

FAO: Emer Costello

London Borough of Richmond upon Thames

Development Management

19 February 2025

Dear Emer,

**Re: Request for Screening Opinion in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)**

**Laboratory of the Government Chemist, Queens Road, Teddington, TW11 0LY.**

On behalf of the Applicant, Royal London Asset Management, I write to submit a request for a Screening Opinion in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) in respect of proposed development at Laboratory of the Government Chemist (LGC), Queens Road, Teddington, TW11 0LY ('the Site').

Royal London Asset Management has recently acquired the 3.2-hectare site from former occupiers LGC. It is their intention, in partnership with developers Graftongate, to deliver a new best-in-class multi-unit industrial development. Former owner LGC has operated from the Site as a laboratory and ancillary office since the late 1980s; however, they are in the process of leaving the Site and moving their operations to Guildford. This is because the existing buildings are no longer fit for purpose, have high operating costs, and insufficient equipment. It is not economically viable to upgrade the existing Site to meet their future needs.

The proposals comprise:

- Demolition of existing buildings and site clearance
- Circa 11,700 sqm of Grade A Class E(g)(ii), E(g)(iii), B2, and B8 floorspace
- Retention of Building 39 (additional 572 sqm).
- Ancillary yard space, vehicle parking, landscaping, and associated works.

This letter reflects the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the "EIA Regulations") and, in accordance with Regulation 6 of the EIA Regulations, includes the following material:

- a) *a plan sufficient to identify the land;*
- b) *a description of the development, including in particular—*
  - i. *a description of the physical characteristics of the development and, where relevant, of demolition works;*
  - ii. *a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;*
- c) *a description of the aspects of the environment likely to be significantly affected by the development;*
- d) *to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—*
  - i. *the expected residues and emissions and the production of waste, where relevant; and*
  - ii. *the use of natural resources, in particular soil, land, water and biodiversity; and*
- e) *such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.*

## **Requirement for Environmental Impact Assessment**

In order to determine whether the proposed development at the site is ‘EIA development’, regard must be had for the EIA Regulations 2017 (as amended) and supporting Planning Practice Guidance (PPG).

EIA development is defined by the EIA Regulations as development: “likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

EIA development falls into two Schedules within the EIA Regulations; EIA is mandatory for developments listed within Schedule 1, whilst Schedule 2 developments require EIA if they would lead to likely significant effects on the environment.

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- a) any part of that development is to be carried out in a sensitive area<sup>1</sup>; or
- b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.

The development is not Schedule 1. EIA is discretionary for projects listed in Schedule 2 of the EIA Regulations. If the development proposed is of a type listed in Schedule 2 then it

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<sup>1</sup> A sensitive area means ‘SSSI’, national parks and the Broads, a property on the World Heritage List, a scheduled monument, a European site, or an area of outstanding national beauty.

may be classified as EIA development depending on the location of the development (i.e. if it is within a sensitive area) and/or whether it meets any of the relevant thresholds.

In 2018, the threshold in Schedule 2 for industrial estate development was increased from 0.5ha to 5ha. The proposed development does meet any of the thresholds (or criteria) set out in Schedule 2 of the EIA regulations. See Appendix A below which assesses the proposed development against Schedule 2.

In deciding whether a Schedule 2 development is EIA development, Regulation 5(4) states:

*“Where a relevant planning authority or the Secretary of State has to decide under these Regulations whether Schedule 2 development is EIA development, the relevant planning authority or Secretary of State must take into account in making that decision—*

*(a) any information provided by the applicant;*

*(b) the results of any relevant EU environmental assessment which are reasonably available to the relevant planning authority or the Secretary of State; and*

*(c) such of the selection criteria set out in Schedule 3 as are relevant to the development.”*

Schedule 3 sets out the criteria in which a screening opinion should be considered against when assessing whether a development which falls within the thresholds of Schedule 2 development. Schedule 3 states:

*“1. The characteristics of development must be considered with particular regard to—*

*a) the size and design of the whole development;*

*b) cumulation with other existing development and/or approved development;*

*c) the use of natural resources, in particular land, soil, water and biodiversity;*

*d) the production of waste;*

*e) pollution and nuisances;*

*f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;*

*g) the risks to human health (for example, due to water contamination or air pollution).*

*2.— (1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—*

*a) the existing and approved land use;*

*b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;*

*c) the absorption capacity of the natural environment, paying particular attention to the following areas—*

- i. *wetlands, riparian areas, river mouths;*
- ii. *coastal zones and the marine environment;*
- iii. *mountain and forest areas;*
- iv. *nature reserves and parks;*
- v. *European sites and other areas classified or protected under national legislation;*
- vi. *areas in which there has already been a failure to meet the environmental quality standards, laid down in retained EU law and relevant to the project, or in which it is considered that there is such a failure;*
- vii. *densely populated areas;*
- viii. *landscapes and sites of historical, cultural or archaeological significance.*

3. *The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—*

- a) *the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- b) *the nature of the impact;*
- c) *the transboundary nature of the impact;*
- d) *the intensity and complexity of the impact;*
- e) *the probability of the impact;*
- f) *the expected onset, duration, frequency and reversibility of the impact;*
- g) *the cumulation of the impact with the impact of other existing and/or approved development;*
- h) *the possibility of effectively reducing the impact”*

For certainty the scheme is assessed against the criteria set out in Schedule 3 (see below) of the EIA Regulations despite falling outside of the thresholds set out in Schedule 2.

### **Schedule 3 Assessment**

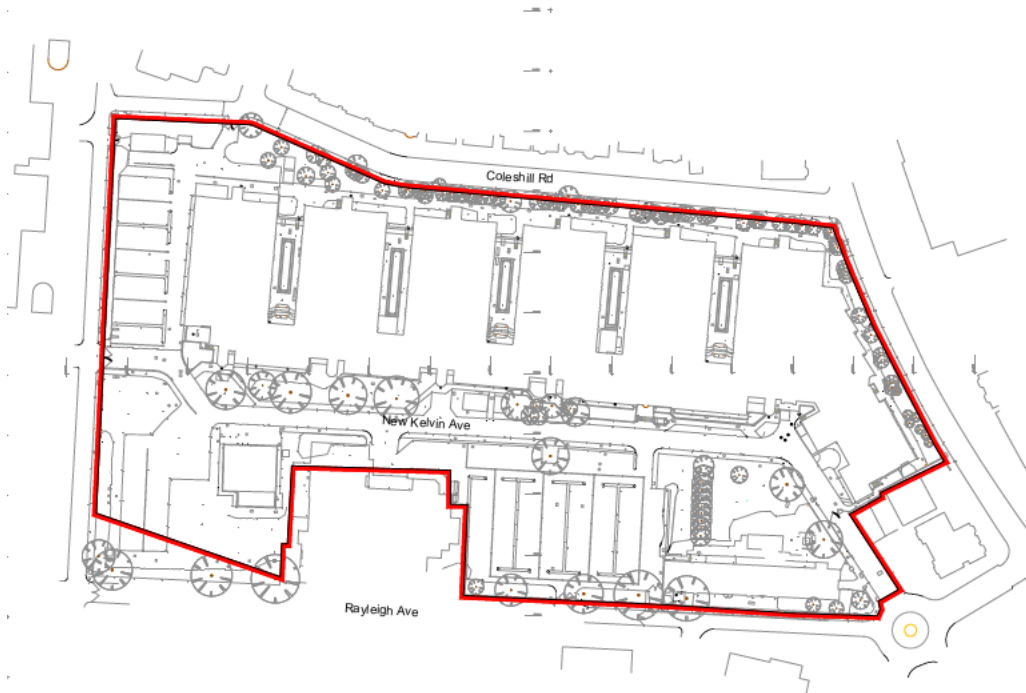
#### **Description of the Location of the Proposed Development**

The Site is known as LGC, Queens Road, Teddington, TW11 0LY and currently accommodates Use Class E(g)(ii) with ancillary Class E(g)(i).

The site sits wholly within London Borough of Richmond upon Thames (LBRuT) and extends to circa 3.2 hectares.

#### **Figure 1 – Site Location Plan**

**Source: UMC Architects**



The Site is divided into two elements by New Kelvin Avenue, with the main laboratory and office buildings to the north and a surface-level car park, storage, and landscaping to the west and south.

The existing buildings vary in height from 11m to 16m with some plant, namely chimneys, extending to over 20m in height and are bespoke design to the original needs of the LGC. The Site has been subject to ad-hoc alterations and extensions to the buildings.

The Site has a Public Transport Accessibility Level of 2/3, whereby a level of 6 is considered 'excellent' and 1 'poor'.

The Site sits within Flood Zone 1 (low-risk) and an SSSI Impact Zone with Bushy Park and Home Park SSSI 55m to the south. Schemes within a SSSI Impact Zone are referable to Natural England if the development could cause air pollution or dust in its construction or operation. The proposed scheme is unlikely to fall under any other development category.

Bushy Park is also a 'Registered Park and Gardens' and a Conservation Area.

The Site forms part of a larger cluster of employment/research and development uses with the National Physical Laboratory to the west and south. They both form part of a larger LBRuT designation as 'Industrial Land and Business Parks' and 'Key Business Area'. Bushy Park and Bushy House sit to the south of the site separated by commercial buildings and Rayleigh Avenue. To the east and north are predominantly residential dwellings comprising of single dwellings and flatted blocks.

The LBRuT Draft Local Plan Policy Map shows that the Site sits within the following key designations:

- i. Within the National Physics Laboratory and LGC 'Industrial Land and Business Parks'. New major employment developments are directed to such locations.

- ii. Within the National Physics Laboratory 'Key Business Area'. New major employment and office developments are directed to such locations.
- iii. The entire site is subject to a blanket Tree Preservation Order (TPO) (T1145).
- iv. Within a Critical Drainage Area.
- v. Within the 'Broad Street and Queens Road' area as part of the Village Plan SPD Character Areas. SPD notes the National Physical Laboratory (NPL) has a negative effect on the neighbouring roads.
- vi. Within an Article 4 Direction restricting conversion from Class E to C3.
- vii. Within an SSSI Impact Risk Zone
- viii. The site falls in the background of a 'vista protected line' (vista to refurbished water garden, bushy park).

#### Description of the Proposed Development

The proposals are made for complete demolition, with exception of Building 39, of the obsolete and out-dated existing laboratory and office buildings (Use Classes E(g)(ii) and ancillary E(g)(i)) and replacement with modern and fit-for-purpose flexible industrial units (Use Classes E(g)(iii), B2, and B8).

The scheme proposes circa 11,700 sqm of flexible industrial floorspace across 16 units ranging from small to medium sized over a 3.2ha site. Building 39 is retained and refurbished and extends to 572 sqm providing additional flexible floorspace.

The proposed site arrangement retains New Kelvin Avenue with the proposed units then located to the north and south of the road. Operational yard spaces are focused to the centre of the site accessed from New Kelvin Road ensuring that noise and lighting will be focused away from the neighbouring residential development.

The Site will continue to be accessed from New Kelvin Avenue and the roundabout to the south east for pedestrian and vehicles. The development will include a reduced car parking provision compared to existing.

The proposed buildings will range in size from 300 sqm to 1,100 sqm. The maximum the units will extend to in height will match or be below the existing building level.

#### Assessment of the Proposed Development

It is confirmed that the site is not within a 'sensitive area' as defined by Regulation 2(1) of the EIA Regulations; however, the Site is located 55m to the north from the Bushy Park and Home Park SSSI which is defined as a 'sensitive area'.

#### Embedded mitigation

The Applicant is keen to avoid any significant impacts on the local environment during construction and throughout its operation. During construction, the Applicant will enforce a Construction Environmental Management Plan and a Construction Logistics Plan to ensure good practice measures including wheel washing and use of environmentally friendly machine.



The proposed building and site layout responds to the site's constraints and sensitivity with massing and yard space focused away from the SSSI and the sensitive neighbours such as the residential dwellings along Queens Road and Coleshill Road. Noise impacts will also be managed through building specification and the use of acoustic materials.

Substantial planting is proposed to provide screening as well as deliver on biodiversity net gain and ecological improvements. Trees will be retained where possible with replacement trees of an equal quality will be provided.

The proposed use of the site for flexible industries uses is not too dissimilar to the existing use and therefore it is considered that the impact will not be greater than existing.

### Cumulative Developments

Schedule 4 of the EIA Regulations requires consideration of cumulative effects with other existing and approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG and EIA Regulations. Paragraph 24 of the PPG states *"there are occasions, however, when 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"*.

The table below identifies the schemes considered in the assessment of cumulative effects.

**Table 1: Cumulative Schemes**

Application	Description	Status	Distance
22/2204/FUL	<b>St Clare Business Park and 7-11 Windmill Road</b> Demolition of existing buildings and erection of 1no. mixed use building between three and five storeys plus basement in height, comprising 86no. residential flats (Class C3) and 1,311.2sqm of commercial floorspace (Class E); 1no. two-storey building comprising 595sqm of commercial floorspace (Class E); 14no. residential houses (Class C3); and, associated access, external landscaping and car parking.	Assessment stage	1.1km

Paragraph 58 of the PPG sets out in Column 4 of the Indicative Screening Thresholds Table the potential issues that are most likely to need to be considered for different development types. For industrial uses they are:

- Increases in traffic
- Increases in noise
- Increases in emissions

The scheme is assessed in Table 2 below against the criteria set out in Schedule 3 of the EIA Regulations despite falling outside of the thresholds set out in Schedule 2.

**Table 2 – Screening Assessment**

Screening Criteria	Proposed Development
<b>1. Characteristics of the Development</b>	
<b>(a) Size and design of the development</b>	
Will the development as a whole be out of the scale with the existing environment?	<p>The Site is currently in employment use as laboratories with ancillary offices. The buildings, built in late 1980s with ad hoc extensions since, extend in height to a maximum of 16m with the flumes extending further to 20m.</p> <p>The Site forms part of a larger designated 'Industrial Land and Business Parks' (National Physical Laboratory and LGC Ltd) and 'Key Business Area' (NPL). The National Physical Laboratory ('NPL') sits to the west of the site along with large open car parking areas. Bushy Park is located circa 70m to the south of the site separated by other commercial buildings, car parking, and vehicular roads. To the east and north of the site is predominantly residential uses comprising a mix of terrace homes and flatted units. The Character of the site and the areas to the south and west can be considered as industrial/commercial. To the north and east is largely residential in character.</p> <p>The proposed scheme will reflect the scale of the existing buildings in height and floorspace. The proposed floorspace of circa 12,272 sqm is less than the existing 12,602 sqm. At this stage, the design approach has been to retain the proposed buildings within the maximum height of the existing buildings so that there is no massing impact on the character or setting of nearby heritage assets or views.</p> <p>The proposed scheme, based on trip generation figures taken from TRICS, when compared to the existing operation of the site will result in reduced trips in the AM and PM peak hour periods. When comparing traffic movements across a typical day, there will be minimal increase in traffic movements.</p> <p>This means that there will be less vehicle trips from the proposed development when the network is typically most congestion (i.e. AM and PM peak hour periods) with car parking also reduced to circa 92 spaces compared to existing. A reduction in vehicles would also mean a reduction in noise and air pollution caused by vehicles compared to the existing scheme.</p> <p>Overall, it is considered that the proposed scheme will not as a whole be out of scale with the existing environment. This is further mitigated by proposed screening and landscaping utilising</p>



	<p>existing trees which will soften the boundaries with the residential to the north and east.</p> <p>Overall scale of development is reducing compared to existing and therefore any impacts related to scale are reduced.</p>
Will the design of the development as a whole fit in with the existing environment?	<p>The proposed development will be sensitively designed to respond to sensitive receptors and neighbouring ecological and heritage assets including Bushy Park to the south of the Site.</p> <p>The landscaping will utilise native species and seek to achieve biodiversity net gain. The scheme will also seek to incorporate other ecological improvements ensuring that the scheme will fit with the SINC to the south of the Site in Bushy Park.</p> <p>Using appropriate materials will ensure the development blends into the landscape. The scale and massing, and the impact on the 'vista protected line' have also been considered to ensure that the development will be no worse than the existing buildings.</p> <p>The proposed uses have the potential to impact through noise pollution on sensitive receptors, so the scheme seeks through design to mitigate this including orientation of the yard space for the industrial units away from the boundaries towards the centre of the site along New Kelvin Avenue. Appropriate screening will also ensure that noise levels are kept to a minimum acting as a buffer between the industrial units and the sensitive residential receptors.</p> <p>The entire site is subject to a blanket TPO (T1145). There will be some loss of trees within the site to accommodate the proposed development namely the trees within the existing buildings with the vast majority of trees around the edge of the site, offering good screening, being retained.</p> <p>Overall scale of development is reducing compared to existing and therefore will fit within the existing environment better than the existing.</p>
Will it lead to further consequential development or works?	<p>No. The proposed development includes all necessary accesses and technical requirements and, therefore, does not require any further consequential development or related works.</p> <p>As part of the Transport Assessment, the traffic impact of the proposal on the local highway network will be assessed, particularly a review of the capacity of the junctions will be undertaken, with mitigation identified should this be required in response to residual traffic generation. This will be considered as</p>

	<p>part of the Transport Assessment submitted as part of the planning application. From initial assessment of the trip generation, the proposed scheme will result in less vehicle trips in the AM and PM peak hours than existing and therefore will not impact on the junctions any more than existing.</p> <p>Indeed, following initial pre-application engagement, LBRuT confirm no modelling is required of the surrounding highway network.</p>
<b>(b) Accumulation with other development</b>	
Are there potential cumulative impacts with other existing development or developments not yet begun but for which planning permission exists?	As identified in Table 1 above, the Applicant is aware of one 'existing or approved' development within the meaning of PPG and the EIA Regulations. It is considered that this scheme will not result in potential cumulative impacts.
Should the application for this development be regarded as an integral part of a more substantial project? If so, can related development proceed independently?	No. The proposed development is a standalone project and would proceed independently.
<b>(c) Use of natural resources</b>	
Will construction or operation of the development use natural resources such as land, water, material or energy, especially any resources which are non-renewable or in short supply?	<p>The proposed construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for an industrial development. The existing gas provision to the site is to be removed.</p> <p>During construction, the Principal Contractor will be required to monitor energy and water consumption on site, as well as transport of materials and waste.</p>
<b>(d) Production of waste</b>	
Will the development produce waste during construction or operation or decommissioning?	<p>Construction waste would be reused and recycled where possible. A Draft Construction Management Statement incorporating a site waste management plan (SWMP) will accompany the application.</p> <p>Construction waste will be transported away from the site where required and to be accounted for as part of the overall quantum of construction traffic movements. Whilst these movements are not anticipated to be significant, this will be detailed in a Framework Construction Logistics Plan (CLP), submitted as part</p>

	<p>of the planning application with a final document to be secured via planning condition.</p> <p>Operation of the site will generate waste and materials although it is considered to be no worse than the existing laboratories. Operational waste would be disposed of in line with Council requirements and managed in accordance with all applicable legislation.</p>
<b>(e) Pollution and nuisances</b>	
Will the development release any pollutants or any hazardous, toxic or noxious substances to air?	Yes. The development is anticipated to generate a number of vehicle movements, which will subsequently release pollutants into the atmosphere. An Air Quality Impact Assessment will be submitted as part of the planning application; however, the proposed number of trips based on a standardised TRICS assessment will be below that of the existing uses trip generation in the AM and PM peak hours and is likely to generate a negligible increase in vehicle movements across a day.
Is there a potential risk from leachates or escape of waste of other products/by-products that may constitute a contaminant in the environment?	No. Appropriate mitigation measures will be put in place in the drainage systems to avoid any escape of waste or leachates.
Will the development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>The development will generate a certain level of noise from vehicle movements and operations within the proposed commercial units.</p> <p>Noise from vehicles will reduce on the site because of the development. The TRICS trip generation for vehicles shows that the proposed scheme will be less than the existing trips in the AM and PM peak hours and similar across a day. On this basis the noise generated by vehicles will be lower than existing.</p> <p>Noise levels from operations will be mitigated to reduce the risk of adverse impacts through the design and layout of the proposals. This includes the proposed buildings entrances and yard spaces orientated away from sensitive receptors (residential to the north and east), and building specification through materials and structure. Additional mitigation includes acoustic fencing and landscaping buffers which ensure that noise levels will be managed effectively.</p>
<b>(f) Risk of major accidents and/or disasters, including those caused by climate change and also having regard in particular to substances or technologies used</b>	

Will there be a risk of accidents during construction or operation of the development which would have effects on people or the environment?	A draft Construction Environmental Management Plan (CEMP) will be submitted as part of the planning application, setting out the potential environmental risks and potential mitigation measures required to ensure the risks of adverse impacts are managed. It is anticipated that a full CEMP would be secured by planning condition.
Will the development involve use, storage, transport, handling or production of substances or materials which could be harmful to people or the environment (flora, fauna, water supplies)?	No.
<b>(g) Risks to human health</b>	
What are the risks to human health such as from water contamination or air pollution?	<p>The whole borough is designated as an Air Quality Management Area (AQMA). which has been declared for exceedances of the nitrogen dioxide (NO2) annual mean objective and particulate matter (PM10) 24 hour and annual mean objectives. A review of local monitoring data for the last five years of available data (2019 – 2023 inclusive) indicates only one exceedance of the NO2 annual mean objective at monitoring location no.64 in 2019</p> <p>The proposed development has the potential to impact air quality through construction and operation. Air pollution will be managed during construction by a Construction Environmental Management Plan (CEMP) that would be secured by condition with a draft to be submitted as part of the planning application. In addition, it is expected that an NRMM planning condition will form part of any decision with all sites are requested to register on the NRMM website and all NRMM used on-site compliant with Stage IV of the Directive.</p> <p>Air pollution will be minimised in operation by designing efficient buildings and incorporating renewable energy into the proposals. The proposals are seeking to achieve BREEAM Excellent, adopt a whole life carbon approach, minimise operational carbon emissions in line with the GLA energy hierarchy, and target EPC A+ (net zero).</p> <p>Air pollution from vehicles will reduce/not significantly worsen as a result of the proposed development with vehicles trips reducing compared to the existing use.</p> <p>Water contamination risk is expected to be low because of appropriate drainage mitigation such as oil filters will limit any</p>

	potential water drainage contamination, and that the Site is not within a 'Drinking Water Protected Area'.
<b>Other characteristics</b>	
Potential physical changes (topography, land use, changes in water bodies, etc) from construction, operation or decommissioning of the development?	<p>The Site is flat and currently consists of several buildings in laboratory use (Use Class E(g)ii) with ancillary office space. Existing buildings range in height from 11m to 16m with some plant, namely chimneys, extending to over 20m in height. All of the existing buildings will be demolished and replaced with flexible industrial units. The maximum height of the units will not exceed the existing buildings height. Therefore, there would be changes to the Site during construction however the overall form and layout will be similar in scale to the existing.</p> <p>There is no significant level change nor water bodies within the Site. Trees will be retained where possible with trees along the boundary retained to ensure screening is sufficient.</p> <p>It is considered that the physical changes to the site will not result in significant environmental effects.</p>
<b>2. Location of the Development</b>	
<b>(a) Existing land use</b>	
Are there existing land uses on or around the location which could be affected by the development, e.g. residential, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying?	<p>The site comprises Use Class E(g)(ii) with ancillary Class E(g)(i), both employment uses. The existing buildings have been used for life sciences since the late 1980s and form part of a larger conglomeration of employment uses with the National Physical Laboratory to the south and west of the Site.</p> <p>To the east and north of the Site sit residential dwellings along Coleshill Road and Queens Road. Parking for Queens Road properties runs adjacent to the Site's access at New Kelvin Avenue.</p> <p>The proposed scheme seeks to provide employment uses similar to the existing with flexible industrial units proposed. The proposed development has been designed to respond sensitively to this context by providing the loading bays and active building facades away from the southern boundary. In addition, screening of the site through tree planting and retention of existing trees as well as being set back further from the boundary will ensure impact is limited on surrounding uses.</p> <p>Daylight/sunlight impacts on surrounding properties are considered to not be worse than existing with the heights of the proposed buildings lower than existing and being set back from</p>

	<p>the boundary. A daylight/sunlight assessment will be submitted as part of the planning application.</p> <p>It is not anticipated that there will be a significant uplift in trip generation therefore the impact through vehicle noise and pollution will not be worse than existing. A transport assessment will be submitted as part of the planning application.</p> <p>The operation of the proposed development will not therefore alter the character of the site given its existing use. Notwithstanding this, the proposals incorporate appropriate screening and good design to ensure impact on neighbouring uses is minimised.</p>
Is the development located in a previously undeveloped area where there will be loss of greenfield land?	The site is previously developed, brownfield land. There would therefore be no loss of greenfield land.
<b>(b) Relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground</b>	
<p>Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the development?</p> <ul style="list-style-type: none"> <li>• Soil;</li> <li>• Land;</li> <li>• Groundwater resources;</li> <li>• Surface waters;</li> <li>• Biodiversity;</li> <li>• Forestry;</li> <li>• Agriculture;</li> <li>• Fisheries;</li> <li>• Tourism; and</li> <li>• Minerals.</li> </ul>	<p>No. The site is not located on or around a location which contain important high quality of scarce resources which could be affected by development.</p> <p>The site does not include any designated, important or protected species.</p>
<b>(c) Absorption capacity of the natural environment</b>	
Are there any areas on or around the location which are protected under international or local legislation for their	The Site sits within the SSSI Impact Zone for Bushy Park and Home Park SSSI which is 55m to the south of the site separated from the Site by buildings operated by NPL and Rayleigh Avenue/Dora Jordan Road. The SSSI is an area of land with ecological interest of national importance designated by Natural



<p>ecological, landscape, cultural or other value, which could be affected by the development?</p>	<p>England for its significant populations of rare insects, the exceptionally large numbers of ancient and veteran trees growing on the site, and the presence of extensive areas of special grassland habitat.</p> <p>CEMP will secure mitigation measures that ensure impacts during construction are limited. During operation, the Site is considered a sufficient distance from the SSSI, but the scheme will still incorporate appropriate screening, ensure noise levels and light pollution is managed, and provide landscaping improvements and deliver biodiversity net gain through native species.</p>
<p>Are there any other areas on or around the location which are important or sensitive for reasons of:</p> <ul style="list-style-type: none"> <li>• Wetlands, riparian areas, river mouths;</li> <li>• Coastal zones and the marine environment;</li> <li>• Mountains and forest areas;</li> <li>• Nature reserves and parks;</li> <li>• European sites and other areas classified or protected under national legislation;</li> <li>• Areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;</li> </ul>	<p>In addition, to the neighbouring SSSI, Bushy Park is a Grade I Registered Park and Garden. Appropriate screening and design and massing will ensure that the impact will be limited.</p> <p>The planning application will be accompanied by a Heritage, Townscape and Visual Impact Assessment considering the impact of the proposals on the historic environment, and an Ecological Impact Assessment which will consider the impact and propose mitigation measures on the ecological environment.</p> <p>The site is not within an archaeological priority area.</p>

<ul style="list-style-type: none"> <li>• Densely populated areas; and</li> <li>• Landscapes and sites of historical, cultural or archaeological significance.</li> </ul>	
Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora, e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected?	There is a low suitability terrestrial habitat in grassland, scrub and woodland. Suitable bird nesting habitat including gardens, hedgerows, woodland, scrub, trees and buildings on site. Potential bat roosting habitat within the mature trees and buildings. Moderate suitability bat foraging and commuting habitat. Potential habitat for hedgehog and other small mammals.
Are there any inland, coastal, marine or underground waters on or around the location which could be affected?	No.
Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources?	No. The Site is located 250m to the north of a 'Drinking Water Protected Area'.
Are there any areas or features of high landscape or scenic value on or around the location which could be affected?	<p>Bushy Park is located 50m to the south of the Site and is a Grade I Registered Park and Garden. The Site is separated from Bushy Park by Rayleigh Avenue and buildings owned and operated by the National Physical Laboratory.</p> <p>The proposed scheme will be of a lower scale and massing than the existing buildings. Nonetheless, appropriate screening and design will ensure that any impact will be further limited. In addition, the planning application will be accompanied by a Heritage, Townscape Visual Impact Assessment.</p>
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?	No, the Site does not consist of any public rights of ways or access ways for the public. The access arrangements onto the site and further afield the roundabout at the end of New Kelvin Avenue will not be affected significantly by the proposed development with it anticipated that New Kelvin Avenue will remain in situ. The Transport Assessment to be submitted as part of the planning application will set out in detail the trip generation and potential impact on junctions.

Are there any transport routes on or around the location which are susceptible to congestion, or which cause environmental problems which could be affected?	No, the trips to be generated by the proposed development are unlikely to result in significant increases in vehicles and therefore congestion.
Is the development in a location where it is likely to be highly visible to many people?	<p>New Kelvin Avenue is not a through road and appropriate screening will ensure that the Site will not be highly visible from sensitive locations including Bushy Park and the 'vista protected line' (vista to refurbished water garden, bushy park).</p> <p>The development will be visible along Coleshill Road and Queen's Road, however the site will read as part of the townscape, with appropriate design detailing, materiality and landscape screening.</p>
Are there any areas or features of historic or cultural importance on or around the location which could be affected?	<p>The Site is 50m to the north of Bushy Park, a Grade I Registered Park and Garden. Several other heritage assets are within the vicinity including Bushy House (Grade II* listed); Conservatory to Bushy House (Grade II listed); Garden House to Bushy House (Grade II listed); Clock House (Grade II listed); which sit to the south of the Site ranging from 200m to 300m, and North Lodge to the NPL (Grade II listed) which sits 60m to the south east from the Site. The Grade II listed Teddington Hall sits 170m to the north of the Site.</p> <p>There are several 'Buildings of Townscape Merit' including Victoria Lodge and Elm Lodge which abut the boundary of the Site in the southeastern corner. These constitute Non-Designated Heritage Assets.</p> <p>Building 39, a building in the southern part of the Site is proposed for retention as part of this development and was noted in recent pre-application engagement as providing a positive impact on the townscape and constitutes a Non-Designated Heritage Asset.</p> <p>All of the above have the potential to be impacted by the proposed development. The proposed scheme in response seeks to mitigate any impact through high-quality design and landscaping, and retention of Building 39.</p>
Are there any areas on or around the location which are densely populated or	No, the density is atypical of suburban development (medium density). Through appropriate mitigation, the impact on neighbouring residential and sensitive properties will be limited.

built up, which could be affected?	
Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected?	No.
Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions, e.g. temperature inversions, fogs, sever winds, which would cause the development to present environmental problems?	No.
<b>3. Characteristics of potential impact</b>	
<b>(a) Extent of the impact</b>	
Will the effect extend over a large area?	No. This is confined to the site only and the land immediately adjacent.
Will many people be affected?	No. Any impact is expected to be localised.
What will be the nature of the impact?	There will be a limited and minor impacts on ecology and trees. This will be in the form of the loss of several trees, scrub, ornamental hedgerows and modified grassland on Site to accommodate the proposed site layout.
<b>(b) Transboundary nature of the impact</b>	
Will there be any potential for transboundary impact?	No.
<b>(c) Magnitude and complexity of the impact</b>	
Will there be a large change in environmental conditions?	No.
Will the effect be unusual in the area or particularly complex?	No.

Will many receptors other than people (fauna and flora, businesses, facilities) be affected?	No.
Is there a risk that environmental standards will be breached?	No.
Is there a risk that protected sites, areas, and features will be affected?	There is the potential for a limited impact on protected sites however this will be mitigated through appropriate measures and the impact is not considered to be significantly more than the existing use on site.
<b>(d) Probability of the impact</b>	
Is there a high probability of the effect occurring?	The effects of the proposed development can be clearly established and the probability of any effects determined with reasonable confidence.
Is there a low probability of a potentially highly significant effect?	As above.
<b>(e) Expected onset, duration, frequency and reversibility of the impact</b>	
What will result in the onset of the impact?	There will be some localised impact from the development in terms of ecology.
Will the effect continue for a long time?	Construction effects would be short term in duration, whilst the operational effects would be long term.
Will the effect be permanent rather than temporary?	Construction effects would be temporary, and the operational effects would be permanent.
Will the impact be continuous rather than intermittent?	Construction – intermittent Operation - continuous
If intermittent, will it be frequent rather than rare?	Frequent.
Will the impact be irreversible?	Construction – yes. Operational – no.
Will it be difficult to avoid or reduce or repair or compensate for the effect?	No.
<b>(f) Possibility of effectively reducing the impact</b>	
What is the possibility of the likely impacts arising from the Proposed Development being effectively reduced?	Significant effects have been considered unlikely and a series of mitigation measures within the design would be used to ensure that any impacts arising from the proposed development would be reduced.

	It is considered that as the scale of the development including massing and vehicle trip generation is less than existing, any impact will be less.
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## Conclusion

Having considered the Proposed Development against both thresholds and criteria set out in the EIA Regulations 2017 (schedule 1 and 2), and on its own merits in the context of the Site location, sensitive receptors and likely environmental impacts, it is considered that the Proposed Development does not constitute Schedule 2 development and, therefore, is not EIA development.

Notwithstanding this, it is proposed that the planning application will be supported by technical reports to address some of the issues raised in this Screening Covering Letter, the scope of which will be agreed during pre-application discussions.

Under Regulation 6 of the EIA Regulations, the planning authority must adopt a screening opinion within 3 weeks beginning with the date of receipt of a request made.

We look forward to meeting you and discussing the proposals further.

Yours sincerely,

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