

Addendum to Appendix A

A-2.19 London Borough of Richmond upon Thames – Environmental Health Officer

A.20 LBRuT's environmental health officers provided the following advice in correspondence dated 28 September 2017.

1. Noise & vibration

LB Richmond upon Thames considers the main issue will be construction noise and vibration and the report indicates that the relevant guidelines will be applied.

In terms of noise sensitive receptors I consider that house boats must be included as well as permanent dwellings on the river side.

Where predicted noise levels indicate significant adverse impacts then the procedures in BS5228: 2009 Control Noise from construction sites must be followed.

2. Air Quality

LB Richmond upon Thames considers the main concerns from an air quality perspective are around dust generation, odour and number of vehicle movements which could adversely impact on the health of local residents and businesses all of which are raised:

Sub-section 7.3 (pp.34-37) identifies the potential impacts of the proposed scheme on air quality and climatic factors, which are summarised for the construction and operational phases of the scheme in Table 7-3 (pp.35-37). The impacts of the proposed development on climate change, in terms of emissions of greenhouse gases, were not classed as significant.

4.8.1 For the construction phase, Table 7-3 reports that the scheme is expected to give rise to the following significant impacts, which would be covered in the assessment:

- Potential adverse impacts on air quality and AQMAs from the release of dust during project construction.
- Potential adverse effects on local residents and businesses from the release of odours from channel excavation through landfill;
- Potential adverse impacts on air quality and AQMAs from emissions from construction traffic and plant.

A large amount of material and waste will need to be transported during the construction phase of Teddington Weir (Estimated CD&E waste: 2,000 cubic metres) and Ham Lands Flood Storage Area & Potential Habitat Creation Area (Estimated CD&E waste: 90,000 cubic metres) – a significant part of this should be done by use of the river in order to help reduce NO2 emissions and

dust/mud/congestion on surrounding residential roads.

Estimating likely odour impacts will partly be dependent on weather and wind direction. Mitigation could be difficult – what plans will be in place to cope with such circumstances? The exact location is difficult to see but it states “An approximately 20m wide, 20m long & 5m deep channel will be cut through the island, approximately 10m upstream of the existing boat rollers & 70m downstream of the footbridge”.

The proponent should be mindful of the location of the Lensbury Club and regular weddings/events during the summer months, as well as local residents. Ideally work which will involve deep noise vibration and the potential emission of odour should be avoided during the summer.

“Ham Lands Flood Storage Area & Potential Habitat Creation Area - An area of woodland approximately 4.5ha within North Ham Lands, which is currently above the floodplain level, will be excavated, lowering the ground level by approximately 2m”. The Mayor of London has just announced a request to increase tree canopy by 10% across London to help improve air quality. It is requested that the proponent reconsider this area, retaining as much of the tree canopy as possible and excavate grass areas in preference?

A-2.20 London Borough of Richmond upon Thames – Ecology Officer

A.21 LBRuT’s ecology officer provided the following advice in correspondence dated 28 September 2017.

LB Richmond upon Thames considers the value of Ham lands as it stands is missed in the EIA documentation and therefore surveys should include:-

Construction phase

- Negative impacts to the existing habitats/biodiversity at Ham Lands from lowering the ground level
- Negative impacts to the existing habitats/biodiversity at Ham Lands from installation of the temporary compound including lighting and noise
- Impacts to any wildlife corridors of bats and badgers (ie disruption to badger runs and bat commuting routes)
- Loss of floral species such as orchids
- Japanese knotweed was abundant on the area destined for reduction – dropping the levels may well uncover dormant strands of JKW

Operational phase

- Negative impacts of losing the existing habitat (woodland/scrub) to be covered by the ‘bund’ on another area of Ham Lands
- Positive/negative impacts of the new habitat to be created on the bund – what

is this habitat?

- Impacts to any wildlife corridors of bats and badgers
- Loss of floral species such as orchids
- Transfer of JKW molecules to new location and therefore new stands of JKW which will need to be treated.
- The introduction of polluted water from upstream into a Local Nature Reserve

The main species that the applicant needs to be concerned with include but are not restricted to; badgers, bats, orchids, terrestrial invertebrates, song thrushes and white-letter hairstreak butterfly.

A-2.21 London Borough of Richmond upon Thames – Parks

Parks key concern will be the protection of the towpath for amenity purposes and the survey needs to assess any impacts from changes to tidal inundations on the foundations of the towpath.

A-2.22 London Borough of Richmond upon Thames – Arboricultural Officer

A.22 LBRuT's arboricultural officer provided the following advice in correspondence dated 03 October 2017.

LB Richmond upon Thames considers in short I have great concerns about the clearance at Ham Lands, this is a significant area of felling which would have a major impact on the appearance of the area and loss of the multiple functions that woodland provide. There will be a a loss of habitat (the area is known to host the white-letter hairstreak butterfly).

I would therefore not be in favour of such a proposal.

With regards to the rest of the proposal I would want to see a tree survey, arboricultural impact assessment and arboricultural method statement provided, all in accordance with British standard 5837:2012, trees in relation to design, demolition and construction - recommendations.

I would also like to see how the effects of the construction phase could be mitigated through landscaping, for example planting trees to act as a screen for construction traffic at teddington Weir, this would also act to

trap airborne pollution.

A-2.23 London Borough of Richmond upon Thames – Planning Policy

A.23 LBRuT’s planning policy officer provided the following advice in correspondence dated 29 September 2017.

It has been agreed via a joint statement by the London Borough of Richmond Upon Thames and the Environment Agency that the proposed work at Ham Lands as part of the River Thames Scheme will not progress at this stage. It should be noted that should this part of the project proceed at some point in the future that Ham Lands is close to the Richmond Park SAC, NNR and SSSI, and an HRA Appropriate Assessment will be required.

LB Richmond upon Thames considers the topics to be otherwise assessed should include:

- Biodiversity, protected species and habitats (and “likely significant effects” upon Natura 2000 sites)
- Waste and waste disposal
- Water, including water pollution and flood risk
- Increased traffic and transport on local roads
- Air quality, noise and vibration during construction
- Townscape, landscape, and conservation areas
- Cultural heritage, archaeology and built heritage including designated and non-designated heritage assets and their settings
- Impact upon the River Thames Metropolitan Open Land and Thames Landscape Area; and
- Cumulative impacts.

Potential direct and indirect direct, secondary and cumulative effects, over short, medium and long term must be considered.

The EIA should account for how identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

A-2.24 London Borough of Richmond upon Thames – Transport

A.24 LBRuT's senior transport officer provided the following advice in correspondence dated 29 October 2017.

LB Richmond upon Thames considers the following information needs to be tested as part of the EIA process:

1. Details of the proposed phasing programming and timing of work activities.
2. Details of any proposed traffic management procedures.
3. Details (including maps) of the proposed size, number, routing along the TLRN and local Richmond highway network detailing manoeuvring and tracking of construction vehicles to and from the site and holding areas for these on/off site.