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**ENVIRONMENTAL IMPACT ASSESSMENT SCREENING
REQUEST REPORT**

**KNELLER HALL,
65 KNELLER ROAD,
TWICKENHAM, TW2 7DU**

**PREPARED ON BEHALF OF DUKES EDUCATION
AND RADNOR HOUSE SCHOOL LIMITED**

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1.0 INTRODUCTION

1.1 This report has been prepared by DWD on behalf of Dukes Education and Radnor House School Limited (the Applicant). This report forms a request to the London Borough of Richmond upon Thames (LBRuT) to adopt a screening opinion to determine whether the proposed development at Kneller Hall, 65 Kneller Road in Twickenham (the Site) constitutes EIA development.

1.2 The proposed development comprises:

“The demolition of existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.”

1.3 The description of development may change prior to the submission of the full planning application.

1.4 This report reflects the requirements of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017*, as amended (the "EIA Regulations"). In accordance with Section 6 of the EIA Regulations, this submission and report contains:

Table 1: Screening Opinion Requirements

REQUIREMENT	COMMENT
(a) A plan sufficient to identify the land;	See submitted Site Location Plan (ref: 0017) which shows the extent of the Site.
(b) A description of the development, including in particular: <ul style="list-style-type: none"> - a description of the physical characteristics of the development and, where relevant, of demolition works; - a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected; 	Set out in this report at Section 2. See also submitted: <ul style="list-style-type: none"> - Existing Site Plan (ref: LXA-1629-002-SITE) and Indicative Plans: <ul style="list-style-type: none"> - Masterplan (ref: ADP-00-00-DR-A-0900 S2 P4); - Masterplan with Dimensions (ref: ADP-00-00-DR-A-0902 S2 P1);

	<ul style="list-style-type: none"> - Masterplan with Existing Buildings and Trees to be demolished/ removed and Proposed Buildings (ref: ADP-00-00-DR-A-0901 S2 P1); and - Further Illustrative Design Information (Movements Diagram, Building Heights and Indicative GIA and Overlay of New and Existing Building).
(c) A description of the aspects of the environment likely to be significantly affected by the development;	Set out in this report at Section 3.
(d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from: <ul style="list-style-type: none"> - the expected residues and emissions and the production of waste, where relevant; and - the use of natural resources, in particular soil, land, water and biodiversity; and 	Set out in this report at Section 3.
(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.	Set out in this report at Section 3.

Requirement for EIA

1.5 In order to determine whether the development is 'EIA development', we have had regard to the EIA Regulations and supporting Planning Practice Guidance (PPG).

1.6 EIA development is defined by the EIA Regulations at Section 2 as development:

"likely to have significant effects on the environment by virtue of factors such as its nature, size or location".

- 1.7 EIA development falls into two Schedules of the EIA Regulations. EIA is mandatory for developments listed within Schedule 1. Schedule 2 developments require EIA if they would lead to likely significant effects on the environment.
- 1.8 In deciding whether a Schedule 2 development is EIA development, Regulation 5(4) states:
- "Where a relevant planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development, the relevant planning authority ... must take into account in making that decision-*
- a) Any information provided by the applicant;*
 - b) The results of any relevant EU environmental assessment which are reasonably available to relevant planning authority...; and*
 - c) such of the selection criteria set out in Schedule 3 as are relevant to the development."*
- 1.9 It should be noted that the PPG (paragraph 018 Reference ID: 4-018-20170728) advises that *"only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment"*.
- 1.10 In order to allow LBRuT to determine the need for EIA, this report provides a description of the Site and proposed development, a review of the EIA Screening Criteria based on the EIA Regulations and PPG and a completed EIA Screening Checklist.
- 1.11 In addition, this report is accompanied by the following plans:
- Site Location Plan (ref: 0017);
 - Existing Site Plan (ref: LXA-1629-002-SITE)
 - Masterplan (ref: ADP-00-00-DR-A-0900 S2 P4);
 - Masterplan with Dimensions (ref: ADP-00-00-DR-A-0902 S2 P1);
 - Masterplan with Existing Buildings and Trees to be demolished/ removed and Proposed Buildings (ref: ADP-00-00-DR-A-0901 S2 P1); and
 - Further Illustrative Design Information (Movements Diagram, Building Heights and Indicative GIA and Overlay of New and Existing Building)

2.0 SITE AND PROPOSED DEVELOPMENT

Site Context

- 2.1 The Site is located in Twickenham, a district within the LBRuT. The Site is located on an area of land bordered by Kneller Road (B361) to the south, Whitton Dene to the west, and Amberside Close to the north, with the Duke of Cambridge Close to the east.
- 2.2 The prevailing character of the area surrounding the Site is residential, with the predominant typology being suburban, semi-detached and detached housing accompanied by generous front and rear gardens all within a green setting. Neighbouring buildings in the immediate surrounds are modest in height, with the majority at a scale of two-storeys along the northern, southern and western boundaries of the Site. The residential flats to the east of the Site boundary are three storeys in height. The northern part of the Site also neighbours Whitton Tennis Club.
- 2.3 The Site is not within a town centre but is located approximately 700 metres (8-minute walk) from Whitton district centre and a 20-minute walk from Twickenham district centre.
- 2.4 The Site is located in close proximity to a number of nearby railway stations providing access to south west and central London. Whitton Railway Station is 0.6 miles (13-minute walk) to the south of the Site, with Hounslow Railway Station situated circa 0.8 miles (16-minute walk) to the north west and Twickenham Railway Station at 1.1 miles (23-minute walk) to the east. The Site is also in close proximity to bus routes which travel along Whitton Road, Whitton Dene, Nelson Road and Warren Road. The closest bus stops located less than 0.1 miles away to both the south and west of the Site, serving local destinations.
- 2.5 The Site also shares its northern boundary with the London Borough of Hounslow (LBH).

Access to Local Services

- 2.6 The Site is well provided for in terms of access to community facilities, with the following located near to the Site:
 - Whitton Social Centre (50m) on Kneller Road;
 - Chase Bridge Primary School (400m) to the east;
 - Nelson Primary School and St Edmund's Catholic Primary School (700m) to the west; and
 - Richmond upon Thames College (1.3km) to the south east.
- 2.7 The following leisure/tourism and hotel facilities are also located near to the Site:
 - Whitton Tennis Club (200m) to the north east;

- Twickenham Stadium, home to England Rugby RfU, (800m) directly to the east;
- Twickenham Stoop (Harlequins Rugby Club) (800m) to the south east; and
- Premier Inn Twickenham Stadium (Whitton) (1km).

2.8 There are also a wider range of public open spaces nearby, these include:

- Murray Park (160m);
- Hounslow open space (180m);
- Hounslow Heath (1.6km);
- Crane Park (1.8km);
- Syon Park (3km); and
- Richmond Park (4km).

2.9 The closest local schools are Chase Bridge Primary School (50m east), Richmond upon Thames Secondary School and College (300m south-east), St Edmund's Catholic Primary School (1km west), Nelson Primary School (1km west), St Richard Reynolds Catholic High School (1km south-east).

Site Description

2.10 The Site comprises the land outlined in red on the enclosed Site Location Plan (ref. 0017), which extends to an area of approximately 9.7 hectares (24 acres).

2.11 The Site was formerly a Royal Military School of Music which included residential accommodation associated with the school (Use Class C2). Kneller Hall was one of 12 Ministry of Defence (MoD) sites that were agreed to be sold as part of the MoD's drive for greater efficiency and was vacated by the MOD in the summer of 2021. The Site has now been acquired by Dukes Education.

2.12 The Site is accessed by road via Kneller Road, a 'Local distributor road' (Kneller Road/Warren Road) which provides access to Chertsey Road (A316), which links Richmond to Central London via Hammersmith and the M3 to the west.

2.13 Buildings are largely located in the western two thirds of the Site. Kneller Hall (Grade II Listed) is the most prominent building (equivalent of 4 storeys), with a range of other buildings within the Site which vary in scale (1-4 storeys). Some of the existing buildings are located within the part of the Site that is allocated as Metropolitan Open Land (MOL). The buildings are all set within a wider context of parking and circulation areas, green spaces and sports facilities.

- 2.14 The overarching landscape typology of the eastern part of the Site is a parkland setting, comprising a large number of trees across the Site. Many of the trees are mature and protected by a Tree Preservation Order. The central / western part of the Site contains a large amount of hardstanding and car parking. The eastern part of the Site is within MOL, largely comprising grassed fields, playing fields, with some sports pitches, buildings and structures.
- 2.15 In addition to the aforementioned partial MOL allocation, the Site has its own LBRuT Local Plan (July 2018) policy, Policy SA 14 Kneller Hall, Whitton. The Site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020).
- 2.16 The Site has a secure boundary, comprising a combination of walls and fencing. Part of the boundary wall and four Gatepiers (at the main entrance and the end of the railed part of the boundary wall) are also Grade II Listed. The boundary to the Site (including the listed wall) varies considerably in quality and style.
- 2.17 There are no other statutory listed heritage assets within close proximity to the Site. The Site is not located within a Conservation Area. The closest Conservation Area is Rosecroft Gardens, which is located approximately 300m to the south and separated by the A316 and residential roads.
- 2.18 The Site is within Flood Zone 1, and therefore at low risk of fluvial flooding. It is however understood to be susceptible to surface water flood risk.

Description of the Proposed Development

- 2.19 The proposed development comprises:
- 2.20 *“The demolition of existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.”*
- 2.21 The description of development may change prior to the submission of the full planning application. Indicative information on the proposed development is also provided in the submitted drawings, listed at 1.11 of this report.
- 2.22 In summary, the proposed development includes:
- Use of the main Grade II listed Kneller Hall for Education Use (Use Class F1);
 - Use of Guard Room and Band Practice Hall for Education Use (Class F1);

- Demolition of existing modern buildings on the Site and the conversion of other existing single storey modern buildings to use as an energy centre and for maintenance storage, ancillary to the main school use (Use Class F1);
- New build development to provide new purpose-built buildings for school use including, teaching space and classrooms, an indoor sports facility with a swimming pool and sporting pavilion (Use Class F1);
- Upgrading and enhancing the existing playing fields and outside sports pitches at the Site; and
- Ancillary works to facilitate the use of the Site as a school to include high quality sports facilities and a Forest School programme; and
- Facilitation of managed local school and local community group access to the outdoor sports and forest school facilities.

2.23 The submitted Masterplan, prepared by ADP Architecture, outlines the proposed indicative masterplan for the Site. The submitted Further Illustrative Design Information (Building Heights and Indicative GIA sheet) sets out the proposed approximate building heights and areas. The maximum height of the proposed development is up to three storeys.

2.24 Further details of the proposed scheme are set out below, which should be read in conjunction with the submitted plans, illustrating the expected quantum of development proposed.

- New build teaching building – 3 storeys in height (Approximately 12.7 metres in height);
- Sports Hall, with indoor swimming pool – 2 storeys in height (Approximately 10.5 metres in height);
- Sports Pavilion – 1 storey in height (Approximately 3.5 metres in height);
- Extension to Band Practice Hall to provide School Hall – 1 storeys in height (Approximately 4.8 metres in height); and
- Energy Centre and Grounds Maintenance – Conversion of existing building with modest extensions of 1 storey in height (Approximately 3.3 - 4 metres in height).

2.25 The Site will be used as a day school. The Site will have capacity for up to 1,000 pupils. The pupils will be aged between 11 and 18 years of age and from Year 7 through to sixth form. There will be no boarding/ residential accommodation at the site.

Kneller Hall, the Guard Room and Band Practice Hall

- 2.26 It is proposed that internal and some external alterations will be undertaken to Kneller Hall, the Guard Room and Band Practice Hall. These works will be to restore the buildings, to support their ongoing maintenance and to facilitate the school use. The building’s previous use by the military school means that the existing layout is well suited to the day school use and therefore this limits the extent to which alterations are required.
- 2.27 A heritage specialist (Iceni Projects Heritage) is appointed to work with the architect on the alterations to the listed buildings and Listed Building Consent will be secured for these works.
- 2.28 Notable works to Kneller Hall comprise of the demolition of the modern rear single storey extension to the west wing. This detractive element is considered to have no heritage significance. In addition, a modern existing 1970s staircase on the west side of the building and central wall is proposed to be removed, to enable a lift to be installed. The heritage consultant has advised that this wall and staircase are considered to hold neutral significance and their removal is considered to cause no harm to the Hall.
- 2.29 The floorspace schedule of the existing historic buildings that will be retained is as follows:

Building	Approximate Areas (GIA sqm)
Kneller Hall	3,659 plus new build extension of 248 = 3907
Band Stand Hall	207 plus newbuild extension of 169 = 376
Guard Room	416
Total	4,282 sqm (4,699 sqm including new build extensions)

New Build Teaching Facilities

- 2.30 New teaching facilities are proposed through the construction of a purpose built 3 storey L shaped building on the western part of the site.
- 2.31 Early masterplan options explored the conversion of the two existing three storey buildings to the north of the existing Band Practice Hall (the accommodation blocks), to utilise as teaching accommodation but it was subsequently concluded that this would not be feasible. The built form on the Site is to be consolidated and will enable the removal of some of the modern piecemeal development that has taken place across the northern and western parts of the Site.
- 2.32 The indicative floorspace schedule proposed for the new build teaching block is as follows:

Building	Approximate Area (GIA sqm)
New Build Teaching Block	5,011

Sports Centre with Swimming Pool

2.33 New sporting facilities are proposed on the central part of the Site. This development will be enabled via the removal of existing modern buildings and the provision of one new high-quality building.

Building	Approximate Area (GIA sqm)
Sports Centre including indoor Swimming Pool	2,780

Outdoor Sports Pitches and Ancillary Sports Pavilion

2.34 The eastern part of the Site has historically been used as sports pitches, by the Military School of Music, and the proposed development seeks to continue to utilise this area for outdoor sports. As shown on the accompanying Masterplan, the following sports pitches are proposed:

- Cricket Pitch (grass);
- Hockey Pitch (all weather astro turf);
- Rugby Pitch (grass);
- Tennis Pitch (hardstanding);
- Football Pitch (grass); and
- Netball/ Basketball court (hardstanding).

2.35 In order to support the continued use of the eastern part of the Site for outdoor sports and recreation, a new sports pavilion is proposed which shall replace the existing buildings and hardstanding to the east of Kneller Hall within the MOL. The pavilion will sit on a footprint very similar to the existing buildings on this part of the site. The pavilion will provide ancillary facilities associated with the sporting use of the land, including changing rooms and storage space. Whilst these facilities will be used by the school during the school day, there will also be managed access at evenings and weekends, for other local schools and community groups to use these facilities. Engagement is taking place with Sports England on these proposals. The Sports Pavilion will comprise of:

Building	Approximate Area (GIA sqm)
Sports Pavilion	309

Other Outside Facilities

- 2.36 The outside bandstand will be retained to retain the Site’s historical musical legacy and provide an opportunity for music-based events and concerts to continue to be held at the Site, including events that the public can be invited to.
- 2.37 It is also proposed to create a biodiversity corridor at the north of the Site. This will include a Forest School programme which will utilise a small covered canopy or shed like structure of circa 30 sqm, as a base for this programme. The Forest School facilities will be able to be used by other local schools. The location of this on the Site is flexible, and it is currently shown indicatively but it could be moved elsewhere along the northern part of the Site.

Supporting Facilities and Infrastructure

- 2.38 An energy centre is required to house the required plant and machinery associated with meeting the energy requirements for the Site. There is also required to be a grounds maintenance store on the Site. These elements are proposed to be located on the northern part of the Site, within existing buildings that will be converted with modest extensions. They will comprise of:

Building	Approximate Area Existing to be Converted (GIA sqm)	Approximate Extension (GIA sqm)	Approximate Total Area (GIA sqm)
Energy Centre and Ground Maintenance (3 Buildings)	131	106	237

Summary of Proposed Development

- 2.39 The table below provides a summary of the extent of existing floorspace at the site, together with the floorspace to be demolished and new build floorspace:

Building	Approximate Existing Area (GIA sqm)	Approximate Demolition (GIA sqm)	Approximate New Build (GIA sqm)
Whole Site	10,833	5,385	8,623

Planning Status

- 2.40 The scheme is currently being refined with ongoing pre-application advice taking place with the allocated Planning Case Officers at LBRuT, Lucy Thatcher and Grace Edwards (ref. 21/P0412/PREAPP).
- 2.41 The proposed plans submitted with this Screening Opinion and the floor areas quoted, are marked as Indicative and are expected to be further refined before the full planning application is submitted.
- 2.42 A full planning application is expected to be submitted later this year.

Previous Development Proposals on the Site

- 2.43 The development proposals determined on the Site have historically related to meeting the operation requirements of the Royal Military School of Music and there have been no applications to comprehensively re-develop the Site.

Mitigation

- 2.44 In accordance with Section 6, (2), e) of the EIA Regulations, a number of mitigation measures will be committed to as part of the proposed development.
- 2.45 This includes adherence to best practice measures during the demolition and construction phases, through a Construction Management Plan. A draft of this report will accompany the full planning application and it will also take into account Demolition / Construction Logistics. Consideration of the potential impact of the demolition and construction works in terms of noise and air quality will also be given consideration as part of the reports that will accompany the full planning application.
- 2.46 The Site also comprises of number of existing trees, protected by a TPO and the north eastern part of the Site is identified as a Deciduous Woodland. Whilst some trees will be required to facilitate development, no trees will be removed within the Deciduous Woodland. As part of full planning application an Arboricultural Survey, Arboricultural Impact Assessment and Arboricultural Method Statement will be submitted. A comprehensive site wide Landscape Strategy will also form part of the full planning application submission, which will include replacement tree planting across the Site and soft landscaping and planting to help enhance biodiversity at the Site.
- 2.47 Advice is being sought from an ecology specialist on biodiversity and site surveys are currently being undertaken in advance of submission of the full planning application. An initial preliminary phase 1 ecology survey has already been undertaken, and the following further surveys will be undertaken prior to the submission of the planning application: Bat Emergence / Re-entry Surveys, Preliminary

Roost Assessment (Trees), NVC botanical survey and an Ecology Survey Report. An Ecological Enhancement Strategy will also accompany the full planning application.

2.48 A Site wide energy strategy and drainage strategy is being progressed and this will accompany the full planning application. Furthermore, the forthcoming planning application will also be supported by accompanying Air Quality Assessment, Transport Statement and Draft School Travel Plan, Delivery and Servicing Plan, Daylight/Sunlight Assessment, External Lighting Strategy and Noise Impact Assessment. Any recommended mitigations measures associated with addressing the amenity considerations of neighbouring residents and/or future pupils on the Site (for both construction stages and operational stages) will be incorporated into the scheme.

3.0 SCREENING ASSESSMENT

Determining the Screening Approach

3.1 In determining whether a proposed development constitutes EIA development, consideration should be had to the following:

- If the proposed development is of a type listed in Schedule 1;
- If not, whether it is listed in Schedule 2;
- Is it located within a sensitive area;
- It meets any of the relevant thresholds and criteria set out in Schedule 2; and/or
- Would it lead to likely significant effects on the environment.

3.2 These points are explored further in this section with reference to the EIA Regulations and supporting PPG.

Schedule 1 Projects

3.3 EIA is mandatory for projects listed in Schedule 1 of the EIA Regulations. Schedule 1 developments are large scale projects for which significant effects would be expected and comprise developments such as new airports and power stations. The proposed development is not of a type listed in Schedule 1.

Schedule 2 Projects

3.4 EIA is discretionary for projects listed in Schedule 2. If the development proposed is of a type listed in Schedule 2 then it may be classified as EIA development depending on the location of the development (i.e. if it is within a sensitive area) and/or whether it meets any of the relevant thresholds or criteria in Column 2.

3.5 Sensitive areas are defined in the EIA Regulations as:

- Sites of Special Scientific Interest and European Sites;
- National Parks, the Broads, and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and Scheduled Monuments.

3.6 In certain cases, local designations which are not included in the definition of sensitive areas, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. Furthermore, in considering the sensitivity of a particular location, regard

should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.

- 3.7 The proposed development has been considered against Category 10 of Schedule 2, 'Infrastructure Projects', sub-section (b) 'Urban Development Projects'. The Site falls within the criteria (iii) in column 2 which states that the triggers are *"The overall area of the development exceeds 5 hectares"*. The development Site is 9.7 ha.
- 3.8 The Site is not located within any of the sensitive areas identified in the definition of 'sensitive areas' in EIA Regulations. The EIA regulations identify that other local designations not listed may also be relevant in determining whether an assessment is required.
- 3.9 As identified previously, the eastern part of the Site is within the MOL designation. The Site also comprises of Grade II Listed heritage assets. Please see paragraphs 2.14 and 2.17 above for further details of the listed heritage assets on the Site. The north eastern corner of the Site is also identified to be a Deciduous Woodland. It is considered that the effects on these designations can be comprehensively understood from the supporting documents that are proposed to be submitted with the full planning application. Namely, the Open Space Assessment, Heritage Assessment, the Arboriculture Impact Assessment, Arboriculture Method Statement and the Ecology surveys and assessments. Notwithstanding this, this Screening Opinion is being submitted to confirm this.

Schedule 3

- 3.10 Schedule 3 of the EIA Regulations sets out selection criteria which relate to specific matters including: the characteristics of the development; the location of the development; and the characteristics of the potential impact. These factors, including characteristics, location and potential impact have been taken into account as part of the screening process, set out in the latter part of Section 3 of this report.

Consideration of Cumulative Effects

- 3.11 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a Proposed Development."

The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

3.12 A review of LBRuT’s online search facility in March 2022 identifies there have been no major schemes approved within the past two years within 200 m of the proposed development. If the LBRuT is aware of any further relevant schemes not listed, please notify us so that these can be confirmed. Notwithstanding, the below minor applications have been determined within 200 metres of the Site within the past 2 years and for clarity have been considered under the assessment of cumulative effects.

Table 1: Cumulative Schemes LBRuT

APPLICATION REF. & ADDRESS	PROPOSAL DESCRIPTION	APPROXIMATE DISTANCE FROM SITE
19/3267/FUL 37 - 38 Duke of Cambridge Close Whitton Full application Non-EIA Development	Alterations to roofs of main dwellinghouse, garage and side addition	Bordering the Site to the east Approved 22/03/2021
19/3268/FUL 39 - 40 Duke of Cambridge Close Whitton Full application Non-EIA Development	Alterations to roofs of main dwelling, garage and side additions	Approx. 30 m east of the Site. Approved 22/03/2021
19/3269/FUL 41 - 42 Duke of Cambridge Close Whitton Full application Non-EIA Development	Alterations to roofs of main dwelling, garage and side addition	Approx. 50 m east of the Site. Approved 22/03/2021
21/3188/FUL Adjacent To 118 Kneller Road, Twickenham, Hounslow TW2 7DX Full application	Erection of 7 residential units (4 x 1 and 2 bed flats and 3 x 3 bed houses) with ground floor Class E commercial business and service space (73.3m ²) including associated works.	Approx. 70 m west of the Site. Pending determination.

Non-EIA Development		
21/4231/ADV	Display of 2 nos. artwork mural advertisements to Lift Shafts 2&3 of the West Stand at Twickenham Stadium	Approx. 150 m east of the Site.
Twickenham Rugby Football Union Stadium 200 Whitton Road Twickenham TW2 7BA		Pending determination
Application to Display Adverts		
Non-EIA Development		

- 3.13 The three applications determined at 37 – 38, 39 – 40 and 41-12 Duke of Cambridge Close are located along the Site’s eastern boundary. Each property comprises of a semi-detached two storey in height building and the proposed works sought to make alterations to each of the buildings. When considered cumulatively with the proposed development, it is not considered to give rise to EIA development
- 3.14 The application at the land adjacent to 118 Kneller Road has yet to be determined and given its scale, when considered cumulatively with the proposed development, it is not considered to give rise to EIA development.
- 3.15 The curtilage of Twickenham Rugby Football Union Stadium falls within 200 meters of the Site and a review of LBRuT identifies there has only been once recent application for advertisement consent for the display of artwork murals. As such, given their limited impact when considered cumulatively with the proposed development, it is not considered to give rise to EIA development.
- 3.16 Richmond upon Thames College at Langhorn Drive, Twickenham, TW2 7SJ is located at the closest point circa 270 m to the south west of the application Site. In the past 2 years some reserved matters applications associated with the new college being developed have been submitted. Given this Site’s location, more than 200 m from the application Site we have not considered them as part of the cumulative assessment. This development was also screened to consider if it was EIA development. The screening opinion issued for both the outline application (ref: 15/3038/OUT) and its reserved matters concluded it was not considered EIA development.
- 3.17 LBRuT website includes a list of screening opinions that have been submitted. DWD has undertaken a review of this list. The closest site within this published list is the scheme at Richmond upon Thames College, Langhorn Drive, mentioned in the above paragraph. The screening opinion was given in 2016. The next closest site is circa 1.5 km to the west at Hospital Bridge Road, Whitton,

Twickenham, TW2 6LE, where a screening opinion was given in 2019. This site is a considerable distance from the application Site and not considered to be relevant.

- 3.18 The Site also shares its northern boundary with the London Borough of Hounslow. A review of the LBH’s online planning register identifies there have been no EIA Major Full Applications, Full Major Applications and Outline Major Applications determined within 200 meters of the Site within the past 2 years.
- 3.19 It is therefore considered that the cumulative impact of these developments does not give rise to EIA development, and instead, that each application can be considered independently via the technical reports submitting with the standalone planning applications.
- 3.20 The cumulative impacts of any subsequent developments that come forward, where appropriate, will be considered in the technical assessments accompanying the forthcoming planning application.
- 3.21 It is therefore not anticipated that the development would cumulatively give rise to environmentally significant effects requiring the need for an EIA.

National Planning Practice Guidance

- 3.22 Paragraphs 057 and 058 of the PPG provides guidance to help determine whether significant effects are likely. In general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Table 1 below sets out the indicative criteria, thresholds and key issues to be considered in determining whether a development is likely to be EIA developed identified in the PPG.

Table 2: Planning Practice Guidance Indicative Screening Criteria

DEVELOPMENT TYPE	INDICATIVE CRITERIA AND THRESHOLD	KEY ISSUES TO CONSIDER
10 (b)Urban development projects, Including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.	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 a high level of contamination. Sites which have not previously been intensively developed: <ul style="list-style-type: none"> • area of the scheme is more than 5 hectares; or 	Physical scale of such developments, potential increase in traffic emissions and noise.

	<ul style="list-style-type: none"> • it would provide a total of more than 10,000 m² of new commercial floorspace; or • the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings). 	
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3.23 The Site was previously used as a military music school for the Ministry of Defence. This use resulted in a number of historic developments taking place across the Site, to meet the operational requirements of the military school. The development took place on an ad-hoc basis, and includes buildings both inside and outside the MOL designation.

3.24 The Site has historically been used for education purposes. How the Site will be used by the proposed day school, will have similarities to how it was used by the residential military school of music. The type of facilities required by both these uses are similar, albeit the day school use does not require residential accommodation. Furthermore, the Site will most intensely be used during the day on weekdays, in term time. Albeit there will be some activity at the Site outside these times, mainly associated with the use of the outside sports pitches. The military school of music, which included residential accommodation, was used continuously throughout the year, including at weekends.

3.25 The Site currently comprises of development of a scale, type and massing that generally reflects the prevailing scale of its surroundings, within an urban area. The proposed development seeks to introduce new build development that is of a scale and height that is similar to the existing built development. No development over 3 storeys is proposed. As such, it is considered the proposed development would not have a significant urbanising effect on a non-urbanised area.

3.26 The proposed development will retain the Grade II listed Kneller Hall, Guard Room and Band Practice Hall and refurbish and convert this accommodation to provide teaching spaces and ancillary school facilities. In addition, three existing single storey buildings to the north of the Site, used by the previous occupier as garages/ stores will be converted to store plant and equipment associated with the site’s energy and ground maintenance equipment.

3.27 New buildings are also proposed. There will be a 3 storey new build high quality teaching building and a new sports centre, with an indoor swimming pool. A sports pavilion is proposed on the east

of the Site. The total indicative gross internal area floorspace associated with the new build development, including the extensions to existing buildings, totals circa 8,623 sqm.

3.28 A full Noise Assessment will accompany the planning application, which will confirm that noise associated with the development, including both pupil noise and plant, will not cause disturbance to the nearest noise sensitive receptors. A Transport Assessment and Draft School Travel Plan will also accompany the forthcoming planning application, which shall assess the local road network and confirm the acceptability of the movements, together with any proposed mitigation measures if required.

3.29 An initial Phase 1 Ground Conditions survey has been undertaken. This will form part of the full planning application. It concludes that:

“The risk estimation matrix indicates a moderate risk.

It is recommended that an intrusive investigation is undertaken to clarify potential risks to the identified receptors, and assess the extent of made ground soils present at the site. It should be noted that significant limited evidence of contaminative uses at the site is sparse. Noting the size of the site, and the extensive areas of it that have not undergone development historically, it is considered that the investigation should be focussed on the identified point sources of contamination only, i.e the electricity substations, tanks and potentially infilled ground; as well as the installation of ground gas monitoring wells in the vicinity of existing and proposed structures.”
(Preliminary Risk Assessment Report, Jomas, February 2022).

3.30 Further site investigations are also being undertaken, to enable the civil engineers to advise on the methods of construction and ground conditions.

3.31 As discussed above at paragraph 2.44 above, prior to the submission of the planning application Bat Emergence / Re-entry Surveys, a Preliminary Roost Assessment (Trees), a NVC botanical survey and an Ecology Survey Report will be undertaken. An Ecological Enhancement Strategy will also accompany the full planning application.

3.32 The proposed development is not considered to exceed the thresholds or key issues set out in the PPG and it is not considered that the development is EIA development.

Screening Assessment

3.33 This section at Table 3 assesses the proposed development against the EIA screening criteria at Schedule 3 of the EIA Regulations. It presents the assessment of the environmental effects likely to occur as a result of the proposed development.

Table 3: Screening Assessment for Schedule 2 Development

1: CHARACTERISTICS OF THE DEVELOPMENT
<p>(a) The size and design of the whole development</p> <p>The Site comprises of previously developed land which is located in an existing urban setting and surrounded predominantly by residential uses. The development has been designed to respond to the Site’s characteristics and the existing site context.</p> <p>On the east of the Site, a new Sports Pavilion is proposed. It will be 1 storey in height and approximately a maximum of 3.5 metres in height. This massing is located in an area of existing buildings and hardstanding. The building will sit on the footprint of an existing sports hall building, consolidating the multiple buildings on the eastern part of the Site into a single building. The landscaping scheme will also aid with improving the visual amenity in this area.</p> <p>At the centre of the Site, outside of the MOL, a new Sports Centre, with indoor swimming pool, is proposed. This will be 2 storeys in height and up to approximately 8 - 10.5 m in height. It shall demonstrate a more contemporary design.</p> <p>To the west of the Site, fronting Whitton Dene, a 3 storey L shaped teaching block is proposed. This will be approximately 12.7m in height. There are currently modern buildings and hardstanding in this part of the Site. The building has been positioned in this location so that it is set away from the Grade II listed Kneller Hall and also so that it is outside of the MOL designation. The buildings are also set away from the curtilage wall that demarcates the Site boundary, by 20.4 m to the west and 11.6 m to the south. The detailed design will need to consider the style of design and use of materials on the west elevation of these buildings, which face out of the Site and on to a residential street.</p> <p>Breaking down the teaching block and Sports Centre building into two separate blocks, as opposed to one larger buildings, helps create breathing space between the buildings and allows landscaped spaces and courtyards to be provided between the buildings. The landscaping scheme will help facilitate the flow of students between different buildings.</p> <p>Whilst some tree removal is required to facilitate the development, the vast majority of existing trees will be retained and protected. The building layout has been designed to ensure that any Category A tree is retained and protected and that the buildings are designed around these trees, and their root protection areas. The tree consultants survey identified 279 trees/hedges across the Site. The scheme as currently presented will require the removal of 12 trees/ hedges (11 trees and 1 hedge) comprising of 5 no. ‘B’ category trees, 5 no. ‘C’ category trees, 2 no. ‘U’ category trees and 1 no ‘C’ category hedge.</p> <p>A strategy for replacement tree planting across the Site is being progressed by the tree consultant and Landscape Architect, to ensure that there is a net increase in trees across the Site. The retention of trees and positioning of new trees, will aid in reducing the buildings’ visibility from the residential areas to the north and west.</p> <p>The school wishes to take advantage of its location and offer outdoor learning for pupils, as part of a forest school programme. Therefore, a light weight and temporary structure, such as a canopy covering or a shed is proposed to be provided as a base for this. This will be a very small structure and won’t require foundations.</p>

In summary, the proposed new build development is not considered to be out of context with existing development on the Site or in the local area. The detailed design of the new build accommodation will be progressed and discussed with LBRuT as part of the pre-application process. Contextual visuals will accompany the full planning application to enable LBRuT to assess the impact of the development and its relationship with its surrounding built and heritage consultant.

(b) Cumulation with other existing development and/or approved development

As identified in Table 1 above, there is no relevant existing and proposed development taking place in the immediate vicinity of the Site. There are no EIA developments within 200 metres of the Site and as discussed above. It is considered the proposed development is a discrete project and can proceed independently.

(c) The use of natural resources, in particular land, soil, water and biodiversity

The proposed construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for a development of this type.

The Applicant will include measures in the CEMP to minimise the consumption of natural resources, particularly non-renewable resources, where possible. A Draft CEMP will accompany the full planning application.

The Site has existing biodiversity value and the proposed development offers the opportunity for net biodiversity gain. A Preliminary Ecology Appraisal has already been undertaken and submitted as part of the pre-application submission. Further surveys are recommended in this report and these will be undertaken during the correct seasons, and the surveys will be submitted with the full planning application. An Ecological Enhancement Strategy will also accompany the full planning submission.

The Energy Strategy that will be submitted with the full planning application will confirm that the new build elements of the development will target meeting BREEAM ‘Excellent’. The Grade II listed buildings proposed to be converted will target BREEAM ‘Very Good’, given the constraints associated with these building’s heritage significance.

(d) The production of waste

As with nearly all construction, the proposed development will result in waste materials from the preparation and undertaking of works. Construction waste would be reused and recycled where possible. Any construction waste would be managed in accordance with all applicable legislation and disposed of in line with best practice. This will be addressed in the CEMP and Construction Logistics Plan that will accompany the full planning application.

Operational waste would be minimised as far as possible and disposed of in line with LBRuT’s requirements and managed in accordance with all applicable legislation. The school will be responsible for teaching pupils about the importance of minimising waste and recycling, and encouraging them to recycle through providing recycling bins across the school.

(e) Pollution and nuisances

During the construction phases of the proposed development, dust would be generated. Dust generation would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. A Draft CEMP will be submitted with the planning application.

There would be noise and emissions associated with plant and vehicles during the construction phase. These will be assessed as part of the Noise Assessment and Air Quality Assessment that will be submitted with the application. Pre- application discussions will take place with the Council on both Noise and Air Quality.

A Construction Logistics Plan (CLP) will also be submitted as part of the full planning application which will include preliminary details of the construction programme and methodology, vehicle routing and access and potential measures to reduce impacts.

The construction works are expected to be phased, and this will be taken into consideration in the draft CEMP and CLP submitted with the planning application.

There would also be emissions associated with the operational phase of the proposed development. Emissions would be associated with the number of vehicles travelling to and from the Site, associated with the proposed uses. A Transport Assessment and Draft School Travel Plan will be submitted in support of the planning application. The Draft School Travel Plan will seek to reduce car use and increase the use of active travel measures, thereby further reducing impacts on emissions to air. A school bus service will also be operated by the school to help reduce vehicle movements to and from the Site.

The potential also exists for noise effects to result from operational activities associated with the proposed development. This includes use of the outside sports facilities on the far east of the Site. The hours of use of the outside sports facilities will be agreed with the LBRuT via a management plan. Noise from vehicles/visitors arriving and departing from the Site, including to make deliveries/collections, also needs to be considered.

A Noise Assessment will be submitted as part of the application to assess the anticipated noise levels at the Site from vehicle movements, use of the outside play areas and outside sports facilities and appropriate mitigation measures will be proposed.

The proposed development is not associated with hazardous substances or toxic emissions to air.

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

During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures will form part of the CEMP.

The Site is located within Flood Zone 1. However, parts of the Site are at risk of surface water flooding and the entire Site is at risk of groundwater flooding. The Site is also within a Critical Drainage Area. A Flood Risk Assessment will accompany the full planning application. This will include a Sequential Test.

A Drainage Strategy and SuDS Strategy will be submitted with the planning application and will ensure that there is no increase to flood risk at the Site or surrounding area as a result of the proposed development. Sustainable drainage measures will be included within the scheme.

The Transport Assessment that will accompany the application will address whether there is a need for highways safety improvements, as a result of the scheme. Engagement with the LBRuT’s transport officers is being undertaken, to agree the scope of the Transport Assessment. Where vehicle access to the Site are proposed, consideration is being given to the width of the entrances and the surfaces, to ensure that pedestrians can cross these areas safely.

(g) Risks to human health

The risks to human health, for example due to water contamination or air pollution, are considered to be low.

An Air Quality Assessment will accompany the proposed development which will be based on the movements outlined within the Transport Assessment that shall also accompany the full development. A Draft School Travel Plan will also be submitted to further reduce car use and increase the use of active travel measures, including the use of a school bus service, thereby further reducing impacts on emissions to air.

With respect to construction effects, the CEMP will set out guidelines to ensure the use of best practice measures to prevent land and water contamination, as well as effects on construction workers.

The development would be connected to the mains water supply before it is operational so clean water would be supplied to future users. Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases. This will be detailed further in the Utilities Assessment and Drainage/ SuDS Strategy that will be submitted with the full planning application.

2. LOCATION OF THE DEVELOPMENT

(a) The existing and approved land use

The Site comprises of previously developed land located within an urban setting. The Site was in use until Summer 2021 as the Military School of Music, providing teaching accommodation and associated residential accommodation for the Military. Associated facilities were also provided on the Site, including indoor and outdoor sports facilities and pitches. Surrounding land uses are predominantly residential dwellings and community uses (Whitton Tennis Club and Chase Bridge Primary School).

The Site has historically been used for educational purposes, as a music school for the military. The historic educational use is proposed to be continued. The proposed development seeks to use the Site for the education of secondary school aged children. This involves retaining the existing historical buildings on the Site (Kneller Hall, Guard Room and Band Practice Hall) and demolishing the majority of the ad-hoc modern buildings on the Site. This will facilitate the delivery of new purpose-built facilities associated with the proposed educational use of the Site.

The eastern part of the Site is located within Metropolitan Open Land (MOL). It is proposed to demolish all existing buildings and hardstanding within this allocation. The MOL land will be used for sports pitches and a new sporting pavilion is proposed, to support the continued use of the land for sports and recreation. Paragraph 149 of the NPPF confirms that development associated with the provision of appropriate facilities for outdoor sport and outdoor recreation, is exceptional development that is not inappropriate. The

proposed pavilion, which is also proposed to be positioned where there is an existing sports hall facility, is considered to be an appropriate form of development in the MOL.

The Site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020). The suggested land uses within this document have been taken into consideration in the masterplan development, namely the Habitat Corridor along the northern part of the Site, consolidating the built development in the MOL and securing a use which is viable for Kneller Hall's long-term occupation. Within the MOL allocation, a multifunctional green space is proposed for pupils to use, this includes the provision of playing fields and sports pitches, that managed access for local schools and community groups will be provided to. The SPD also proposes that the western part of the Site is developed for residential uses. However, as a result of the site constraints, there is not capacity at the Site to deliver residential accommodation as well as the required school facilities. As such, the entire Site is proposed to be delivered as a day school, with managed access opportunities secured as part of the planning application for local community groups and local schools.

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

The Site has no statutory ecology designations, however the Site's SPD states that a habitat corridor should be created to support a net gain in ecological value.

There is one statutory designated site for nature conservation value within 2 km of the Site. This is the Hounslow Heath Local Nature Reserve (LNR), which is located approximately 1.8 km to the west of the Site. 18 non-statutory sites are located within the 2 km search radius of the Site. The closest of these is the Duke of Northumberland's River north of Kneller Road Site of Importance for Nature Conservation (SINC), located approximately 150m to the east of the Site. A Preliminary Ecological Appraisal undertaken by RPS (February 2022) advises that no negative impact of the proposed development on these sites is anticipated due to the distance and the urban nature of the intervening habitats. The Appraisal advises that the habitats on the Site are largely of low ecological value and are common within the wider landscape. Notwithstanding this, it is recommended that a botanical survey be carried out, at the correct time of year, when species are flowering.

A Preliminary Ecological Appraisal has been submitted to support the pre- application discussions and further ecology surveys are being undertaken in advance of the submission of the full planning application. The full planning application will be accompanied by a Ecological Enhancement Strategy and with details associated with Biodiversity Net Gain and the Urban Greening Factor.

Trees within the Site are covered by the site-wide TPO, and the north east corner of the Site is Deciduous Woodland identified as Priority Habitat Inventory by Natural England. The vast majority of trees will be retained across the Site and no development is proposed in the north east corner of the Site. It will be necessary for circa 12 to be removed (11 trees and 1 hedge), as a result of the poor condition of some existing trees and also to facilitate the development proposals. The trees that will be removed will be Category B or lower trees. No trees in the area designated as Deciduous Woodland will be removed unless they require removal because of their condition.

The proposed landscaping strategy will help ensure that pathways are positioned to steer

people away from root protection areas and to ensure that there is sufficient space and soft landscaping around retained trees, and in particular Category A trees. In addition, appropriate tree protection measures will be implemented during the construction phase. A tree survey and Arboricultural Statement has been submitted to the LBRuT as part of the pre-application discussions and the tree consultant is further working with the project team on a replacement tree planting strategy and landscaping scheme. A tree survey, Arboricultural Impact Assessment and Arboricultural Method Statement shall accompany the full planning application.

A drainage strategy, utilising SuDS, will also ensure that the development restricts the discharge, aiming to achieve 'greenfield' run-off, before discharging to the existing surface water sewer.

There are no agricultural, fisheries, tourism or minerals resources that could be affected by the proposed development.

(c) the absorption capacity of the natural environment, paying particular attention to the following areas—(i) wetlands, riparian areas, river mouths; (ii) coastal zones and the marine environment; (iii) mountain and forest areas; (iv) nature reserves and parks; (v) European sites and other areas classified or protected under national legislation; (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; (vii) densely populated areas; (viii) landscapes and sites of historical, cultural or archaeological significance.

The Site is not located within any sensitive areas, within the meaning of the EIA Regulations and there are no statutory designations within the Site i.e. there are no Scheduled Monuments, AONB, SSSI, National Parks, Registered Battlefields, Registered Historic Parks and Gardens, SAC, SPA, or Ramsar Sites.

The nearest "sensitive area", as defined by the EIA Regulations is the Scheduled Monument 'London's Early Porcelain Industries: The Isleworth Pottery', situated approximately 2.2km north east of the Site. Following which, Syon Park SSSI is also located approximately 2.7km to the north east of the Site.

The Site is located within an SSSI Impact Risk Zone. The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site, which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The nearest SSSI is the aforementioned Syon Park SSSI.

Each of the criteria (i) to (viii) have been considered in relation to the Site:

- (i) Not applicable as the Site is not proximate to any wetlands, riparian areas and river mouths.
- (ii) Not applicable as the Site is not proximate to any coastal or marine environments.
- (iii) Not applicable as the Site is not proximate to any mountain or forest areas.
- (iv) As stated under b) above, there are number of non-statutory designated sites for nature conservation value within 2 km of the Site. The Preliminary Ecological Appraisal undertaken by RPS (February 2022) advises that no negative impact of the proposed development on these sites is anticipated due to the distance and

- the urban nature of the intervening habitats.
- (v) Not applicable. The nearest SSSI is the Syon Park SSSI, which is located approximately 2.7km to the north east of the Site.
 - (vi) The Site is located in an urban area, in close proximity to Chertsey Road (A316; dual carriageway). It is necessary to take account of air quality levels and to assess the vehicle movements that will be generated by the scheme. An Air Quality Assessment will accompany the full planning application. The advice from the air quality consultant will be factored into design decisions on mechanical and/ or natural ventilation for the proposed school.
 - (vii) The Site is located outside of a designated Town Centre, and located in a residential area characterised by houses. It is considered to be located in a medium density populated area in outer London. No significant impacts on human populations are likely and the planning application will be supported by the relevant technical reports.
 - (viii) There are two statutory listed heritage assets on the Site, and both are Grade II – Kneller Hall (and the curtilage listed buildings) and the listed wall that edges part of the Site. The Site is not within a Conservation Area. A Heritage Assessment will accompany the full planning application and engagement with heritage officers is taking place as part of the ore- application discussions. Part of the application Site is also within the MOL and an Open Space Assessment shall accompany the Planning Statement.

Where designations have been identified above, it is considered that they are sufficiently distant from the Site and / or appropriate mitigation measures are in place, and therefore significant effects upon them are not anticipated.

No other designations of relevance have been identified.

3. CHARACTERISTICS OF THE POTENTIAL IMPACT

(a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)

On the basis of the comments above, it is unlikely that there will be any significant environmental impacts arising from the proposed development. The potential impact of the development is confined to the Site and the land immediately adjacent.

The specialist reports that will accompany the full planning application will assess the impact of the development and set out the mitigation measures that will be implemented to ensure that the development is appropriate. The potential development impacts, relating to transport, air quality, drainage, energy, biodiversity and noise are all typical for an urban development project of this nature.

The proposed development will not result in the loss of any heritage assets and minor alterations to Kneller Hall will be proposed to meet the operational requirements of the school. A single storey extension is proposed to the Band Practice Hall and an existing low quality and modern addition to Kneller Hall will be replaced with a high quality single storey extension. Both these extensions will be designed to a high quality, to preserve the host building's heritage significance. In addition, significant investment will be made by the Applicant into the restoration and ongoing management of Kneller Hall to ensure that it is protected and preserved both now and in the future. The potential heritage impact to the setting of listed buildings will be assessed as part of the full application, and any impact identified considered on balance in the context of the wider scheme and its benefits. A Desk

Based Archaeological Statement shall be submitted with the application and any additional works required can be secured via Conditions, to ensure that there is not an archaeological impact, as a result of the proposed development and the excavations proposed.

The proposed development seeks to deliver the new buildings, with the exception of the sports pavilion, outside of the MOL designation and to remove the existing piecemeal development in the MOL. This will help improve the openness of the MOL and the views to Kneller Hall across the open space. Whilst outside sports pitches and playground areas for pupils will be positioned within the MOL, these uses are considered compatible with the MOL designation, and how this land has historically been used.

The proposed development will result in the loss of circa 12 trees on the western part of the Site. Whilst this is regrettable, it is considered that through an extensive replacement tree planting scheme and wider landscaping strategy, that the loss of trees can be mitigated. Advice from the tree consultant is that the trees on the Site have been historically poorly kept and maintained. Through the delivery of a site wide landscape strategy, a comprehensive strategy can be delivered that meets the schools needs, whilst also ensuring that existing trees that will be retained are protected and maintained and that replacement trees are appropriately positioned.

The proposed development will be visible from certain locations in the surrounding area. Contextual visuals will accompany the full planning application to enable these to be assessed. Tree planting across the Site will help screen parts of the Site from the surrounding roads.

The location of the Site is such that there are very limited potential impacts on sensitive locations, as defined by the Regulations.

(b) The nature of the impact

At both the construction and operational phase the potential impacts of the development are expected to be limited to heritage, transport, air quality, energy, trees, drainage, lighting, biodiversity and noise.

The scheme is being carefully designed, with input from a range of technical consultants, to ensure that there is not an adverse impact on existing or new local residents, in the immediate surrounding area during both the construction and also the operational phase. The design is also being progressed, with regard to the development’s potential heritage impact and retention of the existing trees on Site.

The scheme will result in a net biodiversity gain in comparison to the existing use of the Site. The development has been registered for BREEAM and the new build accommodation will be targeting BREEAM ‘Excellent’. As set out above, the application will seek to retain existing trees where possible and will provide replacement tree planting to mitigate the loss of trees. The full planning application will be supported by an Arboricultural Impact Assessment and Arboricultural Method Statement.

Air quality and noise associated with the construction phase will be appropriately managed via the CEMP. A noise impact assessment will also be submitted with the application to demonstrate there will be an acceptable noise level at the closest sensitive receptors.

The overall impacts of the development are considered to be limited.

(c) The transboundary nature of the impact

Not applicable. There will be no transboundary impact, as the impact of the development will be contained to the Site and mitigation measures will ensure that there is not a wider impact to the development proposals, that exceed what is expected for an urban development project like this.

The use of the proposed sports pitches, by both the school and local community groups and schools will be managed appropriately, both within and outside of school hours.

The opportunity to provide managed access to some of the on site facilities for local schools and community groups, provides a potential transboundary benefit of the proposed development.

(d) The intensity and complexity of the impact

The potential impacts are typical of an urban development project such as this and do not raise any unusually intense or complex issues.

The Site is located in an urban environment, where it is not uncharacteristic for sites to be redeveloped, for higher density development.

The Site currently includes buildings and facilities associated with education use (Military Music of School) and the proposed development will continue to provide an education use on the Site, with the removal of the ancillary residential uses and the introduction of improved and additional sporting facilities.

(e) The probability of the impact

The likely limited impacts will occur if the development proceeds. These impacts will be appropriately managed and mitigated via Conditions and legal obligations attached to the future grant of planning permission.

(f) The expected onset, duration, frequency and reversibility of the impact

Construction impacts will be controlled by a Construction Management Plan / Construction Logistics Plan. At this stage, the onset and duration of the construction phase is not known.

Construction is currently expected to be in 3 phases. With the conversion of the existing buildings and sports pavilion being delivered as Phase 1. Following the completion of Phase 1, pupils will move on to the Site. Phase 2 will comprise of the construction of the 3 storey teaching building. Phase 3 will be the delivery of the indoor sports facilities. Each phase will come forward with ancillary works relevant to that part of the development, for example the landscaping, parking and access arrangements. Further details of the phasing of the scheme will be submitted with the full planning application.

Construction work will take place on the days and hours permitted by LBRuT, with noisy works not taking place outside these times. The impacts of the construction phase will be short term only and will not continue once the development is complete. Once pupils move on to the Site, the construction works will also have to be managed around the active school use, to ensure that pupil's learning environment is not impacted by the works.

Likely operational impacts will be limited and mitigated via Conditions and legal obligations attached to the future grant of planning permission.

(g) The cumulation of the impact with the impact of other existing and/or approved development

As discussed above, there are not considered to be any nearby planning applications, within close proximity to the Site which would contribute to cumulative impacts. If another major development is determined close to the Site, then it is considered that this can be appropriately managed via the CEMP and Construction Logistics Plan.

(h) The possibility of effectively reducing the impact

Appropriate mitigation measures can be secured via Conditions and legal obligations attached to the future grant of planning permission.

The specialist reports that will accompany the full planning application will set out in full the mitigation measures.

The Applicant will continue to monitor the planning status of neighbouring developments and, for those sites where developments are proposed, monitor their construction programme.

4.0 CONCLUSION

- 4.1 This screening assessment has considered whether the proposed development at Kneller Hall is likely to give rise to significant effects on the environment.
- 4.2 The proposed development falls within column 2 of Schedule 2, 10 (b) of the EIA Regulations as it is an urban development project on a site over 5 hectares. The Site is not located within a sensitive area as defined by the EIA Regulations.
- 4.3 Whilst not located in a sensitive area as defined by the EIA Regulations, the Site comprises of two Grade II listed heritage assets (Kneller Hall and the curtilage listed buildings and part of the boundary wall and four Gatepiers). Icení Projects Heritage have been appointed to advise on heritage matters and to prepare a Heritage Statement, which will accompany the planning application. Engagement with heritage officers is also taking place as part of the pre- application discussions and a Pre- Application Heritage Statement has been submitted to support the pre-application discussions.
- 4.4 The eastern part of the application Site also falls within Metropolitan Open Land. The project masterplan has sought to position development outside of this designation, with the exception of the sports pavilion. The full planning application will be accompanied by an Open Space Assessment and by contextual visuals of the Site and development proposals.
- 4.5 Furthermore, the Site contains Deciduous Woodland, identified as Priority Habitat in the north east corner of the Site. There are also a significant number of on-site trees which are protected by a Tree Preservation Order (TPO). It will be necessary for some trees to be removed at the Site, however replacement tree planting is proposed and no Category A trees will be lost. The proposal will also ensure that soft landscaping around trees is provided, which in some locations will be an improvement on the existing situation, to better protect and enhance retained trees. The Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement, that shall accompany the full planning application, shall assess the removal of trees on the Site and the protection measures. Further ecology surveys will be undertaken in advance of the submission of the full planning application, and an Ecological Enhancement Strategy will also accompany the submission.
- 4.6 It is considered that Heritage, Open Space, Ecology and Arboricultural matters can be fully assessed by LBRuT as part of the full planning application and with the supporting technical documents that will accompany the application.

- 4.7 The screening assessment has identified that significant effects on the environment are not considered likely either alone or in combination with other developments. The proposals would be of a sufficiently limited scale, in an urban location and on an existing developed site, that effects could be assessed via the full planning application and managed in accordance with standard methods, including planning conditions and a S106 legal agreement. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations.
- 4.8 Pre- application engagement is ongoing with the LBRuT and therefore there may be further revisions to the indicative masterplan submitted with this screening opinion. The submitted masterplan should be considered as indicative only by the LBRuT in their assessment. Provided that the overall principle of the development remains the same and the floorspace and building footprints do not change significantly, from the indicative masterplan, then it is considered that the screening opinion shall remain applicable.
- 4.9 The design of the proposed development is being informed by the following, all of which will be submitted with the full planning application and listed building consent:
- Design and Access Statement;
 - Site-wide Masterplan;
 - Planning Statement (including and Draft Heads of Terms);
 - Open Space Assessment;
 - Playing fields and sport facilities assessment;
 - Community Engagement Report;
 - Transport Assessment including parking surveys, parking layouts and access and movements strategy;
 - Draft School Travel Plan;
 - Framework Construction Management Plan / Construction Logistics Plan;
 - Delivery and Servicing Plan;
 - Energy Report
 - Whole Life Carbon Emissions and Circular Economy Statement;

- Sustainability Statement including BREEAM Pre- Assessments and Sustainable Construction Checklist;
- Arboricultural Survey, Arboricultural Impact Assessment and Arboricultural Method Statement;
- Green Infrastructure Strategy;
- Waste Management Plan;
- Landscaping scheme;
- Preliminary Ecological Appraisal and ecological enhancement statement;
- External Lighting Details;
- Details of Green/ Brown Roofs;
- Heritage Assessment;
- Structural Report of Listed Building;
- Desk Based Archaeological Statement;
- Acoustic Assessment and/or an Acoustic Design Statement;
- Air Quality Assessment;
- Odour Assessment;
- Daylight/Sunlight Assessment;
- Fire Statement and Strategy;
- Health Impact Assessment;
- Flood Risk Assessment;
- Drainage Strategy including London Sustainable Drainage Proforma, Statement of Surface Water Drainage Systems, Foul Water Drainage and Utilities Assessment; and
- Contamination Desk Study and Preliminary Site Assessment Report.