



Lucy Thatcher
Applications Manager
Richmond Council
44 York Street
Twickenham
TW1 3BZ

1 April 2020
RESTRICTED

Dear Lucy,

Proposed Development at Twickenham Riverside: Request for EIA Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulation 2017

We are writing to request an Environmental Impact Assessment (EIA) Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations 2017'), to support a detailed planning application for a mixed-use development at Twickenham Riverside. The Application Site (Site) is located adjacent to the River Thames in Twickenham Town Centre, within the London Borough of Richmond Upon Thames (LBRuT).

This EIA Screening Request sets out further details below relating to the Application Site, nature and extent of the Proposed Development, the approach to EIA Screening and the potential environmental effects.

This request for an EIA Screening Opinion includes the following information consistent with Regulation 6 (2) of the EIA Regulations 2017:

- a) a plan sufficient to identify the land; (See attached Site Location Plan);
- b) a description of the development, including in particular—
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works (See attached plan illustrating Buildings to be Demolished and Description of Development set out on page 3 of this letter);
 - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (set out on page 2 of this letter and referred to under baseline conditions within each environmental topic subheadings);
- c) a description of the aspects of the environment likely to be significantly affected by the development (set out within the baseline summary section under each environmental topic subheading);
- d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—

- (i) the expected residues and emissions and the production of waste, where relevant (set out within the potential impacts section under each environmental topic subheading); and
 - (ii) the use of natural resources, in particular soil, land, water and biodiversity (set out within the potential impacts section under each environmental topic subheading); and
- e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment (see EIA Screening Checklist set out in Appendix 1 attached to this letter).

The table set out in Appendix 1 replicates the EIA Screening Checklist (updated September 2017) provided on the Government website for National Planning Practice Guidance and is used by the national planning casework unit and the planning inspectorate when screening for EIA.

Description of Application Site

The Site extends to approximately 1.23 ha and is shown on the plan attached to this letter. The Site is centrally located within Twickenham Town Centre and encompasses the whole of the riverside area between Water Lane and Wharf Lane. It is bounded to the north by the commercial units fronting onto King Street, to the south by the River Thames (with Eel Pie Island beyond), to the east by residential dwellings fronting onto Water Lane and to the west by the side elevation of Esquires Coffee Shop, an existing car park and a boundary wall running adjacent to Wharf Lane. The only access to Eel Pie Island, other than by boat, is by foot-bridge, the northern end of which falls within the Site's red line boundary.

Twickenham Train Station is located approximately 500m to the north of the Site. To the north, north east and north west and west are town centre uses associated with King Street, London Road, Richmond Road, Church Street, Heath Road and Cross Deep. Surrounding the Site is a mixture of residential and commercial development with areas of historic interest including Church Street, St Mary's Church and the Twickenham Riverside site itself, all of which fall within the Twickenham Riverside Conservation Area.

The following uses are located within the Site boundary:

- Diamond Jubilee Gardens, which is the site of a former open-air swimming pool, with some of its features retained as part of its heritage. This area now comprises of hard and soft landscaped public open space which includes a play space and a small café centrally located within the Site;
- Unit numbers 1, 1A, 1B and 1C King Street (currently retail and commercial uses), the pedestrian walkway directly in front of these buildings and the private car park located to the rear of them on Water Lane. The car park is elevated above the height of Water Lane with an access ramp towards its southern end;
- A service road running to the rear of the commercial units which front onto King Street, connecting Water Lane and Wharf Lane;
- The Embankment, which runs along the River Thames waterfront between Wharf Lane and Church Lane. The section of the Embankment which is relevant to the Site stretches between Wharf Lane and Water Lane. It varies in width and has parking on both sides of the road. There is a segregated promenade along the waterfront for pedestrians and cyclists;
- A one-storey pavilion building with a small publicly accessible terrace and benches fronts onto the Embankment. To the west of this building and elevated above the road level is a two-storey property (Bath House) featuring flat roof and garage at roadside level. Access to the property is via a set of steps from the Embankment;

- A red brick retaining wall forms the boundary to the built form and runs from the south of the King Street units along the eastern boundary of the car park on Water Lane. Here it wraps around to the south, in front of Bath House and the pavilion building and continues in south west direction along the entire stretch of the Embankment. It forms the southern boundary to the Diamond Jubilee Gardens;
- The Site includes a landscaped area of public realm to the south of Diamond Jubilee Gardens, which includes seating, raised planting beds and hard landscaping; and
- There is one existing sub-station located within the Site boundary, which may be relocated as part of the Proposed Development.

The Site is located within the LBRuT Air Quality Management Area.

The Site is not subject to any statutory or non-statutory nature conservation designations, though there is one statutory designated site, seven non-statutory designated Sites of Importance for Nature Conservation and five lowland mixed deciduous woodland Habitats of Principal Importance within a 1km radius. The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation.

The Site is highly accessible for pedestrians and cyclists due to the established network of footways and pedestrian connections in the surrounding area. The Public Transport Accessibility Level for the Site is calculated as 5 indicating a Very Good to Excellent level of public transport accessibility. There are approximately 80 car-parking spaces within the Site boundary.

There are no Listed Buildings located within the Site boundary and no Grade I Listed Buildings located within 100m of the Site. There are a number of Grade II Listed Buildings within 100m of the Site and a number of Grade II* Listed Buildings within the wider area.

The Site is located within the Twickenham Riverside Conservation Area (Area 8) and the Twickenham and Marble Hill Archaeological Priority Area. The boundary of the Queen's Road Conservation Area runs along the middle of Kings Street, directly opposite the Site boundary. There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 100m of the Site boundary.

The Environment Agency's modelled floodplain map shows that part of the Site is located in Flood Zone 3a whilst the south-eastern corner of the Site is located in Flood Zone 3b. The Site is therefore at risk of flooding from the River Thames.

Description of Proposed Development

The Proposed Development includes the demolition of all existing buildings located within the site boundary (identified on the attached plan) and will comprise a mixed-use development including approximately 54 residential units (ranging from studios to 3-bedroom apartments, with 50% affordable and disabled accommodation), retail area extending to 543 sq.m., commercial area extending to 1027 sq.m and other uses (food, beverages and amenity) extending to 1000 sq.m in addition to a newly invigorated Diamond Jubilee Gardens.

The key elements of the Proposed Development are set out as follows:

- A revitalised Diamond Jubilee Gardens, which will remain elevated above the flood plain and will provide a new play space and views over the River Thames. The Gardens will extend southwards into the new Riverside Market square located in the southern part of the Site and running adjacent to the River Thames. This area will be car-free and will accommodate approximately one thousand people for large events whilst providing an opportunity to get close to the water;
- A new café in the Gardens, located in the vicinity of a proposed new play area;

- A three-storey building located on Water Lane which will comprise mainly of apartments above retail and commercial uses. It will extend southwards along Water Lane from its junction with King Street and Church Street. A new access road will connect Water Lane and Wharf Lane;
- A four to five storey building on Wharf Lane will be partially built on stilts over the embankment. Residential uses will be provided over commercial/other uses which will be located on the ground floor. A shared Winter Garden space is also proposed in this area. A boathouse and market storage area will sit under this building enabling engagement with the riverfront, though the boathouse will not directly connect with the water itself. There is also some plant accommodation to be located within a basement proposed to be cut into the rising ground below the proposed building on Wharf Lane;
- Numerous external spaces for a range of uses are proposed throughout the Proposed Development, including play spaces, recreational areas etc; and
- Approximate new car-parking provision, (some of which is re-provision of existing parking and some of which is new) will include the following:
 - 7 pay & display car parking bays;
 - 6 business/resident permit car bays;
 - 6 accessible car parking bays;
 - 3 loading bays for Eel Pie Island; and
 - 1 motorcycle space.

Approach to EIA Screening

The process of EIA is governed by the EIA Regulations, which apply to certain types of development and/or projects, referred to as EIA Developments. The EIA Regulations define 'EIA Development' in Regulation 2(1) as either:

- Schedule 1 development; or
- Schedule 2 development likely to have a significant effect on the environment by virtue of its size, nature or location.

Screening is the procedure used to determine whether a proposed development is likely to have significant effects on the environment and whether an EIA is required. If a project is listed in Schedule 1, an EIA is mandatory. If a project is listed in Schedule 2, the local planning authority should consider whether it is likely to have significant effects on the environment. "Schedule 2 development" means development, other than exempt development, of a description mentioned in Column 1 of the table in Schedule 2 where –

- Any part of that development is to be carried out in a sensitive area; or
- Any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

The Proposed Development does not fall within 'Schedule 1' of the EIA Regulations where an EIA is mandatory. However, the Proposed Development falls within the project description set out in Schedule 2 Paragraph 10(b) "urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas". The thresholds set out in Column 2 of Schedule 2, for paragraph 10(b) "urban development projects" are as follows:

- The development includes more than 1 hectare of urban development, which is not dwelling house development;
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

The online national Planning Practice Guidance (PPG) provides further advice on establishing whether an EIA is required for a particular project (Ref 2.1). It states that –

“If a proposed project is listed in the first column in Schedule 2 and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as ‘exclusion thresholds and criteria’) the proposal needs to be screened by the local planning authority to determine whether significant effects are likely and hence whether an assessment is required. Projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria.

Projects which are described in the first column of Schedule 2 but which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area are not Schedule 2 development” (Paragraph 017, Reference ID: 4-017-20170728).

The Site is not located within or adjacent to a sensitive area, as defined in Regulation 2(1) of the EIA Regulations, which includes Sites of Special Scientific Interest and European Sites, National Parks, the Broads, Scheduled Monuments, Areas of Outstanding Natural Beauty and World Heritage Sites.

The Site extends to 1.23 ha in area and the Proposed Development comprises mainly of open space and areas of public realm, which is significantly below the 5ha threshold. Collectively, the proposed buildings located on Wharf Lane and Water Lane will deliver approximately 54 residential units and 0.25 hectares of retail, commercial and other uses, which is well below both the 1 hectare of urban development threshold and 150 dwellings threshold referred to above. As such, the site area, size and scale of the Proposed Development is below the criteria set out in the Column 2 of Schedule 2, Paragraph 10(B).

The PPG sets out thresholds and criteria for the identification of Schedule 2 development requiring EIA and indicative values for determining significant effects. To assist the process of determining whether an assessment is required, the PPG includes a set of indicative thresholds and additional criteria to help identify whether Schedule 2 development requires an EIA.

“...The criteria and thresholds in column 2 represent the ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which EIA does not need to be considered (subject to the proposal not being in a sensitive area). The figures in column 3 are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely”. (Paragraph 057, Reference ID: 4-057-2070720)

The indicative screening thresholds set out in Column 3 (as referred to above) of the PPG do provide a useful first step in considering the likelihood that an EIA may be required. As an introduction to Schedule 2, Paragraph 10 (B) urban development projects, it states:

“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination”.

The Site is currently developed and located within an urban area, comprising predominantly residential and commercial uses. Whilst the Proposed Development would be on a greater scale than its existing use, the surrounding area includes built developments of a similar use. Although the Proposed Development will introduce new residential receptors to the area, it will be sensitive to the scale and massing of the surrounding existing developments. It is therefore reasonable to

assume that the future surrounding receptors would be similar to those currently located within the area and through informed design development, potential environmental effects would be similar to those currently experienced and/or adequately managed through typical best practice design measures.

In line with Column 2 of Schedule 10(b), it is considered that the Proposed Development does not constitute Schedule 2 development and as per the PPG guidance referred to above does not require further screening or EIA.

On the basis that the Proposed Development is not Schedule 2 development and from a review of the indicative thresholds and criteria set out above, the specific nature and context of the Site, the existing development on the Site, the type and scale of Proposed Development, and the potential environmental effects, it is considered that the Proposed Development does not represent EIA development. However, further high-level assessment has been undertaken to ensure that the site context and specific nature of the Proposed Development are given full consideration in reaching a final conclusion.

As such, the following section sets out an overview of the existing site conditions relating to a range of environmental topics, their sensitivity and whether or not there are likely to be any significant environmental effects as a result of the Proposed Development. It also sets out where additional detail, relating to these environmental topics will be included within the overall suite of planning application documents.

Potential Environmental Impacts

Air Quality

Baseline Summary

In December 2000, the LBRuT declared the whole of the Borough an Air Quality Management Area due to exceedances of nitrogen dioxide (NO₂) and particulate matter (PM₁₀) annual mean objectives and the PM₁₀ 24-hour mean objective. The Borough produced its Air Quality Annual Status Report in July 2019, which provided a detailed overview of air quality during 2018. The report identified that for carbon monoxide, benzene, 1,3-butadiene, lead and sulphur dioxide there was not a significant risk of the objectives being exceeded.

However, the latest monitoring results for 2018 confirm that air pollution in LBRuT still exceeds the Air Quality objectives for both NO₂ and PM₁₀, and there is still a need for LBRuT to be designated as an AQMA and to pursue improvements in air quality.

The LBRuT operate three static automatic monitoring sites and one mobile automatic site which record concentrations of both NO₂ and PM₁₀. The closest monitoring stations to the Site and results for the years 2012 – 2018 are shown in Table 1 which indicate an overall downward trend in PM₁₀ concentrations between 2012 and 2018, with all concentrations below the respective annual mean objective.

Table 1: Annual Mean PM₁₀ Automatic Monitoring Results (µg/m³)

	Annual Mean Concentration (µgm-3)						
	2012	2013	2014	2015	2016	2017	2018
Castelnau Library, Barnes (R11)	21	22	20	22	20	18	19
Wetlands Centre, Barnes (R12)	18	20	18	17	16	15	15
Objective	40						

LBRuT also operates an extensive network of diffusion tubes across the Borough measuring concentrations of NO₂. Those closest diffusion tubes to the Application Site, and the associated annual mean NO₂ concentrations monitored between 2011 and 2018, are set out in Table 2.

Table 2: Annual Mean NO₂ Concentrations Measured by Diffusion Tube (µg/m³)

	Annual mean concentrations (µg/m3)							
	2011	2012	2013	2014	2015	2016	2017	2018
15 – Richmond Road	41	44	40	40	37	41	38	34
32 – King Street	75	77	74	73	62	64	59	56
65 – York Street	-	-	-	-	-	75	68	55
Objective	40							

* **Bold** indicates exceedance of annual mean objective

Table 2 shows annual mean NO₂ concentrations consistently above the 40 µg/m³ objective limit at all three monitoring sites, although the data shows a gradual decline in concentrations on King Street and Richmond Road. The Site is located to the south of King Street and based on the data in Table 2 concentrations of NO₂ are expected to exceed the annual mean objective. Monitoring at King Street and York Street has shown annual mean concentrations well above 60 µg/m³ in each year, except for 2018, which suggests that the 1-hour mean NO₂ objective is at risk of being exceeded¹.

¹ Defra LAQM.TG16 states: "For diffusion tube monitoring, it can be considered that exceedances of the NO₂ 1-hour objective may occur at roadside sites if the annual mean is above 60µg/m³."

Potential Impacts

During the demolition and construction phase, dust and particulate matter (PM₁₀ and PM_{2.5}) are likely to be generated from activities including demolition, earthworks, construction and track-out, which may result in localised and temporary adverse impacts from fugitive dust and particulate emissions to local receptors. Emissions associated with non-road mobile machinery on site and construction vehicles using the local transport network could also cause potential air quality impacts. A Demolition and Construction Environmental Management Plan (DCEMP) will be prepared and implemented by the contractor in line with their legislative requirements. This document will set out best practice construction techniques to ensure that the potential effects during these phases of development will be adequately managed to minimise or avoid adverse effects. Procedures may include setting up barriers around dust generating activities; avoiding storing stockpiles of loose material on site; installing wheel washes and vehicle cleaning facilities; ensuring not-in-use vehicle engines and plant motors are switched off and ensuring all plant and vehicles are properly maintained.

During the operational phase, local air quality has the potential to change in comparison to the current baseline, particularly for traffic related pollutants including NO₂, PM₁₀ and fine particulate matter (PM_{2.5}). The Proposed Development will result in a significant decrease in car parking spaces within the Site boundary (approximately 80 car parking spaces currently, reducing to approximately 23 car parking spaces post development), which will help to reduce vehicle traffic and improve air quality within this area.

Pollutant concentrations will be predicted at relevant existing and proposed sensitive receptors to ascertain the impact of the Proposed Development with respect to air quality. Predicted pollutant concentrations will be compared to the relevant air quality objectives and if necessary, appropriate mitigation/ design measures will be recommended to reduce or remove any potentially adverse air quality impacts identified.

An air quality assessment will be required to determine baseline conditions at the Site, assess its suitability for the proposed end-use and consider the effects of the development given its size and nature in accordance with the requirements of the National Planning Policy Framework (NPPF).

It is considered that the demolition, construction or operational effects of the Proposed Development relating to Air Quality are unlikely to be significant. The air quality assessment will be in line with LBRuT validation checklist requirements for air quality assessments submitted with the planning application as a supporting planning document. Reference will be made where applicable to policy requirements set out in the London Borough of Richmond Local Plan 2018 (Local Plan 2018) and relevant Supplementary Planning Documents.

Noise Environment

Baseline Summary

An Environmental Noise Survey was undertaken in November 2017, which set out to establish the noise climate in the vicinity of the Site. It found that the overall noise comprises both individual “event” type emissions from vehicles passing along local roads and continuous low frequency “rumble” due to middle distance traffic flows. Noise emanating from vehicular road traffic was deemed to provide a significant contribution to the ambient noise climate. In addition, aircraft over flights were observed at the Site during manned survey periods with noise levels associated with the aircraft being significant in terms of the ambient noise climate.

Numerous items of mechanical plant were observed that were associated with third party properties to the rear of King Street within the Site boundary. In addition, a low frequency “hum” associated with a transformer located in the vicinity was noted.

Potential Impacts

The Proposed Development will introduce new residential receptors to the Site, whilst also reducing the number of car-parking spaces overall. The operation of the Proposed Development will be broadly similar to the existing situation onsite and the surrounding uses.

Noise and vibration generated during the demolition and construction phases could have some negative effects within the surrounding area. Typical industry standard noise mitigation measures will be set out in the DCEMP and implemented during the demolition and construction phase to reduce and minimise the potential effects of noise on nearby sensitive receptors although due to the close proximity of some of the existing residents some temporary adverse noise and vibration effects are anticipated.

During operation, there is potential for a change in noise and vibration levels from the existing baseline given reduced traffic accessing the Site in comparison to the current use. Furthermore, noise associated with residential properties has the potential to occur 24/7 in comparison with current uses. It is recommended that baseline noise measurements at several locations on the Site is undertaken to establish the range in existing noise levels.

It is considered that the demolition, construction or operational effects of the Proposed Development relating to Noise and Vibration are unlikely to be significant. The results of the noise survey and design recommendations will be contained within an Acoustic Assessment and/or Acoustic Design Statement which will be submitted with the planning application as a supporting planning document.

Transport and Access

Baseline Summary

As referred to above, due to its urban location, the Site is highly accessible for pedestrians and cyclists.

The closest mainline railway station is Twickenham which is located to the north of the Site, 10 minutes away on foot with key services to London Waterloo, Reading, Stratford, Windsor and Eton Riverside and Wimbledon. The closest bus services are accessed from Cross Deep and Richmond Road.

The Embankment, which runs along the River Thames waterfront between Wharf Lane and Church Lane varies in width and has parking on both sides of the road, whilst there is a segregated promenade along the waterfront for pedestrians and cyclists. The Embankment is a designated Highway and is part of the Richmond Cycle Network. The car-parking spaces located within the Site boundary are controlled by the Central Twickenham Car Parking Zone, in addition to the private car park provision on Water Lane.

Potential Impacts

The Proposed Development will have a ‘car lite’ approach. The parking currently located on the Embankment (between Wharf Lane and Water Lane) will be relocated and or removed in line with LBRuT aspirations. This will be documented in the Transport Assessment to be submitted with the

forthcoming planning application. A suite of transport-related documents will be produced to support the planning application and the Transport and Access development proposals will be addressed in detail within them. These will include the following:

- Transport Assessment;
- Construction and Logistics Plan;
- Delivery and Servicing Plan;
- Travel Plan;
- Active Travel Zone assessment; and
- Car and Cycle Parking Management Plan.

It is considered that the demolition, construction or operational effects of the Proposed Development relating to Transport and Access are unlikely to be significant. Adopting best practice construction techniques and practices will ensure that the potential for significant effects on the surrounding footpaths and highway network are adequately reduced and / or eliminated ensuring that access for the public to recreational or other facilities is maintained throughout the construction stage where possible. Communication with local residents will be ongoing prior to and during demolition and construction to inform residents of any roads or transport networks being temporarily closed or diverted.

Design measures such as, but not limited to the provision of long stay cycle parking spaces, provision of pedestrian and cycle accesses and delivery and servicing arrangements will be set out in the Transport Assessment and/or other supporting planning documents submitted with the planning application. The design process will take account of transport-related constraints relevant to the Site and surrounding area, which will be set out in detail within the supporting planning documents.

Ecology and Nature Conservation

Baseline Summary

A Preliminary Ecological Appraisal (PEA) was prepared in October 2017 which related to the majority of the Site except Wharf Lane and the Embankment. It comprised a Phase 1 habitat survey (undertaken in May 2016), a protected species assessment to identify features with potential to support legally protected species and an evaluation of the Site's importance for nature conservation.

The key findings of the PEA were as follows:

- The main habitats present included hardstanding/buildings, amenity grassland, broadleaved woodland, species-poor non-native hedgerows, dense scrub, introduced shrub and scattered trees;
- As referred to above, the site is not subject to any statutory or non-statutory nature conservation designations. There is one statutory designated site within a 1km radius: Ham Lands Local Nature Reserve. There are seven non-statutory designated Sites of Importance for Nature Conservation within a 1km radius. There are five lowland mixed deciduous woodland Habitats of Principal Importance within 1km of the Site;
- The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation;
- Habitats present at that time (2016) were considered to be of local value only and included lowland mixed deciduous woodland and a hedgerow. Hedgerows are a Priority Habitat in the LBRuT. In 2019 the updated LBRuT Biodiversity Action Plan included a Habitat Action Plan for Hedgerows;

- Several buildings and trees were identified as having the potential to support roosting bats. Further Bat surveys were recommended at that time to include internal building inspections and a preliminary ground level roost assessment of trees;
- Buildings and vegetation within the Site boundary were identified as having the potential to support breeding birds;
- Habitat suitable to support hedgehogs was also identified. The report recommended that measures should be taken to continue accommodating this species on site post-development. Deadwood suitable for stag beetle was also identified and best practice should be followed during the removal of any trees/tree stumps; and
- The site does include an area of self-seeded trees considered to be of only local value.

A Preliminary Bat Roost Assessment was undertaken on 18 July and 15 August 2017, which included an inspection of trees and buildings. The four buildings which were inspected are located in the eastern part of the Site and include a derelict two-storey building which was previously used as an office space; two derelict one-storey buildings which were previously used as recreational spaces and the two-storey building located at the junction of Water Lane and King Street. All buildings were assessed as having low potential to support roosting bats. All trees within the redline boundary and four mature trees immediately adjacent to the redline boundary were assessed as having negligible potential to support roosting bats. In line with current survey guidelines one dusk emergence survey was carried out on the four buildings in August 2017. No bats were recorded as emerging from, or suspected as having emerged from, any of the buildings within the Site. Limited commuting and foraging activity by three common species of bats was recorded on Site.

Potential Impacts

Given the 2.5year time frame from when the Phase 1 Habitat Survey was undertaken, it is recommended that an updated PEA (including a Phase 1 habitat mapping and any required protected species surveys) is undertaken and submitted with the planning application. During the design process ecological design measures will be considered, taking account of the findings of the PEA and onsite surveys.

It is considered that the demolition, construction or operational effects of the Proposed Development relating to Ecology and Nature Conservation are unlikely to be significant. Potential effects on birds and/or bats (if found to be present on site) can be fully mitigated through timing of works (such as vegetation clearance outside of bird nesting season or supervised demolition of structures outside of bat maternity season) as well as the provision of compensatory roosting/nesting features in new buildings and foraging habitats as part of the new landscape strategy. Any such works in bird nesting season would be carried out under supervision of a qualified ecologist. Appropriate licences would be sought with regard to any bat roosts after consents are obtained to allow legal demolition of buildings/structures.

The Proposed Development will have the potential to contribute to the improvement of London's urban ecological resource. A PEA, Phase 1 habitat survey and any supporting protected species surveys will be submitted with the planning application as a supporting planning document. Reference will be made where applicable to policy requirements set out in the Local Plan 2018 and relevant Supplementary Planning Documents.

Arboriculture

An Arboricultural Impact Analysis of 49 trees located within or adjacent to the Site was undertaken during May and June 2017, including trees located on the Embankment, which identified the following:

- 39 of the trees surveyed were in good physiological condition;
- 40 of the trees surveyed were in good structural condition; and
- 44 of the trees surveyed had a life expectancy of either 20-40 years or 40+ years.

None of the trees within the Site boundary were covered by a Tree Preservation Order, although their location within a Conservation Area offers them statutory protection.

Given the intervening period since the survey was undertaken in 2017, there is potential for change and as such it is recommended that a fresh Arboricultural Impact Assessment is prepared and submitted with the planning application as a supporting planning document. The Arboricultural Impact Assessment will include a Tree Survey and an Arboricultural Method Statement and will be used to inform the design process. It will set out mitigation measures and working practices if required to avoid or mitigate impacts to existing trees during demolition, construction and operational phases. It is considered that with appropriate mitigation measures in place the demolition, construction or operational effects of the Proposed Development on trees within the Site boundary will not be significant.

Heritage and Archaeology

Baseline Summary

An Archaeology and Heritage Assessment was undertaken in October 2017 which covered the south-eastern part of the Site and included a site walkover survey, historic townscape appraisal and setting assessment.

As referred to previously, the 2017 Archaeology and Heritage Assessment identified that there are no Listed Buildings located within the Site boundary, though there are a number of Grade II Listed Buildings within 100m of the Site. There are also a number of Grade II* Listed Buildings within the wider area. There are no Grade I Listed Buildings located within 100m of the Site. There are a number of non-designated assets located within the Site boundary.

The Site is located within the Twickenham Riverside Conservation Area (Area 8) which was designated in recognition of the historic and architectural value of the original village core and river frontage. The boundary of the Queen's Road Conservation Area, which includes a number of Grade II Listed Buildings runs along the middle of Kings Street, directly opposite the Site boundary. There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 100m of the Site boundary.

The Site is located within the Twickenham and Marble Hill Archaeological Priority Area identified by the Greater London Archaeological Advisory Service and reflecting Twickenham's Saxon origins (c.8th century) and its popularity with the aristocracy during the 17th and 18th centuries. A second Archaeological Priority Area, the Thames Foreshore and Bank (Site 22) extends immediately south of the Site along the channel of the Thames and its foreshore. This second Archaeological Priority Area has been designated to take account of numerous discoveries made both within the Thames and along its banks.

The assessment identified a Low potential for remains or artefacts of prehistoric, Roman or early historic (Anglo-Saxon) located within the south-eastern part of the Site, moderate to high probability of medieval evidence being encountered and a high probability of post-medieval remains being encountered.

Potential Impacts

It is considered that the demolition, construction or operational effects of the Proposed Development on Heritage and Archaeology is unlikely to be significant. It is proposed that an updated Archaeology and Heritage Assessment covering the entire Site will be undertaken and submitted with the planning application as a supporting planning document. Sensitive design measures informed by the Archaeology and Heritage Assessment will be inherent within the scheme design, where possible. This will assess the archaeological impact of the Proposed Development and provide a suitable strategy to mitigate any adverse effects, if required.

Flood Risk, Drainage and the Water Environment

Baseline Summary

The Environment Agency's modelled floodplain map shows that part of the site is located in Flood Zone 3a whilst the south-eastern corner of the Site is located in Flood Zone 3b. Land in flood zone 3a is assessed as having an annual probability of fluvial flooding greater than 1% or tidal flooding greater than 0.5%. Land located within Flood Zone 3b is classified as functional floodplain where water has to flow or be stored in times of flood.

The LBRuT Strategic Flood Risk Assessment Level 1 plan indicates that the Site is located in an area which benefits from flood defences. The existing development forms part of the flood defence line (though there are various openings along this line) and this is maintained at a level of approximately 6.0m AOD. The Environment Agency have classified this defence as Grade 2 'Good' on a scale of 1 (very good) to 5 (very poor).

Potential Impacts

It is considered that the demolition, construction or operational effects of the Proposed Development on Flood Risk, Drainage and the Water Environment are unlikely to be significant. Best practice demolition and construction techniques will be adopted in accordance with a DCEMP.

In line with National Planning Policy Framework requirements, a Flood Risk Assessment (FRA) and Outline Drainage Strategy will be produced to support the planning application. The Outline Drainage Strategy will incorporate a London Sustainable Drainage Proforma and a Statement on Sustainable Drainage Systems. Suitable levels of attenuation will be incorporated into the Proposed Development where possible to reduce runoff rates below the existing situation whilst allowing for climate change,

The FRA will investigate the potential sources of flooding at the Site. It will demonstrate that any flood risk relating to the Proposed Development or caused by the Proposed Development elsewhere is mitigated using appropriate design solutions and management procedures including the preparation of the afore-mentioned drainage strategy. Reference will be made where applicable to policy requirements set out in the Local Plan 2018 and relevant Supplementary Planning Documents.

Daylight, Sunlight and Overshadowing

Given the location of the Site, the proximity of existing sensitive receptors to the Site boundary and the nature and scale of the Proposed Development, a Daylight, Sunlight and Overshadowing Study will be prepared in line with current guidance and submitted with the planning application. It will assess the impact of the Proposed Development on surrounding sensitive receptors and the outputs of the study will inform the iterative design process. A Lighting Strategy, in line with LBRuT Validation requirements will be submitted as a supporting planning document.

Ground Conditions and Contamination

Baseline Summary

A Desk Study and Ground Investigation Report was prepared in 2017 which related to the eastern part of the Site. It included a desk-based review, an intrusive ground investigation and a contaminated land assessment.

The British Geological Survey (BGS) map of the area indicates that the eastern part of the Site is underlain by Langley Silt over Kempton Park Gravel, which in turn is underlain by the London Clay Formation. The Kempton Park Gravel is classified by the Environment Agency as a Secondary 'A' Aquifer which is defined as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Groundwater is likely to be present at the base of the Kempton Park Gravel and flowing towards the River Thames.

The 2017 study identified that there were areas of contamination within the southern parts of the site. It concluded that there is a low risk of there being a significant contaminant linkage that would result in a requirement for major remediation work and that there were no elevated levels of contaminants within the soil samples tested. The preliminary UXO Risk assessment report recommended that due to the known falling of a V-1 bomb immediately south of the Site a detailed risk assessment should be completed.

Potential Impacts

It is considered that the demolition, construction or operational effects of the Proposed Development on Ground Conditions and Contamination are unlikely to be significant. There is a potential for pollutants to be released into the ground or into surface water during both phases, however demolition and construction techniques will be adopted in accordance with the DCEMP to include the storage, use and handling of substances and materials, refuelling and fuel/oil storage and procedures for surface water management.

Overall it is proposed that an updated Phase 1 Land Contamination Desk Study Report be prepared and submitted with the planning application as a supporting planning document, which will include a preliminary risk assessment and where necessary include recommendations of further detailed site investigations. Potential contamination sources would be appropriately remediated with site specific measures outlined within a Remediation Method Statement / Validation report submitted to and approved by LBRuT.

Materials and Waste

The Proposed Development would by its very nature, require the use of a range of natural and man-made construction materials to complete the build and fit-out of the Proposed Development.

Production of waste would primarily be associated with the construction of the Proposed Development, demolition of existing buildings and excavation of the basement area.

Prior to demolition works a pre-demolition audit will be conducted which will provide detailed information on materials that can be reclaimed and recycled, thereby reducing the cost and environmental impact of waste disposal. The pre-demolition audits will aim to identify volumes of waste so that plans to re-use, recycle and recover can be implemented; identify reclamation and re-use potential both on-site and off-site and assist in waste segregation recommendations. Effective water suppression will be used during demolition and buildings will be soft stripped inside before the demolition process commences.

Opportunities to minimise the amount of waste going to landfill will be sought by the contractors in line with good site practice, so that construction materials will be used efficiently on-site and that all re-useable wastes will be recovered, re-used or recycled wherever possible. The removal of waste may lead to some disruption on the road network for other road users, although this would be temporary during construction works. It is not predicted that significant quantities of hazardous wastes will be produced or transported during these works. Construction traffic routing information would be agreed with LBRuT so as to minimise the effects as far as practicable on other road users. Other potential effects of waste removal (e.g. dust, noise) will be managed to ensure that the principles of the waste management hierarchy during demolition and construction phases will be achieved, which will be outlined within the DCEMP submitted with the planning application. As a consequence, the environmental effects of waste removal from the Site during the demolition and construction phases is unlikely to be significant. It is recommended that a Waste Management Strategy considering both demolition and construction waste streams identifying waste minimisation and reduction measures is submitted with the planning application. This will also set out where possible that demolition waste from the existing buildings may be used for the construction of the new buildings where possible. A Waste Management Strategy which will deal with operational waste will also be prepared to inform the design process and submitted with the planning application as a supporting planning document.

Climate Change and Greenhouse Gas Emissions

During demolition and construction, different types of materials will be required and the generation of greenhouse gases associated with the production of such materials is noted. In addition, traffic movements during construction may generate greenhouse gas emissions however, it is not considered that these would contribute to giving rise to a significant increase in greenhouse gas emissions. Best practice measures outlined within the DCEMP during construction (for example turning off/throttling down plant and equipment when not in use and minimising deliveries) will help limit the amount of greenhouse gases produced during demolition and construction.

During operation, the Proposed Development will have significantly reduced car parking provision compared to the current situation. Operational use of the Proposed Development will give rise to greenhouse gases through the use of natural resources and through the heating and cooling of buildings. However, the new development should benefit from the latest energy standards and strategies which will aim to minimise the impact on air quality. Separate energy and sustainability statements will be prepared as application reports and submitted in support of the planning application. Through the application of the recommendations contained within these reports, the effects associated with the operational stage of the Proposed Development will be managed such

that they will not result in any significant environmental effects. Reference will be made where applicable to policy requirements set out in the Local Plan 2018.

People and Communities (including Human Health)

A Health Impact Assessment, in line with current guidance and methodology will be prepared and submitted as a supporting planning document.

As with any development project there is the risk that accidents could occur during the construction phase. Any risk of accident during construction will be controlled in accordance with health and safety legislation and good site management procedures. Given the residential nature of the proposed end use the risk of accidents is considered to be minimal. Whilst the potential for localised sources of contamination exist on site, development of an appropriate remediation strategy, if necessary, would mitigate potential effects on existing and future residential receptors. Implementation of best construction practices and development of an appropriate remediation strategy will be secured by means of a planning condition.

Overall the impacts of the Proposed Development on human health are not considered to be significant.

Major Accidents and Disasters

Schedule 3 of the EIA Regulations 2017 states that: '*1. The characteristics of development must be considered with particular regard to -- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge*'.

The nature of the Proposed Development will not result in the potential for major accidents and disaster events to occur, however for proportionality, the evaluation process of such major accidents and/or disasters is summarised below:

- Flooding – The Site is located adjacent to the River Thames, within Flood Zones 3A and 3B. The risk of flooding will be assessed within the standalone FRA and Outline Drainage Strategy. It will demonstrate that any flood risk relating to the Proposed Development or caused by the Proposed Development elsewhere is mitigated using appropriate design solutions and management procedures. Drainage measures will include allowances for climate change;
- Malicious Attacks (Terrorism) – The current threat level for international terrorism in the UK is 'Severe'. The Proposed Development will incorporate secured by design principles that aim to increase resilience of the Proposed Development in the unlikely event of a malicious attack; and
- Unexploded Ordnance – A Desk Study and Ground Investigation Report was undertaken in 2017, which included a preliminary UXO Risk assessment. It recommended that due to the known falling of a V-1 bomb immediately south of the Site a detailed risk assessment should be completed. An updated Preliminary UXO Risk Assessment, which will include an initial UXO search, will be undertaken and submitted in support of the planning application.

Based on the above, it is considered that major accidents and disasters are unlikely to give rise to significant effects and do not need to be considered further.

Cumulative Effects

Given the size of the Site and nature and scale of the Proposed Development, it is not anticipated that a cumulative assessment, which would form part of an EIA, will be required.



Whilst there is potential for cumulative effects in relation to cumulative construction effects (if construction of multiple sites occurs at the same time) or cumulative effects on changes to traffic on local road networks, it is considered likely that future developments would be subject to the same legislative and planning policy requirements ensuring that any potential effects are likely to be adequately mitigated reducing the overall potential for cumulative effects during demolition construction and/or operation. In summary, the Proposed Development will be carried out in accordance with relevant legislation and planning policy requirements.

Summary

Having considered the Proposed Development against both indicative thresholds and criteria set out in the EIA Regulations 2017 and the online PPG information, and on its own merits in the context of the Site location, sensitive receptors and likely environmental effects, it is considered that the Proposed Development does not constitute Schedule 2 development and is not EIA development and as such an EIA is not required.

Notwithstanding this, it is proposed that the planning application will be supported by a range of planning documents to address some of the issues raised in this Screening Request, the scope of which will be agreed during pre-application discussions. These planning documents will be submitted with the planning application in line with LBRuT Validation Requirements.

It is acknowledged that this is a matter for LBRuT to confirm and it is requested that a formal EIA Screening Opinion is provided from LBRuT within 3 weeks of receipt of this letter, allowing us to proceed with the preparation of the planning application to deliver the Proposed Development.

Yours sincerely

Maeve McWilliams MRTPI, PIEMA
Associate Director

MMW

Encl.Site Location Plan, Demolition Plan and EIA Screening Checklist



APPENDIX 1 - CONSIDERATION OF THE POTENTIAL EFFECTS OF THE PROPOSED DEVELOPMENT

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
1. NATURAL RESOURCES			
1.1 Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies, etc)?	Unlikely: Whilst redevelopment of the site to deliver the Proposed Development will result in a change of land use on site, the redevelopment of the Site will not directly affect physical aspects outside of the application site boundary or within the surrounding area.	Unlikely: Using best practice construction techniques, the potential effects of demolition and construction can be adequately managed. Measures will be set out in a Demolition and Construction Environmental Management Plan (DCEMP) submitted with the planning application. Potential effects associated with the operational stage of the development can be adequately managed by adopting appropriate design measures which would be inherent in the Proposed Development.	None required although it is recommended that a DCEMP be prepared and implemented or a Code of Construction Conduct to be secured by planning condition. In addition, sensitive design measures considering scale, massing and height in relation to existing setting will be inherent within the design, where possible.

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
<p>1.2 Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?</p>	<p>Likely: Land, materials and energy will be required to construct and operate the Proposed Development.</p>	<p>Unlikely: The Site represents a developed site located within an urban area and a high-quality development is proposed. Where feasible, sustainable materials will be utilised during the construction stage and energy efficiency will be designed in to the proposed development. .</p>	<p>None required although the use of sustainable materials, where feasible, will further reduce potential effects. In addition, an energy efficient development in line with planning policy requirements will further reduce potential effects.</p> <p>Separate energy and sustainability statements will be prepared as application reports and submitted in support of the planning application. Through the application of the recommendations contained within these reports, the effects associated with the operational stage of the Proposed Development will be managed such that they will not result in any significant environmental effects.</p>
<p>1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?</p>	<p>Likely: The Site is located within an urban area and is bounded to the south by the River Thames. There are no Listed Buildings within the Site though there are a number of Grade II Listed Buildings within 100m of the Site. There are also a number of Grade II* Listed Buildings within the wider area.</p>	<p>Unlikely: No areas within the site boundary contain high value or scarce resources and there is unlikely to be any significant impacts. The site is not located within or near to a Sensitive Area in line with the EIA Regulations 2017. Best practice construction techniques will be implemented. Supporting environmental information to take account of biodiversity and</p>	<p>Best practice construction techniques will be applied, as set out in the DCEMP submitted as a supporting planning document.</p>

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
	<p>The Site is located within the Twickenham Riverside Conservation Area and within the Twickenham and Marble Hill Archaeological Priority Area (APA).</p> <p>Several trees and/or buildings within the site boundary have the potential to support roosting bats and/or breeding birds.</p> <p>The site is not subject to any statutory or non-statutory nature conservation designations. There is one statutory designated site within a 1km radius: Ham Lands Local Nature Reserve. There are seven non-statutory designated Sites of Importance for Nature Conservation within a 1km radius. There are five lowland mixed deciduous woodland Habitats of Principal Importance within 1km of the Site;</p> <p>The Site is located adjacent to the River Thames and Tidal Tributaries Site of Metropolitan Importance to Nature Conservation;</p>	<p>archaeology resources and other sensitive receptors where relevant will be submitted with the planning application.</p>	



QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
2. WASTE			
2.1 Will the Project produce solid wastes during construction or operation or decommissioning?	<p>Likely: The production of waste would primarily be associated with the demolition of existing buildings and construction of the Proposed Development.</p> <p>Once operational, the waste produced would predominately be associated with the residential and non-residential uses.</p>	<p>Unlikely: Not likely to be significant as best practice waste management techniques will be adopted during demolition, construction and operational phases. A Waste Management Strategy is expected to be developed to ensure that the principles of the waste management hierarchy (i.e. reduce, reuse and recycle) will be adopted.</p>	<p>Recommend the preparation of a Waste Management Strategy considering demolition, construction and operational waste streams identifying waste minimising and reduction measures to be secured by condition.</p> <p>Aggregate from the demolition of existing buildings may be used in the construction of new buildings where possible.</p>
3. POLLUTION AND NUISANCES			
3.1 Will the Project release pollutants or any hazardous, toxic or noxious substances to air?	<p>Likely: It is likely that the demolition, construction and operation of the Proposed Development could result in releases of pollutants to air.</p> <p>For the construction stage, dust and particulate matter (PM₁₀ and PM_{2.5}) are likely to be generated from activities including demolition, earthworks, construction and track-out. Emissions of nitrogen oxides (NO_x), PM₁₀ and PM_{2.5} associated with non-road mobile machinery on site and construction vehicles using the local transport network could also cause potential air</p>	<p>Unlikely: Dust generated during the demolition and construction phases can be adequately managed through the implementation of best practice construction techniques which will minimise or avoid adverse impacts.</p> <p>The Site is located within an Air Quality Management Area (AQMA). Overall vehicle numbers accessing the site will significantly decrease given the reduction in car parking spaces on-site from 80 spaces to 23 spaces.</p>	<p>Recommend the preparation and implementation of a DCEMP to be secured by a planning condition.</p> <p>An air quality assessment will be submitted with the planning application and will determine baseline conditions at the Site, assess its suitability for the proposed end-use and consider the effects of the development given its size and nature in accordance with the requirements of the National Planning Policy Framework (NPPF). The air quality assessment</p>



QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
	<p>quality impacts.</p> <p>During the operational stage, emissions of NO_x, PM₁₀ and PM_{2.5} from traffic associated with the Proposed Development using the local road network may have the potential to impact on local air quality.</p> <p>Existing residential properties located in the vicinity of the Site are sensitive receptors to the potential changes in air quality.</p>		<p>will be in line with LBRuT validation checklist requirements for air quality assessments. Reference will be made where applicable to policy requirements set out in the London Borough of Richmond Local Plan 2018 (Local Plan 2018) and relevant Supplementary Planning Documents.</p> <p>It is considered that the demolition, construction or operational effects of the Proposed Development relating to Air Quality are unlikely to be significant.</p> <p>Separate energy and sustainability statements will be prepared as application reports and submitted in support of the planning application. Through the application of the recommendations contained within these reports, the effects associated with the operational stage of the Proposed Development will be managed such that they will not result in any significant environmental effects. The operation of the new development should benefit from latest energy standard and strategies which may</p>



QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
3.2 Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?	<p>Likely: The Proposed Development would be likely to generate noise and vibration during the demolition and construction phases which could have some negative effects within the surrounding area. It will also generate some noise during the operational phase.</p> <p>Lighting levels associated with the Proposed Development is unlikely to alter significantly from the existing baseline conditions given the urban nature of the site.</p> <p>The release of heat, energy or electromagnetic radiation are not considered relevant to the proposed development.</p>	<p>Unlikely: Noise reduction / mitigation measures will be implemented during the demolition and construction phases to minimise the potential temporary effects of noise on nearby sensitive receptors, set out in the DCEMP</p> <p>Given the nature of the Site and surrounding area and when considering the existing uses on site, it is considered unlikely that the existing noise climate in the local area would be significantly affected.</p> <p>It is anticipated that design measures will be incorporated into the Proposed Development, potentially including adequate treatment to the orientation, façade and glazing of windows to mitigate the potential effects of noise on future residents.</p>	<p>also minimise the impact on air quality.</p> <p>Recommend the preparation and implementation of a DCEMP to be secured by a planning condition.</p> <p>The results of a noise survey and design recommendations relevant to the operational phase will be contained within an Acoustic Assessment and/or Acoustic Design Statement which will be submitted with the planning application.</p>
3.3 Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface	<p>Likely: There is a potential for pollutants to be released into the ground or River Thames during the demolition or construction phases. It therefore, considered possible that</p>	<p>Unlikely: Best practice demolition and construction techniques will be adopted in accordance with a DCEMP.</p>	<p>It is recommended that a Phase 1 Land Contamination Desk Study Report, to include a preliminary risk assessment be submitted with the planning application and where</p>

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
	<p>waters, groundwater, coastal waters or the sea?</p> <p>pollution of controlled waters could occur if not adequately managed.</p> <p>A Desk Study and Ground Investigation Report was prepared in 2017 and concluded that there is a low risk of there being a significant contaminant linkage that would result in a requirement for major remediation work and that there were no elevated levels of contaminants within the soil samples tested.</p>		<p>necessary will include recommendations of further detailed site investigations. It is recommended that this be secured by a planning condition in accordance with current legislation and best practice which would adequately mitigate potential effects associated with land contamination.</p>
<p>3.4 Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?</p>	<p>Likely: The site is located within the LBRuT AQMA due to exceedances of nitrogen dioxide (NO₂) and particulate matter (PM₁₀) annual mean objectives and the PM₁₀ 24-hour mean objective.</p>	<p>Unlikely: The effects on local air quality are not expected to be significant and appropriate mitigation measures would be implemented to minimise effects on air quality.</p>	<ul style="list-style-type: none"> ■ An air quality assessment will be prepared to determine baseline conditions at the Site, assess its suitability for the proposed end-use and consider the effects of the development given its size and nature in accordance with the requirements of the National Planning Policy Framework (NPPF). Reference will be made where applicable to policy requirements set out in the London Borough of Richmond Local Plan 2018 (Local Plan 2018) and relevant Supplementary Planning Documents. ■ It is considered that the demolition, construction or operational effects of the



QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
			<p>Proposed Development relating to Air Quality are unlikely to be significant. The air quality assessment will be in line with LBRuT validation checklist requirements for air quality assessments submitted with the planning application. Design measure to promote sustainable transport modes will be set out in relevant transport related documents, including:</p> <ul style="list-style-type: none"> ■ Transport Assessment; ■ Construction and Logistics Plan; ■ Delivery and Servicing Plan; ■ Travel Plan; ■ Active Travel Zone assessment; and ■ Car and Cycle Parking Management Plan.
<h4>4. POPULATION AND HUMAN HEALTH</h4>			
<p>4.1 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?</p>	<p>Likely: As with any development project there is the risk that accidents could occur during the construction phase. Given the residential nature of the proposed end use the risk of accidents is considered to be minimal.</p> <p>The Site is located adjacent to the River Thames, within Flood Zones 3A and 3B. The risk of flooding will be</p>	<p>Unlikely: Any risk of accident during construction will be controlled in accordance with health and safety legislation and good site management procedures to be outlined in a DCEMP. This will manage any potential risks to the environment and emergency measures in the instance of an environmental accident, such as</p>	<p>None required although recommend the preparation and implementation of a DCEMP to be secured by condition.</p> <p>Preparation of a FRA and drainage strategy to mitigate and manage on and off-site flood risk (taking account of climate change) and implementation to be secured by</p>

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
	<p>assessed within a standalone FRA and Outline Drainage Strategy which will ensure the protection of future occupants against the risk of flooding.</p> <p>A preliminary UXO Risk assessment undertaken in 2017 recommended that due to the known falling of a V-1 bomb immediately south of the Site a detailed risk assessment should be completed. In light of this baseline information, a detailed risk assessment will be undertaken will be submitted in support of the planning application.</p>	<p>spillages or fire.</p> <p>Drainage measures will include allowances for climate change which will be set out in the supporting drainage strategy and suitable levels of attenuation will be incorporated into the Proposed Development.</p>	<p>condition.</p>
<p>4.2 Will the Project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example, due to water contamination or air pollution)</p>	<p>Unlikely: During construction there is a potential temporary risk to human health due to air pollution from demolition and construction processes.</p> <p>Whilst the potential for localised sources of contamination exist on site, development of an appropriate remediation strategy, if necessary would mitigate potential effects on existing and future residential receptors.</p>	<p>Unlikely: Potential effects during construction would be mitigated via the implementation of best practice site management procedures and development of an appropriate remediation strategy if necessary. As detailed above this could be secured by an appropriate planning condition.</p>	<p>Implementation of best construction practices and development of an appropriate remediation strategy to be secured by condition.</p> <p>The FRA and Drainage Strategy will investigate potential sources of flooding at the Site. It will demonstrate that any flood risk relating to the Proposed Development or caused by the Proposed Development elsewhere is mitigated using appropriate design solutions and management</p>

QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
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procedures.

5. WATER RESOURCES

<p>5.1 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?</p>	<p>Likely: The River Thames borders the Site to the south. The Environment Agency’s (EA) modelled floodplain map shows that part of the site is located in Flood Zone 3a whilst the south-eastern corner of the Site is located in Flood Zone 3b. The Site is therefore at risk of flooding from the River Thames. Land in Flood Zone 3a is assessed as having an annual probability of fluvial flooding greater than 1% or tidal flooding greater than 0.5%. Land located within Flood Zone 3b is classified as functional floodplain where water has to flow or be stored in times of flood.</p> <p>The LBRuT Strategic Flood Risk Assessment Level 1 plan indicates that the Site is located in an area which benefits from flood defences.</p> <p>A Ground Investigation report undertaken in 2017 indicated that groundwater is likely to be present at the base of the Kempton Park Gravel and flowing towards the River</p>	<p>Unlikely: Adopting best practice construction techniques will ensure that the potential for significant effects on water quality can be adequately managed by preventing surface water during construction from leaving the site.</p>	<p>Preparation of a FRA and drainage strategy to mitigate and manage on and off-site flood risk, in addition to best practice construction measures to be set out in a DCEMP. Implementation to be secured by a planning condition.</p>
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QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
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Thames.

6. BIODIVERSITY (SPECIES AND HABITATS)

<p>6.1 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).</p>	<p>Likely: The site is a previously developed urban site.</p> <p>The site is not subject to any statutory or non-statutory nature conservation designations. There is one statutory designated site within a 1km radius: Ham Lands Local Nature Reserve. There are seven non-statutory designated Sites of Importance for Nature Conservation within a 1km radius. There are five lowland mixed deciduous woodland Habitats of Principal Importance within 1km of the Site.</p> <p>The Site is located adjacent to the River Thames and Tidal Tributaries which is a Site of Metropolitan Importance to Nature Conservation.</p> <p>Several buildings and trees were identified in 2016 as having the potential to support roosting bats. A Preliminary Bat Roost Assessment of trees and buildings was undertaken in 2017. All buildings were assessed as</p>	<p>Unlikely: No impact on protected, designated areas are anticipated.</p>	<p>It is proposed that a Preliminary Ecological Appraisal, Phase 1 habitat survey and any supporting protected species surveys be undertaken and submitted with the planning application as a supporting planning document. Any recommendations set out in the Preliminary Ecological Appraisal will be designed into the Proposed Development and secured by a planning condition.</p>
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QUESTIONS TO BE CONSIDERED	(PART 2A) / (PART 2B) – ANSWERS TO THE QUESTION AND EXPLANATION OF REASONS (LIKELY/UNLIKELY)	IS THIS LIKELY TO RESULT IN A SIGNIFICANT EFFECT?	MEASURES ANTICIPATED TO MITIGATE LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS
	<p>having low potential to support roosting bats. All trees within the redline boundary and four mature trees immediately adjacent to the redline boundary were assessed as having negligible potential to support roosting bats</p>		
<p>6.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the Site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?</p>	<p>Likely: Whilst the Site is currently assessed to be generally of low nature conservation value, a Phase 1 Habitat survey undertaken in 2016 identified the main habitats present included hardstanding/buildings, amenity grassland, broadleaved woodland, species-poor non-native hedgerows, dense scrub, introduced shrub and scattered trees.</p> <p>Habitats present at that time (2016) were considered to be of local value only. In 2019 the updated LBRuT Biodiversity Action Plan included a Habitat Action Plan for Hedgerows.</p> <p>As referred to in section 6.1 above, several buildings and trees were identified in 2016 as having the potential to support roosting bats.</p> <p>Trees within the Site boundary have</p>	<p>Unlikely. Given that the Site is generally of low nature conservation value, it is considered that the presence of any protected species can be mitigated by implementing standard industry best practice measures in addition to ecological design measures inherent in the scheme design. Impacts are therefore not anticipated to be significant.</p>	<p>A Preliminary Ecological Appraisal, Phase 1 habitat survey and any supporting protected species surveys will be submitted with the planning application, which will set out appropriate mitigation measures where necessary.</p> <p>Reference will be made where applicable to policy requirements set out in the London Borough of Richmond Local Plan 2018 (Local Plan 2018) and relevant Supplementary Planning Documents.</p> <p>An Arboricultural Impact Assessment will be submitted with the planning application, which will include a Tree Survey and an Arboricultural Method Statement and will be used to inform the design process. It will set out</p>

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	the potential to support breeding birds.		mitigation measures and working practices if required to avoid or mitigate impacts to existing trees during demolition, construction and operational phases.
7. LANDSCAPE AND VISUAL			
7.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	<p>Unlikely: The Site is located within an urban area, bounded to the south by the River Thames. Policy LP18 of the LBRuT Local Plan 2018 states that development proposals should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy. Developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas, and incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.</p> <p>Diamond Jubilee Gardens is located within the Site boundary. It is the site of a former open-air swimming pool and some of the features have been</p>	Unlikely: Given the urban nature of the Site significant effects are considered unlikely.	Potential Landscape and Visual effects associated with the Proposed Development will be considered within the DAS and submitted in support of the application. Sensitive design measures will be inherent within the scheme design.

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7.2	<p>retained as part of its heritage. Part of Twickenham Embankment is also located within the Site boundary. Other parks located within the vicinity include York House Gardens, Orleans Gardens, Orleans House and Gardens and Marble Hill House and Park. None of these aforementioned Parks are designated.</p> <p>Likely: The Site is located within an urban area and used by many local residents and visitors. Residential dwellings located to the east of the site directly face onto the site and users within other buildings located on King Street and Cross Deep, depending on location, may have a view of the site. In addition, residents or visitors to Eel Pie Island will also journey through the site.</p> <p>The proposed three-storey building located on Water Lane will be in keeping with existing surrounding development.</p>	<p>Unlikely: The maximum height of the Proposed Development is four to five storeys. However, high-quality development and associated open space and landscaping are likely to improve the visual appearance of the area when compared to the current situation.</p>	<p>Sensitive design measures will be inherent within the scheme design. A Design and Access Statement will be submitted in support of the planning application which will set out the design process and how it has taken account of the surrounding environment.</p>
8. Cultural heritage/archaeology			
8.1	<p>Likely: There are no Listed Buildings located within the Site boundary, though there are a number of Grade II</p>	<p>Unlikely: Potential effects on heritage assets will be assessed within an Archaeology and Heritage</p>	<p>Sensitive design measures taking account of heritage assets within the surrounding area will be</p>

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<p>heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? where designated indicate level of designation (international, national, regional or local).</p>	<p>Listed Buildings within 100m of the Site and a number of Grade II* Listed Buildings within the wider area. There are no Grade I Listed Buildings located within 100m of the Site.</p> <p>There are a number of non-designated assets located within the Site boundary. Additionally, many of the buildings on Eel Pie Island are also designated as Buildings of Townscape Merit.</p> <p>The Site is located within the Twickenham Riverside Conservation Area (Area 8) which was designated in recognition of the historic and architectural value of the original village core and river frontage.</p> <p>The boundary of the Queen’s Road Conservation Area, which includes a number of Grade II Listed Buildings runs along the middle of Kings Street, directly opposite the Site boundary.</p> <p>There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 100m of the Site boundary.</p>	<p>Assessment which will support the planning application. The findings of this work will inform the scheme design to ensure that it is sensitive to the surrounding area. Any non-designated assets potentially impacted by the Proposed Development are not considered likely to be of high significance.</p>	<p>inherent within the scheme design, and will be outlined within the Design and Access Statement submitted in support of the planning application.</p> <p>An Archaeology and Heritage Assessment will prepared and submitted with the application.</p>



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9. TRANSPORT AND ACCESS			
9.1 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	<p>Likely. Due to its urban location, the Site is highly accessible for pedestrians and cyclists due to the established network of footways and pedestrian connections in the surrounding area. The Public Transport Accessibility Level for the Site is calculated as 5 indicating a Very Good to Excellent level of public transport accessibility. The Embankment, which is located within the Site boundary acts as a starting point for a walk along the towpath to Richmond Bridge, is a designated Highway and is part of the Richmond Cycle Network.</p> <p>The site itself is used by the public for recreational and amenity purposes.</p>	<p>Unlikely Adopting best practice construction techniques will ensure that the potential for significant effects on the public footpath network and the surrounding highway network are adequately reduced and / or eliminated ensuring that access for the public to recreational or other facilities is maintained at various stages throughout the construction stage where possible. Once operational the proposed redevelopment is likely to improve access throughout the area.</p> <p>The construction phase adverse impact will be temporary in nature. Once construction is complete, it is considered likely that there will be a permanent beneficial effect and that the Proposed Development will improve the amenity value of the site and surrounding area.</p>	<p>A number of transport related documents will be submitted with the planning application which will include a Transport Assessment; Construction and Logistics Plan; Delivery and Servicing Plan; Travel Plan; Active Travel Zone assessment; and Car and Cycle Parking Management Plan.</p> <p>Mitigation measures and transport related design features will be set out and secured via planning condition where relevant. The design process will take account of all transport-related constraints relevant to the Site and surrounding area, which will be set out in detail within the supporting planning documents.</p> <p>Communication to local residents will be ongoing prior to and during demolition and construction to inform residents of any roads or transport networks being temporarily closed or diverted.</p>

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<p>9.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?</p>	<p>Unlikely. The site is located in an urban area and is used by private and public transport, which may experience congestion at peak times.</p> <p>The reduction in car-parking spaces from 80 to approximately 23 will reduce private cars accessing the site.</p>	<p>Unlikely The reduction in cars accessing the site for parking spaces will reduce the likelihood of significant effects. This will be reviewed in the Transport Assessment and other supporting transport documents.</p>	<p>Preparation of documents referred to in Section 9.1 in support of the planning application and identification of mitigation measures to be secured by condition.</p>
<p>10. LAND USE</p>			
<p>10.1 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.</p>	<p>Likely: The site is located in an urban area with a range of surrounding uses including recreational, residential, commercial and retail all of which could be affected by the Proposed Development.</p> <p>Diamond Jubilee Gardens is a local park and located within the Site boundary, which will be directly affected by the Proposed Development.</p>	<p>Unlikely: Potential effects during construction are not expected to be significant and would be mitigated via the implementation of the best practice site management procedures, secured by an appropriate planning condition. Operational stage effects are not anticipated to be significant.</p>	<p>None required, other than inherent design measures and mitigation measures set out in supporting planning documents.</p>
<p>10.2 Are there any plans for future land uses on or around the location which could be affected by the</p>	<p>Likely: The Site comprises one section of the Twickenham Riverside and Approaches (TW7) allocation within the adopted Twickenham Area</p>	<p>Unlikely: It is considered that the Proposed Development is likely to complement the existing allocations within the surrounding area.</p>	<p>None required.</p>

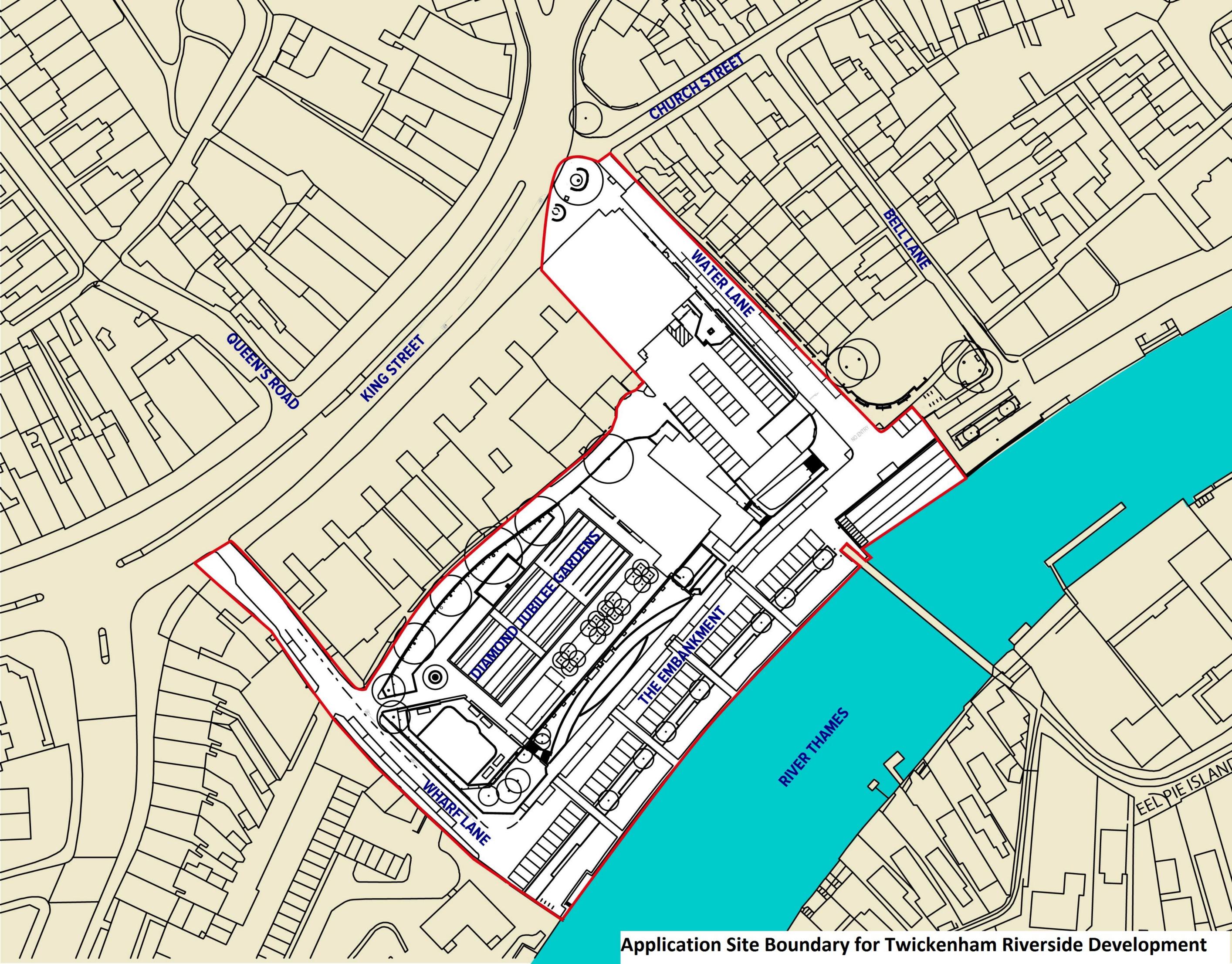
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project?	<p>Action Plan (TAAP, 2013).</p> <p>Section 7.5 of the TAAP sets out general principles, transport and environmental proposals and design guidelines for the Twickenham Riverside area.</p> <p>The TAAP also sets out more detailed policies and the framework for future development for specific opportunity areas surrounding the Site including the Civic and Cultural Quarter, Retail Core and Heath Road.</p>		

11. LAND STABILITY AND CLIMATE

<p>11.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?</p>	<p>Likely: The Environment Agency’s (EA) modelled floodplain map shows that part of the site is located in Flood Zone 3a whilst the south-eastern corner of the Site is located in Flood Zone 3b. The Site is therefore at risk of flooding from the River Thames. Land located within Flood Zone 3b is classified as functional floodplain where water has to flow or be stored in times of flood.</p> <p>Figure 5 of the LBRuT Strategic Flood Risk Assessment (2016) indicates that</p>	<p>Unlikely: Drainage considerations will be inherent in the Proposed Development to mitigate against flooding consistent with the advice and discussions with the EA and LBRuT. This will be presented in a Drainage Strategy to support the planning application.</p> <p>Suitable levels of attenuation will be incorporated into the Proposed Development and set out within the drainage strategy to reduce runoff rates whilst allowing for climate</p>	<p>Preparation of a FRA and Drainage Strategy in support of the planning application and recommendations implemented and secured by a planning condition.</p> <p>The FRA will investigate the potential sources of flooding at the Site. It will demonstrate that any flood risk relating to the Proposed Development or caused by the Proposed Development elsewhere is mitigated using appropriate design solutions and management</p>
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	<p>the Site is located in an area which benefits from flood defences. The existing development forms part of the flood defence line though there are various openings along this line.</p>	<p>change.</p>	<p>procedures.</p>
<p>12. CUMULATIVE EFFECTS</p>			
<p>12.1 Could this project together with existing and/or approved development result in the cumulation of impacts together during the construction/operation phase?</p>	<p>Unlikely: Given the size of the application site and nature and scale of the proposed development, it is not anticipated that a cumulative assessment, which would form part of an EIA, will be required.</p> <p>Notwithstanding this, where appropriate, proposed developments within the surrounding area will be considered within the relevant application reports to be submitted in support of the planning application.</p>	<p>Unlikely: Consideration will be given to future developments/growth within the vicinity of the Site and included within relevant application reports that will support the planning application where relevant.</p>	<p>Consideration of relevant proposed developments within the area within application reports submitted in support of the application if required by specific application reports.</p>
<p>13. TRANSBOUNDARY EFFECTS</p>			
<p>13.1 Is the project likely to lead to transboundary effects?</p>	<p>Unlikely: The Proposed Development is not on a large enough scale or close to any boundaries to be considered to have transboundary effects.</p>	<p>Unlikely: The Proposed Development is not considered to have any significant transboundary effects.</p>	<p>None required.</p>

wsp



Application Site Boundary for Twickenham Riverside Development



Twickenham Riverside Buildings to be Demolished.