

**Development Management**

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Avison Young  
The Met,  
24 Percy Street,  
London

Dear Sir or Madam,

**Re:    Redevelopment at 84 Manor Road, North Sheen**  
**Formal request for screening opinion under Regulation 6 of The Town and Country**  
**Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)**

Thank you for your letter dated 7<sup>th</sup> July 2025, on behalf of Avanton Richmond Development Ltd ('the applicant') and the accompanying EIA Screening Report, to seek a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (the EIA Regulations) in respect of the Applicants forthcoming detailed planning application for the residential-led, mixed-use redevelopment at Manor Road, North Sheen.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 10 October 2025, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Nicki Dale'.

Nicki Dale  
Team Manager, Development Management

## **LONDON BOROUGH OF RICHMOND UPON THAMES - DEVELOPMENT MANGEMENT (PLANNING)**

### **FORMAL EIA SCREENING OPINION IN CONNECTION WITH THE REDEVELOPMENT AT 84 MANOR ROAD, NORTH SHEEN**

#### **1. SUBMITTED INFORMATION AND REGULATION 6 REQUIREMENTS**

Under Regulation 6 (2) of the EIA Regulations, the person making a request for a screening opinion, must provide the following:

- (a) a plan sufficient to identify the land;
- (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;
  - II. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (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; and
  - II. the use of natural resources, in particular soil, land, water and biodiversity; 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.

#### **2. An EIA Screening Report ('the Report') has been submitted which:**

##### **(a) *Identifies the site***

The Site is located in North Sheen, south-west London within the administrative boundary of the London Borough of Richmond-upon-Thames ('LBRuT'). The Site comprises an area of approximately 1.5 hectares (ha). The triangular shaped Site is bound by:

- Manor Road (the B353) to the east.
- Overland rail lines to the south (serving the Southwest Trains route to / from London Waterloo).
- Overland rail lines (serving the Southwest Trains route to / from London Waterloo) and London Underground Limited (LUL) overland rail lines to the west (serving the District Line).

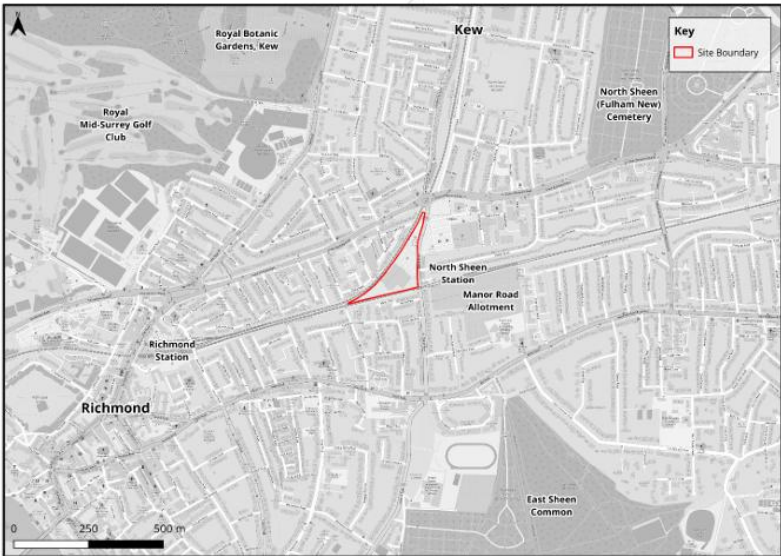
The existing Site currently comprises a low-rise retail store formerly occupied by Homebase. The former retail store is located in the centre of the Site, towards the southern end. To the north-east, east, south and south-west of the retail store is hard-standing. The majority of this hard-standing comprises the access road, surface car-parking in the north-east and servicing areas within the south-west of the Site. In total, the existing Site provides parking for approximately 150 vehicles.

There are several trees planted within the surface car-parking area and at various locations around the Site's perimeter.

Figure 2.1: Site Boundary Plan (Source: Google Earth)



Figure 2.2: Site Location Plan (Source: OpenStreetMaps)



**(b) Provides a description of the development:**

**(i) Provides a description of the physical characteristics of the development and demolition works.**

Section 3 of the Report gives a description of the proposed development. This can be summarised as follows:

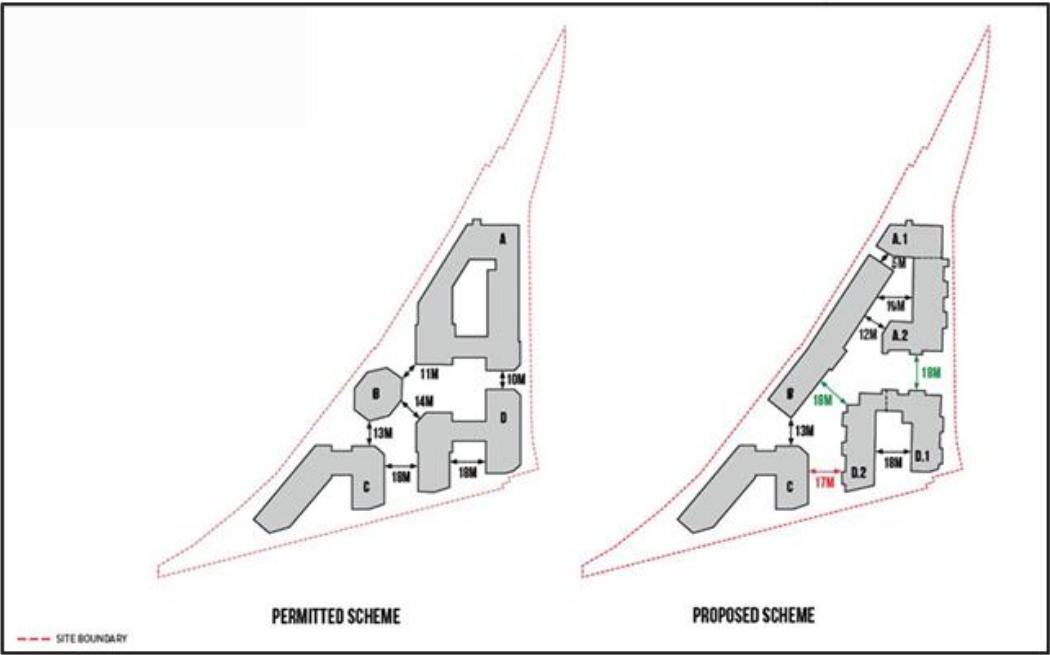
- The Development will necessitate the demolition of all existing buildings and structures on the Site.
- The Development would provide five new buildings ranging from one storey to ten storeys in height.
- Each building would have residential uses along with commercial and community uses in some buildings along Manor Road.
- The development would provide a total of 408 studio one, two and three-bedroom homes, along with 340 purpose-built shared living (PBSL) studios.
- The proposal would provide approximately 458m<sup>2</sup> of commercial floorspace which is a reduction of 36m<sup>2</sup> compared with the Permitted Scheme.
- Vehicle access and servicing would be from Manor Road to the north and west of the buildings along an access road.
- Vehicle parking on site would be limited to disabled parking spaces located at surface level.
- The buildings' energy needs would be provided by air source heat pumps (ASHPs).
- Construction would take place during fixed hours and not on Sundays or bank holidays.

In addition to the description of development provided, the submission sets out the key amendments compared to the previously approved scheme, referred to in the report as the 'Permitted Scheme' (LPA ref 19/0510/FUL) and is also illustrated in a submitted plan (see below):

- The reduction in the overall building height on the Site and removal of the tower building.
- The proposed scheme makes several changes to the previous scheme, including altering the number of blocks, their height and massing, and their arrangement within the site.
- The site massing strategy introduces variation in both height and massing.
- The massing of Blocks B, A2, D1 and D2 has been adjusted.

- Revised site massing with the lowest building heights at the eastern edge, adjacent to Manor Road. Overall, the revised massing steps up towards the centre of the site.
- The allocated retail area and community spaces for Blocks A2 and D1 and the shared amenity areas for Block B (PBSL), have been relocated towards the centre of the Site.
- A large central landscaped plaza central to the development is proposed surrounded by these co-living, amenity, retail and community facilities and primary building frontages.
- Additional routes through the buildings have made to increase the permeability of the Site.

**Figure 2.3: Layout Comparison between the Development as Amended 2023 (Permitted Scheme) and the Emerging Proposed Scheme Layout 2025**



**(ii) Provides a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;**

Section 4 of the Report gives a description of the site with regard to environmental sensitivities, including historic land uses, transportation, air quality, noise, ecology, cultural heritage, townscape, geology, soil contamination, water resources, drainage and flooding, socio-economics and health, and waste. The report also makes a brief risk assessment of a major accident at the site.

**(c) a description of the aspects of the environment likely to be significantly affected by the development.**

As noted above, Section 4 of the Report gives a description of environment context and site sensitivities, and section 5 considers the likelihood of significant environment

effects, and which aspects of the environment are most likely to be affected by the development when assessing the site context.

**(d) 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; and**
- ii. the use of natural resources, in particular soil, land, water and biodiversity;**

Section 5 of the Report considers the likelihood of significant environmental effects in the following environmental areas:

- Transportation
- Air Quality
- Noise and Vibration
- Ecology and Nature conservation
- Townscape and visual amenity
- Cultural heritage
- Geology, Ground Conditions and Contamination
- Soil and agricultural land
- Water Resources, Flood Risk and drainage
- Socio-economics
- Wind Microclimate
- Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
- Climate Change and Greenhouse Gases
- Health and Wellbeing
- Waste
- Risk of Major Accidents and disasters
- Cumulative effects

Consideration has been given to both:

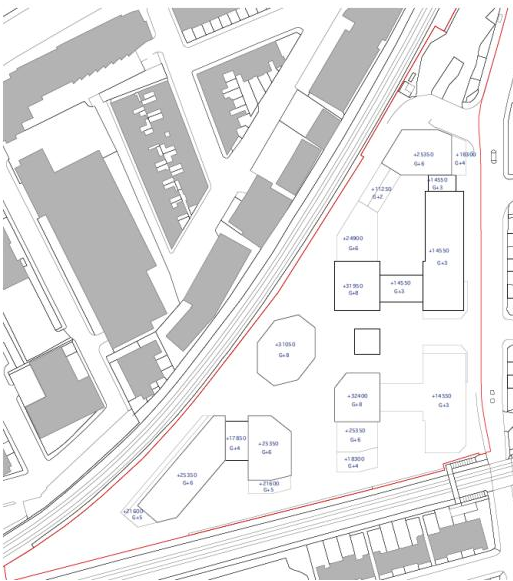
- the site preparation, demolition and construction work associated with the Development ('the Works')
- The operation of the completed development ('the Completed Development')

**(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.**

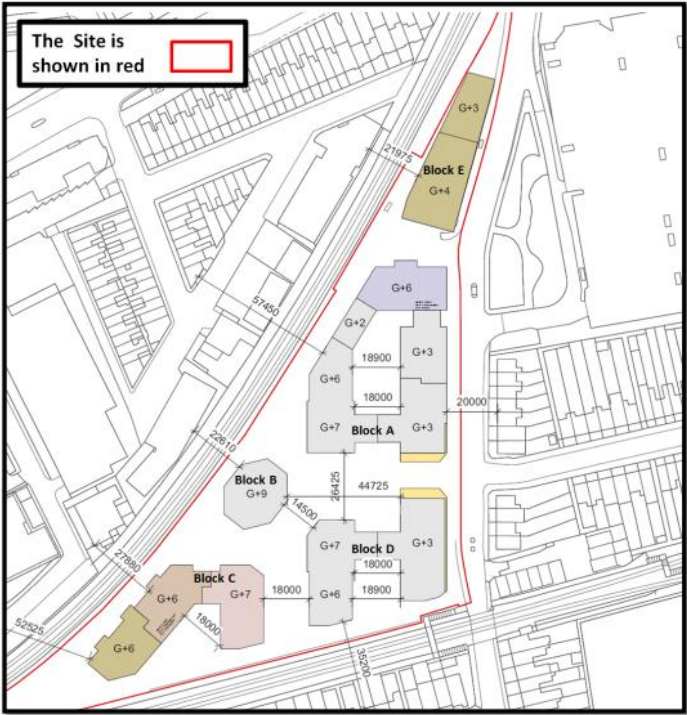
Section 5 also sets out mitigation measures or features.

In addition, Appendix I-VI includes previous EIA Screening Opinion Reports and Opinion given by both the LBRuT and the Greater London Authority (GLA). All resulted in negative screening opinions, concluding these were not EIA development. In line with 5(4) of the Regulations, these will be considered as part of this screening opinion.

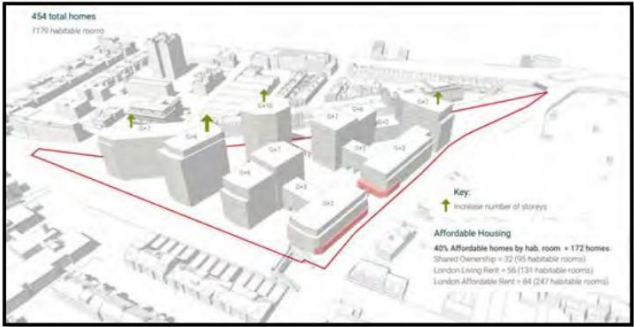
- EIA Screening Report prepared by GVA, submitted 2018, and a negative Screening Opinion of LBRuT adopted in December 2018. This relates to a development involving the demolition of buildings on the site and construction of c. 400 residential units in 4 blocks of up to 9 storeys in height as well as commercial units and associated infrastructure such as public realm, access and parking. A plan of the proposed scheme is shown adjacent:



EIA Screening Report prepared by Avison Young, submitted October 2019, and negative Screening Opinion of GLA adopted November 2019. This scheme comprised demolition of existing buildings and structures and comprehensive residential-led redevelopment of a single storey pavilion, basements and four buildings of between four and eleven storeys to provide 439 residential units (Class C3), flexible retail /community/ office uses (Classes A1, A2, A3, D2, B1), provision of car parking spaces and cycle storage facilities, landscaping, public and private open spaces and all other necessary enabling works. A plan of the proposed scheme is shown adjacent:



EIA Screening Report prepared by Avison Young, submitted July 2020, and a negative Screening Opinion adopted August 2020. The proposal was an amended version of the scheme above which increased the heights of three blocks to a maximum of 11 storeys and the removed Block E above the bus terminus. The resulting scheme increased the number of residential units by 21 to provide a total of 454 residential units. This scheme considered here was later granted planning permission under ref. 19/0510/FUL.



3. EIA REGULATIONS

The Development is not a type that could constitute Schedule 1 Development.

Schedule 2: Threshold

A screening exercise has been undertaken in accordance with Regulation 5 and 6 of the EIA Regulations. The Local Planning Authority (LPA) has had regard to the above regulations in addition to Planning Practice Guidance (PPG) when undertaking the screening exercise.

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- a) any part of that development is to be carried out in a sensitive area; or
- b) 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;

“sensitive area” means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981;
- a National Park ;
- the Broads ;
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The site is not located in a ‘sensitive area’. The LPA is of the view that the proposal would be an Urban Development Project as defined under Schedule 2 part 10 (B) of the Regulations, and therefore the thresholds set out in Schedule 2 of the Regulations have been applied:

Table 1: Schedule 2 developments

| Development type                                                                                                                                      | Schedule 2 criteria and threshes                                                                                                                       | Indicative criteria and threshold                                                                                                                                                                                                                         | key issues                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas; | (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or<br>(ii) the development includes more | Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless<br><br>the new development is on a significantly greater scale than the previous use, or<br><br>the types of impact are of a markedly different nature or | Physical scale of such developments, potential increase in traffic, emissions and noise. |

|  |                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
|--|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  | than 150 dwellings; or<br>(iii) the overall area of the development exceeds 5 hectares. | there is a high level of contamination.<br><br>Sites which have not previously been intensively developed:<br>(i) area of the scheme is more than 5 hectares; or<br>(ii) it would provide a total of more than 10,000m <sup>2</sup> of new commercial floorspace; or<br>(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings). |  |
|--|-----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

The EIA report confirms the site is approximately 1.5 ha and proposes over 150 dwellings. Therefore, the proposal exceeds the applicable thresholds and **constitutes Schedule 2 development** for the purposes of the EIA Regulations. It would involve complete redevelopment of the site which has not been intensively developed at present and would be on a greater scale than at present. However, the proposed development would not cover an area of more than 5a, nor provide more than 10,000m<sup>2</sup> commercial space, nor provide more than 1000 dwellings, therefore remaining below the indicative thresholds.

However, it should not be presumed, that those falling above the indicative threshold should be subject to assessment, or those falling below these thresholds could never give rise to significant effects, and therefore each development will need to be considered on its merits.

Where it is determined that the proposed development does not require an EIA, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment. Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance.

It therefore needs to be screened to determine whether it is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

### Schedule 3: Selection Criteria

When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the 2017 Regulations, however, the PPG notes that not all of the criteria will be relevant in every case.

1. *Characteristics of development*
2. *Location of development*
3. *Types and characteristics of the potential impacts*

Each case should be considered on its own merits in a balanced way: When the local planning authority or Secretary of State issues its opinion they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3:

## **4. SCREENING OPINION**

The scheme currently proposed is set out in the Screening Report prepared by Avison Young in July 2025 and summarised above.

When screening Schedule 2 developments, the EIA Regulations (5 (4)) require LPAs to take into account the following:

- Any information provided by the applicant
- The results of any relevant EU environmental assessment, which are reasonably available to the relevant planning authority
- Such other selection criteria set out in Schedule 3.

The Council has consulted relevant national and regional bodies on the Screening Report submitted, including the Greater London Archaeological Advisory Service (GLAAS), Historic England, Natural England, the Environment Agency, GLA and Transport for London. It has also consulted local bodies or internal departments of the Council including Environmental Health, Ecology, LLFA, Policy, Transport and Urban Design. Comments are summarised below:

|                          |                                                                                                                                                                                                                                                  |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Planning policy</b>   | No comments                                                                                                                                                                                                                                      |
| <b>Historic England</b>  | Archaeology not needed to be included within EIA                                                                                                                                                                                                 |
| <b>Ecology</b>           | Not require an EIA                                                                                                                                                                                                                               |
| <b>Noise / Vibration</b> | Not likely to result in significant environmental effects in relation to noise and vibration, subject to appropriate control and mitigation.                                                                                                     |
| <b>Air Quality</b>       | No EIA development                                                                                                                                                                                                                               |
| <b>Contaminated land</b> | The contaminated land function doesn't need to argue for an EIA                                                                                                                                                                                  |
| <b>Historic England</b>  | Consider it unlikely there will be a significant impact on historic environment, therefore an EIA may not be required in relation to the historic environment                                                                                    |
| <b>Natural England</b>   | Potential for significant effects on statutorily designated nature conservation sites or landscape and further consideration is required. Advise, sufficient information on the potential facts must be submitted with the planning application. |

|                                   |                                                                                                                   |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Urban Design</b>               | Negative screening response remains the same for the current application.                                         |
| <b>Lead Local Flood authority</b> | Refers to policy requirements.                                                                                    |
| <b>Environment Agency</b>         | No comments                                                                                                       |
| <b>Highways</b>                   | Not EIA development                                                                                               |
| <b>TfL</b>                        | Seems to request TA, multi modal impact assessment, CLP, DSP, travel plans, CIL, mitigation secured through S106. |

When considering significant environmental effects, this is undertaken in the context of the EIA Regulations.

### Characteristics of Development

Consideration has been given to the characteristics of the development on (1) schedule 3 of the EIA Regulations.

*The characteristics of development must be considered with particular regard to—*

- a) the size and design of the whole development;*
- b) cumulation with other existing development and/or approved development;*
- c) the use of natural resources, in particular land, soil, water and biodiversity;*
- d) the production of waste;*
- e) pollution and nuisances;*
- 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;*
- g) the risks to human health (for example, due to water contamination or air pollution).*

### The size and design of the whole development;

The current proposals differ from the scheme screened most recently and which obtained planning permission (the Permitted Scheme, ref. 19/0510/FUL) in the following, key, ways:

- An increase in the number of residential units proposed on the site with 408 self-contained residential units (studio, 1-, 2- and 3- bedroom homes - a reduction of 45 compared with the Permitted Scheme) along with 340 purpose-built shared living (PBSL) studios.
- A reduction of 36m<sup>2</sup> in commercial floor space compared with the Permitted Scheme, with approximately 458m<sup>2</sup> of commercial floorspace in total.
- A decrease in the maximum height of the proposed buildings from 11 storeys to 10 storeys maximum.

However, the scheme would be similar to the previously proposed schemes in several ways:

- The proposed scheme would contain residential and commercial uses.

- The overall size and design of the development would be similar to previous schemes. Some buildings, such as Blocks A.1 and C, would be in the same form and location as earlier schemes. Other buildings would be located in similar locations, such as along Manor Road, and of similar or lower height.
- Vehicle access would also be provided by a road from Manor Road to the west boundary of the site. The development would also be largely car-free except for the provision of a limited number of disabled parking space. The scheme would also include landscaping, play space and cycle parking.

The proposed development would be of different design to the Permitted Scheme and larger in size in terms of the number of residential units. However, the changes to the design and size of the scheme and characteristics of the development are not considered to be significant (in context of the EIA Regulations) in comparison to previous developments and screening opinion, which identified these as non EIA developments. It is not considered that the proposal would have a materially different impact on the use of natural resources, the production of waste, pollution and nuisances, the risk of major accidents/disasters or the risk to human health, compared to previously considered schemes and subject to the normal planning conditions and mitigation secured through an application process.

- Transport: The site has access to the wider strategic road network, has a PTAL of 4, with 2 stations within approximately 1km of the Site (Richmond and North Sheen) and proximity to several bus stops. Inevitably, it is acknowledged the development, both during works and as completed, will impact the transport network. However, with a CTLP this can be managed during the Works and is not deemed to be significant. Similarly, given the modest level of parking, space for delivery and servicing, reduced traffic generation compared to existing, and with Travel Plans, Delivery and Servicing Plans, improvements to North Sheen Station, cycle parking provision, and other mitigation secured through conditions / S106, this would negate potential significant effects.
- Townscape and visual amenity: The development will no doubt have an urbanising effect and impact on townscape and visual amenity, both during the works and the end design. However, this is a brownfield site, within a tall and medium building zone. With appropriate CMS conditions (hoarding and site layout), CEMP, supporting material in the submission (DAS, Townscape and Visual Assessments) informing how the design reflects context, regard to the Urban Design Study, significant effects are not predicted, in the context of the EIA regulations.
- Culture heritage: The site does not contain any heritage assets, however, is within the setting of designated and non-designated assets. Like townscape and visual amenity, the scheme will inevitably impact upon hertiage. However, during works this can be managed through conditions, archaeological desk studies, and for the completed development, negotiations to ensure a high acceptable design, informed by hertiage assets, view assessments, materials, will prevent significant environmental effects in the context of the EIA Regulations.
- Socio-economics: To ensure the completed development does not place unacceptable demand on infrastructure, the scheme will be required to provide, Health Impact Assessment, Open Space and Play space

assessments, to identify potential impact and any necessary mitigation to cater for uplift in demand, informed by HUDU and consultation with AFC. With such, significant effects can be negated.

- Wind Microclimate: Due to the low-rise nature of the existing building, impacts arising from works are not deemed significant. For the completed development, wind conditions may be altered. However, to ensure this does not give rise to uncomfortable or unsafe wind conditions, micro-climate assessments will be necessary, information by the Lawsons criteria, with appropriate mitigation secured where necessary. The Report also confirms the design is being informed by a wind microclimate expert.
- Daylight, sunlight, overshadowing, solar glare and light pollution: Environment significant effects are not identified during works given the low rise nature of the existing building. For the completed development, the scheme will have an effect, however, provided the development is informed by daylight / sunlight / shadowing reports, have a sensitive lighting scheme and appropriate orientation, and with appropriate materials, significant environmental effects are not identified in the context of EIA Regulations.

#### Cumulation with other existing development and/or approved development:

- In the wider area, permission has been granted for the redevelopment of the Stag Brewery in Mortlake (ref. 22/0900/OUT) as well as for new residential units at Richmond College site (ref. 21/3136/FUL). These developments are a consideration as to potential cumulative impacts of the proposed development. No concerns about the cumulative impacts of the proposals have been raised by consultees. Overall, there are not considered to be any existing or approved developments near the site that cumulatively might give rise to significant environmental effects subject to the mitigation measures (including highway works, travel plans, air quality assessments, etc.) proposed through a normal planning application process and subject to this EIA screening.

#### The use of natural resources, in particular land, soil, water and biodiversity:

- Geology, ground conditions and contamination: Such effects are deemed to be mitigated through reports and conditions securing desk top studies, site investigations, drainage, remediation, UXO assessment and watching brief and CEMP (PPE, storage of materials, procedures for spills).
- Water resources, flood risk and drainage: Taking into account the flood designations of the site, with the submission of policy required and LVC documents, including FRAs, Drainage, SUDs, inherent design measures, confirmation from utility companies confirming necessary infrastructure or timetable to secured such, and CEMP, evacuation plans relating to surface water / ground water flooding, significant environment effects are not envisaged during works or completed development.
- Ecology and nature conservation: The site is a reductant brownfield site, with a former retail use, and is predominantly hard surfaced. To avoid significant effects, further surveys are recommended upon submission, and conditions to limit timings of works, supervision and safeguarding,

submission of EMP. Conditions will also be secured for BNG, sensitive lighting, and ecological enhancements. With such, significant environmental effects during works and the completed development are not envisaged.

The production of waste;

- Waste: The development will generate waste, through both Works and Completed Development. However, with CEMP, Waste Management Plans, Circular Economy / Whole Life Cycle, and inbuilt design requirement for refuse and recycling storage facilities, the scheme is not deemed to give rise to significant effects, in the context of the EIA Regulations.

Pollution and nuisances;

- Air Quality: The designation of the Borough as a AQMA is acknowledged, as is the potential impacts on air quality arising from dust, plant, machinery, traffic, etc. However, it is deemed this can be managed so not to cause significant effects, both through works and completed development, via CEMP, dust management plans, EVCP, ASHP energy strategy.

Noise and vibration:

- Main source of noise is identified as traffic, rail and air travel, with the potential of vibration from rail travel. The potential for noise and vibration is realised, both through works, and the completed development from traffic and plant. With the use of CEMP, noise management plans, and with the modest level of parking, servicing and delivery plans, plant noise limits, this is not deemed to be significant. However, consideration of the rail needs to also be given regarding proposed occupants.

Risk to human health:

- Health and wellbeing: Taking into account geology, contamination, noise, air quality, windows, microclimate, daylight, sunlight, overshadowing, lighting, water resources, flood risk and drainage, and social economics, the Works and Completed development are not deemed to give rise to significant environment effects on human health and wellbeing of the works, surrounding residents and communities, and occupants and visitors of the development, subject to the mitigation, policy and standards secured.

Risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change;

- Climate change and greenhouse gases: Consideration has been given to the impact arising from the Works and completed development, however, with necessary credential requirements required by policy and standards on matters such as energy, sustainability, building fabrics, carbon footprint, waste, flooding, and with integral design measures with minimal parking, the environmental effects are not deemed significant.
- Accidents / Disasters: The Report identifies the potential risk of accidents, including Mogden Sewage Treatment Works. In addition, the site has a number of constraints / designations, which may give rise to potential

accidents / disasters, including flooding (groundwater, drainage, fire, surface water); proximity to high pressure gas pipe, last industrial land use contamination and UXOs. However, with best practice reports, compliance with development plan policies, consultation with statutory consultees (HSE / Gateway One / EA) and with mitigating conditions and obligations, significant effects are not identified through the course of the works or completed development.

### Location of Development

*The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—*

- a) the existing and approved land use;*
- b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;*
- c) the absorption capacity of the natural environment, paying particular attention to the following areas—*
  - (i) wetlands, riparian areas, river mouths;*
  - (ii) coastal zones and the marine environment;*
  - (iii) mountain and forest areas;*
  - (iv) nature reserves and parks;*
  - (v) European sites and other areas classified or protected under national legislation;*
  - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;*
  - (vii) densely populated areas;*
  - (viii) landscapes and sites of historical, cultural or archaeological significance.*

The Report sets out the environmental context and site sensitivities, and considers the impact on such:

The development, given its location, is not deemed to cause a significant effect on the absorption capacity of: wetlands, riparian areas, river mouths; coastal zones and the marine environment; mountain and forest areas;

### *The existing and approved land use;*

- The site is a vacant Brownfield Site, with a former retail use, has consent for a similar development, and is on a site allocation site (SA29) seeking comprehensive residential-led redevelopment with a flexible range of uses, including retail, office and community/social. Surrounding the site predominantly contains, transport infrastructure, residential uses, open space, retail, light industry. In response to such, the proposed land uses contained within the development are not deemed to give rise to significant effects on environmental sensitivities, in the context of the EIA Regulations, subject to mitigation. However, the design will need to consider the London Underground Rail and Network Rail Safeguarding Zone within the siting and design of the scheme.
- Historical land uses: Predominantly industrial until the present day retail accommodation was erected. There is potential for contamination arising from the past industrial land use, however, significant effects can be mitigated (Table 2).

- There have been no significant changes in the designations, character or land use of the immediate vicinity (noting the approved consent at Stag Brewery) since the previous screening opinions were adopted. There are not thought to be any significant changes in the environmental sensitivity of the immediate vicinity of the site, the abundance of natural resources nearby, or absorption capacity of the local natural environment.

*The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground and the absorption capacity of the natural environment, paying particular attention to nature reserves and parks, and the European sites and other areas classified or protected under national legislation;*

- *The bedrock is identified as London Clay Formation, overlain by sand and gravel. There is not land for agricultural use.*
- The site is within Flood Zone 1, has a number of flooding designations, namely, increased Potential Elevated Groundwater, Area Susceptible To Groundwater Flood, Critical Drainage Area, Risk of Flooding Surface Water (1 in 1000, 1 in 100, and 1 in 30 chance), Throughflow Catchment Area. As set out previously, with confirmation from utility companies and appropriate mitigation, the development is not deemed to have a significant impact on water.
- In terms of nature conservation, there are no statutory or non statutory sites designated within the site, however, Richmond Park is approximately 1.1km south of the site designated a Special Area of Conservation (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). There are 3 non statutory nature conservation designations within approximately 500m of the site (Kew Gardens, East sheen and Richmond Cemeteries and Pesthouse Common, and Richmond Park and associated areas – all designated as SINC's). The Development is not deemed to cause a significant effect on such sensitivities., however, the submission of supporting evidence with the application is recommended to consider any potential impact and mitigation
- The Report confirms a Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment was undertaken in 2019, and Ecological Impact Assessment and Biodiversity Net Gain Report in May 2023. No habitats of principal importance were found, and the Site yields negligible potential for roosting bats. As set out previously, it is deemed the impact on such environmental sensitivities will not be significant, subject to submission of LVC documents, compliance with policy, and good practice.

*The absorption capacity of the natural environment, paying particular attention to areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;*

- In terms of Air Quality the site is located within a Borough wide Air Quality Management Area. As previously set out significant effects can be mitigated during works and completed development, via CEMP, dust management plans, EVCP, ASHP energy strategy.

*The absorption capacity of the natural environment, paying particular attention to densely populated areas;*

- With respect to population and social ecological, the Report identifies the number of primary and secondary schools and GPs in the locality, the provision of public parks and open spaces. It is of note the site is within a public open space deficiency area. With an appropriate HIA, and assessment of play space and open space, with appropriate onsite provision in accordance with planning policy, and mitigation where necessary secured through a S106, significant effects will not be caused.

*The absorption capacity of the natural environment, paying particular attention to landscapes and sites of historical, cultural or archaeological significance.*

- The site does not have any hertiage assets, although within the setting or Sheendale and Sheen Road conservation areas, and a number of BTMS within Manor Road, Trinity Road and St Georges Road in particular. The site is not within a protected view, however, the Report identifies the views of importance. The site is within tall and mid rise building zone. It also identifies OOLTI opposite the site. The site sites outside an archaeological priority area. The submission sets the applicants have undertaken a study to identify the likely zone of Theoretical Visibility of the site and townscape character areas, and identified townscape character areas within the ZTV of high to exceptional value. With such, and Heritage Assessment, a high standard of design, desk top studies, as required by policy, the impacts arising from the scheme are not deemed to be significant in the context of the EIA regulations.

Types and characteristics of the potential impacts

The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

- a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- b) the nature of the impact;
- c) the transboundary nature of the impact;
- d) the intensity and complexity of the impact;
- e) the probability of the impact;
- f) the expected onset, duration, frequency and reversibility of the impact;
- g) the cumulation of the impact with the impact of other existing and/or approved development;
- h) the possibility of effectively reducing the impact

The potential environmental effects arising from the characteristics and location of the development have been considered, against matters such as magnitude and spatial extent, nature, transboundary, complexity, probability, duration and reversibility, and cumulative impacts (arising from nearby development – such as Stag Brewery, the college site, Barnes Hospital and also cumulative from the environments effects caused by the development).

It is noted, the effects arising from the works, in particular transport, air quality, noise and vibration, nature conservation, townscape, heritage, contamination, water

resources, socio economics, micro-climate, waste, are not deemed complex, would be for a limited duration, and mostly reversible.

It is not thought that the characteristics of the development, location and immediate environment or the types and characteristics of the potential impacts of the development would be significant in the context of the EIA Regulations, subject to suitable mitigation (Table 2) so as to warrant an EIA in the context of the Regulations. In addition, the impacts on the environment are not thought to be significantly different to previous schemes in terms of magnitude, spatial extent, nature, transboundary nature, intensity, complexity, probability, onset, duration, frequency, or reversibility, which were not deemed to be EIA development.

In line with Regulation 5(5) of the EIA Regulations, the relevant authority should state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been significant adverse effects on the environment. In this instance, the impact of the development cumulatively with other existing or approved development is thought can be mitigated by other measures, secured through conditions and section 106 mitigation, during the course of a planning application, namely:

**Table 2: Features, mitigation and documents to mitigate significant adverse environmental effects in the context of the EIA Regulations**

| Issue               | Features / mitigation / documents                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Highways            | <ul style="list-style-type: none"> <li>• Construction Transport Logistics Plan</li> <li>• Modest levels of parking</li> <li>• Contributions towards highway network and public transport as found necessary during application process</li> <li>• CPZ reviews and permit restrictions</li> <li>• Travel Plans</li> <li>• Delivery and Servicing Plan</li> <li>• Signposting</li> <li>• Highway and traffic management Plans</li> <li>• Car park management plan</li> <li>• Road Safety audits</li> <li>• Transport Assessment</li> </ul> |
| Air Quality         | <ul style="list-style-type: none"> <li>• Air Quality Neutral</li> <li>• EVCP</li> <li>• Cycle parking and infrastructure</li> <li>• Mitigation during construction – ECMP</li> <li>• Air Quality Assessment</li> <li>• Dust management plans</li> <li>• ASHP</li> <li>• Energy strategy in accordance with policy</li> </ul>                                                                                                                                                                                                             |
| Noise and vibration | <ul style="list-style-type: none"> <li>• CEMP</li> <li>• Noise and vibration assessment and management plans</li> <li>• Modest parking</li> <li>• Servicing and Delivery plans</li> <li>• Conditions to restrict plant noise</li> <li>• Internal noise levels within units</li> <li>• Post completion acoustic verification</li> </ul>                                                                                                                                                                                                   |

|                                              |                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Biodiversity and nature conservation         | <ul style="list-style-type: none"> <li>• Works undertaken during appropriate seasons</li> <li>• CEMP</li> <li>• PEA</li> <li>• Lighting Strategy</li> <li>• Ecological enhancements</li> <li>• Biodiversity Net Gain</li> <li>• Urban Greening Factor</li> <li>• AIA and AMS</li> <li>• Landscaping scheme</li> </ul>                                                      |
| Townscape and heritage                       | <ul style="list-style-type: none"> <li>• Construction (Environmental) Management Plan</li> <li>• Heritage Statement</li> <li>• Archeologically Deck Based Assessment</li> <li>• Townscape and Visual Impact Assessment – views</li> <li>• Design and Access Statement</li> </ul>                                                                                           |
| Geology, ground conditions and contamination | <ul style="list-style-type: none"> <li>• Contamination assessments, with appropriate remediation</li> <li>• UXO assessment and watching brief</li> <li>• CEMP</li> </ul>                                                                                                                                                                                                   |
| Water resources and flood risk               | <ul style="list-style-type: none"> <li>• CEMP</li> <li>• Drainage</li> <li>• FRA</li> <li>• Utility infrastructure capacity confirmation</li> <li>• Evacuation / emergency plans</li> <li>• Inherent design measures</li> </ul>                                                                                                                                            |
| Social infrastructure                        | <ul style="list-style-type: none"> <li>• Health Impact Assessment</li> <li>• Health contribution in line with HUDU model</li> <li>• Assessment and contribution towards play, playing fields, open space</li> <li>• CEMP</li> <li>• Contamination assessment with remediation</li> <li>• Daylight, sunlight and overshadowing</li> <li>• Air quality assessment</li> </ul> |
| Microclimate                                 | <ul style="list-style-type: none"> <li>• Wind Micro-climate assessment</li> <li>• Daylight, sunlight and overshadowing assessment</li> <li>• Lighting strategy</li> <li>• Overheating assessment</li> </ul>                                                                                                                                                                |
| Climate changes                              | <ul style="list-style-type: none"> <li>• Meet the necessary policy credentials</li> <li>• Integral design measures</li> <li>• Limited parking</li> <li>• Meet flood levels / SUDS</li> <li>• Off set payments</li> </ul>                                                                                                                                                   |
| Waste                                        | <ul style="list-style-type: none"> <li>• CEMP</li> <li>• Circulator Economy Statement / Whole life cycle</li> <li>• Waste Management Plan</li> <li>• Appropriate storage facilities for weekly collection</li> </ul>                                                                                                                                                       |

|                             |           |                                                                                                                                                                                                                     |
|-----------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk of Accidents Disasters | Major and | <ul style="list-style-type: none"><li>• CEMP</li><li>• FRA</li><li>• Contamination Report</li><li>• UXO assessment</li><li>• HSE – tall buildings and gas works</li><li>• Utility infrastructure capacity</li></ul> |
|-----------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Reference will also be given to the legal agreement secured in the consented scheme, to identify any further potential mitigation to avoid significant impacts.

**Conclusion**

In conclusion, it is recognised the development is likely to have environment effects arising from the development, in particular, arising from:

- Demolition and construction process – in particular, noise, air, vibration, traffic – however, this will be of a temporary nature
- Cumulative impacts with nearby developments, for example Stag and Richmond College
- A change in built form and impact on surrounding heritage impacts
- The use of natural resources and result in waste and forms of pollution
- An alteration in the traffic and parking environment
- An impact on the social infrastructure

However, in this instances, the site is not within a Sensitive Area as defined by the EIA Regulations, and it is deemed potential effects can be dealt with via the usual legislative requirements, including the submission of documents sets out in the Local Validation Checklist, policy requirements, and with conditions and planning obligations, as summarised above. With such, the impacts arising from the development would not be of the magnitude or complexity that will cause significant environmental impact in the context of the 2017 Regulations.

Based on the information provided, and for the reasons set out above and potential mitigation measures, which will assist in avoiding / preventing any potential significant effects on the environment in the context of the EIA Regulations, an Environmental Impact Assessment would not be required for the development under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended).

**Decision: Negative Screening Opinion**

**Date of Opinion: 10 October 2025**

Yours faithfully



Nicki Dale  
Team Manager, Development Management