



Planning and Development

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Your Ref: WIE16725
My Ref: ENQ/20/0221
Direct line: 01992 785555 x 5561
Please ask for: Douglas Cooper
Date: 8th December 2020

Dear Mr Wells,

Re: EIA Scoping Opinion - Brookfield Riverside, Cheshunt

Thank you for your request for a scoping opinion submitted 22nd September 2020 on behalf of Sovereign Centros.

Under Section 17(3)(i) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [as amended], the Council has a duty to notify the consultation bodies of your request for a Scoping Opinion to remind them of their obligation to make available to you, if requested, any relevant non-confidential, information in their possession. Furthermore, under Section 17(3) (ii) the Council has a duty to inform you of the names and addresses of the bodies notified. Further to that duty, please find attached a list at the foot of this letter.

This decision [letter and enclosures] represents the Council's formal Scoping Opinion in accordance with Regulation 15 of the 2017 Regulations.

It is agreed that the following (as set out in Chapter 4) are scoped into the Environmental Statement:

- Demolition and Construction Works
- Socio Economic Effects
- Transportation and Access
- Air Quality
- Noise and Vibration [using 2017 survey data due to Covid 19 restrictions]
- Landscape and Visual Effects
- Ecology/Biodiversity [in line with any advice from the Herts and Middx Wildlife Trust]
- Greenhouse Gases and Climate Change
- Heritage
- Water Resources and Flood Risk

I note that consideration of **Transportation and Access** is to be limited to the environmental issues arising (i.e. driver delay, air quality (within the air quality section) and noise (within the noise and vibration section)) with the detailed transport assessment contained within a separate TA.

With regard to **Archaeology**, whilst I accept that the likely impacts such that inclusion within the ES is not necessary, I would expect to see this matter dealt with within a separate Heritage Statement.

With regard to **Built Heritage**, I accept that this may be scoped out of the ES, but expect assessment of sites (in particular the impacts on the setting of listed buildings and ancient monuments) included within an accompanying Heritage Statement.

With regard to the **LVIA** and the associated parameter plans which inform the assessment, these should include an allowance above parapet height to account for plant housing and ventilation - up to two metres is likely to be suitable.

With regard to **Waste Management**, although you suggest that this matter will be scoped out and I note the intention to re-provide the current household recycling facilities, this should be included within a comprehensive ES given that the household site is strategic for the borough and Riverside will be a future town centre with all the servicing and other pressures that this entails.

With regard to **Daylight, Sunlight and Overshadowing**, I agree with your reasoning for scoping this out.

With regard to **Wind**, I do not agree with your reasoning for scoping this out as wind micro-climate is a function of many more factors than simply building heights, which at up to eight storeys are not insignificant. This should form part of the ES.

With regard to **Human Health**, I agree with your approach of considering contributory factors to climate change along with air quality and noise within the relevant chapters of the ES, rather than within a standalone technical chapter.

With regard to **Risk of Major Accidents and/or Disasters**, given the future town centre status with civic offices and a high density of likely occupation/use, this should be extended to include potential security threats. I also note the presence of a high pressure 14 inch fuel pipeline. The points raised by Herts Constabulary around security are pertinent.

With regard to **lighting**, I agree that this should be limited to ecological impacts and referenced as appropriate in the relevant chapter.

With regard to floorspace and dwelling number maxima, I note that 250 flats is set as the upper limit. I have suggested in pre-application discussions that this figure could be higher with accommodation above the commercial units along the 'High Street'. It would make sense to leave some headroom in this regard for the purposes of scoping.

In terms of building heights, it would be useful to include storey heights and numbers within the parameter plans so that the Council is clear on the maximum density of occupation of individual buildings and for the avoidance of doubt through the reserved matters process.

I am content that utilities [capacity and delivery] are dealt with by means of a stand-alone Utilities Statement to accompany the outline planning application.

Assessment of Cumulative Schemes

The extent of developments identified in Paragraph 4.15 of your Scoping Report references sites which are within 1km of Brookfield and will have permission by the time this application will be presented to committee [including the Garden Village] is considered to be a credible strategy for this assessment. If, in preparation of the ES, it is found that there are other strategic sites which would entail linkages in terms of cumulative impact then these should be considered as part of the study. The large scale allocated sites include, but are not limited to:

- Park Plaza [all four elements];

- Rosedale Park;
- Cheshunt Lakeside;

My experience of EIA's is that they can be duplicative of other documents submitted in support of planning applications. This is costly for the Applicant, can lead to the provision of conflicting information, create an unwieldy document for consideration by the public and consultees and is incredibly time consuming to assess. I would therefore be grateful if you could avoid duplication wherever possible.

Consultation with Statutory Bodies

Further to statutory consultation, I have previously provided responses received from Natural England, Hertfordshire Constabulary, Cadent and National Grid and Thames Water. Should any further representations be received, I will forward them for your attention.

Yours sincerely,

PP Douglas Cooper
Head of Planning & Development

Consultation Bodies:

Natural England -
 The Environment Agency -
 Thames Water -
 Hertfordshire County Council – Historic Environment Team -
 Hertfordshire County Council – Lead Local Flood Authority -
 Hertfordshire County Council – Education Authority –
 Hertfordshire County Council – Highway Authority -
 Hertfordshire Constabulary –
 Historic England –
 Highways England –
 UKPN -
 Herts and Middlesex Wildlife Trust -
 National Grid –
 Borough of Broxbourne – Environmental Health -