

*Environment Directorate*LONDON BOROUGH OF  
RICHMOND UPON THAMES

PLANNING

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Date: 22nd March 2019

Dear Ms Livesey,

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

**Site: St Paul's school, Lonsdale road, London, SW13 9JT**  
**Proposal: Phased redevelopment of St Paul's School incorporating an amended design for staff accommodation Block A**

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 in respect of the above development proposals.

Preamble

I can confirm that the Local Planning Authority is of the view that the proposals would be an Urban Development Project as defined under Schedule 2 part 10 of the Regulations. The site identified in your letter is more than 1 hectare and is not dwellinghouse development, I can confirm that that the proposed scheme therefore constitutes Schedule 2 development for the purposes of the regulations.

Schedule 3 of the Regulations requires the consideration of three matters in screening Schedule 2 developments, as follows:

- Characteristics of development
- Location of development
- Characteristics of the potential impact

Characteristics of Development

Having regard to the criteria set out in (a) to (g) of this part of Schedule 3, it is considered that the nature of the development as proposed which primarily comprises of changes to Block A and which maintains the principles previously incorporated are considered of a minor nature. The proposal to include a minor adjustment to the mix of the units, which would result in two additional staff units, but four fewer bed-spaces to meet updated requirements resulting in an approximate overall floorspace increase of around 80sqm and due to the resultant changes to the position, form and footprint of the building (would result in a footprint reduction of approximately 10sqm), which it is also indicated would take the edge of the building further away from the root protection zones of trees along the driveway are considered not to significantly alter the characteristics of the development against criteria (A) – (G).

### Location of Development

The site is not a 'sensitive area' as defined by regulation 2 of the EIA regulations. It is also noted the site is generally flat with external ground levels 5 m above AOD (Above Ordnance Datum) and whereas the site is within floodzone 3, it is acknowledged that it benefits from localised flood defences as identified in your letter. Whereas the amended staff accommodation is located partly within Metropolitan Open Land (MOL), this has been previously assessed and it is sited at this part on land currently in use as a car-park and occupied by buildings and their curtilage.

Development which comprises a change to approved development requires EIA only if the change is likely to have significant environmental effects and that the significance of those effects must be considered in the context of the existing development. It is not considered that the external changes proposed are likely to have significant environmental effects.

### Characteristics of the Potential Impact

It is not considered that the nature of the amendments to Block A development would be likely to have significant complex, long-term or irreversible impacts. Given the relatively minor changes sought to the approved scheme which primarily relate to design and appearance, the overall increase of two staff units is not expected to give rise to significant environmental effects. Whereas the amended staff accommodation is located partly within Metropolitan Open Land, this has been previously assessed and it is sited at this part on land currently in use as a car-park and occupied by buildings and their curtilage.

Further, whilst the construction phases may have some impact on the nature conservation value of the site and surrounding area, it is considered that these are unlikely to be wide-ranging or irreversible. Whilst this will be an important consideration in the determination of the application, it is not considered sufficiently significant to require a further Environmental Impact Assessment.

### Conclusions

The original hybrid planning permission for the phased redevelopment of the school (08/1760/OUT) was accompanied by an Environmental Statement, which was subsequently updated in 2009 and a further two Supplementary Environmental Statements submitted to this Council (in 2017 and 2018).

For the reasons above, the minor amendments proposed to the staff accommodation (Block A) the Local Planning Authority consider that the proposed is not likely to have significant effects on the environment over and above that already approved and that the proposal does not require a further Environmental Statement under the terms of the EIA Regulations to accompany any future planning application.

I would however advise that whilst an Environmental Statement is not required, robust information will be required as noted within your letter with the application on the potential impacts of the development on identified heritage assets, trees, the water environment, ecology, transport and details of how these impacts, will be avoided or mitigated.

Yours sincerely,



pp Rob Angus  
Head of development Management (Richmond)