – **No representation received.**

3. Transport for London (TfL)

The site is situated in Mortlake and is bounded by the River Thames to the north, Bulls Alley to the east, the A3003 Lower Richmond Road / Mortlake High Street to the south and Williams Lane to the West. The nearest section of the Transport for London Road Network (TLRN) is Chalker's Corner (the A316 Lower Richmond Road / A205 South Circular junction) approximately 300 metres west of the site; the A205 Upper Richmond Road is located approximately 500m south of the site. TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

TfL would expect the application to be supported by a robust Transport Assessment (TA) report to be provided as part of the planning submission in accordance with TfL's Transport Assessment Guidance. Depending on the development's impact, TfL may ask for mitigation measures towards transport to accommodate the scheme, unless these are adequately addressed as part of the application.

The EIA and TA must include a multi-modal impact assessment including baseline and future car, bus, rail and pedestrian and cycle trips and mode share.

The impact of construction traffic on the operation of the TLRN including buses, pedestrians and cyclists must be considered and could be mitigated through the provision of a Construction Logistics Plan (CLP). TfL would encourage the applicant to submit a draft plan as part of the application.

A framework residential and workplace travel plan should be prepared and submitted as part of the planning application and should include information on deliveries and servicing, and be produced in accordance with TfL's Travel planning best practice guidance.

The applicant should be aware that the Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL, the rate of which in Richmond is £50 per sqm.

Any mitigation measures relating to TfL infrastructure and services must be secured through a s106 agreement, with any changes to the highway network secured through a requirement for the developer to enter into a s278 agreement. Depending on the level of transport mitigation

agreed, it may be appropriate for TfL to be a signatory to any s106 agreement. Less significant issues can be dealt with by use of planning conditions and in some cases TfL may request that it is consulted prior to any discharge of a condition.

4. Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants.
- This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1. Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework (NPPF) sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2. Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations'), should have regard to the Habitats Regulations Assessment process set out in Regulation 61 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the Natural England website.

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Natural England has adopted standing advice for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently published under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. Landscape, Access and Recreation

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the Landscape Character Assessment Guidance for England and Scotland (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

4. Land use and soils

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) 'The Natural Choice: securing the value of nature' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction Code of Practice for the sustainable use of soils on construction sites (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra Guidance for successful reclamation of mineral and waste sites.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" (NPPF Para 109), which should be demonstrated through the ES.

5. The Environment Agency

We have reviewed relevant sections of the document 'Environmental Impact Assessment (EIA) Scoping Report' by Waterman dated March 2017 and agree with the scope of the assessment.

However we wish to highlight the following issues and opportunities that should be assessed within the EIA that the development should look to

- g. Setback from the River Thames
- h. Improvements the Thames path and riverside environment
- i. Water Framework Directive (WFD)
- j. Flood Risk Activities Permit

Setback from the River Thames

The EIA Scoping Report states that the existing, modified and new flood defences will have to last the lifetime of the development (100 years), be raised as part of the TE2100 Plan and have adequate access for statutory maintenance purposes. The EIA should also consider the benefits of retreating the Thames Tidal defences away from the River and providing buffer between the defences and the new development. New flood defences should not extend riverward of the existing defences as this would result in a loss of flood storage.

Development on the riverside edge is contrary to the new emerging Local Planning Policy LP18 River corridors. This seeks to protect and enhance the natural environment of the river corridors by setting development back from river and requiring that development contributes to improvements and enhancements to the river environment.

The Policy states that the Council, in conjunction with the Environment Agency, will require a buffer zone of eight metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames.

We normally require a buffer zone of 16 metres between any new development and landward side of the Thames Tidal Flood Defences. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall.

Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and the Environment Agency takes the view that it is reasonable to expect that any new development should go some way to redress the balance.

Given the significant number of properties and therefore disturbance to riverside areas we expect to see significant ecological enhancements along there riverside area and throughout the development to mitigate for these impacts. Opportunities to introduce an improved riverside environment at this site for example new tidal terracing should be considered.

This is in line with the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

Improvements the Thames Path and riverside environment

The EIA should consider the benefits of improvement to the Thames Path. The section of the Thames path along the boundary of the site is in a poor state of repair and has the potential to benefit both people and wildlife.

Policy LP 18 River corridors states that 'all development proposals adjoining the River Thames are required to provide a public riverside walk, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk.

For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access'.

Given the significant number of properties and therefore disturbance to riverside areas we expect to see significant ecological enhancements along there riverside area and throughout the development to mitigate for these impacts.

Water Framework Directive (WFD)

Development close to rivers should help to deliver the objectives of the Water Framework Directive (WFD) to improve riverside environments. This includes applying mitigation measures (improvements to the river) identified in the river basin management plan (RBMP).

The EIA should ensure that there is no deterioration in the water quality of any designated WFD waterbodies that may be impacted by the proposed development. Information on WFD and the current status of water bodies can be found in the Thames River Basin Management Plan <https://www.gov.uk/government/collections/river-basin-management-plans-2015>

Flood Risk Activity Permit [FRAP]

Under the Environmental Permitting (England and Wales) Regulations 2016, you must submit plans to the Environment Agency and apply for a FRAP if you want to do work:

- In, over or under a main river
- Within 16m of the bank of a tidal main river
- Within 16m of any flood defence structure

Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment.

Summary

- Redevelopment of this former industrial site offers an excellent opportunity for improving a brownfield riverside site and improving the environment, tidal flood defences and Thames Path in line with TE2100 plan actions and improve linkages to Mortlake and Barnes
- Development should consider options to incorporate tidal terracing and set back flood defences in line with the Estuary Edges guidance to increase the amount of natural river bank, currently only 2% of the tidal banks are natural across the estuary. Increasing natural riverbanks will have a significant positive ecological impact on the river and will help restore fish stocks and manage flood risk
<http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf>
- A Flood Risk Assessment and Water Framework Directive Assessment required and we encourage early pre application discussions
- Contaminated land report required due to previous land uses

6. Historic England – No representation received.

7. GLAAS Historic England

This response relates solely to archaeological issues, if necessary my Historic Buildings and Areas colleagues should also be contacted about statutory matters.

Recommend Pre-Determination Archaeological Assessment/Evaluation

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected

by the proposed development. This information should be supplied to inform the planning decision.

It is recommended that archaeology be scoped in if the Borough is minded to request an Environmental Impact Assessment.

The planning application lies in an area of archaeological interest.

The application site is very large in scale and has five key areas of archaeological interest:

6. Palaeoenvironmental/Prehistoric potential;
7. A medieval church and cemetery, although evidence of this does appear to be limited
8. The Archbishop of Canterbury's Palace (potentially of national significance);
9. A house associated with Thomas Cromwell (again, potentially of national significance)
10. The historic development of the Stag Brewery whose origins I believe may date back to the 15th-century.

There has already been a lot of investigation of the eastern part of the site and it may be that further works here could be dealt with by condition however, the level of investigation in the western part of the site is very limited and further predetermination evaluation is recommended. One reason for this is that the exact location of the original Cromwell house is uncertain and so wider evaluation of this area should be carried out. Additionally the sports field in the south-western part of the site appears to have never been developed and so could have very good archaeological survival. One theory is that the lack of development of the sports field could be related to the location of the original Cromwell House.

The Archaeological Environmental Statement Chapter should be supported by the following:

Desk Based Assessment

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted/

One of the interesting aspects of the site is also the historic development of the Brewery which is through to date back to the 15th century. I therefore also recommend that you seek advice from your conservation officers.

Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS. The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

8. Port of London

The PLA has had pre-application discussions with the applicant and their consultants and these discussions have been extremely useful.

As identified in the Scoping Report, the application site is bounded by the River Thames. The PLA's discussions with the applicant have therefore concentrated on the aspects of the proposed development which are in close proximity to the River Thames including the Thames Path, the potential for a river related facility, the river wall, drainage, lighting, riparian lifesaving equipment, landscaping and maintenance. The PLA expects these discussions to continue as the application is worked up in greater detail.

The PLA would recommend that the transport and access section of the ES considers the potential for the River Thames to be utilised for the delivery of construction materials to and waste materials away from the application site.

9. Sport England

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently, we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 73 and 74, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/>

10. Lead Local Flood Authority

Surface Water and Flooding issues are covered in Section 4.10 of the Scoping Report – all requirements are already being considered.

11. Local Highway Authority

It looks ok from a transport point of view although they haven't said anything on river transport use for construction and why they can't utilise that.

12. Southwest Trains – No representation received.

13. Network Rail

Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The protection of existing and proposed assets is an important consideration to ensure the safe operation of the railway.

Network Rail is a publicly funded organization with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It may well be appropriate to require developer contributions to fund such improvements.

The likely impact and level of improvements required will be specific to each station and each development. In order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

The Developer should contact the Network Rail's Asset Protection Wessex Team well in advance of mobilizing on site or commencing any works.

The initial point of contact is Asset Protection Wessex AssetProtectionWessex@networkrail.co.uk. This department will provide all necessary Engineering support subject to a Basic Asset Protection Agreement.

14. Thames Water

Having reviewed the documents we welcome the acknowledgment that this proposed development could have an impact on water and waste water infrastructure. We would advise that the developer consults with Thames Water at the earliest opportunity.

It is important that the developer considers:

- g. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- h. The surface water drainage requirements and flood risk of the development both on and off site and can it be met
- i. The developments demand for water supply and network infrastructure both on and off site and can it be met
- j. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation
- k. Any piling methodology and will it adversely affect neighbouring utility services.

We would request that evidence that water & waste water capacity exists to serve the development and where it doesn't how this will be addressed is included in the evidence submitted as part of the planning application.

The developer needs to ensure that any solutions address both on and off site issues and they are strategic in nature not piecemeal related to individual phases.

The strategy needs to cover the

What – What is required to serve the site

Where – Where are the assets / upgrades to be located

When – When are the assets to be delivered (phasing)

Which – Which delivery route is the developer going to use s104 s98 s106 etc

It is also unclear as to how buildings & structures will be constructed, Thames Water is concerned that water mains and sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses. Therefore, Thames Water requests that further information on foundation design be submitted for detailed consideration. This will include –

- a. the methods to be used
- b. the depths of the various structures involved
- c. the density of piling if used
- d. details of materials to be removed or imported to site.

Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0800 0093921

15. Richmond Biodiversity Partnerships – No representation received.

16. Southwest London Environment Network – No representation received.

17. LBRuT Planning Policy and Design

Section; para	P&D Comments
4.3 The Proposed Development	<p>The density of the proposed scheme is a potential concern and therefore the EIA should include a full assessment in relation to the density, taking account of the setting (i.e. urban) and the PTAL. Whilst the setting and PTAL are some of the factors to consider when determining an appropriate density for a scheme, other factors include the context and character of the surrounding area and proximity to facilities. In general, The Council encourages higher density development in the more sustainable locations, such as main centres of the borough and areas better served by public transport, subject to compatibility with established character.</p>
2.4 Potentially sensitive receptors	<p>Para 2.4 of the EIA Scoping Report sets out potential sensitive receptors. Include future pupils, existing and future workers, residents and the wider community, and microclimate effects on proposed streets and other publicly accessible open spaces will need to be considered.</p> <p>Also included should be:</p> <ul style="list-style-type: none"> • Surrounding residents • Users of local facilities • Users of existing playing fields and other public open spaces • People using public rights of way, towpaths, cycle routes • Pedestrians generally • Passing traffic
4.3 Proposed Development. Site allocation SA 24 Stag Brewery, Lower Richmond Road, Mortlake	<p>SA 24 is set out in the Publication Local Plan, with submission to Secretary of State in May 2017 and adoption in early 2018.</p> <p>The Council supports the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p>
4.5 Socio economics – Education and Health	<p>An assessment of the likely effects of the development's additional population as a result of the provision of new residential development has to be made in relation to early years provision, primary and secondary school places and primary healthcare facilities.</p> <p>In general, the overall impact on well-being and health should be considered, and any subsequent planning application will require an accompanying Health Impact Assessment.</p>
4.5 Socio economics – Retail	<p>The Site Allocation for the Stag Brewery SA 24 set out in the emerging Local Plan includes commercial uses such as retail. The development proposes 7,700m² gross (GIA) of retail floorspace – the applicant should confirm whether this relates to A1 uses in entirety, or whether this also includes other A uses.</p>

It is estimated that in 2016 East Sheen district centre had approximately 16,000m² (gross) of retail floorspace (convenience and comparison) and therefore this proposal is a very significant amount. Currently Mortlake High Street, with its limited retail presence, is not considered a centre in the borough's centre hierarchy as set out in 7.1.1 of the emerging Local Plan and indeed there is no designated shopping frontage. This amount of retail floorspace (assuming A1 convenience, comparison & A1 service) would easily make the new centre a "local centre" in the borough hierarchy in terms of scale if considered as such.

It should be noted that the Stag Brewery Planning Brief (2011) refers to the creation of small retail units and goes on to state that the retail element should not compete with East Sheen District Centre or other centres, and that retail should be ancillary to the uses on the site.

There are therefore possible negative effects on neighbouring centres, in particular East Sheen district centre. The key point is that the EIA / socio-economic impact assessment should analyse the impact of the proposal on neighbouring centres and establish whether the proposal might draw trade away from centres and thus have potentially negative effects.

There might potentially be positive spin-offs to centres through spending generated from new residents and workers, and the impact of that expenditure should also be covered (in relation to the centres).

I note that a standalone Retail Impact Assessment (RIA) Report is to be submitted to assess the impact on East Sheen, Mortlake and Barnes. There is no information provided on the methodology to be used and therefore there is limited scope to comment at this stage. Clearly the impact of a substantial development of this size needs to be assessed.

Attention is also drawn to para 26 of the NPPF, which states that this should include assessment of:

- (a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- (b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

The assessment should also incorporate a Sequential Test as the site is not a recognised centre in the borough's centre hierarchy.

Please note that under the emerging policy LP25 Section A, subsection 4, a RIA is necessary, and its scope should be agreed with the Council before a planning application is submitted. Paragraph 7.1.19 of the emerging Local Plan states that impact assessments and sequential tests should be proportionate to the scale of development. Although retail is accepted as a potential land use on the Brewery Site, the amount proposed is far in excess of that set out in the Planning Brief.

Under 4.5.3 - Please provide details of what is meant by the "local retail assessments" referred to in 4th bullet point – 4th subsection of.

A1 retail floorspace should be assessed separately to A3/A4/A5 uses. Assessment should refer to the Council's Retail Capacity produced by

	<p>Consultant's Nathaniel Lichfield & Partners. http://www.richmond.gov.uk/richmond_retail_study_november_2014.pdf</p>
<p>4.5 Socio economics – Housing</p>	<p>Under 4.5.1 and 4.5.2 the provision of new homes, including affordable homes, should refer to how the proposal will address local priority needs. Policies CP1, CP14, CP15, DMHO4, DMHO6, LP34, LP36. In relation to the affordable element these must be genuinely affordable in relation to the Council's Tenancy Strategy and Intermediate Housing Policy.</p> <p>The broad approach to proposed mix and tenure may need to be identified to fully understand the impacts. To complement the housing offer in Mortlake the site offers a good opportunity to provide for downsizing for older people, as part of a mix of unit sizes and types. The socio-economic assessment should include an assessment of the range of housing choices being offered, in terms of the mix of housing sizes, types, taking account of needs of different groups, and this includes affordable housing. In particular, we expect the scheme to provide for mixed and balanced communities, in terms of tenure and household income, and this should foster social diversity which will help to create successful and integrated neighbourhoods. Therefore, should the proposal involve segregation by housing tenure, particularly where this could potentially lead to gated communities, then the impacts of this have to be fully analysed and assessed as part of the EIA. Relevant policies are DMHO4, DMHO5, LP35, LP37 as well as London Plan policy 3.5, which requires the design of new development to help create a more socially inclusive London.</p> <p>Note that the submitted EIA Scoping Report does not identify extra care housing as part of the proposal. A significant element of units for extra care housing was included in the pre-app consultation proposals; it is understood that this is no longer being proposed. If it had formed part of the proposal, it would need to have been assessed whether it was addressing local priority needs and the impacts. Therefore, should any subsequent scheme or revisions to the proposals incorporate extra care housing, then this would trigger another review of the EIA scoping report to fully address the potential impacts.</p>
<p>4.5 Socio economics – Employment/offices</p>	<p>Given the shortage of industrial land throughout the borough, the site has been identified as suitable for light industrial B1c. This form of employment use, whilst tending to employ fewer people, is likely to generate less car travel, see Policy LP 42.</p> <p>The site is a former employment site and therefore we would expect small scale, flexible re-provision of employment floor space of benefit to the local economy, and job opportunities for local people. What provision is being made for start-ups? What other spin-off benefits would the scheme provide for the local economy?</p> <p>The EIA should also consider both direct and indirect employment generation in the construction stage and the operation.</p> <p>The impact of the new employment uses, i.e. the proposed 3,400m² GIA of office space, will need to be assessed in terms of direct employment. In addition, there are proposals for alternative employment generating uses, including 5,500m² GIA of hotel uses and 2,000m² GIA of leisure uses.</p> <p>The transport issues arising are important and it is therefore essential to establish potential journey to work areas as a basis for assessing potential means of travel and transport impacts.</p>
<p>Socio</p>	<p>The EIA should include a baseline assessment of the current provision of</p>

<p>economics – playing fields</p>	<p>recreational facilities (including the playing fields) within the local area, along with any deficiencies or surplus capacity in such provision. The Council’s Playing Pitch Strategy and the accompanying assessment report can be used as a starting point in this regard.</p> <p>The EIA has to fully consider the loss of and partial replacement of the playing field. The applicant should note that an artificial grass pitch may accommodate more intensive uses in comparison to a natural grass pitch; however, if it is smaller in size, it may not be able to accommodate those sports for which there is an identified demand. The EIA therefore needs to assess and compare the different pitches in terms of quantity and quality (existing and proposed), and analyse which benefits an “upgraded” (potentially artificial) pitch would bring in comparison to the detriment of the loss of the natural (large) pitch, taking account of supply and demand in the local area.</p> <p>The methodology for the EIA has to follow the guidance and methodology contained within the “Playing Fields Policy - A Sporting Future for the Playing Fields of England”: https://www.sportengland.org/media/121630/document-5-a-sporting-future-for-the-playing-fields-of-england-planning-policy-statement-.pdf</p> <p>It is important that the EIA objectively assesses the likely impacts arising from the development, including both positive and negative impacts.</p> <p>Sport England should also be consulted on the EIA Scoping report and involved in any future discussions.</p>
<p>Socio economics – play space</p>	<p>We note that the EIA proposes an estimation of the new residential site population and child yield arising from the development, and that child yields will be calculated using the GLA Population Yield Calculator and LBRuT SPD on Planning Obligations. In line with the Council’s Local Plan LP 31, the play and child occupancy assessment, the Council’s child yield calculator as set out in the Planning Obligations SPD should be used – this is different to the GLA’s population yield calculator.</p> <p>The Council requires all major development proposals in the borough to meet the play space needs arising out of the development. The proposal includes approximately up to 1,000 residential units, which is likely to result in a significant demand for local play space provision. The EIA needs to include an assessment for play space provision. In line with Policy DM OS 7 and LP 31, all developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. The EIA will therefore need to provide an assessment of needs arising from the new development and follow the London Plan benchmark standard of 10sqm per child.</p> <p>It is expected that the EIA will incorporate a child yield/occupancy and play space needs assessments (including with a breakdown for the different age groups). When assessing needs and play space requirements, consideration can be given to nearby existing play areas, but it should be noted that appropriate facilities would need to be in actual walking distance in line with the Mayor’s SPG, i.e. within 100m for under 5 year olds, within 400m for 5-11 year olds and 800m for 12+ age group.</p> <p>New major development, such as the Stag Brewery, should be integrated within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space will need to be made publicly accessible.</p>
<p>Socio</p>	<p>The Council requires all major development proposals in the borough to</p>

<p>economics – green / open space and green infrastructure</p>	<p>meet the Public Open Space needs arising out of the development. Policy DM OS 6 and LP 31 requires larger developments to provide on-site public open space within the scheme, with the aim to strike a balance between private, semi-private and public open space provision. The EIA should also include an assessment of open space provision in the local area, in line with policy DM OS 6 (Public Open Space). This should be based on actual walking distances rather than as the crow flies. The methodology should follow the public open space categorisation as set out in the London Plan (table 7.2) and relevant Local Plan policies (see LP 12).</p> <p>The EIA should also include an assessment of the existing and wider green infrastructure network, including how the proposed development could impact on it. See Local Plan policy LP 12.</p> <p>The EIA also needs to address the following:</p> <ul style="list-style-type: none"> - Potential visual and townscape impacts, especially any effects on the designated OOLTI - Impacts on well-being and health
<p>4.6 Transport and Access</p>	<p>Not reviewed by Policy & Design team</p>
<p>4.8 Air quality</p>	<p>Not commented on in detail by Policy & Design – Carol Lee is best placed to advise on this.</p> <p>The site is located within a borough wide Air Quality Management Area (AQMA) designated by LBRuT owing to high levels of nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀). Air Quality needs to be a consideration in this development. There is concern on the impact of the development, its location and the nature of the development.</p> <p>The development includes a school. We have a recommendation not to site new school buildings within 150m of a main road, so every effort should be made to try and locate the school buildings away from the road. Use data from our own automatic urban background site at the Wetland Centre for background readings.</p> <p>This site also borders on the river, which may be the least polluting way of delivering/removing construction materials and should be considered.</p>
<p>4.9 Ground conditions and contamination</p>	<p>Not reviewed by Policy& Design team</p>
<p>4.10 Surface water drainage and Flood risk</p>	<p>According to the EA's flood maps, the majority of the site is located within defended Flood Zones 2 and 3. It is also within the Flood Zone 3a High Probability of flooding as identified in the Council's updated Strategic Flood Risk Assessment (SFRA, 2016).</p> <p>As identified in the report, a Flood Risk Assessment will need to be submitted with any planning application for this site. This needs to be carried out in line with NPPF and NPPG policies and guidance on flood risk, the Council's Core Strategy policy CP 3, Development Management Policies DM SD 6, DM SD 7 and DM SD 8, Local Plan Policy LP 21 and informed by the Council's updated SFRA, 2016. As the site is over 1 hectare, a surface water drainage strategy will also be required.</p> <p>The development will also need to comply with policies DM SD 9 and LP 22; this sets out the minimum mandatory targets for water consumption to be achieved for the different types of developments.</p> <p>Foul sewerage in particular could potentially lead to significant impacts on- and off-site if there isn't sufficient capacity in the public sewerage network</p>

	(e.g. overloading of infrastructure, foul water flooding etc). In line with policy DM SD 10 and LP 23 the applicant is required to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development. The developer will be required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation from Thames Water Utilities.
Ecology	Ecology matters have not been reviewed by Policy & Design team
Archaeology	The Site is located within an Archaeological Priority Area (APA) designated by LBRuT. Desk based assessments and, where necessary, archaeological field evaluation should be carried out. The EIA should incorporate an initial assessment of the archaeological potential and significance of a site by consulting with the appropriate specialist bodies, Historic England and the Greater London Archaeological Advisory Service (GLAAS). GLAAS is the borough's archaeological advisers and should be consulted with regard to archaeological matters.
Built Heritage	<p>The Mortlake Conservation Area covers an area within the east of the Site which includes the Maltings, the (former) Hotel and (former) Bottling Hall. Seven listed buildings and structures are in proximity to the Site and twenty listed buildings are within 500m of the Site.</p> <p>Three buildings within the Site are locally designated as Buildings of Townscape Merit; the Maltings, the (former) Bottling Hall, and the (former) Hotel.</p> <p>4.13.1: Refers to the BTMs within the site, however these are other built heritage elements that need to be considered:</p> <ul style="list-style-type: none"> • Boundary wall between Reid Court in Williams Lane and the site is listed; • Site boundary walls to north and south; • Railway tracks and river moorings/ granite paving. <p>Mortlake Green Conservation Area is located adjacent to the south of the site. The character of these Conservation Areas is contributed to by the various statutorily listed and non-statutorily listed built heritage buildings and structures.</p> <p>Development is likely to bring about a change to the extent, scale, massing and character of the site and therefore have the potential to affect the settings and fabric of some of the Buildings of Townscape Merit, Listed Buildings and structures, and the character of Mortlake and Mortlake Green Conservation Areas.</p> <p>The EIA also needs to consider the following:</p> <ul style="list-style-type: none"> • the impact on the remaining pub on the corner of Richmond Rd and Ship Lane that may not be included in the development; • Any impact on setting of nearby listed buildings on Mortlake Riverside • Memorials at present on the site (re-siting has been discussed); and • Other old boundary walls shared between the site and houses on Thamesbank, Mortlake Riverside - many of which are listed.
Townscape and visual effects	<p>4.14.1: In relation to views, the reports mentions that the Maltings is identified as a landmark; the following (underlined> text should be included in the assessment (first bullet point):</p> <ul style="list-style-type: none"> • <u>The visual relationship of the Site to the surrounding area,</u>

	<p>including views up and down stream and across the River Thames, together with key views towards and into the Site, <u>and any potential impacts on the role of the Maltings as a key landmark</u>;</p> <p>4.14.3: We note the reference to 'Consultation is currently underway with LBRUT to agree views to be assessed'- (external) views towards the site were agreed some time ago but maybe this refers also to further views within the site?</p>
Wind and microclimate	Not reviewed by Policy & Design team
Daylight, sunlight overshadowing and light pollution	Not reviewed in detail by the Policy & Design team; however, changes to the duration, quantum and quality of daylight and sunlight to existing residential properties surrounding the site should be considered and assessed. This includes changes to the amount of sunlight amenity to public and private amenity spaces surrounding the site and changes to night-time light conditions attributable to the completed and operational development, including light spill to the River Thames and light pollution generally.
Cumulative effects	The EIA should consider potential wider environmental impacts, especially cumulative impacts associated with the developments that are already under construction.
Waste	The West London Waste Plan was adopted in 2015. This DPD will need to be taken into account when assessing the impacts of waste and producing the Waste Strategy. A Site Waste Management Plan (SWMP) must be prepared for the Development prior to commencement of the Works. The implementation of a SWMP should ensure that good site management practice will lead to a minimisation of waste creation and enable the reuse or recycling of waste materials that arise from the works where practicable. The sustainability Statement must set out clearly how waste will be managed during the works and once the development is completed and operational.
Solar Glare	Not reviewed by Policy & Design team
Noise and Vibration	Not reviewed by Policy & Design team
Odour	Not reviewed by Policy & Design team
Other comments	I note that sustainable construction and energy are not scoped into the EIA. The applicant should therefore note the following:
Sustainable construction and energy (including energy centre)	<p>Relevant local plan policies in relation to sustainable construction are Core Strategy Policy CP1 Sustainable Development, CP 2 Reducing Carbon Emissions as well as Development Management Policies DM SD 1 Sustainable Construction, DM SD 2 Renewable Energy and Decentralised Energy Networks, DM SD 4 Adapting to Higher Temperatures and Need for Cooling, and DM SD 5 Living Roofs. Local Plan policies of relevance are LP 20 and LP 22.</p> <p>It will be expected that the applicant submits the relevant pre-assessments as well as an Energy Statement and the Sustainable Construction Checklist as part of any forthcoming planning application; this does not need to be part of the EIA report.</p> <p>In addition, the Local Plan (LP 22) makes it clear that development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). As this is such a large development site, we would expect on-site</p>

18. LBRuT Ecology Officer

I agree with the majority of the applicants comments in section 4.11, however I think that although the applicant has carried out bat surveys and discounted them roosting on site; they should consider that bats may pass along the river on the northern site boundary/Ships Lane and therefore light/noise/vibrations and disturbance may affect their movement. These effects may be permanent depending upon the duration of the effect and the resulting environment. I would therefore like the scope of the surveys increased to cover commuting bats using the whole site.

19. LBRuT Arboricultural Officer

4.11.3 mentions that there will be a stand-alone Arboricultural Report and whilst this will deal with trees that are to be retained and protected I think it misses the point and presents as a tick box exercise. Trees should be included in the EIA, my rationale for this is that there is increasing evidence to show that trees serve multiple functional purposes as follows:

- Trapping pollutants including PM10 and Nitrogen dioxide
- Absorbing noise
- Encouraging people to shop, exercise/walk/cycle and enjoy their surroundings
- Increasing property value
- Providing shade reducing the risk of exposure to harmful radiation
- Alleviating flooding
- Reducing the urban heat island effect
- Insulating and cooling buildings lessening the need for climate control
- Introducing biodiversity

All of the above are areas that are broached in this scoping document and I think that there should be an element focussing on the value or functionality of existing trees determining retention and also targeting areas of landscaping to tackle elements such as air quality, increased sunlight, providing vegetation to complement shopping and residential areas etc.

20 & 21. LBRuT Environmental Health Specialist Pollution & LBRuT Commercial Environment Health, Consumer Protection**1. Environmental Impact Assessment Scoping Opinion**

The Pollution Control Department for the Regulatory Services Partnership for the London Boroughs of Richmond upon Thames & Merton provide the following response to the Request for EIA scoping opinion for the Stag Brewery, Mortlake, Lower Richmond Rd, London SW14 7ET.

The response has taken into account the following planning policy and environmental noise and air quality guidelines:

- i. Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 13 2011 (As Amended) and Amendment Regulations 2015
- j. National Planning Policy Framework (NPPF) 2010
- k. National Planning Policy Guidelines (NPPG) 2014
- l. LBRuT Draft SPD - Development Control for Noise Generating and Noise Sensitive Development
- m. LBRuT Draft SPD – Air Quality

The emphasis of the Noise and Air Quality SPD's is for new development to implement good acoustic and air quality design principles and we encourage innovative approaches to design, construction, layout and mitigation in order to achieve these objectives.

1.1 Areas of Potential Environmental Impact

It is considered that with respect to the departments responsibilities, there is potential for significant adverse environmental impact to existing residents, business users and new occupiers of the development due to the following environmental issues;

1.2 Noise and Vibration

1. Noise impact from external transportation noise sources such as rail, aircraft and road traffic
2. Noise from mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction.
3. Noise impact from increased numbers of vehicle movements, including delivery and collection vehicles.
4. Noise impact from use of the recreational space
5. Construction noise and vibration impacts.

1.3 Air Quality

1. Air Quality impact from external transportation sources
2. Air Quality impact from additional vehicle movements generated by the new use of the site
3. On-site Energy Generation impact
4. Odour impact from commercial kitchen extraction systems
5. Emissions during Construction and Demolition phases

2. Noise and Vibration- Key issues and Likely Effects

We agree that the key issues that have been identified include;

1. Construction Phase

- a. Temporary noise and vibration effects to existing sensitive receptors surrounding the Site as a result of noise generated by the demolition and construction processes,
- b. Temporary vibration effects to retained Buildings of Townscape Merit within the Site as a result of demolition/construction processes;
- c. Temporary noise effects arising from changes in traffic flows associated with the demolition/construction works;

c. Operational Phase

- a. Change in road traffic noise levels at existing sensitive receptors as a result of the Development once completed and operational; and
- b. Noise generated from new proposed building services plant, any commercial, sports and educational
- c. Operations and proposed public space forming a part of the completed and operational Development on existing noise sensitive receptors surrounding the Site.

It is accepted that internal noise design does not have to be dealt with as part of the EIA process. However internal noise requirements are detailed within Section 5 of the Noise SPD and we expect as a minimum that this process and design principles are followed.

2.1 Approach and Methodology

We do not object to the approach and methodology detailed in section 4.7.3 of the EIA Scoping Report, subject to the following matters being considered;

1. Noise generating development including mechanical services plant, deliveries & collection, leisure activities should be designed to achieve the requirements set in section 6 of the Draft Noise SPD.
2. As a minimum a Demolition and Construction Management Statement (DCMS) and Noise and Vibration Management Plan (NVMP) should be submitted as part of the application.
3. The assessment of the likely effect of changes in road traffic noise levels as a result of traffic generated by the completed and operational development shall include the application of the Institute of Environmental Management and Assessment (IEMA) Guidelines for Noise Impact Assessment 2014 and not the draft version as indicated in the Scoping Report. We expect that the IEMA approach to be fully applied and not just a simple single figure change indicator.

4. The application of good acoustic design principles should form an integral part of the design. Ideally separation of noise sensitive receptors, such as schools, away from noise generating sources such as main roads. The use of innovative noise and air quality mitigation such as green barriers and soundscaping is also encouraged.

3. Air Quality - Key issues and Likely Effects

We agree that the key issues that have been identified include;

1. Construction Phase

- a. Temporary generation of dust arising from the demolition and construction works
- b. Short-term localised increases in traffic-related emissions during the Works and as a result of any temporary related plant and vehicles operating on the Site, and / or local road network and construction car park arrangements;

2. Operational Phase

- a. Long-term changes in local air quality particularly in relation to NO₂ and PM₁₀ levels, due to emissions from vehicles associated with the operation of the completed Development;
- b. Effects on local air quality from heating / energy plant emissions.

3.1 Approach and Methodology

We do not object to the approach and methodology detailed in section 4.8.3 of the EIA Scoping Report, subject to the following matters being considered;

- a. Design –Requirements as set out in LBRUT’s draft Air Quality SPD 5.3 Development Design should be followed with particular reference to sensitive receptors such as schools which should not be sited near busy roads.
- b. Traffic reduction - Requirements as set out in LBRUT’s draft Air Quality SPD 5.3 Traffic Reduction should be followed with particular reference to the promotion of active travel infrastructure (cycling and walking) within the development and to car parking . This should be sited near the entrance to the development to reduce pollution to the development and encourage walking and cycling within the development. The installation of EVCP as per London Plan March 2016 will be required as will car club parking bays. Individual car parking spaces on drives is to be discouraged.
- c. As a minimum a Construction Logistics Plan (CLP) should be submitted as part of the application. It should consider the delivery of construction materials by boat..
- d. All NRMM must be registered and compliant
- e. Air Quality Neutral - Requirements as set out in LBRUT’s draft Air Quality SPD 6.1 Air Quality Neutral should be followed. This development should be Air Quality neutral or better. It is within an AQMA and borders the GLA Air Quality Focus area for 2016/18 which runs along the South Circular down Clifford Avenue to Chalkers Corner on the A316. LBRUT has a duty to reduce NO₂ emissions along this route. This site must play its part in reducing such levels. Any addition to NO₂ will require a section 106 payment towards the Council’s air quality monitoring and work to improve air quality in the area.

22 LBRuT Scientific Officer

There is nothing of any particular note. They are taking the standard approach which is fine.

**23 LBRuT Delivery and Development Manager, Housing and Regeneration Directorate - -
No representation received.**

24 Crime Prevention Officer – No representation received.

25 Metropolitan Police Service – Designing Out Crime Officer

I have reviewed the concept of this design and I have also carried out crime analysis in the local area.

If not designed well, a development of this scale will attract the same crime as I've researched in the local area. As such, I would recommend a Secured by Design planning condition for this development. Under separate cover, I will send through the crime statistics.

26 Barnes Town Centre Manager – No representation received.

27 Richmond CCG

Please see below a response on behalf of the Clinical Commissioning Group (CCG) and Healthy Urban Development Unit (HUDU):

Thanks for the opportunity to comment on the Environmental Impact Assessment Scoping Report (March 2017) prepared by Waterman Infrastructure & Environment Limited.

We note that the impact on healthcare services is identified as a key socio-economic issue in paragraph 4.5.1 of the report and that the report recognises that increased population arising from the development will place additional demand on local primary healthcare facilities.

The approach to assess the impact, as outlined in paragraph 4.5.3 of the report, refers to establishing a baseline position using published data, including the 2011 Census and NHS data. It is unclear what NHS data is to be used. It also refers to an appraisal of the likely effects of the additional population on existing primary healthcare facilities, but it is unclear how this will be assessed.

We note that the CCG is not listed in Section 3 regarding on-going consultation in the EIA process and we strongly suggest that the CCG is consulted on the approach and methodology to be used, including data sources.

Section 2.3 describes the development proposals and indicates that approximately 900m² of healthcare provision would be provided by the development. The report does not indicate how this provision, as mitigation of the development impact, has been calculated, or whether there are alternatives, for example increasing the capacity of existing healthcare premises.

It is noted that the Stag Brewery Planning Brief Supplementary Planning Document (July 2011) supports the provision of education and community uses and facilities within the scheme (paragraph 5.19), but also recognises that appropriate financial contributions could be sought to increase local capacity (paragraph 5.20). The Council's Planning Obligations Supplementary Planning Document (July 2014) supports the use of s106 obligations to mitigate the impact of development on infrastructure that is not planned for delivery through the Community Infrastructure Levy (CIL). It states that s106 contributions may be financial or 'in kind' and where provision in kind is made as part of a development, contributions will be secured for reasonable fitting out costs and provided at nominal rents (paragraph 5.2). It is noted that healthcare is not included on the Council's CIL Regulation 123 List as a potential recipient of CIL so appropriate mitigation would be via s106.

Paragraph 4.5.3 of the scoping report refers to the preparation of a stand-alone Health Impact Assessment in addition to the assessment of healthcare impacts under the EIA process. This is welcomed and accords with Policy LP 30 of the Publication Version of the Local Plan (January 2017). We suggest that the Council's public health team and the CCG are fully involved in its preparation.

28 Achieving for Children – No representation received.

29 LBRuT – Public Health

Due to the quantum of development and impact of construction on the surrounding area we would recommend a full EIA including Environmental Statement. We would like to see cumulative and inter-related impacts considered. Lessons learnt from Nine Elms in particular in context of air quality, noise and dust pollution demonstrates the need for inter-related impacts and structured compliance. In this context we would also encourage the EIA to consider impacts on health and link this to the Health Impact Assessment (HIA) which we would be seeking to be undertaken by the developer as required under planning policy requirement as it is a major development containing 1000 plus residential units.

30 BRE – To provide a Scoping Report Review on Wind Microclimate

1. Does the Scoping Report identify all issues / environmental impacts that need to be addressed and investigated in the EA?

No, for 3 reasons:

1. the Scoping Report does not consider the wind impact of nearby cumulative schemes. It is stated that there are no nearby cumulative schemes. However this situation might have changed at the point of time when the Scoping Report is approved. If this happens then it would not then give the Council the opportunity to ensure that the effect of those cumulative schemes are considered in the ES.
2. it is not stated whether or not balcony or roof terrace wind conditions will be considered (note that for planning purposes, balconies and roof terraces are now frequently being considered as amenity space).
3. the method used to assess “significance” of the wind impact in the ES Chapter is not stated.

2. a. Does the Scoping Report suitably cover and identify:

- the environmental studies that are necessary **No**, as noted above the wind impact of nearby cumulative schemes (if they exist) will need to be determined, as well as the winds upon balconies and roof terraces.
- The baseline surveys and investigations which will be carried out and when; **Yes**
- The level of detail required in the investigations; **No** – there are important details about the test methodology that are not defined. In my opinion the Scoping Report needs to state that the wind tunnel testing will be undertaken in an appropriate boundary layer simulation, and that the level of detail of the model is sufficient that it models the effects of small-scale features. Furthermore the testing should be undertaken for at least 12 approaching wind directions.

Statements about the location and provenance of the long-term wind data used in the analysis, and the method by which this data is transformed to the Stag Brewery site, also need to be provided.

- The methods to be used to predict the magnitude of environmental effects; Yes and No. The Scoping Report states that the Lawson Criteria will be used. The question are i) which Lawson Criteria are to be used? (there are at least three “Lawson Criteria” that have been published), and ii) how will these criteria be interpreted with regards to seasonality?

At this moment, the two above issues are a “hot topic” within the UK wind tunnel testing community. We are now trying to work together to establish a common agreed set of wind comfort and safety criteria. Until this is resolved, I believe it is essential that the Scoping Report states (and references) which Lawson Criteria (wind comfort) is to be used, and which Lawson wind safety criteria are to be used.

The issue of “seasonality” is something that the Council needs to take a position upon. For example, does the Council think that “amenity space” should have suitable wind conditions throughout the year (including the worst-case season), or does the Council accept that for some seasons (e.g. spring, autumn and winter) the amenity space wind conditions will be unsuitable? This decision can have a direct effect upon the economics of the scheme – the more onerous condition is for the Council to insist that amenity space has suitable wind conditions for every season. In my opinion, if the Scoping Report can deal with this specific matter at this point in time, it could remove potential problems in the future¹.

- the criteria against which the significance of effects should be evaluated; No. The evaluation of “significance” has now become a serious matter of contention. As a result, I believe that the significance criteria to be used must be given in the Scoping Report. By providing this information the Council can see for themselves whether or not they agree with the approach suggested.

In particular, I would urge the Council

- i. to consider whether or not they agree that a “minor adverse” significance is appropriate for a location that has unsuitable wind conditions (however “marginal” such wind conditions might be).
- ii. to consider the significance of the situation should there be an exceedance of safety criteria (again by however small a margin)

Finally I suggest that the Scoping Report states explicitly that the wind impact of the wind conditions are evaluated by comparing the wind conditions before and after the scheme is built. This comparison should be made i) based upon the wind conditions themselves, and ii) by considering the wind impact based upon the intended usage of the site.

- [the types of mitigation to be considered](#); **No**. However the type (e.g. trees, barriers) , and the amount of mitigation cannot be known before the initial wind tunnel studies have been completed.
- [alternatives to be considered](#); **Yes** – the Scoping Report mentions that re-testing might be necessary.
- [If not, what is missing?](#)

The Scoping Report does not mention Cycling and Road Safety – both of which are impacted by the wind conditions

3. [Does BRE agree with the effects this project could have on the micro-climate environment, and what has been scoped in and scoped out? Any comments.](#)

- The scoping out of cumulative schemes is discussed earlier in this document. Apart from this matter, I have no other comments

4. [Identify whether BRE agrees with the significance of impact?](#)

- As noted earlier, the impact upon balconies, roof terraces and cycling/roadway conditions is not covered by the scoping Report.

Section 4.15.1 of the Scoping Report states “This is of particular importance to the need to create pedestrian environments of the highest quality.....”. In the wind engineering community wind conditions that are “suitable” for their intended activity are those conditions that are defined as being having either “acceptable” or “tolerable” Lawson wind comfort criteria conditions. If a scheme has the “highest quality” wind conditions, this would suggest to me that the scheme has “acceptable” wind conditions everywhere. That is, “tolerable” wind conditions (which people will think are windy, but will tolerate) are not of the “highest quality”. If this is a requirement of the Council, then in my opinion, this requirement needs to be stated explicitly in the Scoping Report. Alternatively, the Scoping Report should remove such hyperbole.

BRE – To provide a Scoping Report Review on daylight, sunlight, overshadowing and light pollution

Thank you for asking us to review the daylight, sunlight, overshadowing and solar glare scoping material submitted by the applicant as part of the pre-application for the Stag Brewery site in Mortlake. This is contained in a report ‘Stag Brewery, Mortlake Environmental Impact Assessment Scoping Report’ by Waterman Infrastructure & Environment Limited, dated March 2017. No site visit has been undertaken, and the review is solely based on the scoping report, together with indicative proposals for the development in exhibition slides dated March 2017.

31 **BRE - Daylight, sunlight and overshadowing: effects on surroundings**

Guidance on the loss of daylight and sunlight to existing surroundings following construction of a new development nearby is given in BRE Report BR 209, Site Layout Planning for Daylight and Sunlight, a guide to good practice, cited in the Waterman scoping report. This source is widely used by local authorities to help determine planning applications. BRE stands for

Building Research Establishment, not 'British Research Establishment' as stated in the scoping report.

The Waterman scoping report mentions changes in daylight and sunlight to existing residential properties surrounding the Site. These should be analysed. In addition there may be a small number of non-domestic buildings for which loss of light could be an issue. These could include the Little Paradise nursery in Lower Richmond Road, and any pre-school facility in Mortlake High Street. They should be analysed as well if they could be affected by the proposed development. Retail and office buildings are not normally analysed unless they have a particular requirement for daylight.

To assess the impact on the amount of diffuse daylighting entering existing buildings, the BRE Report uses the vertical sky component (VSC) on the window wall. The BRE Report sets out two guidelines for vertical sky component:

If the vertical sky component at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window.

If the vertical sky component with the new development is both less than 27% and less than 0.8 times its former (baseline) value, then the area lit by the window is likely to appear more gloomy, and electric lighting will be needed for more of the time.

The BRE Report also gives guidance on the distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its baseline value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit. This guideline has also been addressed in the Environmental Statement chapter. The areas receiving direct skylight will depend on room layout, and the BRE report does state that where room layouts are not known, which may be the case for some of the surrounding properties, the calculation cannot be carried out.

The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. Access to sunlight should be calculated for the main window of each of the above rooms which faces within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former baseline value, and more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected.

The BRE report also gives guidance on sunlight in outdoor spaces where sunlight is required. The Waterman scoping report mentions public and private amenity spaces surrounding the site. These would include, for example, the Thames towpath area and private gardens to the north to dwellings off Thames Bank and the northern section of Williams Lane. Loss of sun to Mortlake Green need not be analysed as it lies to the south of the site, and would not be significantly overshadowed by the new development.

The Report recommends that no more than half of such an area should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. Where a number of private gardens are affected by a proposed development, each garden is normally considered separately for the purposes of assessment.

Where baseline assessment indicates that sunlight to the existing open space is already in short supply (below or just above the BRE guideline), the loss of sun is significant if the area receiving two hours direct sunlight on March 21 is reduced to less than 0.8 times its previous value.

Daylight and sunlight in new dwellings and proposed open spaces

The Waterman scoping report states such issues will not be dealt with as part of the EIA process, as they do not concern impacts on an existing environment. However, the detailed

planning application will be accompanied by separate stand-alone reports in relation to 'internal' daylight, sunlight and overshadowing issues. This is a reasonable approach.

Daylight and sunlight provision to the proposed dwellings should be evaluated using the recommendations in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' (mentioned in the scoping report) and the British Standard 8206-2:2008 'Code of Practice for Daylighting' (not mentioned). The Standard contains guidance on daylight and sunlight for new dwellings, including recommended minimum values for Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH). As well as for individual private dwellings, the guidance should also be applied to residential care accommodation if this is to be provided.

For daylight in new dwellings, the main criterion is the average daylight factor (ADF), which is a measure of the amount of daylight within a room. The ADF depends on the room and window dimensions, the reflectances of interior surfaces and the type of glass, as well as the obstructions outside. Appendix F of the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' explains that 'it is an appropriate measure to use in new buildings because most of these factors are within the developer's control'.

The British Standard recommends the following minimum values for ADF:

Bedrooms 1.0%
Living rooms 1.5%
Kitchens 2.0%

Where a room has a shared use, the British Standard states that the higher minimum value should apply. However, local authorities frequently accept the living room standard for a shared kitchen/living room, as a small kitchen would not be considered as a habitable room. This is a practical approach, as it is seldom in the final resident's interest to have a closed off, small kitchen which is completely artificially lit in order to force compliance with the Standard for the living room. In these circumstances it could be considered acceptable to have living/kitchen/diners which meet the lower living room recommendation of 1.5%.

Assumptions used in the average daylight factor calculation should be stated. Unrealistic assumptions, for example the use of very high internal reflectances, should not be used.

The British Standard and BRE Report also give guidance on sunlight in new dwellings. This is based on living rooms receiving 25% of annual probable sunlight hours, including 5% in the winter.

The new development is a large one, and it may not be necessary to analyse every dwelling to obtain a picture of the overall daylight and sunlight provision within it. An acceptable approach would be to analyse a subset of dwellings in worst case locations, for example on the lower floors and close to other obstructing buildings, particularly tall ones.

Guidance on sunlight provision in proposed open spaces is given in 'Site layout planning for daylight and sunlight: a guide to good practice'. Here the same guideline is used as for existing open spaces, that no more than half the space should be prevented by buildings from receiving two hours of sunlight on 21 March. Sunlight at an altitude of 10 degrees or less does not count. This should be assessed for proposed courtyards and other gardens, plazas, squares, outdoor café areas and playgrounds, including the proposed school playground. Street and walkway areas that are primarily used for circulation need not be assessed, unless they contain significant seating or garden areas.

For a large development like this one, shadow plotting would be recommended to show the times of day when outdoor areas are overshadowed, especially the Thames Path. For this development, an assessment could include shadow plots on an hourly basis on March 21. Additional shadow plots for the summer (eg June 21) could also be helpful.

Solar glare

Solar glare, or dazzle, can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users outside and the occupants of adjoining buildings. Solar glare is more of a problem where there are large areas of glazing or reflective cladding, or where there are areas of sloping glazing which can reflect high angle sun.

The Waterman scoping report has suggested that solar glare could be scoped out of the EIA as the buildings will use a brick based palette of materials and new metal cladding would be oriented so as to 'fracture' any reflected solar light. This will only become clear at the final design stage once building materials have been selected. So a reasonable approach might be to scope solar glare out of the EIA, but to reconsider the potential for glare as part of a planning condition requiring approval of building materials by the local authority.

Looking at the indicative masterplan, the main area where solar glare might be an issue is at the proposed hotel site which is at the junction of three main roads (Lower Richmond Road, Mortlake High Street and Sheen Lane). Having reflective elements on a building here might cause problems for drivers, particularly those travelling east on Lower Richmond Road, and north along Sheen Lane. However the exhibition material appears to suggest that the existing brewery façade would be retained for the new hotel, and therefore there would be little scope for significant additional glare.

Light pollution

The Waterman scoping report mentions light pollution, but not how it would be analysed (the two guidance documents cited, the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' and BRE Digest 350, do not address light pollution).

Guidance on suitable lighting levels to limit obtrusive light is contained within four key documents:

- Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light GN01:2011
- BS EN 12464-2:2014
- CIE Guide on the limitation of the effects of obtrusive light from outdoor lighting installations
- BRE Digest 529 'Obtrusive light from proposed developments'.

There is generally good agreement between the numerical criteria on obtrusive light contained in the key documents above, except in the case of upward light, where BS EN 12464-2:2014 is less stringent than the other documents. The key documents above give various recommendations covering:

- limiting vertical illuminances on windows of neighbouring dwellings;
- limiting values for light source intensity, in a potentially obtrusive direction such as towards a house or garden, or in this case across or along the River Thames;
- limits on the luminance of floodlit buildings;
- limits on upward light ratio from the installation, in order to reduce upward light that causes sky glow, making it difficult to see the stars.

The concept of a curfew is also introduced, where lighting is switched off or reduced at set times (guidance suggests between 2300 and dawn) to save energy and limit spill light when lighting is not actually needed. Different guidelines are given before and after curfew hours. The limits depend on the location of the site (for example whether it is an urban or rural site).

The Institution of Lighting Professionals also give separate guidance on the brightness of illuminated signs, which could be particularly relevant to the hotel and cinema buildings.

In a light pollution study, baseline assessment normally involves on-site night time measurement of light spill in key directions (for example near to existing houses and gardens), together with luminance measurements of floodlit buildings, if any. Upward light ratio is difficult

or impossible to measure on site, and usually has to be estimated from a consideration of luminaire type.

For the proposed development, key areas for consideration include the rear gardens and rear facades of dwellings at the north of the site (they may currently be unaffected by road lighting), the views along and across the River Thames, and Mortlake Green, opposite the proposed cinema.

At the EIA stage, two approaches to evaluation of the proposed lighting are possible. Where a full lighting design is available, it can be assessed directly against the criteria in the guidance documents. This is the preferred approach. However a detailed lighting design may not be available. In this case it is acceptable to provide a qualitative assessment of the overall lighting strategy, on the basis that proposed lighting will be designed in order to comply with the published guidelines. This will normally require further calculations of light pollution at the detailed design stage in order to show that the guidelines have been met for key sensitive receptors. A planning condition may be imposed to require this.

32. Mortlake Brewery Community Group

Stag Brewery Mortlake		
Environmental Impact Assessment Scoping Report by Waterman IE		Comments by Mortlake Brewery Community Group
1.	Introduction	No comment.
2.	The Site and Proposals	
2.1	Site Location and Setting "Buildings within the Site vary in height and range from approximately 2 to 8 storeys." "Three buildings located within the former Stag Brewery.... are non-statutorily designated Buildings of Local Townscape Merit." "An area of approximately 2.1 ha within the west of the site is occupied by the Watney's Sportsground playing fields." "The Chalker's Corner Junction component of the Site includes.... a grassed area adjacent to the Lower Richmond Road and Chertsey Court."	The tallest building, the Maltings, is at least 8 storeys but it should be noted that the storey heights are substandard. No mention of significant trees (including TPOs) and landscaping within the site and its setting. No mention of the playing fields being an 'Other Open Space of Townscape Importance' (OOLTI). No mention of this grassed area and its trees being an OOLTI.
2.2	The Surrounding Area "The Richmond Training and Development Centre at the Old Bakery is located approximately 25m southwest of the Site to the south of the Lower Richmond Road. The centre provides community facilities including those for the Mortlake Community Association and pre-school child day care. Little Paradise Nursery is located to the south of the Lower Richmond Road directly opposite the Site's southern boundary." "Open and amenity space, including the River Thames towpath.... and Mortlake Green...."	This should be corrected as follows: The Barnes Children's Centre at 67b Lower Richmond Road is located approximately 25m southwest of the Site to the south of the Lower Richmond Road. The Children's Centre, despite its name, serves the families of Mortlake, Kew and North Richmond. The Mortlake Community Association uses one of the rooms for community activities part of the week. Half the building is occupied by Working Mums, a pre-school day care provider. Little Paradise Nursery is located to the south of the Lower Richmond Road directly opposite the Site's southern boundary. No mention of Mortlake Green and the 'Apex' garden within Chertsey Court being OOLTIs. No mention of numerous significant trees (including TPOs) and landscaping in the surrounding area which contribute to the setting.
2.3	The Development Proposals "Approximately 1,000 residential units...." "Approximately 900m ² of healthcare provision." "New secondary school is proposed within the west of the site."	No indication of affordable units. Not clear if this includes a health centre like at Sheen Lane. No indication of the size of the school/number of pupils.

Stag Brewery Mortlake	
Environmental Impact Assessment Scoping Report by Waterman IE	Comments by Mortlake Brewery Community Group
<p>"An area for a playing field would be provided for the school which would also provide community use."</p> <p>"Public open space will include public squares between buildings."</p> <p>"Other pedestrian and cycle routes would be provided within the Development creating permeability through the Site from the south towards the River Thames and the towpath."</p>	<p>Is one playing field seriously going to be sufficient for the size of school/number of pupils? Is 'field' a misnomer? How is a playing field defined in terms of use and size?</p> <p>Will residents, who have bought expensive housing units, seriously expect the spaces between buildings to be public?</p> <p>Worth noting that there is conflict between pedestrians and cyclists on the towpath and that, as part of the National Trail, there is pedestrian priority along the towpath.</p> <p>N.B. No mention of the proposals to widen the junction at Chalker's Corner taking land from the grassed area in front of Chertsey Court.</p>
<p>2.4 Potentially Sensitive Receptors</p> <p>"Existing residential properties surrounding the Site, including those located along Thames Bank, Williams Lane, the Lower Richmond Road and Mortlake High Street."</p> <p>"The River Thames and Tidal Tributaries SMI...."</p> <p>"Mortlake Green and Mortlake Conservation Areas."</p> <p>"Users of the Watney's Playing Fields."</p>	<p>Worth mentioning that there are many residential properties in cul de sacs off Lower Richmond Road, for whom access onto the main road is difficult and could become more so as traffic increases. If this includes the towpath it must say so.</p> <p>Again no mention of significant trees (including TPOs) and landscaping.</p> <p>Including birds and other wildlife?</p>
<p>3. Consultations</p> <p>"Community groups...."</p>	<p>Add special interest groups.</p>
<p>4. Key issues to be addressed by the EIA</p> <p>4.1 Introduction</p> <p>4.2 Alternatives</p> <p>"The ES will present a description of the main alternatives.... that were reasonably considered by the Applicant prior to selection of the final scheme. A summary will be provided of the reasons for selection of the final Development design...."</p> <p>"Since the site is in the ownership of the Applicant and is currently vacant, the Applicant has not and will not consider any alternative sites for the Development. Accordingly, alternative sites will not be considered in the ES."</p>	<p>No comment.</p> <p>It is very important that the ES does this, leaving no stone unturned.</p> <p>It is important that the Council's consideration of alternative sites for the school is included in the ES, otherwise the ES is not complete. The Mayor/GLA will surely ask for this information to be included when the application is referred to them.</p>

Stag Brewery Mortlake	
Environmental Impact Assessment Scoping Report by Waterman IE	Comments by Mortlake Brewery Community Group
	<p>In addition it should be noted that the Chalker's Corner site is not in the ownership of the Applicant.</p>
<p>4.3 The Proposed Development</p> <p>"The description of the Development in the ES will include a factual description of sustainability measures."</p>	<p>It is good to see that sustainability measures have been included and we look forward to seeing what these are.</p>
<p>4.4 Development Programme, Demolition, Alteration, Refurbishment and Construction</p>	<p>We also look forward to seeing how a vast amount of earth will be removed from the site in order to create a basement for the majority of the parking demand. Will it be barged off?</p>
<p>4.5 Socio-Economics</p> <p>"The contribution of new homes, including affordable homes, to local policy housing targets."</p> <p>"An appraisal of the likely effects of the Development's additional population on existing early year provision, local primary and secondary schools, primary healthcare facilities, open space and children's playspace."</p>	<p>Good to see affordable homes mentioned here, but what percentage?</p> <p>Noted that these effects will be considered and we look forward to seeing the results in both the EIA and in the separate Health Impact Assessment.</p>
<p>4.6 Transport and Access</p> <p>"The assessment of transport and access will consider the.... effects of the completed and operational Development upon pedestrians and cycle facilities."</p> <p>"The assessment of transport and access will consider the.... effects of the completed and operational Development upon the local road network and associated effects on driver journey times through key junctions."</p> <p>"The TA.... will include a full multi-modal impact assessment which will consider the impact of the Development on all transport infrastructures surrounding the Site."</p>	<p>This is especially important in the area around the Sheen Lane level crossing.</p> <p>This is a key issue and it is important that correct assumptions have been made about traffic generated by the type of development proposed.</p> <p>We look forward to seeing this and hope it includes assumptions about extending the 209 and 22 bus services to Kew Gardens, etc. The TA will in addition need to include guidance on Travel Plans to be produced on behalf of the residents, school and other users – these must provide clear evidence of effectiveness and enforceability.</p>

Stag Brewery Mortlake		
Environmental Impact Assessment Scoping Report by Waterman IE	Comments by Mortlake Brewery Community Group	
	<p>"It should be noted that the assessment of temporary traffic flows associated with the Works upon the local road network will account for traffic arising from the movement of demolition and construction waste."</p>	No mention here of the disposal of waste and import of construction materials by barge.
4.7	Noise and Vibration	It is noted that the noise measurement locations in Figure 1 of Appendix B are presented on a plan showing a different location for the school than appeared at the exhibition in March. Does this plan predate or postdate the exhibition plan?
4.8	Air Quality <p>"Temporary generation of dust arising from the Works leading to potential dust nuisance to surrounding sensitive receptors." "Long term changes in local air quality particularly in relation to NO₂ and PM₁₀ levels due to emissions." "As LBRuT undertakes air quality monitoring across the Borough, some of which is in proximity to the Site, additional monitoring is deemed unnecessary and will not be undertaken."</p>	<p>No mention specifically of asbestos.</p> <p>This is a key issue, particularly at the Chalker's Corner junction, in Chertsey Court and along the Lower Richmond Road. No mention specifically of PM_{2.5} and nano particles.</p> <p>We note the Council's reference in Appendix B to schools not being within 150m of the main road and we look forward to seeing the proposed new location of the secondary school.</p> <p>The only monitoring stations in the vicinity are at Lower Richmond Road/Kingsway and at the Sheen Lane railway crossing. We urge the Council to install a monitoring station at Chalker's Corner in front of Chertsey Court.</p>
4.9	Ground Conditions and Contamination	No comment.
4.10	Surface Water Drainage and Flood Risk	<p>No mention of how to manage residual risk – whether through raised floor levels or through emergency planning procedures. If the latter, a site-specific emergency evacuation plan should be developed, this being particularly relevant for the more vulnerable users of the site, school, residential, etc.</p> <p>Nor is there mention of whether the towpath and surrounding areas should still be allowed to flood as it does quite frequently at the moment, and how will this be managed through the construction phase.</p>

Stag Brewery Mortlake		
Environmental Impact Assessment Scoping Report by Waterman IE	Comments by Mortlake Brewery Community Group	
4.11	Ecology <p>"A Preliminary Ecological Appraisal (PEA).... was undertaken...." "Surveys were undertaken between May and July 2016. These surveys confirmed the Site and the adjacent Jolly Gardeners Public House do not provide any existing habitat for black redstarts or roosting bats."</p>	<p>Why has this not been appended? Why was this survey period so short? Ecological surveys are often done in the course of a whole year. We would expect extensive suites of bat surveys to be undertaken on all the buildings. Surely the existing trees on the Site provide habitats and feeding opportunities? The site is also known to be home to acid grassland and a plant list will be required.</p>
4.12	Archaeology (Buried Heritage)	No mention of the time likely to be allowed for rescue archaeology given the importance of the site. This is very important.
4.13	Above Ground Built Heritage	No mention of photomontages demonstrating how the settings of existing historic buildings might be affected, albeit this is mentioned under Townscape and Visual Effects below.
4.14	Townscape and Visual Effects <p>"As indicated previously, the Site comprises Buildings of Townscape Merit, and is set amongst a number of Listed Buildings...." "Consultation is currently underway with LBRUT to agree the views to be assessed. A combination of verified wireline and rendered photomontages would be produced to demonstrate and assess the likely effect of the Development upon townscape and key views."</p>	<p>As indicated previously, no mention of the playing fields and grassed area at Chertsey Court being OOLTIs and no mention of existing significant trees (including TPOs) and landscaping. The ES will be seriously incomplete if it does not address these assets.</p> <p>Will there be any consultation with the local community about the views to be assessed? There is no distinction made between visual intrusion which is subjectively assessed and visual obstruction which is more objectively assessed. Properties in Williams Lane are likely to experience the latter.</p>
4.15	Wind Microclimate <p>"A change in the wind conditions immediately adjacent to the Site once the Development is completed, including the River Thames."</p>	Good to see the River Thames included but it must be emphasized that this is not just the towpath but the river itself where users, particularly dinghy sailors, can be exposed to adverse microclimate. We understand the 12-storey tower is to be removed from the plan, and this should improve such conditions.

Stag Brewery Mortlake		
Environmental Impact Assessment Scoping Report by Waterman IE		Comments by Mortlake Brewery Community Group
4.16	Daylight, Sunlight, Overshadowing and Light Pollution	We envisage this being a critical issue both in the surroundings of the site, including along the river and towpath, and also within the site itself where we are concerned that spaces between buildings are very tight, the density of development being way above the GLA threshold. We are also concerned about the light pollution from the proposed floodlighting of the playing field and its impact on local residents and also on wildlife and plants.
4.17	Cumulative Effects	No comment.
4.18?	Section missing on sustainability measures?	As well as the adverse effects listed above it is important surely for the Applicant to demonstrate the benefits of the sustainability measures mentioned in Section 4.3 above.
5.	Insignificant Issues Waste "The number of vehicular trips generated by the Works will be quantified, taking into account the likely volume of waste to be generated...."	As mentioned in Section 4.6 above, we trust that vehicular trips will include trips by barge?
6.	Proposed Structure of the Environmental Statement	No comment – it follows the Structure of Chapter 4 of the Scoping Report – but there is a section on sustainability measures which could be included.

33 Barnes Community Association – No representation received.

34 Barnes and Mortlake History Society

These comments relate to the history and heritage of the Stag Brewery site. The issues raised are of much concern to the members of the History Society.

The proposed development would either border on or be in the close proximity of 14 buildings and structures that are Grade II Listed, and some 46 that are of Townscape Merit. These properties are of considerable historic importance and could be materially affected by the new development. The site should therefore be designed in sympathy with these existing buildings.

The houses along Thames Bank are of particular importance (Leyden House is the oldest surviving house in Mortlake) and have stood in the historic centre of the village since the 15th century. The houses are also of aesthetic importance and enhance the very popular tow path walk and show Mortlake off to great acclaim on Boat Race day. The new buildings behind Thames Bank should not therefore distract from these buildings in height, style or building material.

An Archaeological Impact Assessment was carried out in 1995 by the Museum of London when work on the Eastern section of the brewery site was developed. This identified several areas of particular importance – the Archbishops Palace/Mortlake Manor House, Mortlake's original medieval church and a lost road which dated back to at least as far as the 16th century. Archbishops of Canterbury used the Palace frequently from before the Domesday Survey until 1536 when it was granted to Thomas Cromwell. Several monarchs are known to have visited the Palace. A thorough archaeological excavation of the site could yield findings of national historic significance.

In addition (and not included in the 1995 Assessment) are the remains of the old Cromwell House, probably dating back to the late 15th century, which now lie under a part of the Western site of the brewery. This house had a long history and all of its owners have been identified. No archaeology has ever been undertaken on this site and therefore important evidence of the House's past would be discovered should an investigation and excavation take place.

The playing field has never been built on. It was a part of Mortlake's medieval common field system and was called Clay Ends. In 1614, it was bought from the Mortlake Vestry by the then owner of Cromwell House. It was used for grazing and, since the First World War, has been used as a sports field.

The heritage of this original historic core of Mortlake, which lies adjacent to and under the Stag Brewery site should be taken into consideration at every stage of the site's development.

- 35 Mortlake Community Association – No representation received.**
- 36 Mortlake and East Sheen Society – No representation received.**
- 37 Sheen Conservation Group – No representation received.**
- 38 Rowing clubs**
 - a. Quintin Boat Club – No representation received.**
 - b. Tideway Scullers School – No representation received.**
 - c. Barnes Bridge Ladies Rowing Club– No representation received.**

1. Response from Mr. M. R. Millington, resident of Williams Lane:

I write in relation to the above scoping exercise. The exercise has only been brought to my attention very recently, just prior to the expiry of the 28-day period for responses. As such, responses are non-exhaustive and necessarily brief, but I would be happy to expand on these and, where applicable, provide cross-references to the scoping report prepared by Waterman Infrastructure and Environment Limited dated March 2017 (the **Waterman Report**). I can be reached at max_millington@hotmail.com.

1. BACKGROUND

I am a resident of Williams Lane and live adjacent to the Stag Brewery site. I acquired the property on construction in December 2011, after (and in reliance upon) publication of the 2011 planning brief (a supplementary planning document for statutory purposes, the **2011 APB**).

The location of the Williams Lane and Wadham Mews residences (the **Trinity Mews Development**) is set out in the Indicative Plan annexed to the 2011 APB as 'Approved residential development'. It can be seen, completed, to the north-west of the Site in the picture shown at pages 4 and 5 [here](#).

The Trinity Mews Development comprises some 17 houses and approximately 60 apartments – an estimated 170, directly-affected, local residents, all of whom took up residency on the basis of the 2011 APB. Although not a formal representative of the residents, and I have not had the opportunity to discuss these representations with them, I have been acting as a liaison contact for the group in recent discussions with the developer. I am also seeking to reach out to a wider group in the immediate vicinity of Williams Lane. This group is therefore a significant consultee in the brewery site planning process and I would ask that appropriate weight be given to these comments.

2. GENERAL

- 2.1 **2011 APB:** Initial consideration was given to environmental issues at the time of preparing the 2011 APB. For these and other reasons, the 2011 APB reached several conclusions, including: (i) that housing should generally be low density, and if taller buildings were required, they should be situated towards the centre of the site where existing, taller industrial buildings were and are currently located; (ii) that green space, and in particular, the playing fields, should be retained for the benefit of future generations; (iii) that a small primary school, rather than a large secondary school, should be included; and (iv) that the development, including having regard to transport, should be sustainable.
- 2.2 The proposed Development (as defined in the Waterman Report, and hereinafter, the **Development**) reverses or otherwise places material risks on the delivery of these key conclusions. Some of the issues raised are set out below.
- 2.3 In principle, the starting point for the EIA should be that the 2011 APB represented a balanced assessment of how environmental issues could properly be addressed against the backdrop of the (then-current) legislative and best-practice framework.
- 2.4 Environmental impact assessment, pursuant to the legislation referred to in the Waterman Report and the National Planning and Policy Framework (**NPPF**), is now even more stringent, as well as being politically sensitive. It is therefore vital that each deviation from the 2011 APB be evaluated and, unless neutral or an improvement on the 2011 APB, should be dismissed. The EIA should impartially, and relying on proportionate evidence, demonstrate that this is the case.
- 2.5 Finally, the EIA should allow the Developer to demonstrate objective compliance against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 which implement the European Directive 2001/42/EC on 'the assessment of effects of certain plans and programmes on the environment' (the 'strategic environmental assessment' directive or SEA Directive) in England. The Directive describes the objective of SEA as to "*provide for a high level of protection of the environment and to contribute to*

the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development".

3. IDENTIFIED ISSUES TO BE ADDRESSED

- 3.1 **Impact of Development (especially high housing density and a large secondary school, plus sixth form) on air quality:**
- 3.2 Paragraph 109 of the NPPF states that, *'The planning system should contribute to and enhance the natural and local environment by ... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability'*.
- 3.3 Further, at para. 110, it states: *'In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.'*
- 3.4 The playing fields are situated immediately adjacent to the Lower Richmond Road. Recent studies showed that this particular area, especially at Chalker's Corner (approx. 0.3km away), suffers from being one of the worst areas in London for air pollution, where noxious emissions exceed legal and recommended levels.
- 3.5 Furthermore, it was identified as being a Council 'Air Quality Focus Area' - such was the acknowledged poor level of air pollution and the desirability for improvement.
- 3.6 The proposed Development, as currently contemplated, is therefore strongly at odds with planning law and public policy requirements. First, by removing the grass playing fields, and (if effected) the trees on that part of the Site, there will be a removal of the vegetation that mitigates the harmful effects of vehicular transport. Furthermore, and more significantly, the Development plans would materially increase the number of road users, to an unsustainable level, which will inevitably add to and slow down existing traffic in the area. This must be assessed by the EIA.
- 3.7 **Local Plan:** Reference is also made to paragraphs 154, 156, 157 of the NPPF as they pertain to environmental issues affecting Local Plans. The Site is the subject of a site allocation (SA 24) in the Local Plan which is currently awaiting submission to the planning inspector. A number of representations have been made to the Inspector demonstrating material non-compliance by the Council's proposed Local Plan in respect of environmental issues. The EIA should assess compliance with those issues to allow the inspector to benefit from their findings in a cost-efficient manner.
- 3.8 **Protected nature of the playing fields:** An application dated on or about 14 February 2017 – prior to any planning application being made – has been made to designate the playing fields as a Local Green Space pursuant to the para. 76 of the National Planning Policy Framework. There appears to be a *prima facie* strong case for the playing fields to receive that designation, for the reasons set out in the letter.
- 3.9 **Impact assessment: comparator:** The Waterman Report proposes (at para. 4.5.1), in relation to an analysis of socio-economic impact of the Development, that the assessment should be based on there being no activity presently on the site since it closed. If that approach is accepted, the same must be said for the comparator as to whether or not the Development will result in the environmental position being positively or negatively impacted – e.g. will it result in any net increase in air pollution or other noxious emissions vis-a-vis a currently dis-used site.
- 3.10 **Impact on eco-systems:** Paragraph 100 of the NPPF states that:
'The planning system should contribute to and enhance the natural and local environment by:
 - *protecting and enhancing valued landscapes, geological conservation interests and soils;*
 - *recognising the wider benefits of ecosystem services;*
 - *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;...*
- 3.11 Paragraph 111 then states that, *'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield*

land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.'

- 3.12 The playing fields are a greenfield site, and of high environmental importance. As planning policy and decisions must not seek to require development of such a site, an assessment of whether the Development would include building on a greenfield site – as clearly appears to be the case – and whether the Development would have a negative impact on eco-systems and bio-diversity, taking due account of how these interact closely with the adjacent river – for instance, one frequently sees stalks and seagulls on the site.
- 3.13 **Listed monument:** The Waterman Report acknowledges the listed status of the Cromwell House gates. The Development, as currently proposed, seeks to encourage traffic flow to within 1.5 meters of those gates. The additional traffic flow and related emissions will cause damage to the appearance – and potentially the structure – of the listed monument. This should be assessed and, if it proves to be the case, traffic should be routed away from Williams Lane.
- 3.14 **Flooding:** An assessment should be made of whether the Development could cause any areas on or around the site currently designated as flood zone 2 to be given a lower designation.
- 3.15 **Chalkers' Corner:** Although the subject of the request, there is no (or very limited) discussion of this aspect of the Development.
- 3.16 **School:** As noted above, the developer seeks to reverse the 2011 APB as regards provision of a two-form entry primary school by including a six-form entry, plus sixth form, secondary school. It cannot be considered sustainable development to site a school any larger than the bare minimum in a known pollution hotspot with poor transport links and access: the Council owes a duty of care to its students and its staff. Consequently, the developer should incorporate no school, or a much smaller school, on the site to mitigate its environmental, health, transport and amenity impact on the site and its environs.

4. SPECIFIC REFERENCES TO DRAFT TEXT

- 4.1 Para. 2.3 (and generally) – references to providing playing fields should be re-worded to reflect the removal of the existing grass playing fields and the replacement in part only with a synthetic pitch.
- 4.2 Para. 2.4 – receptors: reference should also be made to Wadham Mews residents and to the 'Working Mums' nursery school on the Lower Richmond Road.
- 4.3 Para. 4.2 – alternatives: this is a key aspect of the EIA and should be considered. In particular, other locations for all or part of the secondary school and housing.
- 4.4 Para. 4.3 – the Proposed Development:
(a) to include details of anticipated traffic movements across and around the site (vehicular and pedestrian), including related emissions versus current emissions;
(b) to include details of any use of building roofs and floodlights;
(c) to include details of expected hours of use of the different areas of the site;
- 4.5 Para. 4.5.2 – Likely Effects (Socio-economic): clearer reference should be made to the proposed provision of a secondary school and the removal from the 2011 APB of a primary school.
- 4.6 Para. 4.5.3 – Approach and methodology: in ascertaining child yields, due account must be taken of the anticipated profiling of new residents – which one would expect to be heavily skewed towards couples anticipating, or having, young families, rather than of secondary school age.
- 4.7 Para. 4.6.1 – Key Issues (Transport and access): this needs to:
(a) make clear how land-locked the site is as a result of the river and the A316 to the north and west, a single-lane Mortlake High Street to the east and the railway line to the south. This is a material issue which will impact a number of assessments;
(b) consider impact on Mortlake station and up the train line to London of an additional 1,000 to 2,000 users of peak time rail transport from Mortlake – e.g. at Barnes and Putney where people will no longer be able to get on trains.
- 4.8 Para. 4.8 – Air quality: to note this has the potential for a material impact and so must be assessed in great detail on the basis of reasonable assumptions (including as to traffic).
- 4.9 Para. 4.8.2 – Likely Effects (Air quality): Long-term changes needs to refer also to the impact of the Development on surrounding areas, especially roads.

- 4.10 Para. 4.16.1 – Key issues (Daylight, sunlight, overshadowing and light pollution): To note the 2011 APB is prescriptive as regards building height and density (i.e. low-level residential of varying heights of up to three storeys to the north of the playing fields), in part to limit the impact of the Development. The proposed Development must be brought into conformity with these requirements and then be assessed. Buildings to be set back as far as possible from existing residential buildings to mitigate this risk. Testing should include all residences on Williams Lane.
- 4.11 Para. 5.3 – scoping out solar glare: this should not be scoped out, on the basis there are frequent near-collisions on the Lower Richmond Road (including at the pedestrian crossing) where drivers cannot see because of the sun. If there is any risk this could be aggravated by the Development, in view of the potential loss of life, this should be retained.
- 4.12 Para. 5.4 – scoping out archaeology: this is an area which has been inhabited for a long time, including by some of the most prominent statesmen and women. It also borders the River Thames. I will defer to the Mortlake and Sheen Historical Society – but at first glance, it seems illogical to carve this out from the scope, even if just for the period after the Works given how much of the site is presently not built upon and the plan to build upon exactly those areas.

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