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Dear Ms Thatcher

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.

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. 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 reading 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.

Development Plan Position

The site is subject to planning policy contained within the NPPF, consultation draft NPPF, London Plan (2016) and emerging proposals of the new draft London Plan, Richmond's Local Plan Core Strategy (2009), Local Plan Development Management Plan (2011) and the Draft Local Plan Review which is at an advanced stage. The entire site is identified as Metropolitan Open Land within the Core Strategy Policy CP10 and DM OS2 of the Development Management Plan. There are no proposals to change this status as part of the Local Plan Review.

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 2015

It is proposed that the school buildings be located on the eastern part of the site, close to the Hospital Bridge Road frontage, with the western part of the site identified partially for open playing field use and the balance retained as open land and habitat within the school boundary.

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 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.

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 later 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. We also have regard to the fact that a full EIA was undertaken in the context of the previous planning application (16/5948/FUL) for a larger all-through school facility and in almost all aspects, the operational elements of the scheme were adjudged to have no or limited environmental impact with only traffic and landscape impact requiring mitigation.

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.

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. The Transport Assessment will assess the existing conditions of the site in terms of pedestrian, cycle, vehicular and public transport accessibility and the operational and safety characteristics of the surrounding highway network. It will provide a movement and access strategy in relation to the proposed development, calculate person trip generation, provide an analysis of the implications of development related traffic on the operation of nearby links and junctions and identify mitigation measures to offset the impact of the development. The Travel Plan will also include measures to enhance travel by foot, cycle and public transport.

This analysis will consider the operation of the school at full capacity (1050 pupils and **approximately 100 staff**) by forecasting trip generation until 2025.

Given that the Turing School is already in operation, data on existing home location and travel mode is already available and demonstrate that most pupils live closer or equidistant to the current site in comparison with the Teddington site. Whilst current public transport accessibility to the Hospital Bridge Road site is not at the same level as to Teddington, the travel plan will examine options to address this.

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.

Emissions and Noise

The use of the site as a school does not involve any industrial or business processes that will result in potentially harmful emissions. An Environmental Noise Assessment will be prepared to recommend services and plant noise limits considering the local and national requirements for noise. Indeed, the major impact of noise is likely to arise from existing external impacts on the school from Heathrow Airport and the adjoining railway and the noise insulation and ventilation of the school will take account of these factors.

The site is located within an AQMA although given the open character of the site, local concentrations of pollutants are not likely to be high and although the school has the potential to increase levels at peak times, the scale of increase is not considered to be significant.

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

Ecology, Flood Risk and Hydrology, Ground Conditions, Daylight/Sunlight and Lighting

The site is located in Flood Zone 1 and so is at low risk of fluvial flooding and localised drainage issues can be addressed as part of the proposed surface water drainage. The site history is also such that it is at low risk of contamination. The height and massing of the proposed school will also not give rise to daylight and sunlight issues given the distance from neighbouring properties. A lighting assessment will be undertaken but again the scale and intensity of lighting sought around the school buildings is not anticipated to give rise to any significant impacts.

In terms of ecology, it is noted that the current site is a grassland habitat but the location of development toward the north-eastern corner of the site, the retention of open access between the site and the adjoining recreation ground and cemetery and retention of the western portion of the site as grassland along with wildlife corridors and trees along all boundaries, will ensure the retention of key linkages and a significant area of grassland habitat.

Consequently, the scale of impacts in respect of all of the above issues are not considered to be so significant as to require assessment via way of an ES.

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

A handwritten signature in black ink that reads 'R. J. Robinson'.

Bob Robinson MRTPI
Director
DPP
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