

**Environment Directorate
Planning and Transport Division**



PLANNING

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By Email Only

emma.penson@dwdllp.com

Dear Ms Penson

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (As Amended)

Site: Kneller Hall Royal Military School Of Music, Kneller Road, Twickenham, TW2 7DU

Proposal: Request to the London Borough of Richmond to adopt a screening opinion to determine whether the proposed development at Kneller Hall constitutes EIA development.

The proposed development comprises: The demolition of some existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities, a performing arts centre and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

I write in reference to your letter requesting a formal screening opinion of the Local Planning Authority under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) in respect of the above proposals.

Preamble

I can confirm that the Local Planning Authority is of the view that the proposed development would be an Urban Development Project as defined under Schedule 2 Part 10 of the EIA regulations. Although the site is constrained, it is not considered to be within a sensitive area and therefore the thresholds have been applied. The applicable thresholds and criteria of urban development projects as outlined in Schedule 2 are:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The site is identified in the screening report as 9.7 hectares (ha). Therefore the LPA considers the proposed scheme constitutes "Schedule 2 development" for the purpose of the EIA regulations and the proposal needs a screening opinion to determine whether the proposed development is likely to have significant effects on the environment and whether an Environmental Impact Assessment (EIA) is required.

Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the development; the location of the development; and the characteristics of the potential impact.

To aid the LPA in the determination of whether the project is likely to have significant environmental effects, the LPA has also had regard to indicative thresholds and criteria as set out in the EIA Regulations and NPPG.

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.

Sites which have not previously been intensively developed:

- *area of the scheme is more than 5 hectares; or*
- *it would provide a total of more than 10,000 m² of new commercial floorspace; or*
- *the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).*

Characteristics of development

(a) the size and design of the whole development:

The proposed new build development is not considered to be out of context with existing development on the site or in the local area in principle. The detailed design of the new build accommodation can be progressed and discussed with the LPA as part of the pre-application and application process. Contextual visuals as well as other technical and specialist reports should accompany the full planning application to enable the LPA to assess the impact of the development with the site constraints including but not limited to heritage assets, trees/landscaping and Metropolitan Open Land.

(b) cumulation with other existing development and/or approved development;

Although the site is surrounded by predominately residential development, many other planning applications nearby are of a minor nature. There is no relevant existing and proposed major development taking place in the immediate vicinity of the site. There are no other EIA developments within 200 metres of the site.

(c) the use of natural resources, in particular land, soil, water and biodiversity;

The proposed construction and operational phases of the proposed development would use resources in terms of land, water and energy like many types of major development. A future planning application would be expected to include a Construction Management Plan to minimise the consumption of natural resources, particularly non-renewable resources, where possible. The site has existing biodiversity value and the proposed development should offer the opportunity for net biodiversity gain which is a critical consideration. A Preliminary Ecology Appraisal and further surveys, which are recommended in the applicant's EIA report, should be undertaken in the relevant seasons and be submitted as part of a future

application. This would be a suitable process to assess these issues. An Energy Strategy would also be expected with a planning application to deal with sustainability considerations in accordance with the development plan without the need for an EIA.

(d) the production of waste:

As with nearly all construction, the proposed development will result in waste materials from the preparation and undertaking of works. Nevertheless, it is not considered these would require further investigation before the submission of an application.

(e) pollution and nuisances.

The proposed development would create dust and noise etc particularly during the construction phase. These issues could be dealt with via a construction management plan enforcing best practise. Noise from vehicles/visitors arriving and leaving the site, including to make deliveries/collections, also needs to be considered.

Emissions would be associated with the number of vehicles travelling to and from the site, associated with the proposed uses. A Transport Assessment and Draft School Travel Plan would be submitted in support of the planning application including on-street vehicular parking stress surveys which need to be carried out during the proposed hours of operation of the school on all roads and streets within 500m walking distance of the site. The Draft School Travel Plan should seek to reduce car use and increase the use of active travel measures, thereby further reducing impacts on emissions to air. A Noise Assessment would be required as part of an application to assess the anticipated noise levels at the site from vehicle movements, use of the outside play areas and outside sports facilities and appropriate mitigation measures will be proposed. The proposed development is not associated with hazardous substances or toxic emissions to air. It is considered that this could be dealt with through a series of conditions and management plans agreed with the Council in the event planning permission is granted.

(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 site is located within Flood Zone 1. However, parts of the site are at risk of surface water flooding and the entire site is at risk of groundwater flooding. A Flood Risk Assessment including a Sequential Test, a Drainage Strategy and SuDS Strategy also need to ensure that there is no increase to flood risk at the site or surrounding area as a result of the proposed development. Sustainable drainage measures will be included within the scheme. The Lead Local Flood Authority would be a statutory consultee as part of any future application.

The proposed development would locate a school for day pupils, which would therefore lead to more frequent person and vehicular trips than the site land use that it replaces, a residential educational establishment. It would also lead to an increase in the number of person trips by vulnerable road users, up to 600 young people aged 11-16. The B361 Kneller Road is a two-way local distributor road which accommodated 8,483 vehicles per 12-hour day in 2019, the full-year pre-COVID manual count. It has a variable running lane width near the site of 6m to 4.1m. There are no signal controlled pedestrian crossings near the site. No traffic counts have been undertaken close to the site in recent years, work is needed to help assess the need for and impact of a signalised pedestrian crossing close to the proposed main pedestrian access to the site. The applicant must also assess the safety of this road for cyclists.

The proposed land use is likely to create at least 319 two-way vehicular trips in the AM weekday peak hours and possibly 319 two-way vehicular trips in the PM weekday peak hour, depending on the amount of after-school activity, and the time employees leave the site. The B361 Kneller Road has double yellow lines on its northern side and single yellow

lines on its southern side close to the site. The carriageway is not wide enough for parents to stop on it and drop their children off safely. Therefore, the lining on the southern side of the road might need to be changed. Parents will need to access and egress the site to drive children to school. Detailed designs of the vehicular access and egress to assess whether these are safe and meet national highway design standards. Given the above it is clear the issue of highways safety needs to be fully addressed however it is considered this is capable as part of a planning application with the submission of the relevant documents.

(g) the risks to human health (for example, due to water contamination or air pollution).

The LPA does not have any records that there have been potentially contaminative uses associated with the site or adjacent land. Taking this into account and measures that could be applied and controlled through relevant Environmental Health and Safety legislation and Planning Conditions, the development is not deemed to give rise to significant effects.

Location of the Development

(a) the existing and approved land use;

The site comprises of previously developed land located within an urban setting. Associated facilities were also provided on the site, including indoor and outdoor sports facilities and pitches. The site has historically been used for educational purposes, as a music school for the military and the proposed use is not too dissimilar given a future proposal is for the education of secondary school aged children. The listed historical buildings on the site are proposed to be retained with modern additions demolished allowing a new purpose built educational use of the site. The site is constrained with the aforementioned heritage asset and the eastern part of the Site is located within Metropolitan Open Land (MOL).

The MOL land would be used for sports pitches and a new sporting pavilion is proposed, to support the continued use of the land for sports and recreation. A planning application is a sufficient process to determine whether the proposal would be an exception to 'inappropriate development' within the MOL and its impact on the openness or provide out-weighting 'very special circumstances'. The site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020). Within the MOL allocation, a multifunctional green space is proposed for pupils to use, this includes the provision of playing fields and sports pitches, that managed access for local schools and community groups will be provided to. The SPD also proposes that the western part of the site is developed for residential uses. However, as a result of the site constraints, there is not capacity at the site to deliver residential accommodation as well as the required school facilities. As such, the entire site is proposed to be delivered as a day school, with managed access opportunities secured as part of the planning application for local community groups and local schools (a community use agreement). Given the above, whilst the planning considerations are not straight forward, it is not considered that an EIA is required to determine whether the proposal would have a significant impact on the local environment.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

The site has no statutory ecology designations, however the aforementioned SPD states that a habitat corridor should be created to support a net gain in ecological value. Hounslow Heath Local Nature Reserve (LNR), is within 2 km of the Site. This is the which is located approximately 1.8 km to the west of the Site. 18 non-statutory sites are located within the 2 km search radius of the Site. The closest of these is the Duke of Northumberland's River north of Kneller Road Site of Importance for Nature Conservation (SINC), located approximately 150m to the east. As stated above A Preliminary Ecology Appraisal and further surveys need to be undertaken in the relevant seasons and be submitted as part of a future application – this would be a suitable process to assess these issues.

Trees within the Site are covered by the site-wide TPO, and the north east corner of the Site is Deciduous Woodland identified as Priority Habitat Inventory by Natural England. The vast majority of trees are proposed to be retained across the site and no development is proposed in the north east corner of the site. The applicant's report states it would be suitable for some trees to be removed (11 trees and 1 hedge). The trees that will be removed will be Category B or lower trees. A landscaping strategy would help ensure that pathways are positioned to steer people away from root protection areas and to ensure that there is sufficient space and soft landscaping around retained trees, and in particular Category A trees. It is considered that as part of a future application, appropriate tree protection measure details during the construction phase, a tree survey and Arboricultural Statement could accompany any submission and details agreed by suitably worded conditions in the event planning permission is granted, therefore it is considered the development could be suitably assessed as part of an application.

There are no agricultural, fisheries, tourism or minerals resources that could be affected by the proposed development.

(c)the absorption capacity of the natural environment, paying particular attention to the following areas—

The Site is not located within any sensitive areas, within the meaning of the EIA Regulations and there are no statutory designations within the Site i.e. there are no Scheduled Monuments, AONB, SSSI, National Parks, Registered Battlefields, Registered Historic Parks and Gardens, SAC, SPA, or Ramsar Sites. The nearest "sensitive area", as defined by the EIA Regulations is the Scheduled Monument 'London's Early Porcelain Industries: The Isleworth Pottery', situated approximately 2.2km north east of the Site. Syon Park SSSI is also located approximately 2.7km to the north east of the Site.

(i) wetlands, riparian areas, river mouths;

- No significant effect likely.

(ii) coastal zones and the marine environment;

- No significant effect likely.

(iii) mountain and forest areas;

- No significant effect likely.

(iv) nature reserves and parks;

- Discussed above

(v) European sites and other areas classified or protected under national legislation;

- No significant effect likely.

(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; -

The Site is located in an urban area, in close proximity to Chertsey Road (A316; dual carriageway). It is necessary to take account of air quality levels and to assess the vehicle movements that will be generated by the scheme. An Air Quality Assessment would accompany the full planning application. The advice from the air quality consultant would be factored into design decisions on mechanical and/ or natural ventilation for the proposed school. It is not considered a further Environmental Impact Assessment would be required.

(vii) densely populated areas; - The site is outside a Main Centre and located in a residential area characterised by houses. It is considered to be located in a medium density populated area in an outer borough. No significant impacts on human populations are likely and the planning application will be supported by the relevant technical reports.

(viii) landscapes and sites of historical, cultural or archaeological significance. There are two statutory listed heritage assets on the Site, and both are Grade II – Kneller Hall (and the curtilage listed buildings) and the listed wall that edges part of the Site. The Site is not within a Conservation Area.

Types and characteristics of the potential impact

(a)the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);

On the basis of the comments above, it is unlikely that there will be any significant environmental impacts arising from the proposed development. The potential impact of the development is confined to the site and the land immediately adjacent. Whilst harm could still occur and material planning considerations need to be fully assessed, specialist reports which would accompany a planning application would assess the impact of the development and set out the mitigation measures that will be implemented to ensure that the development is appropriate. The potential development impacts, relating to transport, air quality, drainage, energy, biodiversity and noise are all typical for an urban development project of this nature.

(b)the nature of the impact;

At both the construction and operational phase the potential impacts of the development are expected to be limited to heritage, transport, air quality, energy, trees, drainage, lighting, biodiversity and noise. The scheme is being carefully designed, with input from a range of technical consultants, to ensure that there is not an adverse impact on existing or new local residents, in the immediate surrounding area during both the construction and also the operational phase.

(c)the transboundary nature of the impact;

Any transboundary impact could be controlled by management schemes or suitably worded planning conditions. The impact of the development would likely be contained to the site and mitigation measures will ensure that there is not a wider impact to the development proposals. The use of the proposed sports pitches, by both the school and local community groups and schools will be managed appropriately, both within and outside of school hours.

(d)the intensity and complexity of the impact;

The potential impacts are typical of an urban development project such as this and do not raise any unusually intense or complex issues which could not be dealt with at a planning application stage. The site is located in an urban environment, where it is not uncharacteristic for sites to be redeveloped, for higher density development. The site would continue to provide an educational use with the removal of the ancillary residential uses and the introduction of improved and additional sporting facilities.

(e)the probability of the impact;

Although it is considered a further Environmental Impact Assessment is not required, there would still be some limited impacts if the development is granted planning permission and is implemented. These impacts would be appropriately managed and mitigated via planning conditions and legal obligations attached in the event planning permission is granted.

(f)the expected onset, duration, frequency and reversibility of the impact;

Construction impacts will be controlled by conditions such as a Construction Management Plan however it is not possible to gauge that impact until a more advanced stage. At this stage, the onset and duration of the construction phase is not known. It is likely the development would be phased and once completed operational impacts would be limited and mitigated via Conditions and legal obligations in the event planning permission was granted.

(g)the cumulation of the impact with the impact of other existing and/or approved development;

As discussed above, there are not considered to be any nearby major planning applications, within close proximity to the Site which would contribute to reasonable cumulative impacts. If another major development is determined close to the site, then it is considered that this can be appropriately managed via the CEMP and Construction Logistics Plan and would form a material planning consideration as part of a future planning application.

(h)the possibility of effectively reducing the impact.

Appropriate mitigation measures can be secured via Conditions and legal obligations attached to the future grant of planning permission. The specialist reports that will accompany the full planning application will set out in full the mitigation measures.

Conclusion

For the reasons above, having completed the screening exercise, the Local Planning Authority consider that the proposal is not like to have significant effects on the environment and the proposal does not require a further Environmental Statement under the terms of the EIA Regulations to accompany any future application. Material planning considerations can be fully assessed as part of an application. However, whilst an Environmental Statement is not necessary, robust information would be required on the potential impacts of the development identified above and details of how these impacts will be avoided or mitigated.

Yours Sincerely



pp Robert Angus
Head of Development Management