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Date: 12th May 2025

By Email Only

Dear Mr Winch,

**SITE: LABORATORY OF THE GOVERNMENT CHEMIST, QUEENS ROAD,
TEDDINGTON, TW11 0LY**

**Re: Formal request for screening opinion under Regulation 6 of The Town and
Country Planning (Environmental Impact Assessment) Regulations 2017 (As
Amended)**

Thank you for your letter dated 19th February 2025, and the accompanying EIA Screening letter, site plan, and further supporting heritage documents, to seek a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 in respect of a forthcoming detailed planning application for the redevelopment of the site.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 12th May 2025, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with the EIA Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

**Lucy Thatcher
Strategic Applications Manager**

LONDON BOROUGH OF RICHMOND UPON THAMES

**PLACE, PLANNING AND TRANSPORT DIVISION, DEVELOPMENT MANAGEMENT
(PLANNING)**

EIA SCREENING OPINION REVIEW

**SITE: LABORATORY OF THE GOVERNMENT CHEMIST, QUEENS ROAD, TEDDINGTON,
TW11 0LY**

PROPOSED DEVELOPMENT: The demolition, with exception of Building 39, of 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 to be retained and refurbished and extends to 572 sqm providing additional flexible employment floorspace.

The EIA Screening Approach

The project is proposed under The Town and Country Planning (Environmental Impact Assessment) (as amended) Regulations 2017 regime.

Consultation

Consultation was carried out. The responses are summarised below.

LBRUT	
Environmental Health (Noise)	Scoped out
Policy	Scoped out
Trees	Scoped out
Environmental Health (Contamination)	Scoped out
Environmental Health (Air Quality)	Scoped out
Ecology	Scoped out
LLFA	No comment
Transport	Scoped out

External Consultees	
Environment Agency	No comment
GLAAS	Scoped out
Historic England	Scoped out
Marine Management Organisation	No comment
Natural England	Scoped out
TfL	No comment

The EIA Regulations Threshold

A screening exercise has been undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The Local Planning Authority (LPA) has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise.

The EIA Regulations define 'EIA Development' in Regulation 2(1) as either:

- Schedule 1 development; or
- Schedule 2 development likely to have a significant effect on the environment by virtue of its size, nature or location.

The development is not a Schedule 1 development.

If the project is listed in Schedule 2, the LPA should consider whether it is likely to have 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; 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;

“sensitive area” means:

- (a) land notified under section 28(1) (sites of special scientific interest) (SSSI) of the Wildlife and Countryside Act 1981;
- (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- (c) the Broads;
- (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;
- (g) a European site;

The site is not located within a ‘sensitive area’.

The proposal is regarded as an Infrastructure project (10), and more specifically an industrial estate development project as defined under Schedule 2, Part 10 (a) of the Regulations, which has a relevant threshold of ‘area of the development exceeds 5 hectares’.

As set out in PPG, “only a very small proportion of Schedule 2 development will require an EIA. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced”

The indicative thresholds ([eia-thresholds-table.pdf](#)) identify the indicative criteria and threshold for an industrial estate development project, as a site area of the new development of more than 20 hectares, with the key issues to consider including, potential increase in traffic, emissions and noise.

The NPPG states, “*projects which are described in the first column of Schedule 2 but which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area, are not Schedule 2 development*”. If a

proposed project is listed in the first column in Schedule 2 and exceeds the relevant thresholds or criteria set out in the second column the proposal needs to be screened to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required”.

The proposed development has the following project quantities (Table 1), which confirms the **Development falls below the relevant threshold.**

Table 1: Project quantities

	Schedule 2 thresholds	Indicative thresholds	Screening Opinion
Site area	>5ha	>20 hectares	3.2 ha

In summary:

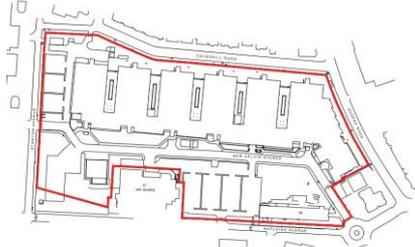
- The development is not within a sensitive area
- The development does not exceed the Schedule 2 thresholds.
- The development does not exceed the Schedule 2 indicative thresholds.

Notwithstanding the above, the NPPG states “it should not be presumed that developments ... 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”. Therefore, a screening review has been undertaken.

Regulation 6 of the EIA Regulations

Regulation 6 (2) sets out the necessary information the person making a Screening Opinion request must provide. The submission documents that accompanied the screening opinion request are deemed to confirm with such requirements:

- Site location plan
- Be First Planning Consultancy letter dated 19 February
- Pre-application Heritage & Townscape Assessment: Queen’s Road, Teddington – Smith Jenkins Planning & Heritage, January 2025
- Final Heritage & Townscape Rules (undated)
- Emerging Masterplan (extract) – UMC Architects.

Regulation 6 requirements	Conformity
(a) a plan sufficient to identify the land;	<p>Yes</p> <p>Plan 24173-UMC XXXX SI DR A 0500 P01 Site Location Plan has been supplied.</p> 
(b) a description of the development, including in particular—	<p>Yes</p>

<p>i. a description of the physical characteristics of the development and, where relevant, of demolition works;</p> <p>ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;</p>	<p>The following was submitted in the EIA Cover Letter dated 19.02.2025 (later referred to as the Cover Letter), Table 2 Screening Assessment (pages 8 – 20):</p> <ul style="list-style-type: none"> • Characteristics of the development including size and scale. • Environmental sensitivity to nearby geographical areas. <p>The below details were provided in the Cover Letter, Schedule 3 Assessment (pages 4 – 6):</p> <ul style="list-style-type: none"> • Description of the location of the proposed development. • Description of the Proposed Development (Including the extent of demolition)
<p>(c) a description of the aspects of the environment likely to be significantly affected by the development;</p>	<p>Yes</p> <p>Details were provided in the Cover Letter, Table 2 Screening Assessment (pages 8 – 20):</p> <ul style="list-style-type: none"> • Transport (page 9) • Waste (page 10) • Pollution/nuisance (page 11) • Air Quality/ Human Health (page 12) • Natural Environment (page 14) • Heritage (Page 16)
<p>(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—</p> <p>i. the expected residues and emissions and the production of waste, where relevant; and</p> <p>ii. the use of natural resources, in particular soil, land, water and biodiversity; and</p>	<p>Yes</p> <p>The details are provided in the Cover Letter, Table 2 Screening Assessment (pages 8 – 20):</p> <p><u>Construction:</u> Waste (construction (page 10) Natural resources (page 10) Air pollution (page 12)</p> <p><u>Operational:</u> Air pollution & water contamination risk (page 12) Natural resources (page 10) Noise (page 11) Air pollution (page 12) Water contamination (page 12)</p>

<p>(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.</p>	<p>Yes</p> <ul style="list-style-type: none"> • The Cover Letter sets out mitigation measures at Table 2, Screening Assessment (pages 9 – 19). • The necessary information has been supplied against the Council's Local Validation Checklist.
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SCREENING OPINION

Regulation 5(4) of the Regulations and NPPG require the LPA to consider the screening criteria set out in Schedule 3 of the Regulations (listed below), however, the NPPG notes not all criteria will be relevant and each case should be considered on its own merits in a balanced way:

1. *Characteristics of development*
2. *Location of development*
3. *Type and characteristics of the potential impact*

To aid LPAs to determine whether a project is likely to have significant environmental effects, the NPPG at Column 4 sets out an indication of the types of impact that are most likely to be significant for industrial uses. Of relevance to this Development are:

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

Whilst any development will have an impact on the environment, which will be considered against the Development Plans and guidance, for the purpose of this Screening Opinion, consideration is given to the whether the development is likely to give rise to significant impacts in context of the EIA Regulations.

When the LPA issues its opinion, it must state the main reasons for the conclusion with reference to the relevant criteria listed in Schedule 3.

(1) Characteristics of the Development

a) The characteristics of development must be considered with particular regard to the size and design of the whole development

The site is approximately 3.2 ha and currently comprises of circa 12,300 sqm of employment land. The site's primary use is research and development E(g)(ii) (R&D). The Site forms part of a larger designated 'Industrial Land and Business Parks' (National Physical Laboratory and LGC Ltd).

The proposed scheme seeks to refurbish Building 39 and replace the existing units with modern and fit-for-purpose flexible industrial units (Use Classes E(g)(iii), B2, and B8).

This proposal would result in a small reduction in industrial floorspace. (The proposed floorspace of circa 12,272 sqm (Building 39) is less than the existing employment floorspace 12,602 sqm). The design of the proposed scheme would reflect the height of the existing buildings and would not result in a significant increase in mass.

The site's primary access is off Queens Road (B358) north-west of the mini roundabout. There is a secondary (closed off) access from Coleshill Road (unclassified Road). Both Queens Road and Coleshill Road connect to Broad Street A313 to the north (TfL maintained) a main artery in and out of the Borough. The existing access off Queens Road will remain unchanged. The secondary access will remain closed.

The redevelopment of this industrial site results in physical changes. The existing laboratories will be demolished and replaced with purpose built industrial units. The siting, scale and design of the replacement units seek to remain broadly within the existing silhouette. They would not result in an increase in maximum height or uplift in industrial floorspace.

In summary, the development characteristics, particularly size and design, are not deemed to have significant adverse effect.

b) The characteristics of development must be considered with particular regard to the cumulation with other developments

The Site forms part of a larger designated 'Industrial Land and Business Parks' (National Physical Laboratory and LGC Ltd). There are potential cumulative effects arising from the day to day activities associated with the wider NLP site (particularly in terms of the operational vehicle movements and servicing).

St Clare Business Park and 7-11 Windmill Road (22/2204/FUL) was approved by the Planning Committee in October 2023, subject to a legal agreement. The decision notice has not yet been issued.

"demolition of existing buildings and erection of 1no. mixed use building between three and five storeys plus basement in height, comprising 86 no. residential flats (Class C3) and 1,311.sqm of commercial floorspace (Class E); 1 no .two storey building comprising 59 sqm of commercial floorspace (Class E); 14 no. residential houses (Class C3); and, associated access, external landscaping and car parking. The status of this is currently pending consideration".

There are potential cumulative effects is construction periods coincide, (particularly relating to vehicle movements on the A313 Hampton Road).

Appropriate conditions would be applied were development to come forward at St Clare Business Park and at the LGC site, at both the construction and operational phases.

As discussed, in terms of scale, the proposed development would not result in an increase in industrial floorspace comparable to the existing site.

Given the mitigation (particularly appropriate transport/highways conditions) that would be put in place were a development to come forward and the limited size and nature of the Development, the cumulative impacts of the Development are not deemed to give rise to significant environmental effects.

c) The characteristics of development must be considered with particular regard to the use of natural resources, in particular land, soil, water and biodiversity

Land and Natural Resources

The land at this site is an existing local industrial park which will be redeveloped to broadly the scale and mass comparable to the current scenario. The Cover Letter sets out that the new employment units will achieve BREEAM Excellent, adopt a whole life carbon approach, minimise operational carbon emissions in line with the GLA energy hierarchy and achieve a target EPC A+ (net zero).

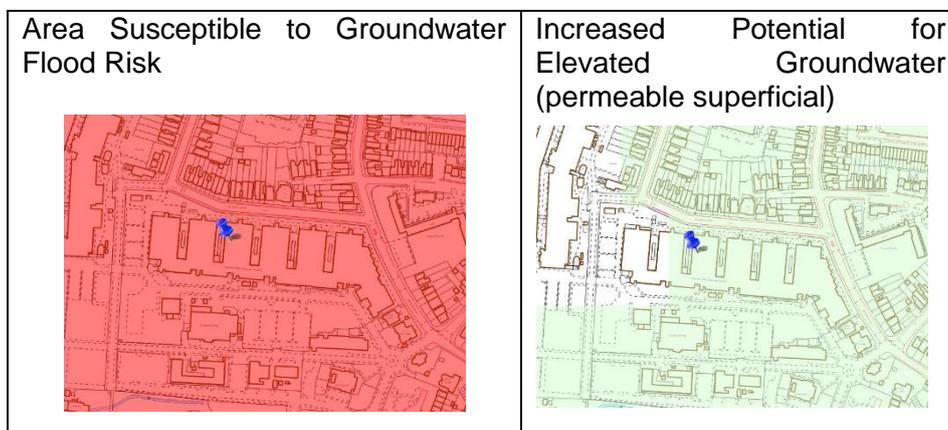
Geology and Hydrogeology

The site is located in a land use past industrial. Site investigation strategies, risk assessments, remediation works (where necessary) and verification reports are requirements which will be applied to the scheme by the Council. Such evidence can mitigate any potential significant effect.

Surface Water and Flooding

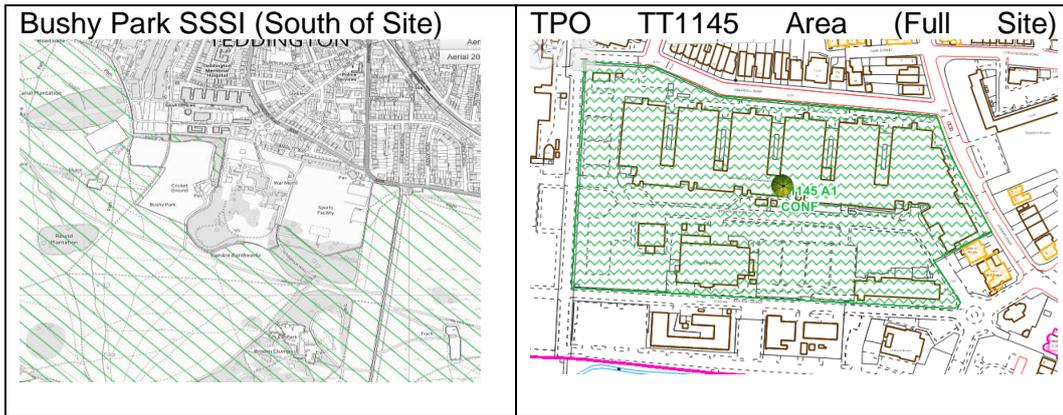
Whilst the site is within Flood Risk Zone 1 where there are no land use restrictions, the site is within a location of surface water (1:100) and ground water flood risk (75% or >).

A high proportion of the existing local industrial site contains built form or hard landscaping. Proposed floor plans have not been provided with this submission, however from the description of development it is evidence that this scheme would not increase the industrial floorspace. A Flood Risk Assessment, Sustainable Urban Drainage/ Surface Water Drainage Strategy and Flood Emergency Evacuation Plan (where required) are requirements which would be imposed on any future submission. Such evidence could address potential impacts arising from surface water and/or ground water flood risk.



Biodiversity:

Bushy Park Specific Scientific Interest (SSSI) is located to the south of the site (circa 54m), also extending to the east and west. Bushy Park is also designated as a Site of Importance for Nature Conservation (SINC) and Other Site of Nature Importance (OSNI) which are local biodiversity designations reflecting the fact it also contains Local Biodiversity Action Plan habitats and species.



The site is a designated Group TPO TT1145, contains grassed areas and scrub. The mature trees and scrub provide some suitable bird nesting habitat. Additionally, there is potential bat roosting. It is considered that there is moderate suitability for bat foraging and commuting habitats on site. Additionally, there are suitable foraging habitats for hedgehog and other small mammals on site.

The development has potential to have an impact on the biodiversity value of the site, from construction. It may also result in a loss of habitats (particularly trees and scrub) from the revised layout of built form.

However, the overall proposed development (both construction and operational) compared to the existing local industrial site is not such that it is deemed significant. Effects can be avoided with conditions (including biodiversity hierarchy, conditions (surveys, times for tree removal etc), ecological enhancements, landscaping, protection, ecological management plans). The scheme is also not anticipated to result in significant direct or indirect impacts on statutory designated sites.

d) The characteristics of development must be considered with particular regard to the production of waste

Construction:

Waste will be associated with the demolition of all the existing buildings (with the exception of 1), excavations and construction.. The management of waste will need to follow the waste management hierarchy (reduce, reuse and recycling), Circular Economy and the Whole Life Cycle Carbon Assessment. Appropriate conditions will be applied to mitigate such impacts including a construction waste management plan. If the development follows such policy requirements, significant impacts are not anticipated.

Operation:

The industrial site will generate waste requiring servicing and removal. The scale of development is not an uplift comparable to the existing industrial floorspace. The Cover Letter states waste will be managed in line with the Council's requirements. The Council will require on-site waste and recycling provision along with a Waste and Servicing Management Plan will be secured by a condition. Significant effects are not anticipated.

e) The characteristics of development must be considered with particular regard to pollution and nuisance

Noise pollution:

Construction: Noise and vibration generated during demolition and construction could have some negative effects within the surrounding area / sensitivity receptors. Noise mitigation measures which would be applied, including a Noise and Vibration Construction Management Plan and Environmental Construction Management Plan. Subject to these, significant effects are not envisaged.

Operational: There is potential for a change in noise as a result from the shift from E(g)(ii) (R&D) to a mix of E(g)(iii), B2, and B8. However, this is not considered significant, all uses falling within the reservoir of appropriate uses on an industrial site. Conditions requiring a Noise Assessment, Noise Management Plan, Noise Protection Scheme, Mechanical Services Noise Control, and Hours of Use will be applied. The Cover Letter also refers to acoustic fencing and landscaping buffers if required. Subject to these adverse impact on health or quality of life arising from noise are not anticipated.

Light pollution:

Both the construction and the operational stages of the development have the potential to cause light pollution. During works, an Ecological CMP will be secured via condition to addresses the impact of light pollution at the construction stage.

A Lighting and Illumination Strategy will be required. This will be secured by condition to protect against harm at the operation stage (including upon roosting bats if they are identified). Overall, it is not considered that lighting pollution will give rise to significant effects.

Land / soil contamination:

The site is designated as Land Use Past Industrial. There is the potential for existing pollutants to exist on the site. There is a potential for pollutants to be released into the ground or into surface/ground water during the demolition and construction. However, it is deemed this could be suitably addressed through integral parts of the design and conditions, including:

- Environmental Construction Management Plan
- Foul and Surface Water Drainage Plan
- Contaminated Land Preliminary Risk Assessment with Site Investigation, Remediation and Verification.
- Appropriate Storage of Materials

Conditions will also be applied for waste storage and servicing for the operational stage of the industrial scheme. The proposal does not result in a net increase in industrial floorspace on the site.

Overall, significant impacts are not envisaged on land or soil contamination.

Climate change and greenhouse gas emissions

Construction: The proposal is retaining 1 new building. The remaining buildings on the site will be demolished and new units will be constructed. The generation of greenhouse gases associated with the production of new materials is acknowledged. Additionally, demolition and construction will result in additional traffic movements that are likely to generate greenhouse gas emissions.

It is deemed these will not give rise to significant impacts, and conditions would be applied to avoid significant effects, including, a Construction Management and Logistics Plan

(CMP). The CMP would incorporate air quality measures, (such as no bonfires, no idling, scheme complying with the latest Non-Road Mobile Machinery standards). Additionally, a Construction Waste Management Plan will be applied.

Operational: At the operational stage of development, the scheme proposes to restrict trip generation, so it does not exceed that of the existing site. A Transport Assessment will be required to be submitted to the Council. The scheme will also need to provide cycle spaces EVCPs in line with the GLA requirements. A travel plan will also need to be submitted. The Cover Letter sets out that proposed development will seek to achieve BREEAM Excellent, alongside minimising operational emissions in line with the GLA hierarchy. There will be a requirement to meet zero carbon, Air Quality Neutral and the London Plan green house policies. Given the above, it is not considered that the proposed development would have a significant impact on climate change and greenhouse gas emissions.

f) The characteristics of development must be considered with particular regard to the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;

Accidental pollution: The Construction Environmental Management Plan (CEMP) would include construction protocols such as details of safe storage of materials (including contaminants). Conditions will also be secured in case of contamination is found / caused. Both would be secured by a condition.

Construction accidents: The Construction Management Plan (CMP) would include procedures to demonstrate safe on-site practices to minimise risks of accidents.

Crime: A condition is recommended for the development to achieve Secure by Design to reduce the risks of crime. Management Plans will be required to show how the units will be serviced, managed and maintained at the operational stage to ensure the standards of the build environment will be maintained.

Surface water/groundwater flooding: The site is not at risk of fluvial flooding being in Flood Risk Zone 1. In terms of surface water and ground water flood risk, an FRA, Sustainable Urban Drainage Strategy and Evacuation Plan would be required to minimise the risk of an event occurring. Additionally, design measures and recommendations should flooding occur (proportionate to the level of risk) would be included within the above evidence.

Based on the above, it is deemed any risk to major accordance or disasters is not significant and can be mitigated.

g) The characteristics of development must be considered with particular regard to the risks to human health (for example, due to water contamination or air pollution).

- Construction: There is a risk to human health due to accidents at the construction stage of a development. Such risk can be controlled / mitigated through the following:
 - health and safety legislation
 - appropriate site management procedures
 - conditions (in particular, Construction Management Plan, Foul & Surface Water Drainage; Site Investigations, Remediation & Verification)
- Operation: A Health Impact Assessment and Air Quality Assessment would be required and consultation with Environmental Health would take place in any future

application. The scheme does not seek to increase trip generation on site compared to the existing scenario. It would seek to reduce carbon emissions in line with the GLA hierarchy. The development would also need to meet Air Quality Neutral. Further, conditions would secure drainage; remediation from contamination (if required); and noise management.

Overall, the scheme would not give rise to significant adverse impacts as the potential risk to human health, may be dealt with through conditions and mitigation measures.

Summary – On the basis of the information provided within the submission, by reason of the layout, scale and nature of the Development, the temporary duration, reversibility and intensity of such impacts through construction, in addition to the environmental context of the site and potential mitigation measures that can be secured via condition, significant environmental effects are not considered likely.

(2) Location of Development

The Site is located within the NLP Industrial Land / Business Park, designated as an 'Locally Important Industrial Land', and comprises of approximately 12,303 sqm R&D E(g)(ii) purpose-built units.

The site's access is off Queens Road north-west of the mini roundabout. The site borders Colehill Road. New Kelvin Avenue runs through the centre of the site, providing access to car parking and the buildings. Both Queens Road and Colehill Road connect to Broad Street A313 to the north. The site is in PTAL 3.

The site is within Teddington Village (Character Area 15 Broad Street and Queens Road). It is in an Area Susceptible to Groundwater Flooding (75% or more) an area of Increased Potential Elevated Groundwater (Permeable Superficial) it is also in an area at Risk of Flooding from Surface Water (1 in 100 chance). The site is in an industrial past Land Use; a TPO Wood Group Area REF: T1145.

There are two Buildings of Townscape Merit (BTMs) adjacent to the south-eastern boundary, Victoria House (C3 flats 1-4) and Elm Lodge (C3 flats 1-8). Further south is the North Lodge and Clock House which are both Grade II Listed Buildings.

To the south and west of the Site is Bushy Park, designated Metropolitan Open Land (MOL), Site of Specific Scientific Interest, Site of Importance for Nature Conservation (SINC), Other Site of Nature Importance, Public Open Space, Conservation Area 61 (Bushy Park), Grade I Historic Park and Garden and Archaeological Priority Zone (Tier II). The boundary wall to Bushy Park is Grade II Listed to the south. two listed building groups within Bushy Park, around Bushy House (grade II*) and Upper Lodge (grade II). Additionally, there is Other Open Land of Townscape Importance (OOLTI) to the north of the pre-application site boundary.

It is considered that, with the application of safeguarding conditions, significant effects will not be caused on this location.

a) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to the existing and proposed land use

Traffic, social-economic and community:

The Cover letter sets out that the proposed scheme seeks to ensure trip generation does not exceed existing levels. The site is in PTAL 3. Cycle spaces and EVCPs will be required in line with the GLA requirements along with a Travel Plan.

A Construction Environment and Logistics Management Plan would be required for the construction phase. Whilst it is acknowledging the development will cause inconvenience and an element of disturbance during the construction, a series of conditions would ensure significant effects would not be generated.

Any future application would be accompanied by a Transport Assessment and Travel Plan to address highway and transport impacts at the operational stage.

Future land uses:

It is concluded the proposed uses respond to the land use designation and aspirations for the Site as a LSIL.

Employment:

The proposal will be redeveloped to create 16 purpose built industrial units in a variety of sizes which will support local employment in an already established industrial site. Additionally, the proposal will generate short-term opportunities through construction. As such, the scheme is not deemed to give rise to significant effects.

Demographics:

The proposal would result in a shift of jobs as the current use E(g)(ii) which has been decommissioned. New industrial employment floorspace is being provided providing a different range of employment opportunities. Given the nature of development (redevelopment of an existing industrial site) it is not deemed to significantly alter the demographics in the area.

Wind climate:

This proposal would not materially change the current site conditions such to impact on wind climate. Given the existing buildings on site and the nature & scale of the proposed redevelopment (which is not significantly larger in mass or scale) the proposal is not deemed to result in significant effects on wind climate.

Daylight, sunlight, overshadowing and solar glare

The height, bulk and mass of the proposal does not reflect a material increase compared to the existing situation. Given scale of what is proposed in this scheme, significant effects are not anticipated on daylight, sunlight, overshadowing and solar glare beyond what can be addressed and mitigated through conditions. A Daylight and Sunlight Assessment will be required as part of any future development.

In conclusion, the proposed Development would not be significantly greater in scale compared to its existing use. The existing site is in industrial use (E(g)(ii), and the proposed range of uses although of a different type remain industrial (E(g)(iii), B2 and B8). Conditions will be put in place to mitigate impacts that arise from development where required (such as transport, employment, daylight & sunlight). As such, it envisaged the scheme will not create significant impacts on the environmental sensitivities of the area, with particular regard to existing and proposed land uses.

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard to:

- b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground
and
c) the absorption capacity of the natural environment, paying particular attention to the following areas

Wetlands, riparian areas, river mouths and coastal zones and the marine environment
N/A.

Mountain and forest areas
N/A.

European sites and other areas classified or protected under national legislation, and nature reserves and parks

Bushy Park is located to the south and west of the Site. This is designated Metropolitan Open Land (MOL), Site of Specific Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC), Other Site of Nature Importance, Public Open Space, Grade I Historic Park and Garden. Additionally, there is Other Open Land of Townscape Importance (OOLTI) to the north of the site boundary. Given the separating distances; the temporary nature of the construction, and applying mitigation measures secured via condition, significant effects upon Bushy Park and the OOLTI are not envisaged.

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

The whole Borough is within an Air Quality Management Area (AQMA) due to exceedances of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). The Cover Letter outlines that an Air Quality Impact Assessment will be submitted as part of any future application. Subject to the scheme meeting Air Quality Neutral, measures to minimise exposure to future residents and to improve air quality (secured via condition), significant effects will not be caused.

Densely populated areas

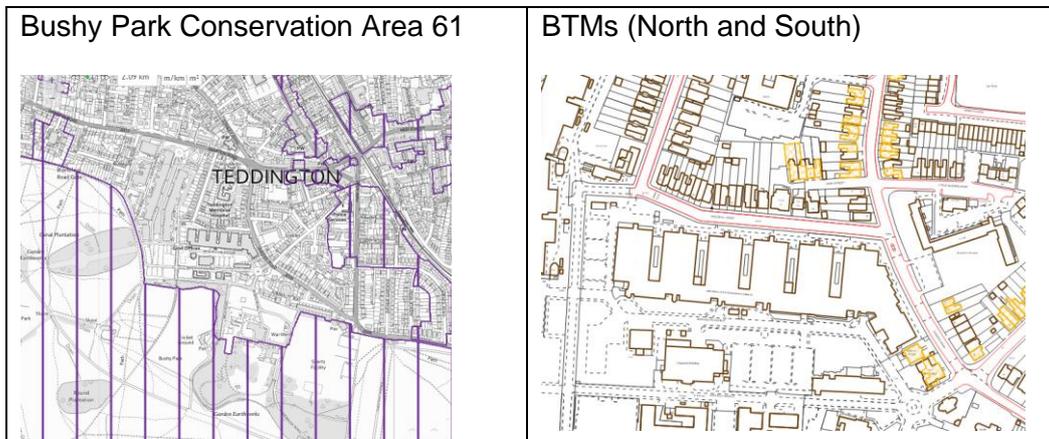
The Site is surrounded by residential dwellings to the north and east. The Development has the potential to cause impacts on such receptors, particularly in terms of:

- Noise, vibration, emissions and dust during construction
- Noise and light pollution during operational use
- Visual impacts through construction and the design of the future scheme
- A change in the nature and type of vehicle movements
- Surface or groundwater flooding
- Contamination

Given the scale, siting, nature and temporary duration of the Works, the surrounding context and considering measures and mitigation that could be applied and controlled the development is not deemed to give rise to significant effects. Such measures include Environmental Health legislation, Health & Safety legislation and planning conditions.

Heritage assets

The site is adjacent to Bushy Park Conservation Area, and within the setting of a number of designated and non-designated heritage assets. Examples are shown below:



Designated heritage assets

- Bushy Park Conservation Area and Grade I Listed Historic Park & Garden
- Bushy Park Boundary Wall Grade II
- North Lodge Grade II Listed Building
- two listed building groups within Bushy Park, around Bushy House (grade II*) and Upper Lodge (grade II).

Non-designated heritage assets:

- Victoria Lodge (BTM)
- Elm Lodge (BTM)
- 81-83 Queens Road (BTM)
- 95 Queens Road (BTM)
- Building 39 (Emerging BTM)

Building 39 on the south-eastern corner of the site is being put forward for a BTM designation. In terms of existing BTMs, these are located to the north, east and south. Closest to the entrance to the site are Victoria House (BTM) and Elm Lodge (BTM). The development will retain Building 39.

Any future scheme would be accompanied by a Heritage Assessment and view analysis, which should inform the scheme to avoid harm to the significance of designated and non designated assets. Subject to sensitive design and the building heights remaining within the existing prevailing height of the site, it is not envisaged to date the scheme would not cause significant impacts.

Archaeology

The site is not within an Archaeology Priority Area. Notwithstanding this, an Archaeological Statement would be supplied with any future application. This would include measures to investigate the presence of any archaeological remains and measures to suitably protect these where any discovered, on-site. On this basis, significant effects are not considered.

Townscapes and landscapes

The landscaping and trees immediately along the boundary with Coleshill Road are to be retained. The existing site, given its use, contains limited landscaping. There is little in the way of landscaping to soften the visual effect of the proposed industrial units and in fact large areas of hardstanding and car parking are likely to dominate the site. No significant

increase in height is proposed. A Landscaping Strategy and Management Plan will be required with any future application along with the BNG requirements which require a 10% net gain and the necessary Urban Greening Factor. Such details would be secured by condition if the scheme is successful, and with such significant impacts are not anticipated.

Summary – The Development would not be an enlargement on an existing area. Given the scale, land use and nature of the Development and environmental context of the area, the magnitude, intensity and duration of any impacts on the environmental sensitivities of the area, are not deemed to be significant.

(3) Type and characteristics of the potential impact:

The likely significant effects of the development on the environment must be considered in relation to:

- **criteria set out in points 1 and 2 (characteristics and location of the development)**
- **with regard to the impact of the development on the factors specified in Regulation 4(2),**
 - a) **population and human health;**
 - b) **biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(1) and 2009/147/EC(2);**
 - c) **land, soil, water, air and climate;**
 - d) **material assets, cultural heritage and the landscape;**
 - e) **the interaction between the factors referred to in sub-paragraphs (a) to (d)**
- **taking into account the**
 - a. **magnitude and spatial extent of the impact**
 - b. **nature of the impact;**
 - c. **transboundary nature of the impact;**
 - d. **intensity and complexity of the impact;**
 - e. **probability of the impact;**
 - f. **expected onset, duration, frequency and reversibility of the impact;**
 - g. **cumulation of the impact with the impact of other existing and/or approved development;**
 - h. **possibility of effectively reducing the impact.**

Construction: Whilst it is inevitable the impacts will be incurred during construction, such impacts would be temporary in nature and duration; a number being reversible (construction waste, air, noise, traffic, visual impact of associated construction equipment). Mitigation measures would be applied within the submission documents. As such given the temporary nature of the construction impacts, along with mitigation, they are not deemed significant.

- *Population and human health:* The works have the potential to impact on population and human health during construction. However, by reason of the temporary nature of the works and such impacts being typical to construction sites, these are not unusual or complex. The possibility of accidents can be reduced through conditions including securing a CMP to demonstrate safe site practices. Impacts arising from emissions would also be managed through an Air Quality and Dust Management Plan. In terms of contamination, a site survey and remediation would be requirements upon any future condition.
- *Biodiversity:* The site is not subject to any statutory nature conservation designations. The closest site is Bushy Park to the south. The proposal does have the potential to have

impacts, However, significant effects can be avoided through mitigation measures secured by condition, including an Environmental Construction Management Plan.

- *Land, soil, water, air and climate:* With mitigation measures, secured via condition, the Works are not deemed to have a significant effect on air quality, natural/scarce resources, land, soil water or climate. The construction period would add to air pollution, however, given the limited duration and the measures that would be applied to control this, significant effects are not anticipated.
- *Material assets, cultural heritage and the landscape:* Vehicles movements, machinery, and hoardings associated with construction will impact upon the emerging non-designated heritage asset on-site along with designated and non-designated heritage assets in the immediate vicinity. However, with conditions (including the Construction Management Plan and Environmental Construction Management Plan) it is not considered that impacts would be of a great magnitude. Moreover, the effects would be temporary and reversible. Therefore, it is not considered effects would be significant.

Operational Development: The operational phase of development does have the potential to generate impacts and some would not be reversible. However, these would be limited in their nature and scale and can be mitigated against. As such they would not be significant in scale to warrant an EIA:

- *Population and human health:* The Development does have the potential to impact upon the population through the generation of vehicle movements and noise. However, the baseline scenario is an industrial site of broadly the same quantum of floorspace. The replacement floorspace in this proposal seeks to maintain existing levels of trip generation on the site compared to the current use. Subject to a Transport Assessment, Noise Assessment and Air Quality Assessment along with support conditions, the nature, intensity and complexity of such impacts are not deemed of significance.
- *Biodiversity:* It is likely that the proposal would result in some harm to biodiversity for example through the removal of trees, soft landscaping and scrub. However, the proposal seeks to recreate areas for soft landscaping. The scheme will be subject to a 10% net biodiversity gain requirement and urban greening factor. Effects on biodiversity will not be complex and can be reduced or avoided. Ecological enhancements, landscaping and management details will be required in any future application and such details would be secured by a condition.
- *Land, soil, water, air and climate:* Any impacts are not deemed complex or of a magnitude that cannot be mitigated. The Development seeks to achieve Air Quality Neutral, Zero Carbon, and is designed to mitigate against flood risk. The scheme does not seek to increase trip generation and would be accompanied by a Travel Plan.
- *Material assets, cultural heritage and the landscape:* There is an emerging designated heritage asset on site. The site is also adjacent to non-designated heritage assets. Designated heritage assets are also in the vicinity including Bushy Park Conservation Area and Grade I Listed Historic Park & Garden and Boundary Wall Grade II. Bushy Park is also a MOL. The development will cause physical changes to the site and surrounds. Given the proposal's modest scale, heritage assessments, views analysis and mitigation where necessary, this impact is not deemed complex, or significant.

In conclusion, the criteria set out in Part 3 of Schedule 3 of the Regulations have been considered. The Development, both during construction and operation, will potentially generate impacts upon the above areas (a) – (e). However, none of these are considered to be significant with appropriate mitigation. Additionally, given the location of the development and its scale, the proposal is not deemed to cause transboundary effects.

Therefore, it is the LPA opinion that the Development does not trigger the need for an Environmental Statement, under the terms of the EIA Regulations, and the identified environmental effects associated with the Development can be adequately dealt with via compliance with the local validation checklist, reports and drawings along with safeguarding conditions / heads of terms. On this basis, significant environmental effects are not considered likely.

Mitigation measures

The EIA Regulations (5.5b) and NPPG state, “Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”.

Through the assessment of the application, it is deemed conditions / heads of terms can be applied to avoid or prevent other potentially significant adverse effects on the environment. The submission sets out some of the mitigation measures, and an officers summary below.

Environmental Effect	Measures anticipated to mitigate likely significant environmental effects - conditions	Components of the scheme to avoid / prevent significant adverse effects
Natural Resources	<ul style="list-style-type: none"> • Construction Management Plan • Construction Environment Management Plan 	<ul style="list-style-type: none"> • Redevelopment of an existing site & retention of Building 39 • Whole Life Carbon Approach • EPC A+ (net zero) • BREEAM excellent (water consumption, sustainable materials) • Energy Strategy (Operational) BREEAM Statement (Operational)
Waste	<ul style="list-style-type: none"> • Constructional Waste Management Strategy • Operational Waste management and Servicing Strategy 	<ul style="list-style-type: none"> • Circular Economy • Whole Life Cycle • Construction waste reduced, reused and recycled on site. • Retention of Building 39 • Provision of refuse and recycling facilities (Operational)
Pollution	<ul style="list-style-type: none"> • Construction Management Plan • Construction Dust Management Plan • Construction Air Quality, Noise and Vibration Construction Management Plan 	<ul style="list-style-type: none"> • On-site measures to reduce emissions such as: No idling of construction vehicles, NRMM compliance, and no bonfires on-site.

	<ul style="list-style-type: none"> • Electric Vehicle Charging Points • Travel Plan 	<ul style="list-style-type: none"> • Whole Life Carbon Approach • New units to meet EPC A+ (net zero) • New units to meet BREEAM excellent • Air Quality Neutral • Air Quality Strategy (Operational) • Energy Strategy (Operational) • Contamination (risk assessment, remediation strategy and verification reports)
Population and human health	<ul style="list-style-type: none"> • Construction Management Plan • Environmental Construction Management Plan. • Construction Air Quality, Noise and Vibration Construction Management Plan • Sustainable Urban Drainage Systems • Contamination – investigation, remediation and verification strategy • Local Employment Agreement (construction and operation) • Noise Management Plan (Operational) • . 	<ul style="list-style-type: none"> • Vehicle movements restrictions during construction. • Construction hours limited on -site. • Noise reduction measures built into scheme including hours of operation. • Provision of local employment on site (Construction) • On-site security measures built into the design. (Operational) • On-site fire safety measures designed into the scheme. (Operational) • On-site drainage measures built in. (Operational) • Air Quality Strategy (Operational) • Design Out Crime / Secure by Design • Fire Safety Strategy • Daylight & Sunlight Assessment
Water resources		<ul style="list-style-type: none"> • On site drainage systems. • Urban greening • Green runoff or 50% betterment • Flood Risk Assessment • Sustainable Urban Drainage Systems • Evacuation Plan

<p>Biodiversity</p>	<ul style="list-style-type: none"> • Ecological Construction Management Plan • Timings for tree/vegetation removal and certain works. • Ecological Enhancements Statement and Mitigation • Hard and Soft Landscaping Strategy • Landscape and Ecology Maintenance and Management Plan • Bat Surveys 	<ul style="list-style-type: none"> • On site protection measures during construction for habitats and species. • Design of the scheme to incorporate ecological enhancements and soft landscaping. • Lighting Strategy (Operational) • Urban Greening Factor and Biodiversity 10% Net Gain
<p>Landscape and townscape</p>	<ul style="list-style-type: none"> • Landscape and Ecology Maintenance and Management Plan • Environmental Construction Management Plan 	<ul style="list-style-type: none"> • Development to remain within the existing silhouette of the existing structures on site. • Development no to materially increase the existing built footprint. • Development to be supported with landscaping /planting. • . Soft and Hard Landscaping • Urban Greening Factor and Biodiversity 10% Net Gain • CAVAT assessment and payment where necessary
<p>Cultural / Heritage and Archaeology</p>	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Retention of Building 39 (Emerging BTM) • On site trenches (as appropriate) for archaeological evaluation. • Development to remain within the existing silhouette of the existing structures on site. • Design lead approach to the design of the development. • Design and Access Statement and Heritage Assessment to inform design • Heritage Strategy (Building 39 and designated and non-designated heritage assets in the vicinity) • Materials / details of design • Archaeology – written scheme of investigation,

		foundation design, public engagement
Transport	<ul style="list-style-type: none"> • Construction Management Plan • Vehicle Parking Management Plan • Travel Plan & Monitoring 	<ul style="list-style-type: none"> • Trip generation retained to the existing scenario • Car parking limits • On site restrictions (vehicle weight/sizes) • On site cycle storage on site • Onsite EVCPs • Transport Assessment
Land stability and climate	<ul style="list-style-type: none"> • Construction Management Plan • Environmental Construction Management Plan 	<ul style="list-style-type: none"> • Sustainable Urban Drainage Systems on site • New units to all meet BREEAM Excellent • EPC A+ • Urban Greening initiatives • On site landscaping • Flood Risk Assessment • Sustainable Urban Drainage Strategy • Energy Strategy (Operational) • BREEAM Excellent

In addition, measures could be applied and controlled through relevant Environmental Health, and Health & Safety Legislation, to reduce the extent, duration, probability, frequency, magnitude, intensity of potential impacts.

Conclusion

The impact, both individual and cumulatively, with future and surrounding receptors and on the surrounding environment, whether it is on transport networks, local character, flood risk, biodiversity, pollution, noise, carbon emissions and air quality have all been considered as part of the screening opinion request. Given the proposed scale and nature of the Development, the local context, and the mitigation and measures that can be secured via conditions, the Development is not likely to result in significant effects on the environment by virtue of factors such as its nature, size or location, nor does the Council consider the proposed development will result in any usually complex, significant or potentially hazardous environmental effects. The potential effects of the proposal are considered likely to be of a more localised nature and not so significant in terms of their magnitude/extent or sensitivity to warrant a full assessment by way of an Environmental Statement.

The scheme does not trigger the relevant EIA thresholds for the type of development.

In accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Richmond hereby determines the proposed development does not warrant the submission of an

Environmental Impact Assessment / Environmental Statement, as set out in the meaning of the EIA Regulations 2017.

Decision: Negative Screening Opinion

Date of Opinion: 12 May 2025

**Lucy Thatcher
Strategic Applications Manager**