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Date: 4 July 2013

Dear Philippa Edwards,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2011: REGULATION 5 SCREENING OPINION**

**Site: Royal Star and Garter, Richmond Hill, Richmond**  
**Proposal: Change of use from C2 to C3 to create approximately 90 residential units**

I write in reference to your letter dated 19 June 2013 requesting a formal screening opinion of the Local Planning Authority under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 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 is identified in your letter as 0.7ha, I can confirm that the area outlined on the site plan is 0.73ha and that the proposed scheme therefore constitutes Schedule 2 development for the purposes of the 2011 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 (f) of this part of Schedule 3, it is considered that the nature of the development as a change of use with relatively little external change, is such that it would not trigger the requirement for an EIA under this criteria. Whilst it is acknowledged that the change of use will have associated impacts in terms of traffic and intensity of use, this is not considered likely to have a significantly more harmful impact upon the environment than the existing C2 use.

Location of Development

The site is within an environmentally sensitive location, sitting at the top of Richmond Hill. It is in one of the most prominent locations in the Borough just to the south of the historic riverside of Richmond Town Centre and at the entrance to Richmond Park. The elevated position of the Home

affords the building a particularly high level of visibility from many historic and environmentally sensitive sites and places within the borough including along stretches of both banks of the River Thames, Petersham, Ham and Richmond Bridge (listed Grade I). As such, the Royal Star and Garter is recognised as a Landmark Building from and to which are protected vistas.

The site is within 30m of the boundary of Richmond Park which is designated as a SSSI, Special Area of Conservation, Metropolitan Open Land and Grade I Historic Park and Garden. To the north-west is Terrace Walk, a Grade II\* Historic Park and Garden. The site is bordered on three sides by Petersham Common which is designated as Metropolitan Open Land, Other Site of Nature Importance and Public Open Space.

The building itself is Grade II listed, within a Conservation Area surrounded by other listed buildings and partly within the Thames Policy Area.

I note that Circular 02/99 states that 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 change of use from C2 to C3 with relatively little external change is likely to have significant environmental effects. Given the sensitivity of the location, Natural England has been consulted upon the Screening Request and concurs with this view.

#### Characteristics of the Potential Impact

It is not considered that the nature of the development would be likely to have significant complex, long-term or irreversible impacts. Whilst the application could potentially have been of more than local significance given that views of the building are protected, relatively little external change is proposed to the exterior and these changes are largely to remove more modern fabric to restore views to the original facades.

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 formal Environmental Impact Assessment.

#### Conclusions

For the reasons above, the Local Planning Authority consider that the proposed change of use and associated alterations is not likely to have significant effects on the environment and that the proposal does not require an Environmental Statement under the terms of the EIA Regulations 2011 to accompany any future planning application.

I would however advise that whilst an Environmental Statement is not required, the site is within an environmentally sensitive location. As such, robust information will be required with the application on the potential impacts of the development on the notified features of Richmond Park SSSI and SAC, and Petersham Common, and a strategy for how these impacts, if any, will be avoided or mitigated.

Yours sincerely,

Jon Freer  
Assistant Director, Development and Street Scene