

## **Environmental Issues**

### **1. Why did the Council commission a Development Brief before considering environmental issues, such as flooding and contamination, which might make redevelopment unviable?**

**Ans:** The cost of assessing the environmental impact of potential redevelopment is an iterative process and where the eventual cost will probably exceed the cost of the initial Development Brief. The Council as landowner is following a logical sequence; first, review via the Development Brief whether regeneration of the LRIE remains commercially viable and secondly, should commercial viability stand, then review at an initial level environmental matters that might require substantial mitigation works therefore affecting commercial viability – flooding, drainage, decontamination and highways works being items most likely to incur high cost if substantial mitigation work is required.

After confirming whether substantial mitigation works are required, it is logical to then analyse the issues in further detail. For example if flooding is an issue, can housing be delivered with engineered solutions that do not make construction costs prohibitive? If extra design costs remain within estimated build costs, it is safe to then think about building design in more detail and then again check whether detailed proposals throw up other issues – for example deeper foundations and ground water levels. At each stage of an analysed problem, the assessment process looks at design solutions, then at costs and if they remain affordable against likely market returns, the process continues on with the evaluation process where eventually there is information fit for planning purposes and assessment of environmental issues have produced information sufficient to publish with an application an Environmental Statement.

Before determining any planning application on the LRIE, the Council as Local Planning Authority (LPA) will objectively review the Environmental Statement and if the statement is not sufficient in scope and detail, the LPA will not determine any application until it is satisfied environmental issues have been appropriately addressed.

### **2. How can the public be confident environmental considerations will go far enough in the context of regenerating the LRIE?**

**Ans:** Production of the Environmental Statement as part of any planning application will be more onerous to produce than any outline planning application, which is the likely form of the application on the LRIE. The Local Planning Authority (LPA) will not determine an outline application, with guidance design on where building types and quantum are proposed to be delivered, on the basis that all detailed issues can be covered at the stage of discharging reserved matters. At outline application stage, unless the LPA are satisfied proposals will not cause environmental issues both within the regeneration site itself - affecting estate occupants both existing and new – and also that proposals will not have any negative impact on occupiers beyond the regeneration site, the LPA will not determine any application unless further environmental investigative work is

undertaken. If there are any doubts as to any possible effect, the planning process will require more analysis work to be undertaken and if it is not undertaken within an agreed timescale, the application will be rejected.

**3. Should the LRIE be redeveloped can private landowners, whose own assets sit next door to the Council's land, be confident their property will not be affected adversely?**

**Ans:** There has already been considerable dialogue between the LRIE project team and neighbouring landowners and the Local Planning Authority (LPA) is aware of concerns over drainage, flooding and sewer capacity. The LPA will not only require development proposals to prove there will be no adverse effect on occupiers and neighbours but the LPA will use regeneration proposals as an opportunity to see if there are reasonable ways of improving local infrastructure that go beyond providing new infrastructure to mitigate against development proposals. For example persuading Thames Water to bring forward network repairs and upgrades that might benefit the estate. The LPA will seek for regeneration not to maintain the status quo but where possible to improve upon it and where this is in line with emerging Council policy.

**4. Is the existing Thames Water sewage infrastructure in the area capable of taking housing development in the area of the old football ground?**

**Ans:** Thames Water is under a statutory obligation to maintain a network that can absorb reasonable development. Thames Water will be a statutory consultee to any planning application and where that process is not one inviting Thames Water to object to proposals, but to confirm whether capacity is there and if not for Thames Water to confirm what they will do to address matters so that capacity is sufficient to accommodate development proposals.

**5. How can the Council consider delivering housing on the old football ground when the adjacent Newspaper House site had an application for residential development refused on the grounds of flooding?**

**Ans:** This application went to appeal and where the inspector upheld the Local Planning Authority (LPA) decision not to grant a consent. A primary reason for the rejection was that the inspector rejected the applicant's view that existing flood mitigation measures in the area meant the Flood Zone 2 status of the Newspaper House site could be treated as Flood Zone 1 where delivery of housing is not so problematic. The old football ground pitch is recorded within Flood Zone 1 by the Environment Agency. The two sites are critically different.

**6. Will the public be made aware of environmental assessment information before submission of any application in respect of the LRIE?**

**Ans:** Yes, the public will have an opportunity to understand what the environmental assessment process has thrown up. It is the Council's intention the public will be updated generally on the progress of development proposals and where there should be an opportunity for active engagement. That process will elicit informed public questions on infrastructure and potential environmental issues and where the Council will need to address those questions by offering to the public the findings of progressive environmental analysis work.

**7. At this early stage does the Council have any significant concerns over environmental issues and whether they might make regeneration proposals unviable?**

**Ans:** At this stage there are no known environmental challenges that represent unmanageable obstacles thereby making development unviable. Existing information available via organisations such as Thames Water and the Environment agency are sufficient at this stage to allow the Council to safely and wisely expend further monies looking at matters in more detail which it is hoped will lead to an outline planning application in 2022. There will be challenges ahead but none that the Council should not face up to in order to deliver regeneration on the LRIE