

28 April 2017

Dear Lucy Wood

**Re: FORMER IMPERIAL COLLEGE PRIVATE GROUND**

**REQUEST FOR SCREENING OPINION UNDER REGULATION 5 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 AS AMENDED BY THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (AMENDMENT) REGULATIONS 2015**

Thank you for your letter and the attached Environmental Impact Assessment Screening Report dated April 2017 and received on 10 April requesting a screening opinion concerning the above site and the proposed development of:

*Up to 130 retirement living homes, communal facilities, car park, GP surgery, playing pitches, conversion of existing pavilion, new clubhouse and a public park on the Former Imperial College Private Ground.*

I attach the Local Planning Authorities **Positive Screening Opinion** adopted on the 28 April 2017, which concludes the Authority does consider the above development requires an Environmental Impact Assessment. In line with Regulation 4(7) and (5) of the above EIA Regulations, the accompanying Screening Opinion provides clear and precise reasons for this conclusion.

Yours sincerely

  
**Robert Angus**  
Head of Development Management

**LONDON BOROUGH OF RICHMOND UPON THAMES**

**ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT -  
DEVELOPMENT MANAGEMENT (PLANNING)**

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**FORMAL SCREENING OPINION IN CONNECTION WITH THE FORMER IMPERIAL  
COLLEGE PRIVATE GROUND, TEDDINGTON (REGULATION 5)**

**PROPOSED DEVELOPMENT:**

**Up to 130 retirement living homes, communal facilities, car park, GP surgery, playing pitches, conversion of existing pavilion, new clubhouse and a public park**

A screening exercise has been initiated in furtherance of Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 (*EIA Regulations*). The Local Planning Authority (LPA) has had regard to the EIA Regulations and National Planning Policy Guidance (NPPG).

**Preamble:**

I can confirm that the LPA is of the view that the above Proposed Development would be an Urban Development Project as defined in (b), Part 10 of Schedule 2 of the above EIA Regulations. The site is not within a 'sensitive area' and therefore the thresholds have been applied. The applicable thresholds and criteria of urban development projects, as outlined in Schedule 2, are:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) The development includes more than 150 dwellings; or
- (iii) The overall area of the development exceeds 5 hectares.

The site identified in the Screening Report is 5.2 hectares (ha) and on measuring the area of development the LPA can confirm this is 5.21 ha. Therefore, the proposed scheme constitutes 'Schedule 2 development' for the purpose of the EIA Regulations and the proposal needs to be screened to determine whether the Proposed Development is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

Regulation 4(6) of the EIA Regulations and NPPG requires the authority to take into account the selection criteria as set out in Schedule 3 of the EIA Regulations when deciding whether a Schedule 2 development is an EIA development. These include:

1. Characteristics of development
2. Location of development
3. Characteristics of the potential impact.

To aid the LPA in the determination whether the project is likely to have significant environment effects, the LPA has also had regard to the indicative thresholds and criteria as set out in the EIA Regulations and NPPG.

An Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use or the types of impact are of a markedly different nature or there is high level of contamination.

Sites which have not previously been intensely developed:

- I. Area of the scheme is more than 5 hectares; or
- II. It would provide a total of more than 10,000m<sup>2</sup> of new commercial floorspace; or
- III. The development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development or more than 1,000 dwellings).

Further, the NPPG advise:

- "when considering the thresholds, it is important to also consider the location of the proposed development".
- "In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely".

Key issues to consider include:

- Physical scale of such developments
- Potential increase in traffic, emissions and noise.
- The extent to which mitigation or other measures may be taken into account in reaching a screening opinion depends on the facts of each case.

## **1. Characteristics of development**

- (a) The size of the development: The existing site (apart from the pavilion) consists of open playing fields, leased out to local sports clubs on an adhoc basis. The prevailing pattern of development in the area, and therefore local context, is primarily semi-detached and detached properties, most of which are two storeys with accommodation in the roof. The development is deemed to be significant in physical scale, and will lead to the urbanisation of the site when compared to existing, and thereby is likely to give rise to significant visual effect on the local environment in terms of townscape and local character; and result in a marked intensification of the site, leading to significant environment effects including traffic, noise and light pollution.
- (b) The cumulation with other developments: The EIA Regulations and NPPG require authorities to have regard to the cumulative effects of the Proposed Development with other existing and approved developments. The EIA Screening Report has not satisfactorily considered the potential cumulative impact with other developments, namely, Television Studios, Broom Road, Teddington, - including:
  - (i) Approved scheme: 14/0914/FUL: Demolition of the existing buildings with the exception of Weir Cottage. Erection of part four/part five/part six/part seven storey building to provide 213 flats. Erection of 6 three storey houses to Broom Road frontage. Use of Weir Cottage for residential purposes. Provision of 258 car parking spaces at basement and ground level. Closure of existing access and provision of two new access from Broom Road,

provision of publicly accessible riverside walk together with cycle parking and landscaping

- (ii) Approved scheme: 16/2875/FUL: Amendment to approved application 14.0914/FUL proposing Erection of extension to Lock E to provide three more affordable housing units and related parking.
- (iii) Pending scheme: 17/1286/VRC - Variation of approved drawing nos attached to 14/0914/FUL to allow for the development of Block B as two blocks and an increase in the overall number of units from 220 to 235 and minor changes to the riverside walkway. To allow changes to the internal layout and the riverside walkway as shown on the submitted drawings

The cumulative impact of the above schemes may result in a significant effect in terms of transport and socio-economics in the local area.

- (c) Use of natural resources: The Proposed Development will result in the loss of hedgerow and amenity grassland, which is under increasing pressure, and is likely to cause significant impact on Protected Species, Red Data Listed species and habitats listed within Richmond Biodiversity Action Plan. Further, potential loss of playing fields, which are listed as an Asset of Community Value.
- (d) Production of waste: Whilst operational waste is not deemed to cause significant effect, the construction process, namely, the excavation of an underground car park is likely to raise significant effects in terms of waste.
- (e) Pollution and nuisance:
  - (i) Air pollution and quality: The site is located within an Air Quality Management Area. The LPA deem that subject to the submission and agreement of a robust Air Quality Assessment, which considers air quality impact from external transportation sources; vehicle movements; onsite energy generation and emissions during construction (including demolition) and provides mitigation measures (travel plan real time bus timetable screens; cycle parking and EV charging points; delivery and service) the development is not likely to raise significant effect.
  - (ii) Contaminated Land: According to the Authorities records there have not been any potentially contaminative uses associated with the site or adjacent land, and therefore the scheme is not likely to result in significant effects.
  - (iii) Surface water drainage: The site is entirely within Flood Zone 1 and not within a Groundwater Protection Zone. It is deemed that surface water run-off and foul water drainage can be managed through appropriate drainage design, remedial measures and a Flood Risk Assessment.
  - (iv) Noise and light: Whilst the LPA deems that light pollution from the construction process can be managed, depending on the build length the noise associated with construction may cause significant effects on Protected Species (Bats). Further, the LPA deems the proposed sports and playing pitches (and the illumination of such) may give rise to significant effects on receptors from noise and light pollution, including existing and proposed residents and protected species.
- (f) Risks of accidents: The LPA does not have any records that there have been potentially contaminative uses associated with the site or adjacent land. Taking this into account and measures that could be applied and controlled through relevant Environmental and Health and Safety Legislation and Planning Conditions, the development is not deemed to give rise to significant effects.

*Summary:* Having regard to the criteria set out in (1) of Schedule 3, in particular 'the size of the development' (a), which is significantly greater in scale than the existing or previous land uses of the site; the cumulative effect with other developments within the surrounding area (b); the loss of natural resources (c); the production of waste through construction (d); and noise and light (e); it is considered the proposed development is of sufficient size to potentially have significant effects on the environment.

## **2. Location of development**

The environmental sensitivity of geological areas likely to be affected by development must be considered, having regard, in particular, to –

- (a) The existing land use: Apart from the pavilion, the site is open, grassed playing fields. The importance of this site is recognised in its designation as 'Other Open Land of Townscape Importance' (OOLTI) within the Adopted Local Plan (apart from a small area adjacent to west boundary). The land meets the criteria of OOLTI designation, whereby it contributes to the local character and / or streetscene, by virtue of its size, position and quality; it is of significant value to local people for its presence and openness; there are immediate and long views into and out of the site, including from surrounding properties; it contributes to a network of green spaces and green infrastructure; and has biodiversity value. Further, the emerging Local Plan has designated the Udney Park Playing Fields as Local Green Space, given the land meets the national and local policy requirements for designation as a Local Green Space; and holds a particular local significance to the local community and whose special qualities should be afforded the greatest protection. The site was also listed as an Asset of Community Value (since 31/03/2016), and therefore is identified as land of importance to a local community which is subject to additional protection from development under the Localism Act 2011. The emerging Local Green Space Designation and Asset of Community Value indicate the significance of this land to the local community and the strong desire locally to maintain the land in open use.

The site is leased out to local sports clubs and residential properties surround the site.

Notwithstanding the character of the surrounding area, the development would result in a significant environmental impact on this site, resulting in loss of the green network; green spaces, open space and have a significant urbanising effect on the openness and undeveloped character of this site and local environment. The Proposed Development is likely to have significant environmental effects on surrounding residential properties (noise & light pollution and traffic), further, notwithstanding the provision of playing pitches, there may be significant effects on existing clubs that currently use the site.

- (b) The relative abundance, quality and regenerative capacity of natural resources in the area: The site is within Flood zone 1; is not within a Groundwater Protection Zone; and whilst it is identified as a site with potential for groundwater flooding, there have been no such flooding incidents. Therefore, subject to Flood Risk Assessments and Drainage Strategies, the Proposed Development is not deemed to result in significant environment effects.
- (c) The absorption capacity of the natural environment, paying particular attention to the following areas:
- (i) Wetlands: No significant effect likely
  - (ii) Coastal zones: No significant effect likely

- (iii) Mountain and forest areas: There are individual TPOs and Group area TPOs on the site. The loss is likely to have a significant visual effect on the environment.
- (iv) Nature reserves and parks: Amenity grass is hugely under pressure, especially from schools, 3G pitches and MUGAs. The scheme will result in the loss of amenity grassland and hedgerow, which are likely to result in significant effect on European Protected Species and Red Data Listed Species. The Hedgerow is also listed in the Richmond Biodiversity Habitat Plan.
- (v) Areas designated by Member States pursuant to Council Directive 2009/147/EC on the conservation of wild birds (a) and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (b): The authority is of the opinion the development will not affect birds on the directive above. However, the existing site is 'amenity grassland' - Whilst this is low ecological importance, the scheme may have significant effects on European Protected Species – i.e. bats – in terms of potential roosting, foraging areas and commuting lines. The hedgerow surrounding the site is a Richmond Biodiversity priority Habitat Plan and the amenity grassland is a very important and valuable resource to a number of Red Data Listed species which are significant in an urban area as found here.
- (vi) Areas in which the environmental quality standards laid down in EU legislation have already been exceeded: The development is within an Air Quality Management Area, and is situated close to the A313, High Street, Teddington. This road has exceeded the EU limit values for NO<sub>2</sub> for 5 out of the preceding 7 years. The effects of air quality are not deemed likely to give rise to significant effects subject to mitigation.
- (vii) Densely populated areas: The site is within a relatively densely populated area, on the edge of Teddington Town Centre, and the site is highly visible with residential properties surrounding the site on Kingston Lane, Cromwell Road and Udney Park Road:
- The effects of noise pollution during construction are not likely to be significant.
  - The proposed sports and playing pitches may give rise to significant noise and light pollution effects on existing and proposed receptors.
  - The size of the Proposed Development is likely to give rise to significant visual effects on the townscape and character of the site and local area.
  - The site is adjacent to three roads – Kingston Lane, Udney Park Road and Cromwell Road, and close to High Street in Teddington Town Centre. These are used for general traffic movement and access to facilities in the Centre and local schools (i.e. Collis). The LPA considers the Proposed Development is likely to give rise in significant effects on the local road network, particularly when the use is in operation. The immediate roads surrounding the site already become congested at peak times, especially with schools, and rat running. The more intensive usage of the sport facilities, doctor's surgery and the residential aspect to the scheme, is likely to have significant effects on the local road network, especially when considering the cumulative impact of other developments.
- (viii) Landscape of historical, cultural or archaeological significance: The Proposed Development is not likely to raise significant effects to historic or archaeological significance, given distance to heritage assets and ancient monuments. However, the site is designated OOLTI and is proposed to be

adopted as Local Green Space. The characteristics of the development are such that it would have a significant effect on its openness and value.

*Summary:* The site does not lie within or adjacent to a 'sensitive area' as defined in Part 1 of the EIA Regulations, however, the surrounding area to the site, is relatively densely populated and the site is in an environmentally sensitive location, being designated OOLTI, an Asset of Community Value and 'Local Green Space' within the emerging Local Plan (which holds a particular local significance and whose special qualities should be afforded the greatest protection). The Proposed Development is deemed to give rise to significant environmental effects, namely the loss of green network and playing field, loss of amenity grassland and hedgerow, the visual impact arising from the development, and the effects through construction and operation, namely, noise and light pollution and traffic condition.

### **3. Characteristics of the potential impact**

The potential significant effects of the development have been considered in relation to the criteria set out in (1) Characteristics of development and (2) Location of Development, having regard in particular to:

- (a) The extent of the impact (geographical area and size of the affected population):  
This is deemed to be significant by reason of the size of the site (5.2 hectares), the character of the existing land use, the characteristics and scale of the Proposed Development, the significant number of sensitive receptors surrounding the site; the biodiversity on the site; and existing local road conditions.
- (b) The transfrontier nature of the impact:
- (c) The magnitude and complexity of the impact: There will be a significant change to the environmental conditions of the site, which are currently open playing / grass fields, which will become urbanised and result in a significant intensification of the site. This is deemed to cause sizeable, complex and permanent effects on receptors:
  - Noise and light pollution
  - Visual impact
  - Loss of green network
  - Traffic
  - Loss of amenity grassland – and potential roosting, foraging, commuting lines
- (d) The probability of the impact: Given the characteristics of the existing land use and characteristics of the development, the probability of the impact is highly likely.
- (e) The duration, frequency and reversibility of the impact:
  - The environmental impacts of the construction may be temporary and not significant to some receptors, subject to appropriate mitigation and legislation. However, the build will generate considerable noise and disturbance, and the duration may be in excess of a year, which has the potential to cause significant effects on protected species (bats) forcing them away permanently. This is deemed difficult to reduce or avoid.
  - The likely significant effects from noise and light pollution (whilst intermittent at times), loss of green space, and the urbanising effect on

the character of the site and local environment on townscape, are deemed to be permanent and irreversible. This is deemed difficult to avoid, reduce or compensate for the effect.

*Summary:* Having regard to the above factors, the development (construction and operation), could have a significant impact upon a number of areas of acknowledged interest. Broadly speaking these would include visual impact (local character and streetscene), noise and light pollution; traffic generation and socio-economics, and biodiversity, wildlife corridor and habitat including protected species. Some of these impacts would not be reversible, would not be limited to the immediate locality thereby potentially affecting a significant number of people and receptors, and deemed difficult to reduce, avoid or compensate.

### **Conclusion**

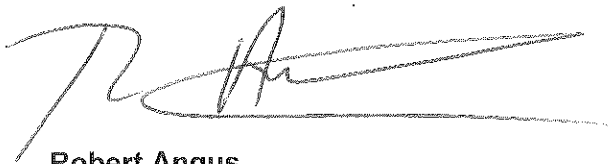
For the reasons above and having completed the screening exercise, the LPA considers that the 'Proposed Development', by virtue of its nature, size and location, would be likely to have significant effects on the environment and that the Proposed Development does require an Environmental Impact Assessment to accompany any future planning application, under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015, to accompany any future planning application.

The proposed scale and massing of the new buildings and relationship with the surrounding development; the impact on traffic, ecology, residents, will be the major factors which need to be evaluated.

**Decision: Positive Screening Opinion**

**Date of opinion: 28 April 2017**

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Angus', written over a horizontal line.

**Robert Angus**  
**Head of Development Management**