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Date: 24 April 2017
Our ref: 06620/09/NT/AY/13723112v4
Your ref: 08/1760/OUT

Dear Mr Angus

St Paul's School: Amendments to Conditions U21854 (Reserved Matters), U21855 (Phasing) and U21856 (Parameters) attached to Planning Permission Ref: 08/1760/OUT

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as updated) – Request for London' Borough of Richmond upon Thames's Opinion on the Scope of Supplementary Environmental Information

On behalf of our client, St Paul's School (SPS or the School), we request London Borough of Richmond upon Thames's opinion on the scope of additional environmental information to be submitted in conjunction with an application under Section 73 of the Town and Country Planning Act 1990 for amendments to the hybrid planning permission for the comprehensive redevelopment of the School (ref: 08/1760/OUT).

The request is made with reference to the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2011 (as updated) and follows recent discussions with you on this matter.

Background

Hybrid planning permission for the phased redevelopment of the School was granted on 16 January 2009 for:

“Demolition of most of existing School buildings. Outline permission for the refurbishment of the sports hall and construction of a maximum of 36,090m² floorspace/13,159m² footprint of educational facilities comprising classrooms, dining hall, kitchen, assembly hall, library, chapel, junior music school, boathouse and associated staff accommodation (1 unit), sports pavilion, ancillary boarding accommodation (40 bedspaces) and associated staff accommodation (3 units). Reconfiguration of vehicular circulation and car parking provision, playing fields and sports facilities within the site, landscaping and the erection of minor structures to accommodate covered cycle parking, canopies, pergola and covered play area. Full planning permission for the area east of the access to provide 2,758m² floorspace/1,084m² footprint of buildings (3 to 4 storeys including basement and attic levels) comprising a total of 33 residential units for full time

school personnel (including immediate family) with part underground car parking (25 spaces) and cycle parking (54 spaces), associated servicing, hard and soft landscaping and boundary treatments.”

A Site Location Plan that identifies the location of the outline and full elements of the permission is provided in Annex 1.

The application was accompanied by an Environmental Statement (ES) (May 2008 ES) which had been prepared pursuant to the (then) Town and Country Planning (EIA) Regulations 1999. The scope of the May 2008 ES covered the following matters:

- a Biodiversity;
- b Water;
- c Townscape and Visual Resources;
- d Cultural heritage;
- e Transport;
- f Construction;
- g Sustainability; and
- h Cumulative Impact.

The May 2008 ES concluded that there would be slight to moderate benefits in relation to biodiversity, water, townscape and visual resources, cultural heritage and transport. With a significant enhancement to the sustainability of the site.

The approved parameter plans define the use, location, amount, height and articulation of buildings, as well as access and parking. The School began implementing the outline element of the hybrid permission in 2011. Since then, several reserved matters and other applications have been submitted to and approved by the Council. The following aspects of the masterplan have been built:

- 1 The reconfiguration of the access drive, provision of drop-off points and turning area;
- 2 Sustainable drainage measures for the whole site comprising attenuation tanks beneath the Bowl car park and an outfall to the River Thames;
- 3 Some perimeter planting;
- 4 Science building and associated landscaping;
- 5 Drama building;
- 6 Centenary building extension;
- 7 A substation; and
- 8 Service yard.

The construction of the General Teaching Building is underway and due for completion in 2019.

The full element of the planning permission relating to the staff accommodation has not been implemented, but is the subject of an extension of time application which is due to be considered by the Council's Planning Committee on 19 April 2017.

Development Site and Surrounding Area

The Site

SPS is located in Barnes immediately west of Hammersmith Bridge, with its northern boundary extending 1.1km along the Thames Path on the south side of the River Thames. Beyond the Thames Path, to the north, is the River Thames. To the west, the playing fields extend to another school; the Swedish School. The southern boundary of the site is formed partly by Lonsdale Road and partly by the rear gardens of residential properties on the north side of Lillian Road. To the east, the School's playing fields extend to Castelnau (A306).

The School buildings are mainly concentrated at the centre of the site, extending from the boundary with the Thames Path to the boundary with the rear gardens of properties along Lillian Road, with playing fields to both the east and west. In addition, there are sports pavilions, grounds maintenance buildings and staff accommodation distributed around the site.

The School was mostly constructed in the late 1960s using the prefabricated CLASP system of concrete panels and a lightweight steel frame. A number of buildings have been constructed during the 1980s and 90s, mainly utilising more traditional forms of brick and block construction. The buildings range in height up to four storeys, with various roof level projections above this level.

Surrounding Area

The School site is within a predominantly residential area of Barnes. There are houses to the south of the site along Lillian Road and Lonsdale Road with a mix of residential and small scale commercial units along Glenthams Road (some of which have received prior approval for the change in use from commercial to residential since the hybrid permission was granted). There are also residential properties facing the School across Castelnau. There are local facilities at the junction of Lonsdale Road and Castelnau. There is another school adjoining the School's eastern boundary (the Swedish School), beyond which is a reservoir and Local Nature Reserve known as the 'Leg O' Mutton'.

The area immediately to the south east of the site is designated as a conservation area (Castelnau Conservation Area) and comprises substantial villas along Castelnau and Lonsdale Road that date from the early to mid 19th Century. There is terraced housing along Lillian Road, mainly dating from mid-late 19th Century with generally mews type accommodation along Glenthams Road, particularly its western end. There are conservation areas and listed buildings to the north of the River Thames. Hammersmith Bridge is also listed (Grade II).

Proposed Amendments

As you are aware, SPS has undertaken a detailed review of the progress in the delivery of the redevelopment of the School site and has prepared a strategy to take the project forward. This review has identified a number of alterations that are required to the conditions of the 08/1760/OUT (or if granted the replacement 08/1760/EXT) permission.

The alterations within the s73 application to be considered by the EIA will comprise the substitution of Parameters Plans primarily in order to amend the scale and layout of existing parcels 4 and 7 to enable construction of the required amount of boarding accommodation. Other minor changes will also be sought to ensure consistency with approved reserved matters and other planning permissions on the site. The alterations to the Parameter Plans will principally comprise the following:

- 1 Relocate Parcel 7 to the south-east, immediately adjacent to Parcel 4 (as shown on the draft Layout Principles Plan provided in Annex 2);
- 2 Increase the maximum total proposed building footprint in Parcel 7 from 650 sqm to c. 975 sqm (the overall maximum footprint across the site will be unaltered) (as shown on the draft Layout Principles Plan provided in Annex 2);
- 3 Reduce the total maximum of new building footprint in Metropolitan Open Land (MOL) in Parcel 4 to c. 705 sqm so that the amount of MOL development across both Parcels 4 and 7 remains as approved (as shown on the draft Layout Principles Plan provided in Annex 2);
- 4 Extend the Parcel 4 50% maximum built footprint within restricted zone into the revised Parcel 7 (as shown on the draft Layout Principles Plan provided in Annex 2);
- 5 Increase the maximum total proposed building floorspace in Parcel 7 from 1,700 sqm to c. 2,925 sqm (the overall maximum floorspace across the site will be unaltered) (as shown on the draft Layout Principles Plan provided in Annex 2);
- 6 Increase the height parameters for Parcel 7 to allow for a 3 storey maximum height of c. +14.9m AOD c. +2m roof projection zone (as shown on the draft Heights Plan provided in Annex 3);
- 7 Extend 'zone of additional height related to Landmark Building roof articulation' into Parcel 4 (as shown on the draft Heights Plan provided in Annex 3);
- 8 Lowering the finished ground floor level of Parcel 7 to +5.27m AOD so that it is consistent with Parcels 1-4);
- 9 In accordance with the DDO1 reserved matters approval, identify the offices and staircore adjacent to the rackets court building in Parcel 3 for demolition;
- 10 Relocate Parcel 8 in accordance with planning permission ref: 15/1101/FUL;
- 11 Minor amendments/corrections in the existing and proposed building footprint areas for Parcel 3 and Parcel 5 and the number of service/flue projections in Parcel 2 (in accordance with planning permission ref: 14/1705/RES);
- 12 Minor amendments to the access and movement plan to accommodate the above amendments; and
- 13 Amendment to condition U21871 (or superseding condition) to remove reference to the provision of two multi-functional wetlands.

As previously discussed with officers, the s73 application is also likely to seek changes to the wording of additional conditions in relation to the timing and delivery of the redevelopment of the School. Such amendments will be matters for review against planning policy and any other material considerations and ultimately has no bearing on the environmental effects of the scheme. The amendments should not therefore be considered within the Supplementary Environmental Information.

Proposed Scope of 2017 s73 Environmental Statement

The s73 application will be a 'new application' in the context of the Town and Country Planning (EIA) Regulations 2011 (as updated in 2015). In respect of such applications, the Planning Practice Guidance (Paragraph: 017 Reference ID: 17a-017-20140306) provides the following information:

"Where an Environmental Impact Assessment was carried out on the original application, the planning authority will need to consider if further information needs to be added to the original Environmental Statement to satisfy the requirements of the Regulations."

It is considered that the s73 application should be accompanied by additional environmental information that should be read in conjunction with the original May 2008 ES.

Regulation 13(2) of the Town and Country Planning (EIA) Regulations 2011 (as updated) establishes those matters which need to be provided to assist the relevant planning authority in forming an EIA Scoping Opinion. Accordingly, a summary of the likely issues, the potential effects and the proposed methodology of assessment for the identified areas of interest are set out in this section.

In considering the scope of the EIA, it is important to identify that the focus of Schedule 4 of the Regulations is the significant effects. Other lesser impacts need not to be addressed as part of the EIA process.

The topics set out below have been identified in discussions with Council officers. In addition, a summary is provided of other topics which have been reviewed but are considered should be scoped out of this EIA as they are unlikely to give rise to significant effects requiring assessment either individually or in combination with the extant scheme. The assessment will consider:

- 1 Biodiversity;
- 2 Water (specifically flood risk);
- 3 Townscape and Visual Resources;
- 4 Cultural Heritage; and
- 5 Cumulative Impact.

The amended scheme will be assessed with reference to the approved/extant scheme and the conclusions of the May 2008 ES, having regard to the proposed mitigation and enhancement measures (including any changes). Consideration will be given to the potential for effects during both the construction and operational phases of development; direct and indirect effects will be identified; as well as any secondary, cumulative, short, medium and long term, positive and negative effects.

The current policy context and relevant methodologies to specific topics will also be summarised. The 2017 s73 ES will be produced by a suitably qualified and experienced team.

Biodiversity

The Biodiversity chapter of the ES will be prepared by Biodiversity by Design and will consider the potential ecological effects of the scheme as proposed to be amended in relation to the location of Parcel 7/ reconfiguration of parcel 4 and the removal of the multi-functional wetlands having regard to the conclusions of the May 2008 ES, current policy and guidance and the existing situation at the site.

No ecological resources were identified in the vicinity of parcel 7 or its proposed revised location within the May 2008 ES. The vast majority is classified as 'bare ground' (hardstanding, roads, pavements etc.) which is assessed to have negligible value. Whilst no significant additional effects are anticipated as a result of the scheme as amended, further surveys will be undertaken to confirm and review the benefits arising from the enhancement works that have already been undertaken.

A schedule of previous surveys by ecological resources is appended to this request which sets out the surveys already undertaken and provides a summary of their findings alongside the proposed timing and methodology of additional surveys that are proposed to be undertaken (Annex 4). In the context of the nature, scale and location of the amendments to the scheme and the conclusions of the previous ES it is considered that the survey scope is sufficient to assess the potential for significant environmental effects.

Water

The Water chapter of the ES will be prepared by Michael Barclay Partnership/ Ambiental and will consider the potential effects to both on and off site flood risk in relation to the proposed amended scheme.

The floor level of parcel 7 (boarding accommodation) will be adjusted to be the same as the adjacent parcel 4. No basement development is proposed in the revised parcels and the mitigation measures provided within the May 2008 ES will continue to apply. Given the update to the Council's Strategic Flood Risk Assessment, an updated site Flood Risk Assessment will be undertaken to consider the potential for any additional significant effects as a result of the scheme as amended in respect of flood risk.

The sustainable drainage strategy has been approved, the main measures have been implemented and remaining measures will continue to be implemented in accordance with the approved strategy. Attenuation tanks and an outfall to Thames have been constructed and a green roof has been provided on the Science Building. Water harvesting and water storage for irrigation of the playing fields and a further green roof will be implemented as part of the ongoing works on the General Teaching Building. The minor changes to the location and scale of buildings will have no additional effect on drainage or water resources. It is not therefore considered that an update to this aspect of the chapter is required.

Townscape and Visual Resources

The Townscape and Visual Resources chapter will be prepared by Lichfields and will identify and assess the likely effects resulting from the proposed change in location of parcel 7 and alteration to Parcel 4 and associated alteration to floorspace, footprint and height parameters. The chapter will also consider the sought extension to the 'zone of additional height related to Landmark Building roof articulation'. The assessment will have regard to the consented scheme and the potential for amendments to give rise to any additional significant townscape or visual effects that were not considered in the May 2008 ES.

The Chapter will be accompanied by updated visualisations from a selection of the viewpoints previously tested by the May 2008 ES (see Annex 5 for viewpoint location plan that accompanied the May 2008 ES). This will include views from Lonsdale Road across the playing fields (views 1 and 2), from the Thames Path (views 8 and 9) and from the north side of the river (views 10, 11 and 12). The changes to the scheme would not be visible from locations 3-7 and it is not proposed to consider these in the revised assessments as there will be no change.

Cultural Heritage

The Cultural Heritage Chapter will be prepared by Lichfields and will assess the potential for significant environmental effects on heritage assets arising from the proposed amended scheme having regard to the conclusion of the May 2008 ES and updated policy and guidance. The location of heritage assets is shown on the plan in Annex 6.

The changes to the scheme are on the north side of the school site and the role of the school in the setting of heritage assets on the north side of the river is filtered by intervening trees.

Whilst no significant additional effects are anticipated, due to the increase in height, an update to consider the potential for any potential effects on the setting of listed buildings LB19-41, The Mall Conservation Area, the western end of Castelnau Conservation Area that were not considered in 2008 will be undertaken.

Cumulative Impact

In accordance with the Town and Country Planning (EIA) Regulations 2011 (as updated); the EIA will include an assessment of any direct and indirect cumulative effects arising from the inter-relationships between different effects arising from the proposed amended scheme when considered alongside any other developments in the area surrounding the site and having regard to the previous ES/ extant scheme. The objective is to identify whether combined effects from the development or effects from several developments, and which individually might be insignificant could, when considered together, cause a further significant direct or indirect and cumulative effect requiring mitigation.

In relation to other development, best practice dictates that cumulative assessments of this nature should have regard to those schemes which are 'reasonably foreseeable' (i.e. usually those under construction or with planning permission). The assessment is only capable of being carried out based on the information available at the time of assessment.

The assessment should focus only where there is the potential for significant cumulative effects and we are not aware of any schemes in the surrounding area that require consideration in terms of the potential for cumulative effects. Consideration will be given to proposals for 3G pitches within the school's western playing fields.

If the authority is aware of any other proposals that it considers will need to be assessed in terms of potential cumulative effects it would be appreciated if these could be identified as part of the EIA scoping opinion.

Matters to be Scoped Out

Transport

The May 2008 ES predicted no adverse residual transport related environmental effects in relation to the redevelopment of the School site.

The overall parameters of the development are unchanged as far as transport matters are concerned (i.e. there is no change sought to the overall quantum of development on site or the amount of parking).

We are not anticipating any additional transport effects as a result of the amended scheme compared to those considered in 2008 and it is not considered that the updated policy context or cumulative schemes would lead to any different conclusions or significant environmental effects that have not been tested.

Construction

The overall construction period remains as presented by the May 2008 ES. The prediction of impacts section and associated mitigation measures remain appropriate and have since been formalised through the discharge of relevant site wide conditions relating to the Construction Management Plan and details of the construction buildings and accesses. Construction effects will be considered together with operational effects for the topic areas that are updated in any event. No update of this chapter is therefore considered necessary.

Sustainability

The proposed amended scheme would not give rise to any significant alterations as far as sustainability is concerned and existing conditions will remain in place to ensure necessary sustainability targets will be met. It is not anticipated that supplementary information will be provided on this topic.

Approach and Form of Environmental Statement

Methodological Approach to the EIA

The EIA will be prepared in accordance with the requirements of the Town and Country Planning (EIA) Regulations 2011 (as updated) and with reference to best practice including that published by the Institute of Environmental Management and Assessment. All information required or reasonably required to identify the significant environmental effects of the development, as defined by Schedule 4 of the Regulations will be provided as part of the ES.

The assessment will also include a consideration of relevant policy and legislation of relevance as well as considering comments received by consultees during the pre-submission period.

Each technical assessment will follow a consistent approach and format and including:

- 1 Brief review of relevant policy and legislative context;
- 2 Confirmation of the detailed topic specific assessment methodology, consultation undertaken and confirmation on how the assessment relates to the standard significance criteria adopted for the EIA (see below);
- 3 Consideration of Baseline Conditions including an identification of sources of information, site history, current environmental conditions and future trends/anticipated changes to current conditions that could be anticipated without the scheme;
- 4 Identification of the potential effects including a summary of those resources/receptors likely to be affected, the sensitivity of those receptors to accommodate change; the degree of change resulting from the proposal; the change of events or pathways linking cause to effect and a prediction of the significance of effects in terms of nature, extent and magnitude including whether it is direct/indirect, short/long term, permanent/temporary, beneficial/adverse;
- 5 The scope for incorporating mitigation measures to avoid, reduce, remedy or compensate for any identified effects; and
- 6 Identification of any effects remaining after mitigation.

The effects of individual environmental matters will be transcribed against a common list of significance criteria for the EIA which will comprise:

- 1 Substantial¹ beneficial;
- 2 Moderate² beneficial;
- 3 Minor³ beneficial;
- 4 Neutral/negligible;
- 5 Minor³ adverse;
- 6 Moderate² adverse; and
- 7 Substantial¹ adverse.

¹ Substantial – considerable effects (by extent, duration or magnitude) or of more than local significance or breaching identified standards or policy

² Moderate – limited effects which may be considered significant

³ Minor – slight, very short or highly localised effects

The ES will include a clear description of the likely significant environmental effects on the environment including direct/indirect effects, secondary, cumulative, short/medium/long term, permanent/temporary and beneficial/adverse effects arising from the development.

Structure and Format of the Environmental Statement

The findings of the EIA will be set out in the ES which will comprise two volumes as follows:

- 1 Volume 1 – Non-Technical Summary; and
- 2 Volume 2 – Technical Assessments, Figures & Appendices.

The following documents will be included in the ES as appendices:

- 1 Flood Risk Assessment;
- 2 Ecology surveys; and
- 3 Townscape and Visual Impact Assessment Addendum.

Concluding Remarks

We trust that the above provides you with sufficient information to adopt a scoping opinion and we look forward to receiving your opinion as soon as possible within the five weeks allocated by the Town and Country Planning (EIA) Regulations 2011 (as updated).

Please contact Judith Livesey, Alfred Yeatman or me if you require any further information or wish to discuss this further.

Yours sincerely

PP 

Nicki Mableson
Planning and EIA Director

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Bryan Staff
David Lamont

London Borough of Richmond upon Thames
London Borough of Richmond upon Thames

Annex 1: Site Location Plan

Annex 2: Draft Layout Principles Plan

Annex 3: Draft Heights Plan

Annex 4: Existing and Proposed Ecological Surveys

Annex 5: Viewpoint Locations

Annex 6: Location of Heritage Assets