

Our Ref: RMG/MB/21313
Your Ref:

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Date: 19 May 2015

Mr J Wilson
Planning Officer
London Borough of Richmond Upon Thames
Civic Centre
York Street
Twickenham
TW1 3BZ

Dear Mr Wilson,

RICHMOND-ON-THAMES COLLEGE, COLLEGE DEVELOPMENT ZONE, COLLEGE BUILDING ZONE 1: REQUEST FOR A SCREENING OPINION UNDER REGULATION 5 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATION 2011 AND AMENDMENT REGULATION 2015 (THE EIA REGULATIONS) FOR RESERVED MATTERS PURSUANT TO OUTLINE PLANNING APPLICATION 15/3038/OUT, AT RICHMOND UPON THAMES COLLEGE, TWICKENHAM.

CgMs, part of RPS Group Plc, act on behalf of the Richmond College (the 'Applicant') in respect of their interests at the above site.

We have been instructed to submit a formal request for a Screening Opinion from the Council under Regulation 5(3) of the Town and Country Planning (Environment Impact Assessment) Regulations 2011 and Amendment Regulations 2015 ("The Regulations") to establish whether or not the Council considers the proposed development constitutes EIA development in respect of the College Building Zone 1 within the College Development Zone ('the site') at the Richmond upon Thames College (RuTC) site in Twickenham.

Background

The College intend to submit Reserved Matters details (layout, scale, appearance, and landscaping) in respect of College Building Zone 1. The wider site is subject of an application for outline planning permission including access details (15/30308/OUT) for the proposed Richmond Education and Enterprise Campus (REEC) Development. The outline planning application for the REEC development was submitted in July 2015 and recommended for approval subject to finalising the S106 Agreement. Upon receipt of outline planning permission, the College will submit Reserved Matters, targeted for the end of May 2016.

National Planning Practice Guidance (PPG) sets out procedures for pursuing 'multi-stage consents' such as outline planning applications followed by reserved matters in the context of Environmental Assessment. The PPG states that the "*likely significant effects of a project on the environment should be identified and assessed at the time of the procedure relating to the principal decision.... However, if those effects are not identified or identifiable at the time of the principle decision, an assessment must be undertaken at the subsequent stage.*" (PPG paragraph 056, ID:4-056-20140306)

The PPG goes on to set out the criteria and thresholds representing ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area). It also provides indicative criteria and thresholds to help to determine whether significant effects are likely. (PPG paragraph 057, ID:4-057-20140306).

For urban development projects such as that proposed at Richmond College (development type 10b in the PPG Annex) the Schedule 2 criteria is as follows:

- (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 Annex further states that:

“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.” (PPG paragraph 058, ID:4-058-20140306).

In accordance with Regulation 5(3), a request for a Screening Opinion in relation to a subsequent application shall be accompanied by:

- a) a plan sufficient to identify the land;
- b) sufficient information to enable the Council to identify any planning permission granted for the development in respect of which a subsequent application has been made;
- c) an explanation of the likely effects on the environment which were not identified at the time that the planning permission was granted; and
- d) such other information or representation as the person making the request may wish to provide or make.

To allow the Council to assess the proposed development and its possible effects on the environment and to accord with the requirements of Regulation 5(3) of the EIA Regulations, this letter provides a brief description of the site and its surroundings, a description of the nature and purpose of the development proposals in the context of the outline application, a review of the Environmental Statement (ES) produced at the outline application stage, and a Site Location Plan to identify the extent of the proposed development site.

As set out below, it is considered that:

- The Environmental Statement submitted in support of the outline planning application tested the maximum parameters;
- The Reserved Matters submission for the College development zone entails development which falls squarely within these maximum parameters;
- The Reserved Matters for the College Building therefore do not result in any significant environmental effects which have not already been assessed in the outline ES.

- The proposal does not constitute EIA development.

Description of the Site and Location

The site falls within the administrative area of the London Borough of Richmond upon Thames

Site Location Plan (Ref: 5137894-ATK-MB-00-DR-A-001 P01) identifies the site for the proposed development to which this Screening Opinion request relates. The Site Boundary includes an area of the Schools Development Zone which is included to provide the necessary utilities work. The wider REEC redevelopment site is bounded to the north by the A316 Chertsey Road, by Egerton Road to the east, residential properties on Craneford Way to the south and by a pedestrian footpath known as Marsh Farm Lane and The Stoop/Langhorn Drive to the West. The remainder of the wider site includes the existing College sports fields south of Craneford Way.

The College Development Zone lies within this wider site. As is evident from outline Parameter Plan ref: PL-04 Rev A, College Building Zone 1 makes up part of the College Development Zone. The actual site area is 1.7ha. The enclosed Site Location Plan includes the landscaping and access road immediately around the College Building Zone which are necessary to enable the College to function. The site is an irregular shape forming around the Schools Development Zone to the south and east and the Tech Hub development zone to the west. The site's northern boundary runs along the A316 Chertsey Road. The access arrangements are subject of determination as part of the outline application.

The site is currently used as one of Richmond upon Thames College playing fields and is mainly level. The rest of the College Development Zone will be occupied but the College STEM building (College building zone 2) and the combined College and School Sports Centre (College building zone 3) will be subject of separate Reserved Matters submissions at a subsequent date.

The site is not a site of Special Scientific Interest or land to which a Nature Conservation Order applies, an International Conservation Site, a National Park, an Area of Outstanding Natural Beauty, World Heritage Site or Scheduled Monument.

The site is currently used for educational purposes and is one of Richmond College's playing fields. The playing field is being relocated to the Playing Field Development Zone ensuring there is no overall loss of playing fields on the site. While it is not a developed brownfield site, it does function as part of the wider College use, an urban development. Furthermore the site is not considered to be particularly environmentally sensitive; it is not within a 'Sensitive Area' as defined by the EIA Regulations and is not covered by any statutory or non statutory wildlife or heritage designations.

The Nature and Purpose of the Proposed Development

The proposed development seeks Reserved Matters approval pursuant to outline planning application 15/3038/OUT for a new College facility which will offer a wide range of courses and subjects for post-16 pupils graduating from the nearby secondary schools, Clarendon School pupils and young people.

The outline planning application seeks approval for:

The demolition of the existing college buildings, site clearance and groundworks together with the comprehensive redevelopment to provide:

- (i) A new campus for education and enterprise – comprising:
 - Replacement College (Use Class D1) of up to 16,000 sq metres GEA to accommodate up to 3,000 FTE day time students, as well as evening and weekend use;
 - A Science, Technology, Engineering and Maths (STEM) Centre (Use Class D1) of up to 6,100 sq metres GEA;
 - A new Secondary School (Use Class D1) of up to 7,000 square metres GEA for up to 750 students;
 - A new Special Education Needs (SEN) School (Use Class D1) of up to 4,000 square metres GEA for up to 115 students; and
 - A new ancillary 'Technical Hub' for Haymarket Media (Use Class B1) of up to 1,700 square metres (GEA); and
 - Replacement on-site sports centre (Use Class D2) of up to 3,900 square metres (GEA) to serve both the college, schools and the wider community;*
- (ii) The upgrading of existing Craneford Way Playing Fields for use by the College, schools and the local community;*
- (iii) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 and minor realignment of Langhorn Drive as well as alterations of existing vehicular access points on Egerton Road and Craneford Way;*
- (iv) Provision of on-site parking for up to 230 vehicles, open space and landscaping; and*
- (v) New residential development (Class C3) of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.*

In respect of the College Development Zone, the outline planning application therefore seeks approval for, inter alia, a replacement College facility of up to 16,000sqm Gross External Area (GEA), a STEM centre of up to 6,100sqm GEA and replacement on-site sports centre of up to 3,900sqm GEA which will serve both the college, schools and wider community. This ES Screening request relates solely to the College Building Zone which is to come forward as a separate Reserved Matters submission.

The proposed replacement College subject of the Reserved Matters submission is c. 13,443sqm (GEA). The Reserved Matters details therefore falls well below the amount of floorspace established and assessed at the outline planning application stage.

Environmental Assessment at the Outline Planning Application Stage

The outline planning application was subject of a comprehensive Environmental Statement (ES) prepared by Cascade Consulting in June 2015 which considered the effects during demolition and construction, during operation, and the cumulative effects in respect of the following topics:

- Transport
- Noise and Vibration
- Air Quality
- Ground Conditions
- Waste
- Water Resources and Flood Risk
- Daylight, Sunlight and Overshadowing
- Ecology
- Townscape and Visual Amenity
- Cultural Heritage
- Socio-Economics

Impacts on Sustainability/Climate Change, Health and Wellbeing, Telecommunications, Utilities, Micro-climate, and Design Evolution were scoped out of the EIA when the Council issued its EIA Scoping Opinion under Regulation 13 of the EIA Regulations in February 2015.

No significant residual environmental effects after mitigation were identified in connection with the outline proposals. This assessment was based on the 'worst case' impact the buildings, roads and other structures could have on people and the environment derived from maximum parameters. The parameter plans (PL-01 - PL-16) show fixed areas within which the buildings can be located; the access routes to those buildings and parking; and where the open spaces and recreational areas will be.

In terms of the replacement College building, the Environmental Assessment was based on a maximum gross external area of 16,000m². The parameter plans assumed a maximum building length of 112m and a maximum width of 51m. The maximum height of the building was 23.5m (32.7m AOD).

These parameters have since been reduced to reflect the evolving design of the College, notably a reduction in maximum height of the College buildings to 19.95m (29.15m AOD), which would have a positive impact on the conclusions of the ES.

The outline Environmental Assessment established that, providing the development when taken forward at Reserved Matters stage, remains within these parameters, the environmental effects should be no greater than assessed in the June 2005 ES.

The ES in support of the outline application did however identify a few topics which would need to be reviewed at the Reserved Matters stage when more details are available. These include the issue of solar glare, which could not be fully assessed until facade treatments were known. This was particularly relevant to the proposed College building. Other issues to review include landscape strategy, waste servicing, ground investigations (re groundwater levels), and townscape.

Solar Glare

Solar glare was scoped out of the Environmental Statement for the outline application as the impacts could not be fully assessed until facade treatments were known. The Council's consultants, BRE, considered there might be a possibility of reflected solar glare to traffic on the main A316 to the north of the site, if reflective materials are used on the northernmost blocks. BRE therefore recommended that the potential for glare should be reviewed at the detailed proposal stage, when any use of reflective finishes on the buildings has been identified. Details of the proposed materials to be used on the building facades and a solar glare study will be submitted to discharge conditions 116 Solar Glare – A316 and 45 Misc Details – Sample Panels (Condition References taken from Officers Report).

Landscape Strategy

In terms of landscaping, minimum areas of open space are defined by the parameters plans and the rules and aspirations for the overall landscaping scheme is set out in the Design Code submitted with the outline application. An Illustrative Landscape Plan is provided in Figures 5.2 and 5.3 in Chapter 5 - Proposed Development of the outline ES. However, it was acknowledged that the landscape strategy, detailing the exact requirements for new planting, would be a reserved matter. Furthermore, at the scoping stage of the outline ES, the Council considered the 'operation' scenario should include time slices when all mitigation measures will have achieved full effect (typically after 15 years). For landscaping, it was established that only at the detailed stage could photomontages be produced showing the likely residual effects after 15 years. Landscaping details, including new planting proposals, will be submitted as part of the Reserved Matters and to discharge the relevant conditions for each of the development zones.

Waste Servicing

The outline ES established that operational waste servicing provisions would be in accordance with Supplementary Planning Guidelines. However, further details of waste servicing were not available at the outline design stage and would therefore be developed under Reserved Matters. The outline ES did establish that Commercial waste effects (including new educational facilities) on waste management infrastructure would be negligible and no additional mitigation over and above the planning requirements for waste servicing was therefore considered necessary.

Ground Investigations

The outline ES established that the ground investigation of the wider site undertaken by Soiltechnics in 2008 would need to be updated at Reserved Matters stage to precisely map

groundwater levels across the site and to confirm the location of potential infiltration SuDS measures. Further specific on site intrusive investigations were therefore envisaged to be carried out under a planning condition or as part of the Reserved Matters applications. However, additional investigations were carried out in October 2015 and are presented in the Soiltechnics Report No. STM3361D-G01 Rev 2 dated May 2016 which will be submitted to discharge condition 38.

A number of trial pits and boreholes were excavated for both the 2008 and 2015 reports and the results of the chemical testing of soil and groundwater samples from these were combined into the 2015 report. This considered the results in the context of current Soil Guideline Values and published Generic Assessment Criteria. This found that there was contamination that exceeded the guideline values for benzo(a)pyrene and TPH. However, both of these were located within a single borehole which has been considered an outlier for all contaminants with the exception of Phenols and so has been removed from the statistical analysis. It is likely that these localised elevated results are from gravels of bituminous coated materials. Additionally, it is considered that the near surface soils are likely to exhibit significant contamination with respect to water sources. However, this is currently bound within the bituminous material and so is not a risk, however, as this material is being removed from the site remediation of the made ground will be necessary. This will be undertaken by the removal of any made ground in the area of proposed porous paving and soft landscaping which could allow contamination of the underlying groundwater.

The outline ES found that there was a low risk of hazards from ground gases on the site (methane and carbon dioxide) as a result of the current readings. However, further final gas readings are still to be taken and will be submitted to the Council upon receipt.

Subject to appropriate mitigation the ES found that the potential environmental effects of contaminated soil and groundwater were considered to be negligible and a quantitative risk assessment would not be required.

The Soiltechnics 2008 and 2015 reports showed groundwater levels generally 2-3m below ground level, however some trial pits recorded groundwater at 1-1.5m.

The conclusions from these reports and the implications for site drainage within the College Development Zone have been fully assessed in the Sustainable Drainage Statement which will be submitted to discharge condition U02714.

Townscape

In terms of Townscape, the outline application identified secondary mitigation measures which would form part of the detailed design process and the approval of Reserved Matters for individual buildings, viz:

- Articulation of the built form to reduce the apparent mass of buildings and
- create a visually interesting façade of appropriate scale for the street scape;
- Articulation of the roof scape to create a visual interest;
- Consideration of the design, siting and appearance of roof level projections and in the context of the overall architecture of the building including façade composition;
- Detailed design to reinforce appropriate local landmark elements; and
- Well-detailed buildings with good quality elevational and roofing materials.

No significant adverse residual townscape or visual effects were identified by the outline ES based on maximum parameters. A number of moderate adverse effects were identified that would require mitigation as part of the detailed design of the proposals. This included replacement planting to mitigate the loss of trees along Marsh Farm Lane (as set out in the Illustrative Landscape Masterplan), Air Quality, Noise, and location of construction compounds and site offices to limit visual effects on residents during the construction period so far as is possible (as set out in the CEMP). However, the majority of these are temporary, short term effects apart from Air Quality which could potentially have a moderate adverse effect during the operational phase.

We therefore do not consider these issues give rise to further environmental impacts above and beyond those fully tested at the outline application stage. Furthermore, these issues will be addressed in supporting documentation submitted with the Reserved Matters details and Discharge of Condition applications.

The Need for Environmental Impact Assessment

The Department for Communities and Local Government (DCLG) guidance advises that the proposed works fall under Schedule 2.10(b) (urban development projects) of the EIA Regulations provided the threshold and criteria for this type of development are met. EIA Screening is required in this case as the development area of 1.7ha, thus exceeding the 1 hectare threshold.

The site is however subject of an outline planning application for the wider REEC development which was lodged in July 2015 and was subject of a comprehensive Environmental Statement.

The potential environmental impacts of the proposed development have been fully tested in the Environmental Statement submitted in support of that outline planning application. The proposal is to submit Reserved Matters details pursuant to the outline planning permission once issued.

No significant residual environmental effects after mitigation were identified in connection with the outline proposals. This assessment was based on the 'worst case' impact the buildings, roads and other structures could have on people and the environment derived from maximum parameters.

The Reserved Matters details for the proposed College Building fall within the maximum parameters tested at the outline stage. We therefore consider that the environmental impacts have been fully assessed.

Conclusion

The site is not within a 'Sensitive Area' as defined by the EIA Regulations, but is captured within Schedule 2.10(b) (urban development projects) of the EIA Regulations as the area of development is approximately 1.17ha. This exceeds the 1 hectare threshold.

Many of the key environmental considerations of our clients' proposals such as traffic, landscaping, ground conditions, and visual impacts have been addressed in the supporting material to the outline application to enable your Council to fully assess the implications of the development proposals. Where matters have not been able to be fully assessed at the outline application stage, these will be addressed in the supporting material to the Reserved Matters submission and to discharge the relevant conditions.

The content of this letter and the enclosed Site Location Plan (Ref: 5137894-ATK-MB-00-DR-A-0001 Rev 1) should provide the Council with sufficient information to consider whether the proposed development is likely to have a significant effect upon the environment. In the circumstances, and taking into consideration the requirements and advice set out in the Regulations and PPG outlined above, we have concluded that this is not a development that is likely to have a significant effect on the environment over and above that already tested at the outline application stage ('the principal decision'). As such, it does not constitute an EIA development. We request that the LBRuT take into account the contents of this letter when determining the Screening Opinion.

In the event that it is considered that the development proposal does constitute 'EIA development', thus requiring an Environmental Statement in support of the applications, we would appreciate your advice on the appropriate scope of the EIA under Regulation 13.

Should you wish to discuss this matter please do not hesitate to contact me.

Yours Sincerely



Mark Buxton
Director