



21 March 2022

Dear Ms Thatcher,

**Planning Application 21/2758/FUL Environmental Impact Assessment**

The Twickenham Riverside Trust (the Trust), Owner of the Diamond Jubilee Gardens, objects to the absence of an Environmental Impact Assessment (EIA) for the Twickenham Riverside scheme, planning application reference 21/2758/FUL.

The Planning Department issued a Negative Screening Opinion on May 7<sup>th</sup> 2020, determining that the development fell below the EIA threshold.

**The Trust requests that an up-to-date Screening Opinion is undertaken forthwith to capture alterations made to the scheme post the adopted Screening Opinion (of May 2020), and to enable a reappraisal of all screening criteria given the scheme's likely effect on the environment by virtue of its size, nature and location.**

National Planning Practice Guidance states "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." Also advising, that EIAs are likely to be required for new development that is on a significantly greater scale than the previous use.

**The trust asks the following information be reappraised, from the May 2020 Screening Opinion:**

- The Site is currently developed and located within an urban area
- Whilst the Development would be on a greater scale than its existing use, the surrounding area includes built developments of a similar uses and scales.
- Given the surrounds, context and existing receptors, the type of impacts the Development will generate are not deemed markedly different in nature to those already in the area.
- The development is not within a sensitive area
- The development does not exceed the Schedule 2 or indicative thresholds.
- The development is not Schedule 2 development.
- On review of the indicative thresholds and criteria, the specific nature and context of

the Site, the existing development on the Site, the type and scale of Development, and the potential environmental effects, it is considered the Development does not represent EIA development.

**And that the following changes/additions and other pertinent factors are taken into consideration, including:**

- 1)** Extension of the development site boundary to include the Tidal Thames
- 2)** Significant reconfiguration of flood defences on the Embankment following advice onboarded from the Environment Agency
- 3)** Installation of 2 floating structures to the Thames; *“without appropriate avoidance measures, there is some potential for both direct and indirect impacts on this designated site. Potential impacts include increased sediment deposition which can smother important fish habitats such as spawning grounds, increased suspended sediment which can reduce feeding behaviour and oxygen exchange as well as impulsive sound sources and vibration which could impact fish migration or cause fatal internal injuries”.* (5.3 Environmental Impact Assessment submitted with planning application)
- 4)** Removal of over 50 trees from the development site (within a Conservation Area)
- 5)** The reprovision of open space to flood zone 3
- 6)** Construction site run-off could impact the water quality in this section of the river (and further downstream).

**Particular regard should be given to the following sections of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 screening Matrix:**

**9.1** 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?

**10.1** 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)).

**10.2** 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?

**11.1** 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? 1. Where designated indicate level of designation (international, national, regional or local).

**11.2** Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)

**12.1** Are there any areas or features which are protected for their cultural 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).

**13.2** 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?

**14.1** Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. [...] leisure /sports / recreation.

**14.2** Are there any plans for future land uses on or around the location which could be affected by the project?

**15.1** 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?

Thank you for your consideration in this matter, and with my best wishes,

Luke Montgomery-Smith  
*Chair, Twickenham Riverisde Trust*