

Town & Country Planning (EIA) Regulations 2011  
**Secretary of State Screening Direction – Written Statement**

Application name:	Imperial College Private Ground, Teddington
SoS case reference:	NPCU/EIASCR/A5810/77719
Schedule and category of development:	Schedule 2, 10 (b) Urban Development Projects

**Full statement of reasons as required by 4(5) (a) of amended EIA Regulations including conclusions on likelihood of significant environmental effects.**

*Schedule 3 selection criteria for Schedule 2 development refers:*

The Secretary of State has had regard to Planning Practice Guidance. In particular, Paragraph 4 advises that 'each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development'.

**1 (a) – (f) regarding characteristics of development**

The Secretary of State notes that the proposed development comprises up to 130 extra care apartments, communal facilities, car park, GP surgery, playing pitches and new club house.

The Secretary of State has noted the Council's concerns about cumulative impacts in this case, notably on the approved scheme for the provision of 213 flats and additional houses at the Television Studios, Broom Road, Teddington and this matter is addressed later.

The Secretary of State accepts that the proposal will use natural resources including the use of land, water, materials and energy and it will be expected to generate waste during construction and when the proposed development is complete. However, it is expected that any wastes generated from the construction of the proposed development will be transported off-site. It is also likely that the impacts from the proposed development, both during the construction and operational phases, will result in increased noise and vibration levels in addition to any significant increase in levels of lighting and heating.

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant.

**2 (a)-(c) (i) – (viii) regarding location of development**

The site is within a relatively densely populated area on the edge of Teddington Town Centre and is considered to be highly visible from the nearby residential developments in Kingston Lane, Cromwell Road and Udney Park Road. There are no known public rights of way crossing the site.

The land comprises around 5.2ha of open grassed playing fields, leased out to local sports clubs, with tennis courts located in the south western corner of the site with a pavilion on the western boundary of the site. Whilst this proposed development will inevitably comprise a physical change to the locality, there will, in the Secretary of State's view, be a limited physical change in terms of the topography necessary to enable construction. Overall, the addition of this development in this location is not considered to have significant effects through the resulting physical change.

The site is not located within or adjacent to a groundwater source protection zone and there is no evidence that the site contains any important, high quality or scarce resources. The site is also within Flood Zone 1 (the lowest risk of flooding). Whilst the site is within an Air Quality Management Area, the Council are satisfied that, subject to an adequate Air Quality Assessment, the development is not likely to raise significant environmental effects. The Secretary of State has no reason to disagree with this view. There is no evidence that there are any areas around the location which are already subject to significant levels of

pollution or environmental damage.

The site is not subject to any statutory national or international designations with the nearest ecological site being the Bushy Park and Home Park SSSI which is located approximately 30m south of the site. A further three SSSIs are located within 5km of the site. Richmond Park Special Area of Conservation is located approximately 2.4km to the east of the site. There are no AONBs or National Parks close to the site.

There are nine scheduled ancient monuments located within 5km of the site, the closest being the Old Brew House located approximately 2km to the west. The nearest protected feature to the site is a Grade II listed building - Oak Cottage – which is located approximately 185m to the north of the site. A Grade II\* listed building, Church of St Alban, is also located approximately 270m to the north east of the site.

Neither Natural England nor Historic England has raised any concerns about the likelihood of significant environmental effects and the Secretary of State has no reason to believe that there are any outstanding concerns in this regard.

### **3(a) – (e) regarding characteristics of potential impact**

This proposal for the development of up to 130 extra care apartments and the associated development will change the land use and cause physical changes through the construction of the dwellings. Whilst the project will result in the loss of some of this land, it is noted that up to 3.87ha of the 5.2ha site will still be retained for use as the Teddington Community Sports Ground. The Secretary of State does not, however, conclude that the scale and characteristics of the proposed development will be likely to result in any significant loss of natural resources.

The construction and operations associated with the proposed development are not considered likely to lead to the significant release of any pollutants. Additionally, and whilst there is always the risk of pollution being generated on the site due to the proposed development, there is no evidence to suggest that this will be likely to lead to any significant risk of contamination. It is also expected that the site operators will ensure that all vehicles carrying any substances or materials considered harmful to human health and/or the environment will be strictly controlled by Health and Safety Legislation. For these reasons, it is concluded that this is unlikely to lead to a significant risk to human health during the construction and operational phases.

This proposed development will be likely to generate short term employment opportunities during the construction period. In addition, the proposed new apartments have the potential to create demographic changes in the area. However, the Secretary of State concludes that the issues raised by this development on its own or in combination with the proposed new housing site are unlikely to create significant social or demographic changes.

The site is adjacent to three roads – Kingston Lane, Udney Park and Cromwell Road – and close to High Street, Teddington. However, whilst some changes affecting the flow of traffic may result from vehicles using the local road network, this is not considered likely to give rise to significant levels of traffic. The proposed development will be expected to generate very few new trips onto the M3 motorway network (other than those to serve the site) and, as such, will not significantly increase congestion. Although there will be additional movements of vehicles and HGVs during the construction phase, these will be negligible in the context of the existing M3 traffic and, in any event, short term in duration. On the evidence available, however, it is not considered that these issues amount to potentially significant environmental impacts.

The Secretary of State considers that the key issue relating to the potential impact of the proposal, both on-site and in the vicinity, relates to its potential for cumulative impact particularly with the approved nearby residential development at the Television Studios, Broom Road, Teddington. The Secretary of State has carefully considered the evidence provided and although he accepts that there will be some interaction of impact between the proposed site and this approved site, he considers this site to be reasonably self-contained and standalone in nature. Whilst the issue of cumulation with the nearby site granted planning permission is certainly relevant, any cumulative effects from the proposals would not, in the Secretary of State's view, be likely to be significant. Furthermore, the Secretary of State considers that there is limited evidence of likely significant impacts on sensitive landscape or historic/archaeological or nature conservation interests directly being caused by cumulation. It is important to note, however, that cumulative effects will need to be re-considered with any further incremental development proposals in this area and the need for EIA may change depending on the circumstances of each case.

In conclusion, the Secretary of State does not consider that the proposed development will result in any

unusually complex and potentially hazardous environmental effects. He has carefully considered the potential for cumulative effects in this case and does not believe these, even at their highest level, would result in likely significant effects. In his view, there are no other factors in this case in this specific location, including urbanising effects, traffic, noise, and air quality effects, loss of best and most versatile agricultural land and effects on local receptors, that either in isolation or together, would necessitate EIA. EIA is therefore not required.

Is an Environmental Statement required?	No
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Date	09 June 2017
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