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Dear James

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Request for a Screening Opinion on Land West of Hospital Bridge Road, Whitton, LB of Richmond.

Introduction

On behalf of our clients, the Education and Skills Funding Agency/Bowmer and Kirkland, we write to request a screening opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as to whether the Local Planning Authority considers that an Environmental Impact Assessment is required to accompany a planning application proposing the redevelopment of the above site to accommodate a new 5FE secondary school and 300 place sixth form, associated internal and external sports facilities, new pedestrian and vehicular access and servicing. The site is proposed to be the permanent home for Turing School which already operates from temporary accommodation in Teddington and Hampton.

Applications for planning permission require a Local Planning Authority to issue a screening opinion as to whether an EIA is necessary where the proposed development is listed under Schedules 1 or 2 where it satisfies the criteria or thresholds set in the 2017 EIA Regulations.

As an 'urban development project' on a site exceeding 1 hectare, the development could potentially be classed as EIA development under Schedule 2 of the Regulations. This letter sets out the site details, the nature and purpose of the development and the main environmental issues that are likely to be associated with the proposed scheme. The scheme is also considered against the selection criteria set out in Schedule 3 of the Regulations.

The following screening letter assesses these matters in further detail.

The Site

The total site covers an area of 6.7 hectares and is shown edged in red on the plan which accompanies this letter. The site predominantly comprises grassland and is currently utilised in part for open storage by Sempervirens Nursery under the terms of an agricultural business tenancy, albeit we understand that they do not have planning consent for this activity. Trees line the boundary of the site at various points, demarcating it from the adjacent residential properties and other surrounding uses. It is understood the site has been used in the recent past for the grazing of horses. There are

scattered single storey buildings which are understood to relate to former equestrian use of parts of the site as grazing land. There are a small number of immature trees on the eastern portion of the site. It is unknown currently whether these trees are covered by Tree Preservation Orders. To the south east, the site adjoins a horticultural nursery business (Sempervirens Nursery), who's operations have also expanded to occupy approximately 30% of the proposed school site for the purposes of open storage and pallets as well as bags of gravel and aggregate. The Nursery business is to be consolidated within its formal site prior to the proposed development. The balance of the southern boundary to the site adjoins the rear gardens of houses on Stirling Road and Springfield Road, an undeveloped frontage to Berwick Close and a public footpath which separates the site from Heathfield Recreation Ground. To the west the site adjoins Borough Cemetery whilst to the north, the bulk of the boundary is adjoined by the rear gardens of properties on Redfern Ave. In the north-eastern corner however, the site adjoins the Whitton to Hounslow and Feltham rail line which runs in slight cutting at this point. Finally, to the east, the site abuts Hospital Bridge Road which at this point rises relative to the site from south to north leading to the vehicular bridge across the railway. Beyond Hospital Bridge Road lie further residential properties.

Vehicular access to the site is from Hospital Bridge Road via the access serving the nursery. The site has a Public Transport Accessibility Level (PTAL) rating of between 0 and 1b.

Whilst an area of open grassland may be seen as a scarce resource within an urban area, a vegetation classification assessment has identified that the type of grassland present is itself commonplace within the UK and as such the site is of no more than local significance.

Development Plan Position

The site is subject to planning policy contained within the NPPF, London Plan (2016) and emerging proposals of the new draft London Plan and Richmond's Local Plan (2018). The entire site is identified as Metropolitan Open Land. The site is also located within the area covered by the Whitton and Heathfield Village Planning Guidance SPD but is not the subject of any specific guidance or area character assessment within that document.

The Purpose of the Proposed Development

The proposed development would provide an entirely new build secondary school and sixth form for 1050 pupils (at full capacity). The school would be made up of a 5FE secondary school for 750 pupils and a post 16 sixth form for 300 pupils. The proposed development is proposed to be the permanent home for The Turing School which has been established in temporary accommodation in Teddington since Sept 2015 and Hampton since Sept 2018

It is proposed that the school buildings be located on the eastern part of the site, close to the Hospital Bridge Road frontage. The western part of the site is identified partially for open playing field use as part of the overall school development. The precise usage of the balance of the site is under discussion but will be an MOL compatible use.

Is an EIA Required?

The EIA Regulations indicate that requests for Screening Opinions should be accompanied by an appropriate level of information to assist the authority in reaching its decision. The following matters will each be dealt with in turn:

- The nature of the proposed development; and
- The consideration of the screening criteria.

The Nature of the Proposed Development

The works proposed include the demolition of existing structures and the construction of a new school facility contained broadly within the eastern part of the site north of the existing horticultural nursery use. The school will comprise two linked buildings (teaching block and sports hall). The school buildings range from 2 to 3 storeys in height.

The western area of the site will be utilised for soft, formal and informal recreation space.

The primary pedestrian and vehicle access to the school would be taken from Hospital Bridge Road to the east of the site utilising the existing access point to the Nursery, a staff car park and servicing facilities including a bus drop off area would be provided to the east of the proposed school building. There is also potential for a pedestrian only link to the public footpath which runs adjacent to the southern boundary of the site connecting to Powder Mill Lane and Springfield Road. The attached indicative layout drawing ALA-00-XX-DR-L-001 shows the currently proposed layout of the site and indicative areas given over to the different elements of the proposed scheme are as follows.

- MUGA = 2,000m²
- Ped Tarmac = 2,300m²
- Vehicle tarmac = 1,200m²
- Ped paving = 800m²
- Vehicle paving = 700m²
- Grass = 48,700m²
- Planting = 6000m²

Wider community usage of both internal and external sports facilities and the school hall is proposed under the terms of a community use agreement.

Consideration of Screening Criteria

The requirements to provide an EIA should be determined having regard to the Regulations and government advice set out in the National Planning Practice Guidance (NPPG) on Environmental Impact Assessment (2011). In determining whether a proposal constitutes EIA development, the determining body must consider whether a development falls within the relevant thresholds for either Schedule 1 or Schedule 2 development. Secondly, if development falls within Schedule 2 but not Schedule 1, it must be determined whether the development would be 'likely to have significant effects on the environment' by reference to Schedule 3.

Schedule 1 of the Regulations establishes the development categories for which an EIA **must** be submitted (our emphasis). These are proposals which have a clear potential for significant environmental effects such as crude oil refineries, thermal and nuclear power stations and installations for the processing of irradiated nuclear fuels. There are 23 types of development in this schedule but none include any of the elements proposed as part of this development.

Schedule 2 of the Regulations outlines the development categories for which an EIA **may** be required (our emphasis). Paragraph 10(b)(i) establishes that where the development includes more than 1 hectare of urban development which is not dwellinghouse development, this may require an EIA. As the portion of the site to be developed is 1.4 hectares, it exceeds this threshold. However, it should also be noted that Paragraph 10 (b) (iii) also advises that an EIA may be required where the overall area of the development exceeds 5 hectares. Given that the overall application site in this case is 6.57ha, this latter threshold criterion is not triggered by the development.

Nonetheless give the advice at Paragraph 10(b)(i), we have considered whether the proposal is likely to have significant environmental effects or is located within a sensitive area. These matters are discussed below.

Schedule 3 establishes that the requirement to provide an EIA for Schedule 2 development will be subject to the consideration of the characteristics and location of the development proposed and whether the development would be likely to have any 'significant effects on the environment'. There are no set criteria or thresholds to establish whether an EIA is required, although the NPPG Annex 'Thresholds and criteria for the identification of Schedule 2 development requiring EIA and indicative values for determining significant effects' provides a broad indication of the type and scale of development that is likely to require an assessment. In relation to 'urban development projects', where the area of development exceeds 1 hectare the guidance states:

'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'.

The preamble to the threshold guidance states that the figures ‘are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development’.

The NPPG confirms the above by stating that ‘it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.’ (Reference ID: 4-018-20140306).

The key test is whether the proposed development would have a significant effect on the environment and this relates largely to the location of the site and the existing use of the land.

The Annex to the NPPG goes on to consider the likely environmental issues which would trigger the requirement for an EIA. The Annex indicates that the key issues to consider in the circumstance of the application proposals would be ‘physical scale of such developments, potential increase in traffic, emissions and noise’.

In light of the above, we will now turn to look at the likely effects of the development. We will have regard to the selection criteria contained within Schedule 3 of the Regulations and the key considerations set out in the NPPG, in relation to the physical location of the proposal.

Physical scale of development

The built form including the proposed school building, sports hall and playgrounds are to be contained within the north-eastern portion of the site and are to be located within an area ‘contained’ by the buildings of the Sempervirens Nursery in the south, Hospital Bridge Road in the east and the railway line to the north. Only the MUGA, sports pitches and informal open space would be located on the more expansive eastern portion of the site. The resultant scale and massing of the part two, part three storey building will be up to 14.5m high with a footprint of 3760m² or less than 6% of the overall site. Even when the footprint of the buildings is combined with the external hard areas (Playgrounds, pathways, car park etc) the resultant ‘hard’ area of 10,960 sq metres or 1.9 hectares represents around 28% of the site. The height and mass of the proposed buildings is not considered to be out of keeping with the character of the surrounding urban area or, given its siting, harmful to the open character of the MOL. In this context, it should be noted that playing fields are an appropriate MOL use. As the site is relatively level, no changes to the site topography are proposed

In terms of location, whilst the site is located within MOL it does not fall within an environmentally sensitive area (i.e. SSSI, National Park, AONB, World Heritage Site or scheduled monument). The site also does not lie within or adjoining a Conservation Area and there are no listed buildings on the site.

Given the location of the site within designated MOL, it is proposed that the planning application submissions will include evidence to demonstrate Very Special Circumstances for the development and a visual assessment to assess the impact of the proposed development on openness of the MOL, however, we conclude that the scale of development is such that an EIA is not required based on physical scale or location of the development or the nature of the proposed use

Traffic and transport

The planning submission for the scheme will be accompanied by a comprehensive Transport Assessment and Travel Plan. This analysis will consider the operation of the school at full capacity (1050 pupils and **approximately 100** staff) by forecasting trip generation until 2025. The scope of the TA is to be as set out in the attached scoping report. This document, amongst other matters, provides information on the current home location of pupils and the current mode of transport to the current temporary sites as well as estimates of travel mode to the proposed site.

Turing House School already benefits from STARS Gold Accreditation in terms of their current travel plan achievements and it is anticipated that this will be carried across to the proposed site by the introduction of a range of measures including the limitation and management of car parking on site, promotion of CPZ’s on nearby roads, high levels of cycle parking provision, provision of pedestrian access from both Hospital Bridge Road and from Powder Mill Lane via Heathfield Recreation Ground and the funding of enhancements to local bus services. Turing House currently runs a

breakfast club and a number of after school curricula activities. These will continue when they move to HBR and assist with arrival and dispersal of pupils.

In terms of wider highways issues, TfL have confirmed that the proposals do not require consideration of impacts on any TfL routes either in terms of solus or cumulative impacts although the site access and some local roads and junctions will be assessed in terms of impacts resulting from the school development. Again, no cumulative assessment has been identified as being necessary.

Data in respect of accidents has not identified any issues with the local highways network with the majority of accidents due to behavioural factors such as failing to obey traffic signals. No accidents were deemed to be due to speeding and indeed surveys have identified that average speeds along Hospital Bridge Road are low at school pick up and drop off times

It is considered that the Transport Assessment and Travel Plan would be adequate to assess the transport related impacts of the proposed development. Consequently, it is not considered that the scheme warrants an EIA on transport grounds.

Noise Emissions

The use of the site as a school does not involve any industrial or business processes that will result in potentially harmful emissions. A Background Noise Assessment has been prepared which has confirmed there to be no noise related issues which cannot be readily mitigated. It is recommended that acoustically attenuated natural ventilation and/or mechanical ventilation will be required on certain elevations to control noise break-in to within the internal ambient noise level criteria although natural ventilation using opening windows alone will be sufficient to the western and southern façades.

It is likely that 2m high close boarded fences will be required at the boundaries adjacent to sports pitches to reduce the potential noise impacts on residential receptors and any noise from new fixed plant installations should not exceed a rating level of 40 dB LA,r and 30 dB LA,r at the nearest sensitive receptors for daytime and night-time periods, respectively.

Air Quality

The site is located within an AQMA and so an Air Quality Assessment has been undertaken to consider the existing baseline position and the likely impacts of the proposed development.

The impact of emissions arising from traffic on Hospital Bridge Road, and from the energy plant within the proposed development, have been assessed. The assessment has demonstrated that future users of the site will experience acceptable air quality.

Although the proposed development will generate additional traffic on the local road network. The assessment has shown that there will be no significant effect at any existing, sensitive receptor and the impacts will be negligible.

An assessment of the emissions from the boiler plant has also demonstrated that the off-site impacts of these emissions will also be negligible. On-site, the emissions from the plant will not lead to exceedances of the air quality objectives at the school.

During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works.

Overall, the construction and operational air quality effects of the proposed development are judged to be 'not significant'.

The proposed development has also been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.

As such, there are no issues under these headings that are considered to require examination in the context of a formal EIA.

Ecology

In terms of ecology, a Preliminary Ecological Assessment has been undertaken. This identified that the majority of the Site contains semi-improved grassland and recommended a botanical survey to establish the level of ecological value. This has been undertaken and its findings are referred to above under 'The Site'.

The PEA also identified potential for the presence of Bats, Badgers and Reptiles and these species have been the subject of further investigation.

In terms of Bats, a Preliminary Ground Level Roost Assessment (PGLRA) has identified three trees with moderate potential to support roosting bats (T10, T11 and T12) and one tree with low potential to support roosting bats (T6). Current development proposals include the retention of these four trees. The existing site is currently not open to the public, and the site itself is exposed to minimal light pollution. The existing trees may be suitable for roosting and foraging bat species so lighting will be installed in accordance with the recommendations of the assessment which includes;

- Use of low pressure sodium lamps, LEDs or high pressure sodium instead of mercury or metal halide lamps.
- Lighting should be directed to where it is needed and light spillage avoided
- The height of lighting columns in general should be as short as possible.

In respect of Badgers, a walkover survey revealed a disused outlier badger sett, showing no signs of current use. No other signs of badger activity were recorded during the survey. In addition, two potential fox earths or rabbit burrows were recorded.

For reptiles, additional surveys were undertaken in June and July 2018. Despite the presence of suitable basking, sheltering, hibernation and foraging habitat on the Site, and immediately adjacent to it, no evidence of reptiles was recorded during the surveys. The weather conditions during the checks were considered suitable for recording reptile activity and a greater density of refugia were set across the Site than required by the standard guidance such that the potential to record reptiles during each of the survey visits, if present, was high. It is, therefore, considered unlikely that the Site supports any reptile species.

Impact on other Sites

Whilst three statutory sites are located within a 2km search radius of the Site. Due to the scale and nature of development, it is not considered that the proposed development will have a direct impact on the surrounding statutory sites.

There are also 12 non-statutory sites located within a 2km search radius. In particular, the site is bounded to the north by Feltham RAILSIDES which make up a connection of SINC's within the borough. The limited presence of significant species on the site itself however suggests little linkage with this area at present. The current proposals for the site will if anything add to the potential habitats on the site via the provision of additional planting and the creation of new habitat areas.

Given the findings of the above surveys, it is concluded that the development will have minimal negative impact on ecology and if anything its impact will be positive. As such consideration of these issues will not require an EIA.

Flood Risk and Hydrology

A desk study was carried out of available information on flood risk factors that may affect the site. This included information on potential flooding from rivers and sea, surface water, groundwater, sewer and other artificial sources (e.g. reservoirs).

From the available information there is no significant evidence of any historical flooding within the vicinity

of the site.

The Environment Agency's flood map for planning shows the site is in Flood Zone 1 (less than 1 in 1,000 annual probability of flooding), at low risk of fluvial flooding. The Environment Agency mapping does show areas of the site as being at risk from surface water flooding, but the potential flood depths are all indicated to be below 300mm and is largely limited to the playing fields and car park area. The areas of surface water flooding in the fields pose limited risk to the development, whilst Surface water flooding in the car park area will partly be eliminated by the introduction of a positive drainage system. Any remaining surface water flooding will likely be retained within the kerbed area of the car park. The on-site drainage will be designed to ensure that the 100 year plus climate change event run-off from the site is attenuated.

The SFRA mapping indicates that the site is in an area with 'Potential for groundwater flooding to occur at surface'. However, during the intrusive ground investigation and subsequent monitoring, groundwater ranged between 2.4m and 2.62m bgl. The risk of groundwater flooding affecting the development is therefore considered low.

The risk of sewer flooding is considered low based on the available information. Thames Water have been consulted on this matter as part of a Pre-Development Enquiry. The site has been identified as being at low risk of flooding from other sources.

In terms of drainage of the development itself, tests undertaken as part of the SI proved that drainage by infiltration into ground is unviable. In addition, there are no watercourses in the vicinity of the site to which the development runoff could outfall. Consequently, separate foul and surface water connections will be made to the available public sewers within Hospital Bridge Road, this has been confirmed acceptable by Thames Water.

The current greenfield rate of run-off has been estimated as 2.18 l/s. However, as the practical minimum limit on the discharge rate from a flow control device to ensure an acceptable level of risk from blockages is 5 l/s, this figure has been proposed as the discharge rate from the surface water system. For a 100 year plus 40% climate change event the attenuation required is approximately 632m³. The proposed location for this is under the proposed car park to the north east of the site.

Proposed foul water flows from the development will be pumped to the public foul water sewer within Hospital Bridge Road to the south east of the development. This approach has been confirmed as acceptable with Thames Water.

Consequently, the limited risk of flooding at present and in the future following the development is not considered to require assessment via way of an EIA.

Ground Conditions

A Stage 2 site investigation was undertaken in Summer 2017. Whilst Asbestos fibres were recorded within a sample of Made Ground / poor quality topsoil collected from the southwest corner of the site, no other contaminants of concern were recorded within samples collected from beneath the site. As such, the potential risk to human health receptors from concentrations of contaminants of concern detected within soil and groundwater sampled from beneath the site is considered to be LOW.

In addition, contaminants of concern were not recorded within groundwater samples analysed from beneath the site at concentrations in excess of adopted AC. Consequently, based on the available information, the potential risk to controlled water receptors from concentrations of contaminants of concern detected within groundwater sampled from beneath the site is considered to be LOW.

Based on ground gas monitoring undertaken on site as part of the investigation CIRIA CS1 is considered applicable to the site, whereby ground gas protection measures are not required for new buildings. The risk posed by ground gas to human health receptors and infrastructure is therefore considered to be LOW.

Daylight/Sunlight and Lighting

Given the proposed 3-storey height of the school buildings and the distances from the closest dwellings, it has been confirmed that the development does not trigger a requirement for a daylight/sunlight assessment under the BRE guidance.

Whilst some lighting will be required in the environs of the school buildings and along approach paths/roadways, this can be provided to accord with the guidance within Bat Conservation Trust – Bats and lighting in the UK (2009) and in most cases can be switched off outside of school operating hours. No floodlighting of the MUGA and sports pitches is proposed.

Cumulative Impacts

Whilst the above assessment has identified that the solus impacts of the proposed development are such that they do not give rise to any impacts which would justify the need for an EIA, we have also considered whether there are any proposed or recent developments within the vicinity of the site which combined with the proposed school development, could give rise to cumulative Impacts of sufficient significance as to give rise to a need for a formal Environmental Impact Assessment.

The development of a permanent home for Turing House School alongside the development of the Richmond upon Thames School which opened in September 2017 will meet the anticipated need for secondary school additional secondary school places in the western part of LB of Richmond upon Thames. As such, this represents a cumulative positive socio-economic impact which arguably has a zone of influence which covers all of this area of LB of Richmond upon Thames, albeit this of itself would not represent a justification for a full economic impact assessment.

In terms of other impacts, aside from transport issues, the studies undertaken have shown that the development will have limited if any impacts outside of the site itself and therefore has a very limited zone of influence. Furthermore, in respect of highways, scoping reports agreed with both TfL and LB of Richmond upon Thames have established that there are no other significant developments recently completed or proposed which are required to be considered as part of a cumulative transport assessment.

We therefore conclude that there are no cumulative impact issues which would warrant the need to undertake a formal EIA.

Conclusion

In conclusion, whilst the proposed development falls within Schedule 2 of the National Planning Practice Guidance (NPPG) on Environmental Impact Assessment (2011), this does not mean that an EIA is automatically required. The guidance states that 'urban development projects' exceeding 1 hectare may require an EIA where it is likely to have significant environmental effects or is located within a sensitive area.

There remains a need to assess whether the proposed development, by virtue of its location, will have significant environmental impacts. We have shown, by reference to the nature of the proposed use and the characteristics of the site that, whilst the proposed development will inevitably raise important planning considerations, there will be no potential environmental impacts of a type and scale that would trigger the requirement for an EIA nor is the site located within a sensitive area.

We trust the above information is of assistance and look forward to receipt of your formal Screening Direction within the timescales prescribed by Regulation 6(6). In the meantime, please do not hesitate to contact me should you require any further information.

Yours sincerely

Bob Robinson

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