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London Borough of Richmond upon  
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Planning Department  
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Twickenham  
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FAO Andrew Vaughan

**Date:** 15 February 2019

Dear Mr Vaughan

**Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated)**

**Phased redevelopment of St Paul's School incorporating an amended design for staff accommodation Block A, St Paul's School, Lonsdale Road, London, SW13 9JT**

On behalf of our client, St Paul's School ("the School") we request that the Council provides a formal screening opinion to confirm whether there is a requirement for an Environmental Impact Assessment ('EIA') in respect of amendments to the planning permission for the proposed development on the above site. This request is made in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations ('the Regulations').

To enable your consideration of this issue, we set out below the following information:

- 1 Description of the site and its surroundings
- 2 Description of the proposed development
- 3 Review of the requirement for an EIA

Item 3 is dealt with by reference to a preliminary review of the site and its surroundings and a consideration of the issues set out in the EIA Regulations which take into account recent case law.

In summary we consider that the proposal will not give rise to further significant environmental effects than previously assessed, and will not require further EIA. We outline below the analysis undertaken to reach this conclusion.

**1. Description of the site and its surroundings**

The School 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 application site covers 10.38ha of the School grounds. It includes the main developed parts of the site and excludes areas of playing fields where no development is proposed.

The proposed Staff Accommodation Block is located east of the School's driveway at 82 Lonsdale Road on the southern boundary of the School fronting Lonsdale Road. It is bound to the east by 80 Lonsdale Road- a semi-detached villa (which is currently being converted to flats by the School, planning permission Ref: 14.3047/FUL); to the north by the staff car park; and, to the west by the main driveway entrance to the School. There is a wall and a line of mature trees along the driveway and concrete panel wall on the site frontage to Lonsdale Road. This part of the School site is currently occupied by a staff car park and a 20<sup>th</sup> century building adjacent to 80 Lonsdale Road. Block A of the proposed Staff Accommodation is partly located within Castlenau Conservation Area.

The School's main entrance is from Lonsdale Road on the southern edge of the site. In addition, there are controlled pedestrian access points in use at St Hilda's Road and on Castelnau.

The School site is within a predominantly residential area of north 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).

Hammersmith Mall, on the north bank of the River Thames, (within the London Borough of Hammersmith and Fulham) is also designated as a conservation area. There are a number of listed buildings (Grades II and II\*) in the row of development fronting the river. The only listed building in the immediate vicinity of the application site is Hammersmith Bridge (Grade II) approximately 0.4 miles away and adjacent telephone kiosk (also Grade II).

The Thames Path follows a pronounced bend in the river in the vicinity of the School and has a landscape-dominated character along this reach of the Thames although the School buildings are clearly visible from the Tow Path. A metal railing, dating from the site's use as part of the Barnes Water Works, defines the edge of the School site.

The School is approximately 15 minutes walking distance (700m) from Hammersmith London Underground Station and is served by a number of frequent local bus services that run along Lonsdale Road and Castelnau. In addition, the School has a number of private bus services that run daily.

The site is within Flood Zone 3 in an area benefiting from flood defences. The site is also within the Thames Policy Area.

The following sites designated for nature conservation interest are located within 2km of the Site:

- River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation (SMINC): Wildlife corridor and habitat of huge importance including a key foraging and commuting corridor for bats approximately 200m north.
- Barn Elms Wetland Centre Site of Special Scientific Interest (SSSI) and SMINC: Located 545m south-east of the site.
- Chiswick Eyot Local Nature Reserve (LNR): Located 475m north-west of the site.
- Leg of Mutton Reservoir LNR and Site of Borough Importance for Nature Conservation Grade I (SBINC I).
- Barnes Common LNR: Located 1610m south of the site.
- Duke's Hollow LNR: Located 1830m south-west of the site.

A site location plan is provided at Appendix 1.

## 2. Description of the proposed development

The School was originally granted planning permission for staff residential accommodation as part of a hybrid permission for the comprehensive phased redevelopment of the school on 16 January 2009 (ref. 08/1760/OUT). A number of the school buildings approved in the outline part of the scheme have been built and a further building is under construction. Changes to the vehicular circulation within the site have also been implemented together with landscape and biodiversity enhancements. The detailed element of the hybrid planning permission related to the provision of staff residential accommodation in three blocks (A, B and C) to the east side of the School entrance and included:

*“Full planning permission for the area to the east of the access to provide 2,758m<sup>2</sup> floorspace/1,084m<sup>2</sup> 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 space), associated servicing, hard and soft landscaping and boundary treatments.”*

A subsequent application to extend the time limit to implement the staff accommodation (08/1760/EXT) was approved on 30 June 2017.

The School intends to develop the staff accommodation in three phases starting with Block A, but would like to make some changes to its design. Pre-application discussions with the London Borough of Richmond (LBR) have confirmed that a Minor Material Amendment (MMA) application under Section 73 of the Town and Country Planning Act 1990 is an appropriate form of application.

The original comprehensive scheme for the redevelopment of the school was subject to EIA. The 2008 Environmental Statement, submitted with that application, has been updated several times as follows: a 2009 Addendum (relating to 09/2798/FUL), December 2017 Supplementary ES and July 2018 update (both relating to application ref 17/4358/VRC).

The approved scheme for Block A (on Lonsdale Road) includes 10 units comprising 6 x 3-bedroom flats, 2 x 2-bedroom flats and 2 x studios over four storeys, over lower ground and attic space.

The varied scheme within the future MMA application proposes the following amendments to Block A:

- 1 A revised mix of accommodation, including 8 x 1 bed flats and 4 x 3 bed graduate teacher flats;
- 2 Minor adjustment to the alignment of the frontage of Block A to better tie in with Lonsdale Road;

- 3 Removal of the single storey projection on the west elevation, reduction in footprint and alteration to the massing;
- 4 Changes in materials from stone cladding to a light toned brick; and
- 5 Changes to the design of Block A. Minor changes to the position, form and footprint of the building comprising a reduction of 10 sqm in the footprint, a minor increase in floorspace (circa 80sqm) and adjustment of the footprint taking the edge away from the tree root protection zone.

No changes to the overall height of the building are proposed.

The following draft drawings are enclosed at **Appendix 2** to assist the Local Planning Authority in screening the development:

- Draft Existing and Proposed Site Plans, Drawing 1716-P-D-1000 Rev C; and
- Draft Elevations and Context Study, Drawing 1716-P-D-1004 Rev D.

### **3. Requirement for EIA**

The overall scheme is one to which the EIA Regulations may apply because it falls within Part 10(b) of Schedule 2 as an “urban development project” as the development includes more than 1 hectare of urban development which is not dwellinghouse development. For Schedule 2 developments, the Regulations require that an EIA be undertaken where “*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*”.

It is noted that an ES has been undertaken for the development, comprising the following documents:

- Environmental Statement (May 2008)
- Environmental Statement Addendum (November 2009),
- Supplementary Environmental Statement (December 2017); and
- Supplementary Environmental Statement Update (July 2018)

As detailed in the Planning Practice Guidance (ref. 17a-016-20140306), ‘a section 73 application is considered to be a new application for planning permission’ under the EIA Regulations. It continues by stating the following:

*“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. Whether changes to the original Environmental Statement are required or not, an Environmental Statement must be submitted with a section 73 application for development which the local planning authority considers to be Environmental Impact Assessment development.”*

In determining whether the development is likely to give rise to further significant environmental effects not previously assessed in the ES (and its associated updates), reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health)
- 2 Location of the development (by reference to the environmental sensitivity of the area)
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility)

In this case, it should be noted that there are no EU environmental assessments which are relevant to the proposed development.

### **Development Characteristics:**

The overall development is the phased redevelopment of school buildings that were originally built in the 1960s on the site of a former water treatment works. The outline element of the planning permission is for:

Demolition of most of the existing School buildings, refurbishment of the sports hall and construction of a maximum of 36,090 sqm floorspace/ 13, 159 sqm 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 accommodations and associated staff accommodation. Reconfiguration of vehicular circulation and car parking provision.

The full element of the permission is for three staff accommodation buildings (blocks A, B and C).

The only element of the scheme proposed to be amended by the MMA is the design of Block A of the staff accommodation, other elements remain as previously approved. The approved scheme for Block A, on the Lonsdale Road frontage includes a building over four-storeys (including lower ground and attic levels) accommodating 10 units, comprising 6 x 3-bedroom flats, 2 x 2-bedroom flats and 2 x studios. The proposed amendment is also over four storeys and consistent with the pattern of development along Lonsdale Road. The proposed mix of accommodation is 4 x 3 bedroom and 8 x 1 bedroom units. There would be two additional units but 4 fewer bedspaces.

In order to address flood risk issues, the extant scheme includes a wall around the building to provide a flood defence. This is retained in the amended scheme, with the level of the defence amended to reflect up to date data. This approach was confirmed as acceptable by the Environment Agency at a meeting in December 2017.

The proposed amendments to the scheme for Block A maintain the principles previously incorporated including:

- The building is in the same position on the site, set back from the frontage with a front garden area accessed via steps and ramps.
- A symmetrical design with a central entrance and massing that responds to the villa type and end position and is broken up at roof level by gabled forms.
- Building of the same scale and same relationship to 80 Lonsdale Road
- A blank eastern elevation (facing 80 Lonsdale Road).

The changes to Block A are minor and include an adjustment to the mix of units to meet the School's most immediate requirements. Small changes to the position, form and footprint of the building comprising a reduction of 10 sqm in the footprint, a minor increase in floorspace (c80sqm) and adjustment of the footprint taking the edge of the building further from the root protection zones of the trees along the driveway.

### **Environmentally Sensitive Location**

The site is not in a 'sensitive area' as defined by Regulation 2 of the EIA Regulations. The site is generally flat with external ground levels of ground 5m above ordnance datum (AOD). The entire site is within Flood Zone 3 but benefits from localised flood defences. There is a flood defence bund within the site, running

approximately parallel with the boundary with the Thames Tow Path. The bund is a minimum of 5.6m AOD in height, but up to 6.0m AOD in places.

The amended staff accommodation block is located partly within Metropolitan Open Land but is sited on land currently in use as a car park and occupied by an existing building/ its curtilage.

It is also located, in part, within the Castelnau Conservation Area. There are no Scheduled Monuments or Listed Buildings located within or adjacent to the site of Block A.

Significant adverse impacts on protected or notable habitats species are not anticipated from the proposed development.

### **Environmental Effects**

As stated the original ES was most recently updated in December 2017 and July 2018. Therefore, the environmental information within these documents is up to date. The requirement for an update to the Environment Statement has been discussed with LBR. Given the minor changes sought to the approved scheme which primarily relate to design and appearance, significant effects not previously identified in the ES (and associated updates) are likely. The increase of two units is also not expected to give rise to significant environmental effects.

Irrespective of this, this section considers the characteristics of the potential impact from the proposed development to identify whether significant effects that would give rise to a need for further EIA are considered likely. It draws from site investigations to inform the conclusions that have been drawn. The scope of topics covered in this section have been discussed and agreed with the Council.

### **Heritage**

A note has been prepared by Lichfields (attached in **Appendix 3** of this letter) which assesses the amendments to the design of Block A in relation to the potential for effects on cultural heritage assets, which were not previously considered in Chapter E (Cultural Heritage) of the 2008 Environmental Statement (as updated in 2009, 2017 and 2018).

The note reviews the amended scheme design in relation to potential impacts on the surrounding heritage assets. It concludes that the amended proposal for Block A would better reflect the characteristics of the Conservation Area and its Buildings of Merit (BOM). Therefore, the proposal represents an improvement to the setting of these heritage assets, when compared with the previously assessed scheme for Block A. The setting improvements will not alter the significance of the heritage assets.

The amendments do not change the cultural heritage effects during construction which remain as previously reported. During operation, the revised design of Block A would respond better to the proportions, massing, depth and materials of the adjacent Buildings of Townscape Merit in Character Area 1: Lonsdale Road of the Castelnau Conservation Area. This would result in an improvement to the setting of BOM 1-7 and BOM 8-12 and the setting and character/appearance of Character Area 1: Lonsdale Road of the Castelnau Conservation Area, when compared with the previously assessed design for Block A. However, this improvement will be small in nature and would not alter the significance of the heritage assets, nor would it cause a step-change in the level of beneficial effects to the conservation area or its constituent BOM. Therefore, the significance of effect on the conservation area and its BOM will remain as previously assessed.

The conclusions of the 2008 Environmental Statement (with 2009 addendum), the SES (December 2017) and SES update (July 2018) should continue to be relied upon in relation to Cultural Heritage. The

assessment concludes that there will be no additional significant effects due to the changes to the design of Block A.

## **Water Environment**

A Flood Risk Assessment (FRA) has been prepared by Ambiental. The FRA is attached in **Appendix 4** of this letter.

The previously approved scheme set a level of 5.735m Above Newlyn Datum for the flood protection measures and had an upper ground floor level of 6.22m AOD for Block A. The EA, since these mitigation measures were approved, now accepts that mitigation is only required to the 2100 breach flood level (5.47m AOD). This proposal therefore now seeks to lower the upper ground floor to 5.47m AOD. The lower ground floor is also being lowered to 2.245m AOD. The perimeter wall is also to be lowered to 5.47m AOD, thus keeping the mitigation in place to protect the basement accommodation. The proposed perimeter wall should be enclosed around the entire Block A development. Any thresholds should be a step up/ step down mechanism with minimum thresholds of 5.47m AOD.

The FRA appended to this letter assesses the proposals in terms of the site geology, site flood hazards and sources of flooding such as tidal, surface water, groundwater and sewers. The FRA also sets out details of the probability of flooding and the residual risk as well as flood risk management measures.

The FRA makes its conclusions on the basis that:

- a planning permission was previously granted for a similar scheme;
- b the site has been shown to be defended to the 1:1000-year standard, and will remain so until at least 2100;
- c the proposal seeks only to lower the proposed upper and lower ground floors compared to the approved scheme;
- d the proposed upper ground floor and retaining wall will be set at the 2100 breach flood level (5.47m AOD) in line with recent EA guidance;
- e appropriate mitigation can be implemented at the proposed staff accommodation blocks at the south of the site to manage the residual risk of breach flooding; and
- f betterment can be provided by the formalisation of a flood warning and evacuation plan.

Following the guidelines contained within the NPPF, the proposed development is deemed to be acceptable on the basis that appropriate mitigation (including adequate warning procedures) can be maintained for the temporary lifetime of the development. Given the assessment within the FRA, it is not considered that the scheme is likely to give rise to additional significant effects due to the changes to the design of Block A.

## **Ecology**

An Ecological Update Survey & Wintertime Review of the Status of Ecological Enhancement and Mitigation Report has been prepared by Biodiversity by Design. This report is attached in **Appendix 5** of this letter.

This report provides an update Preliminary Ecological Appraisal of the staff accommodation area (which covers the location of Block A) and immediately adjacent habitat, incorporating key results of the following:

- A desk-based review of existing ecological baseline information from the 2016 and 2017 surveys, 2016 ecological desk study and review of relevant information from recent planning applications in the area.
- An update Extended Phase 1 Habitat Survey (habitat survey and protected species audit).

- A bat roost potential survey of buildings, completed in January 2019 accordance with best practice guidance.
- An update tree condition assessment, completed in accordance with best practice guidance, to verify that conditions had not changed appreciably since the bat roost potential suitability assessment undertaken in April 2017.

The ecological baseline conditions of the staff housing application area have not changed significantly since the December 2017 SES. Bat roost potential of existing trees is 'Negligible' and the bat roost potential of Existing buildings within the Application Site is also 'Negligible'. The adjacent recently-refurbished building B5 (80 Lonsdale) was assessed as having Low potential to support roosting bats. However, currently the likelihood of bats roosting in this recently refurbished building in consideration of its context was assessed as near-negligible; and based on physical arrangements and design of buildings, the potential for adverse impacts from the present scheme on any bats that might ever roost in B5 was assessed as negligible.

Overall the risk of impacts on roosting bats are considered negligible and no further survey for bats in relation to demolition of the B2 and construction of the new Staff housing is proposed.

It is not considered that the scheme is likely to give rise to significant adverse ecological effects, giving rise to a need for additional EIA work.

The Ecological Update Survey (February 2019) also assesses trees within the ecological surveys area for the suitability for roosting bats. In the 2016 survey, three trees (FT1, FT2 and FT3) possessed features which indicated decay including a broken limb (FT1) and small, shallow knot holes (FT2 and FT3). However, the features were shallow and unsuitable for use by roosting bats. Therefore, the potential of these trees and all other trees within the Application Area to support roosting bats was assessed as Negligible. This assessment was confirmed in the 2017 survey (see Figure 4.2, reproduced from the 2017 Supplementary Environmental Statement). Inspection in January 2019 indicated no significant changes to the condition of trees within the Application' bat roost potential.

As stated the proposed Block A building has been set back, following the removal of a single storey ground floor projection to be further from the root protection zones of the trees to the west of the building. In addition, an update to the original Tree Survey was undertaken in January 2019 (attached to this letter in **Appendix 6**).

It is not considered that the scheme is likely to give rise to arboricultural effects, giving rise to a need for further EIA work.

## **Transport**

While there would be a small increase in the number of units (2 no), there would be a slight reduction in the number of bed spaces provided (4 no). There would be no change to the approved parameters or proposals for access and parking. Given the very small increase in floorspace 80sqm, there is considered to be no potential for significant transport effects that have not been previously assessed.

## **Planning Submission**

Notwithstanding your consideration of the requirement for EIA in connection with the proposed development, additional material will accompany the application to assist in your consideration of the proposals. The material will comprise:

- 1 Planning Application Form;
- 2 Community Infrastructure Levy Additional Form;



- 3 Substitute application drawings;
- 4 Illustrative drawings to show the position prior to the completion of Block B;
- 5 Planning Statement (including Heritage Statement);
- 6 Tree Survey and Arboricultural Impact Assessment;
- 7 Design and Access Statement Update; and
- 8 The previous ES as updated together with all information relating to this request for a Screening Opinion.

### **Conclusion**

The original hybrid planning permission for the phased redevelopment of the school (08/1760/OUT) was accompanied by an Environment Statement. This has been updated by a 2009 Addendum and two Supplementary Environmental Statements submitted to the Council (in 2017 and 2018). The applicant has given consideration as to whether a Supplementary Environmental Statement is required. The applicant does not consider that the application for minor amendments to the host planning permission gives rise to the need for further information in EIA terms, and the previous ES and its associated updates can be submitted to support the Section 73 application.

We trust that you have sufficient information to determine whether further information is required under the (Environmental Impact Assessment) Regulations 2017 (as updated). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3.

Please contact Jennifer Woods or me if you have any questions.

Yours sincerely



**Judith Livesey**  
Associate Director



**Appendix 1- Site Location Plan**



## Appendix 2- Draft Drawings



## **Appendix 3- Heritage Note**



## **Appendix 4- Flood Risk Assessment**



## **Appendix 5- Ecological Update Survey**



**Appendix 6- Tree Survey**