

**BY EMAIL AND POST: npcu@communities.gsi.gov.uk**

National Planning Casework Unit  
5 St Philips Place  
Colmore Row  
Birmingham  
B3 2PW

25615/A5/Screening

10<sup>th</sup> May 2017

Dear Sir / Madam,

**FORMER IMPERIAL COLLEGE PRIVATE GROUND, TEDDINGTON**

**REQUEST FOR SCREENING DIRECTION OF THE SECRETARY OF STATE UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011, AS AMENDED**

This letter requests that the Secretary of State adopts an EIA Screening Direction for the proposed redevelopment of the above site as the Local Planning Authority, Royal Borough of Richmond-upon-Thames (RBR), has adopted the opinion that the proposals constitute EIA development (letter dated 28th April 2017; see Appendix A). The proposed development comprises up to 130 extra care units, communal facilities, car park, GP surgery, playing pitches, conversion of existing pavilion, new clubhouse and a public park on Former Imperial College Private Ground, Teddington.

This letter makes representations on behalf of the Applicant, Quantum Group, and sets out why it is considered that EIA is not required. As per the provisions of Regulation 6 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2011*, as amended, (the "EIA Regulations") this submission is accompanied by the Screening request submitted to RBR which contains a description of the proposed development and site plan (Appendix B). The Screening Report includes an overview of the likely significant effects (or otherwise) of the proposed development using a 'Screening Checklist' that reflects the requirements of Schedule 3 of the EIA Regulations.

The Applicant is of the view that, whilst the site area is 5.2 hectares (ha) it only just exceeds the 5ha mandatory screening threshold under Schedule 2, 10, b) of the EIA Regulations and of the total site area, only 3 acres (1.2 ha) is proposed for up to 130 extra care apartments. Whilst the request for a Screening Opinion issued to RBR was for up to 130 units, the scheme has evolved and is now 113 units, of which 8 would be within the converted pavilion. The remainder of the site would be gifted to Teddington Community Sports Ground CIC for publicly accessible sport, leisure and community facilities including a GP surgery and creche, the conversion of the existing sports pavilion and a public park. From the 1920s until its acquisition by the Applicant in 2015, the site has been a private playing field used by educational institutions with access granted occasionally and on a temporary basis to a small number of selective groups. It is not therefore public open space, although the proposals will make it so. The site is not located within a sensitive area as defined by the EIA Regulations and given the developed urban context, is unlikely to give rise to significant effects on the environment.



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RBR's conclusion on the final page of their Screening Opinion for the proposals states that:

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

The summary relating to characteristics of impact (also on the final page of the Screening Opinion) states that:

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

RBR's Screening Opinion also states that cumulative effects could be significant with other approved developments in the area.

The Applicant makes the following rebuttal to the adopted Screening Opinion, taking each of the key points in turn:

### *1. Scale and Massing and relationship with the surrounding development*

The development would be up to four storeys above ground level (approximately 25m Above Ordnance Datum). The surrounding buildings are predominantly two-storey residential dwellings with accommodation in the roof. Some are three storeys and the development would be the same height as Fullerton Court and buildings along the High Street. The site is contained by mature trees and fencing which limit views into the site. The majority of the site would remain undeveloped by buildings. An increase in height compared to surrounding buildings does not automatically mean that the proposal would lead to likely significant effects on the environment. The site is not located within, or in close proximity to, a sensitive area as defined by the EIA Regulations (such as a Scheduled Monument or Area of Outstanding Natural Beauty), which would have a lower threshold for significant effects. The site is located in a dense, urban location and the proposed buildings are not high-rise. A townscape and visual impact assessment will be submitted with the planning application which will address local and, where appropriate, long distance views. Significant effects are not anticipated and therefore EIA is not considered necessary on this basis.

### *2. Impact on Traffic*

The construction phases of the proposed development would involve changes to traffic movements (e.g. use of HGVs). Such effects would be temporary and could be mitigated through standard methods. A Construction Traffic Management Statement would be submitted with the planning application setting out the proposed management arrangements to minimise disturbance.

Operational traffic phase movements would be associated with up to 130 extra care units, GP surgery, new clubhouse and creche, plus people accessing the park and playing pitches.

The nature of age restricted extra care accommodation means residents typically need personal care in their own homes. Both their ability to use vehicles and their reliance on driving for transport is considerably reduced. This is reflected in the parking standards which require only 0.5 spaces per residential unit.

The shift patterns for staff at the site can also be controlled such that change over does not occur during sensitive hours of the day. Car and cycle parking will be provided on site in line with Appendix 4 of the London Borough of Richmond upon Thames – Adopted Development Management Plan. The GP surgery and creche is likely to be used by those living and working on site and living within the dense residential area surrounding it. Therefore, there are likely to be a high proportion of trips from outside the site made on foot.

A Transport Assessment would be submitted in support of the forthcoming planning application. Significant effects are not anticipated and therefore EIA is not considered necessary on this basis.

### *3. Impact on Ecology*

The site is predominantly amenity grassland, a pavilion building and some areas of hardstanding. Mature trees are located along the site boundaries. As stated in the screening report submitted in support of the request for the Screening Opinion from RBR (Appendix B) an ecological appraisal was conducted on site in March 2016 which confirmed that the site contained hardstanding, tall ruderal vegetation and surrounding hedgerows. Overall, the site was considered to have low ecological value. The pavilion building has bat potential and small areas of suitable reptile habitat were identified in scrub on the eastern site boundary. Protected species surveys would be taken in support of the planning application. Should bats or reptiles be found, a suitable mitigation strategy could be accommodated within the planning application using best practice methods and secured through a planning condition. Significant effects are not anticipated and therefore EIA is not considered necessary on this basis.

In order to benefit ecology, landscaping will include the following:

- Consistent, locally appropriate treatment of railings and native species hedge to all roadside boundaries
- Additional tree planting (including native and climate-change resistant species) along boundaries and within areas of open space;
- Biodiversity enhancements to include native hedgerow, wildflower grassland and a wildlife pond, in addition to tree/hedge planting; and
- Green/brown roofs to proposed buildings.

### *4. Impact on Residents*

The site is currently a private playing field hired on an adhoc basis to local sports clubs. The proposals include providing a publicly accessible park and playing pitches over the majority of the site, leisure and community facilities within a new clubhouse plus a GP surgery that would be of benefit to local residents. Up to 130 extra care apartments would not lead to significant levels of noise or disturbance that would have a significant effect on nearby residents. The residential use would assimilate well in the dense residential surroundings.

The site is not located in a remote area that would be expected to be dark at night. There is dense residential development and streetlighting in the surrounding area. The extra care apartments would be expected to have blinds/curtains drawn at night as would the neighbouring residential properties. It is proposed that the sports pitches will be lit following completion of the development however there are currently mobile lights in use on the pitches so there would not be a material change from the baseline conditions. Lighting would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP) (2011) Guidance Notes for the Reduction of Obtrusive Light. The site is bounded by mature vegetation and fencing that would limit light spill outside the site. Likely significant effects are not anticipated and therefore EIA is not considered necessary on this basis.

The Planning Practice Guidance Annex<sup>1</sup> includes indicative criteria to consider when screening Schedule 2, 10, b) development. Key considerations are the scale of development and potential increases in traffic, emissions and noise. Such effects are not anticipated to be significant, as discussed above.

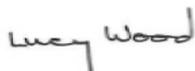
### 5. Cumulative Effects

RBR's Screening Opinion (Appendix A) mentions three additional developments that were not mentioned in the request for a Screening Opinion (Appendix B). The only one of these that proposes new major built development is Television Studios, Broom Road, Teddington (application ref. 14/0914/FUL) for 213 flats plus 4 houses and associated development. Given the justification above for lack of effects on transport and socio-economics, particularly in light of the proposed provision of community facilities, a GP and creche on site, it is not considered that there would be significant adverse cumulative effects that warrant assessment through EIA with this additional scheme.

In conclusion, the site is small in area, just exceeding the threshold for mandatory screening and not within or nearby a sensitive area as defined by the EIA Regulations. The quantum of extra apartments proposed (up to 130) also falls below the screening threshold of 150 residential units, above which EIA may be more likely to be required. The majority of the site would be gifted to Teddington Community Sports Ground CIC for publicly accessible sport, leisure and community facilities. Construction effects could be controlled through standard mitigation measures implemented through a CEMP. Operational effects from the 130 extra care apartments, GP surgery creche, park and sports facilities are not considered to be significant given the dense residential location, low environmental sensitivity of the site and proposed uses. Cumulative effects are also not expected to be significant. As explained above, whilst the request for a Screening Opinion issued to RBR was for up to 130 units, the scheme has evolved and is now 113 units, of which 8 would be within the clubhouse.

I trust the accompanying submission is sufficient to register the request for a Screening Direction. However, please do not hesitate to contact me should you require any further information. I confirm that a copy of this request has been sent to RBR in accordance with Regulation 6 (2) of the EIA Regulations.

Yours faithfully,



**LUCY WOOD**

Director - Environmental Planning

Enc. Appendix A – EIA Screening Opinion from RBR  
Appendix B – Request for EIA Screening Opinion

cc. Sam Hobson, Quantum Group  
Robin Meakins, Hannah Leary, Hannah Bedding – Barton Willmore  
Robert Angus – London Borough of Richmond Upon Thames

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<sup>1</sup> PPG Paragraph: 057 Reference ID: 4-057-20140306

**APPENDIX A**  
**EIA SCREENING OPINION FROM RBR**



28 April 2017

Dear Lucy Wood

**Re: FORMER IMPERIAL COLLEGE PRIVATE GROUND**

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

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

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

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

Yours sincerely

  
**Robert Angus**  
Head of Development Management

**LONDON BOROUGH OF RICHMOND UPON THAMES**

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

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

**PROPOSED DEVELOPMENT:**

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

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

**Preamble:**

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

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

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

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

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

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

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

Sites which have not previously been intensely developed:

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

Further, the NPPG advise:

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

Key issues to consider include:

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

## **1. Characteristics of development**

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

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

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

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

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

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

## **2. Location of development**

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Conclusion**

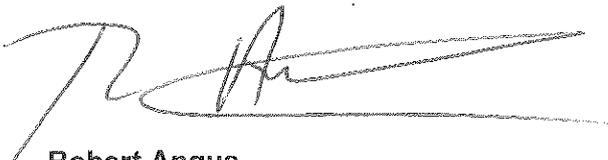
For the reasons above and having completed the screening exercise, the LPA considers that the 'Proposed Development', by virtue of its nature, size and location, would be likely to have significant effects on the environment and that the Proposed Development does require an Environmental Impact Assessment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

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

**Decision: Positive Screening Opinion**

**Date of opinion: 28 April 2017**

Yours sincerely

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

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

**APPENDIX B**  
**REQUEST FOR EIA SCREENING OPINION**



Development Management  
Royal Borough of Richmond Upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

Our Ref: 25615/A5/EIAScreening  
10<sup>th</sup> April 2017

Dear Sir/Madam,

**RE: FORMER IMPERIAL COLLEGE PRIVATE GROUND**

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

We write on behalf of Quantum Group, to request an Environmental Impact Assessment (EIA) Screening Opinion in accordance with Regulation 5 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2011*, as amended<sup>1</sup>, from the Royal Borough of Richmond Upon Thames (RBR) with regard to the proposed development of up to 130 retirement living homes, communal facilities, car park, GP surgery, playing pitches, conversion of existing pavilion, new clubhouse and a public park on Former Imperial College Private Ground.

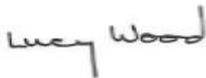
The attached EIA Screening Report includes a Screening Checklist that reflects the requirements of the EIA Regulations. The Screening Checklist contains a comprehensive review of the likely significant effects of the proposals on the environment and should be read in conjunction with the main body of the report.

In accordance with Regulation 5 of the EIA Regulations, the report also contains:

- a plan sufficient to identify the land; and
- a brief description of the nature and purpose of the development and of its possible effects on the environment.

We look forward to receiving your response within the statutory timeframe as set out in the EIA Regulations and if you have any queries in the meantime, please don't hesitate to contact me.

Yours sincerely



**LUCY WOOD**

Director – Environmental Planning

Encl. EIA Screening Report

<sup>1</sup> SI 2011/1824 as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 (No. 660)



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# Former Imperial College Private Ground

## Environmental Impact Assessment Screening Report

April 2017



Commitment to  
Excellence in EIA



# Former Imperial College Private Ground

## Environmental Impact Assessment Screening Report

Prepared on behalf of Quantum Group

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## APPENDICES

APPENDIX 1:      SITE LOCATION PLAN



## 1.0 INTRODUCTION

- 1.1 This report has been prepared by Barton Willmore, Institute of Environmental Management and Assessment (IEMA) qualified assessors and Environmental Impact Assessment (EIA) Quality Mark registrants, on behalf of Quantum Group. The report accompanies a request to the Royal Borough of Richmond upon Thames (RBR) to adopt a screening opinion to determine whether the proposed development of up to 130 retirement living homes with associated communal facilities and parking, GP surgery, playing pitches, new clubhouse with community facilities, crèche and play area and a public park on the Former Imperial College Private Ground at Udney Park Road, constitutes EIA development.
- 1.2 This report reflects the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011<sup>1</sup> (the "EIA Regulations") and in accordance with Regulation 5 of the EIA Regulations, this report contains:
- A plan sufficient to identify the land;
  - A brief description of the nature and purpose of the development and of its possible effects on the environment; and
  - Other information the applicant wishes to provide.

### Requirement for EIA

- 1.3 In order to determine whether the proposed development is 'EIA development', regard must be had for the EIA Regulations and supporting Planning Practice Guidance (PPG)<sup>2</sup>.
- 1.4 EIA development is defined by the EIA Regulations as development:
- "likely to have significant effects on the environment by virtue of factors such as its nature, size or location".*
- 1.5 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.
- 1.6 In deciding whether a Schedule 2 development is EIA development, Regulation 4(6) states:

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<sup>1</sup> SI 2011/1824 as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 (No. 660)

<sup>2</sup> DCLG, 2015, online access: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/>

*"Where a local planning authority ... has to decide under these Regulations whether Schedule 2 development is EIA development ... the authority ... shall take into account in making that decision such of the selection criteria set out in Schedule 3 as are relevant to the development."*

- 1.7 In order to allow RBR 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 the PPG, a completed EIA Screening Checklist, and a site location plan at Appendix 1.

## 2.0 SITE AND PROPOSED DEVELOPMENT

### Site Context

- 2.1 The site (see Appendix 1) is located within RBR, approximately 2km to the south of Twickenham and 2km to the north east of Kingston-Upon-Thames.
- 2.2 Residential development is located on the southern, western and eastern boundaries of the site, along Cromwell Road, Udney Park Road and Kingston Lane, respectively. As well as residential dwellings, Fullerton Court is located to the north of the site which is a retirement facility for the elderly. Residential development is located further north along with Teddington's High Street. Udney Hall Gardens and a sports ground is located to the east of the site with the River Thames located beyond. Residential development and Collis Primary School are located further south of the site along with the South West Trains railway line servicing Twickenham and providing connections to London Waterloo and Shepperton. Bushy Park, the second largest of London's Royal Parks, is located approximately 360m to the south of the site, beyond the B358.

### Site Description

- 2.3 The site extends to approximately 5.2 hectares (ha) and is an area of private grounds leased out to local sports clubs on an ad hoc basis. Tennis courts are located in the south western corner of the site and other sports pitches (including rugby and cricket pitches) make up the remainder of the athletics ground. A pavilion is located on the western boundary of the site.

### Proposed Development

- 2.4 The proposed development comprises the following:
- Up to 130 extra care retirement homes (mix of 1,2 and 3 beds);
  - Communal facilities;
  - Underground car park (approximately 80 spaces);
  - GP Surgery (including approximately 20 car parking spaces);
  - Conversion of the existing two storey pavilion on site to assisted living accommodation with parking;
  - A new clubhouse with community facilities, crèche and play area;
  - A new 3G playing pitch;
  - A multi-use games area (MUGA) pitch to replace existing
  - Assorted grass pitches; and

- A new public park.

2.5 The development will rise to a maximum of four storeys above ground (approximately 25m Above Ordnance Datum).

## 3.0 SCREENING ASSESSMENT

### Introduction

- 3.1 In determining whether the 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 Planning Practice Guidance (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;
  - 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 falls within category 10 of Schedule 2, 'Infrastructure Projects', sub-section (b) 'Urban Development' Projects. The site is not located in a sensitive area and therefore the thresholds should be applied. The thresholds for urban development projects as set out in Schedule 2 relate to developments that "*include more than 150 dwellings or the overall area of the development exceeds 5 hectares*". The proposed development does not exceed 150 units however the area of development exceeds 5ha. Accordingly, this screening assessment has been prepared to determine whether the proposed development would be likely to result in significant environmental effects. In order to achieve this, Schedule 3 of the EIA Regulations and the Planning Practice Guidance need to be taken into account. Information on these are set out below.

### Schedule 3

- 3.8 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 should be taken into account as part of the screening process and are set out below:

Characteristics:

- The size of the development;
- The cumulation with other development;
- The use of natural resources;
- The production of waste;
- Pollution and nuisances; and
- The risk of accidents, having regard in particular to substances or technologies used.

Location:

- The existing land use;
- The relative abundance, quality and regenerative capacity of natural resources in the area; and
- The absorption capacity of the natural environment.

## Potential Impact:

- The extent of the impact (geographical area and size of the affected population);
- The transfrontier nature of the impact;
- The magnitude and complexity of the impact;
- The probability of the impact; and
- The duration, frequency and reversibility of the impact.

### Consideration of Cumulative Effects

3.9 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG:

*"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."*

3.10 Table 1 identifies the committed developments to be included within a consideration of cumulative effects. The developments included below are yet to be approved by RBR and therefore do not constitute an 'existing or approved development' as defined in the PPG. However, they may become approved in the application's determination period so have been listed here and included under a consideration of cumulative effects.

**Table 1: Committed Developments**

Scheme	Description	Distance from Site	Status
2 High Street, Teddington (Ref. 16/2647/FUL)	Demolition of the existing office (B1a) building (395 sq.m) and the erection of a part six / five-storey mixed-use building with a ground floor office / commercial unit (300 sq.m) and 22 (11 x 1 and 11 x 2 bed) affordable 'shared ownership' apartments above with 10 car parking provided at basement level including associated works.	Approx. 430m to the north west of the site	Pending consideration
St Michaels Convent, 56 Ham Common (Ref. 16/3552/FUL)	Conversion and extension of the existing convent buildings (following demolition of some mid-20th century extensions), together with new build apartments and houses, to provide a	Approx. 1.7km to the north east of the site	Pending consideration

Scheme	Description	Distance from Site	Status
	total of 23 residential retirement units, an estate managers office and meeting rooms, parking and associated works within a landscaped site, with access via Ham Common.		
63 – 71 High Street, Hampton Hill (Ref. 16/4553/FUL)	Demolition of existing buildings on site and erection of a group of part three, part four storey buildings around outer and inner landscaped courts comprising 8 townhouses and 31 apartments and two non-residential units on the High Street frontage (102.5m <sup>2</sup> GIA) and (131.5m <sup>2</sup> GIA) for use as A1(retail: non-food) and/or A3 (cafe) and/or B1 (offices) and/or D1 (clinics / creche / non-residential education and training centre) together with the formation of a basement to provide ancillary car parking (45 spaces) cycle storage (65 spaces) refuse storage rooms and plant rooms.	Approx. 2km to the west of the site	Pending consideration
Twickenham Railway Station, London Road (Ref. 10/3465/FUL)	Detailed application for the demolition of existing station building and access gantries to the platforms and redevelopment to provide; a podium across the existing railway lines; a new station concourse with stair and lifts to platform level; three buildings ranging in height between 8 storeys and 3 storeys comprising 165 residential units, 734 sqm of flexible Use Class A1 (shops), A2 (financial and professional services), A3 (restaurant and café) and D2 (leisure) floorspace, plant space including a combined heat and power plant, and green roofs; sustainable transport facilities to include a taxi rank, kiss and ride and car club spaces, 35 commuter car parking spaces (including disabled spaces), residents disabled spaces, delivery and servicing spaces, electric car charging points, 250 cycle spaces for commuters and 208 cycle spaces for residents; provision of a new station plaza, river walkway including children's playspace, soft and hard landscaping; and off site highway works to include the relocation of the existing bus stop.	Approx. 2.7km to the north of the site.	Pending consideration
Police Station 60-68 Station Road, Hampton (Ref. 16/0606/FUL)	Full application for the retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bedroom, 12 x 2 bedroom, 10	Approx. 2.8km to the south west of the site	Pending consideration

Scheme	Description	Distance from Site	Status
	x 3 bedroom and 2 x 4 bedroom) and associated access, servicing, cycle parking and landscaping (The proposal has been amended to include setting back the top floor away from the eastern boundary of the site; roof design on Plots 24 to 28 amended; and amendments to unit mix).		

### Planning Practice Guidance

- 3.11 Paragraphs 057 and 058 of PPG provide 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 2 below sets out indicative criteria and thresholds identified in the PPG along with some of the issues that are most likely to need to be considered in determining the whether a development is likely to be EIA development.

**Table 2: Planning Practice Guidance Indicative Screening Criteria**

Development type	Indicative criteria and threshold	Key issues to consider
(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: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m <sup>2</sup> of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).	Physical scale of such developments, potential increase in traffic, emissions and noise.

- 3.12 Table 3 sets out a review of all off the above criteria and requirements and specifically addresses the proposed development at the site.

**Table 3: Screening Assessment for Development on Former Imperial College Private Ground**

SCREENING CRITERIA	PROPOSED DEVELOPMENT
<b>1. CHARACTERISTICS OF THE DEVELOPMENT</b>	
<b>(a) Size of the development</b>	
Will the development be out of scale with the existing environment?	The site is currently private land, leased on an ad hoc basis to local sports clubs. The proposed development would provide up to 130 extra care retirement homes in close proximity to Fullerton Court, an existing extra care facility for the elderly. Also proposed are community and communal facilities, a GP surgery,

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	underground car park, conversion of the existing pavilion, sports pitches, new clubhouse (including a crèche and a play area) and a park. 3.8ha of the site will be gifted to the community for inclusive recreational and sporting use as per the existing use. In light of this context, the development would not be out of context with existing environment.
Will it lead to further consequential development or works?	No. The proposed development is a discrete proposal and includes all necessary works, including access. A Community Interest Company has been formed to receive the gift of 3.8ha. This is an independent company run by local people with the land held as an asset lock, meaning it must remain in public ownership in perpetuity.
<b>(b) Accumulation with other development</b>	
Are there potential cumulative impacts with other existing development or development not yet begun but for which planning permission exists?	<p>The following schemes have been included in a consideration of cumulative effects despite not receiving planning approval yet. It is considered that the schemes below could be granted planning permission within the determination period of the application so have been included under a consideration of cumulative effects.</p> <ul style="list-style-type: none"> <li>• 2 High Street, Teddington (Ref. 16/2647/FUL);</li> <li>• St Michael's Convent, 56 Ham Common (Ref. 16/3552/FUL);</li> <li>• 63 – 71 High Street, Hampton Hill (Ref. 16/4553/FUL);</li> <li>• Twickenham Railway Station, London Road (Ref. 10/3465/FUL); and</li> <li>• Police Station, 60-68 Station Road, Hampton (Ref. 16/0606/FUL).</li> </ul>
Should the application for this development be regarded as an integral part of a more substantial project? If so, can related developments which are subject to separate applications proceed independently?	No. The proposed development is a discrete project and could proceed independently.
<b>(c) Use of natural resources</b>	
Will construction or operation of the development use natural resources such as land, water, material or energy, especially any resources which are non-renewable or in short supply?	The proposed construction and operational phases of the development will use resources in terms of land, water and energy as would be expected for an urban development project.
<b>(d) Production of waste</b>	
Will the development produce wastes during construction or operation or decommissioning?	<p>Construction waste would be reused and recycled where possible.</p> <p>Operational waste would be disposed of in line with RBR requirements and managed in accordance with all applicable legislation.</p>
<b>(e) Pollution and nuisances</b>	
Will the development release any pollutants or any hazardous, toxic or noxious substances to air?	<p>During the construction phase of the proposed development, dust would be generated. Dust generation would be managed in accordance with standard best practice measures, enforced through a construction environmental management plan (CEMP) and is not anticipated to generate significant adverse effects.</p> <p>There would be emissions associated with plant and vehicles during the construction phase and from</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	<p>vehicles during the operation of the proposed development.</p> <p>The proposed development is primarily of residential use which is not associated with hazardous substances or toxic emissions to air. Furthermore, other uses proposed, such as sports pitches, GP surgeries and community facilities are also not likely to be associated with hazardous substances. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials would be stored and handled in accordance with relevant legislation.</p>
<p>Is there a potential risk from leachates or escape of wastes or other products/by-products that may constitute a contaminant in the environment?</p>	<p>Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction or operational phases of the proposed development. The land uses proposed are not highly contaminative and it is not expected that there is a high risk of contaminants being released into the environment.</p>
<p>Will the development cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>The potential exists for noise effects to result from the construction processes associated with the proposed development. These effects will be managed in accordance with best practice measures, implemented through the CEMP and are not anticipated to generate significant adverse effects.</p> <p>Lighting would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP) (2011) Guidance Notes for the Reduction of Obtrusive Light. It is proposed that the 3G and MUGA pitches will be lit following completion of the development.</p> <p>No electromagnetic radiation, heat or energy releases are expected other than those associated with normal residential development.</p>
<p>Will the development lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>Hydrocarbons will be used as part of the construction phase of the development. This would involve plant and vehicle fuel and lubricants.</p> <p>Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases. Sustainable drainage would be considered and appropriate drainage design would be included within the planning application documents including the Flood Risk Assessment (FRA).</p>
<b>(f) Risk of accidents, having regard in particular to substances or technologies used</b>	
<p>Will there be a risk of accidents during construction or operation of the development which would have effects on people or the environment?</p>	<p>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 would form part of the CEMP. There are no anticipated significant risks of accidents during operation as the proposed development does not involve users dealing with hazardous substances.</p>
<p>Will the development involve use, storage, transport, handling or production of substances or materials which could be harmful to people or the environment (flora, fauna, water supplies)?</p>	<p>During the construction phase, certain materials may be present on the site which may be harmful to the environment. However, it is considered that through the implementation of appropriate environmental control measures in line with the relevant legislation there will be no significant environmental effects. The</p>

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	operational development is not expected to involve the use, transport or production of substances or materials which could be harmful to the environment.
<b>Other characteristics</b>	
Potential physical changes (topography, land use, changes in water bodies etc.) from construction, operation or decommissioning of the development?	The principal land use will change from private grounds with underutilised and ad hoc sporting use to publicly accessible sport facilities, parkland and community facilities. Part of the site will change from private grounds to an extra care retirement facility with communal facilities and car parking, and GP surgery. There would be changes to the site during the construction phase. There will be no change to water bodies or topography.
<b>2. LOCATION OF THE DEVELOPMENT</b>	
<b>(a) Existing land use</b>	
Are there existing land uses on or around the location which could be affected by the development, e.g. residential, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying?	The site is currently private grounds leased on an ad hoc basis to local sports clubs. The proposed development is not considered likely to affect the surrounding residential areas and the existing extra care facility at Fullerton Court as these comprise similar land uses.
Is the development located in a previously undeveloped area where there will be loss of greenfield land?	The site comprises a private piece of land which is leased to local sports clubs. Sporting facilities are therefore present on site.
<b>(b) Relative abundance, quality and regenerative capacity of natural resources in the area*</b>	
<p>Are there any areas on or around the location which contain important, high quality or scarce resources which could be affected by the development?</p> <ul style="list-style-type: none"> <li>• groundwater resources</li> <li>• surface waters</li> <li>• forestry</li> <li>• agriculture</li> <li>• fisheries</li> <li>• tourism</li> <li>• minerals</li> </ul>	<p>According to the Environment Agency website, the site is located within Flood Zone 1 and is at low risk of flooding from rivers and the sea. The site is not located within a groundwater Source Protection Zone (SPZ). There are no groundwater source protection zones on or adjacent to the site.</p> <p>None of the other features are present in or adjacent to the site.</p>
<b>(c) Absorption capacity of the natural environment**</b>	
Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the development?	<p>There are no sensitive areas, as defined by the EIA Regulations, located within the site. The closest sensitive area to the site is the Bushy Park and Home Park Site of Special Scientific Interest (SSSI) which is located approximately 380m to the south of the site. A further three SSSIs are located within 5km of the site.</p> <p>There are nine Scheduled Monuments located within 5km of the site, the closest to the site being Old Brew House located approximately 2km to the west. Richmond Park Special Area of Conservation is located approximately 2.4km to the east of the site. This is also designated as a National Nature Reserve and a Registered Park and Garden. There are a further 12 Registered Parks and Gardens within 5km of the site, one being Bushy Park and Home Park which is mentioned above. The South West London Waterbodies are located 4.5km to the south west of site and are designated as a Special Protection Area and a Ramsar site.</p> <p>The nearest protected feature to the site is a Grade II listed building, Oak Cottage, located approximately 185m to the north of the site. A Grade II* listed</p>

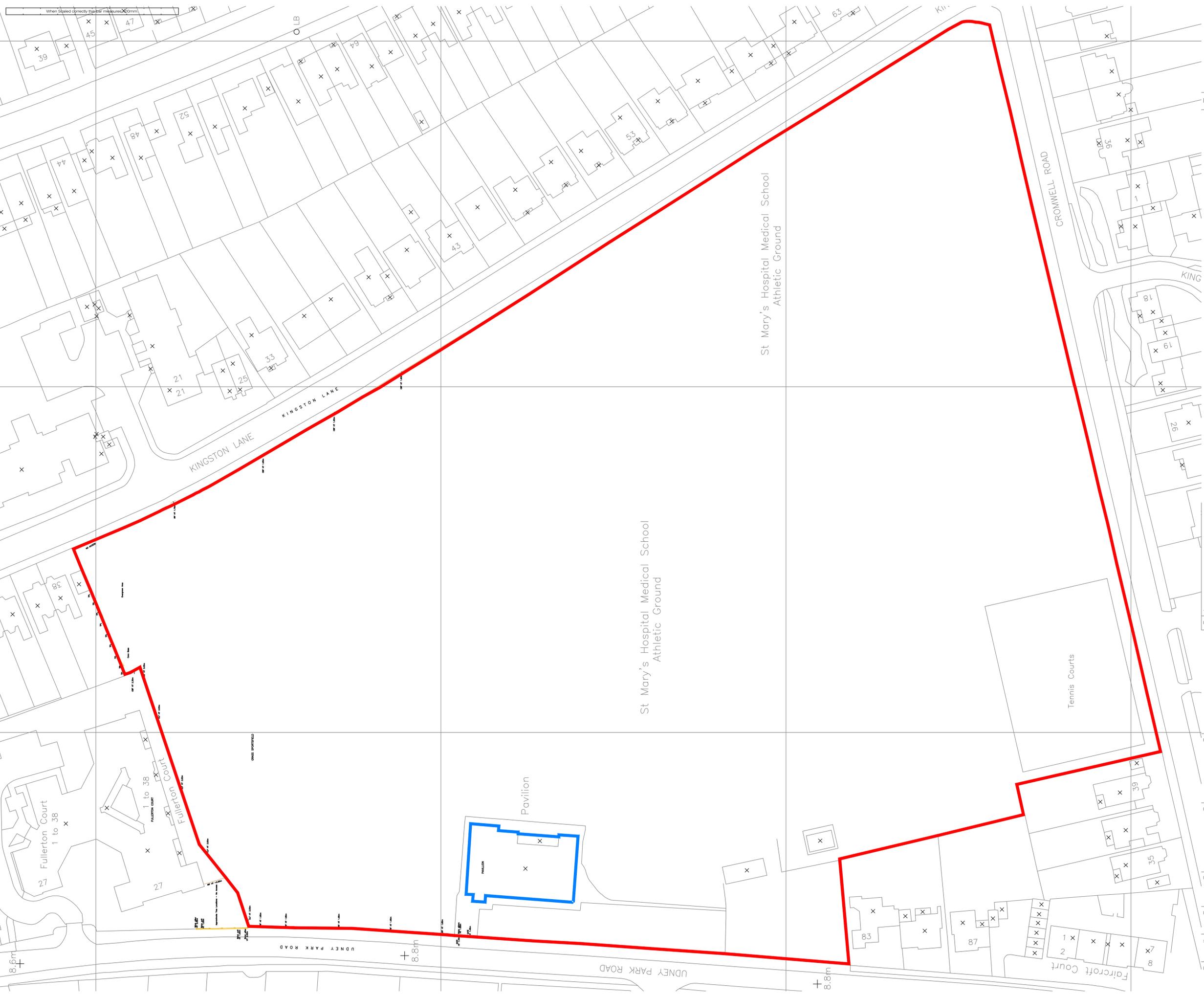
SCREENING CRITERIA	PROPOSED DEVELOPMENT
	building, Church of St Alban, is also located approximately 270m to the north east of the site.
<p>Are there any other areas on or around the location which are important or sensitive for reasons of:</p> <ul style="list-style-type: none"> <li>• wetlands;</li> <li>• coastal zones</li> <li>• mountains and forest areas;</li> <li>• nature reserves and parks;</li> <li>• Special Protection Areas and Special Areas of Conservation;</li> <li>• Areas in which environmental quality standards laid down in EU legislation have already been exceeded</li> <li>• Densely populated areas</li> <li>• Landscapes of historical, cultural or archaeological significance.</li> </ul>	None identified, see row above.
<p>Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected?</p>	<p>An ecological appraisal was conducted on site in March 2016 which confirmed that the site contained hardstanding, tall ruderal vegetation and surrounding hedgerows. Overall, the site was considered to have low ecological value.</p> <p>The pavilion building is considered to hold high potential for roosting bats due to numerous access points and roosting opportunities. As such, a Phase 2 bat survey will be completed for submission alongside the planning application.</p> <p>Hedgerows, scattered trees and ornamental planting on site provide nesting opportunities for birds. It has been recommended that any hedgerow removal be compensated by replacement native planting together with an initial management regime for the first few years of the development.</p> <p>Suitable reptile habitat was identified along the eastern boundary of the site in small areas of scrub. A reptile survey and mitigation may be required if suitable areas are to be impacted by the proposed development. If reptiles are confirmed, mitigation is likely to involve a Method Statement that either incorporates reptile habitat within the development or translocation of reptiles to a suitable off-site receptor.</p>
<p>Are there any inland, coastal, marine or underground waters on or around the location which could be affected?</p>	<p>According to the Environment Agency website, the site is located within Flood Zone 1 and is at low risk of flooding.</p> <p>The site is not located within or close to a groundwater SPZ.</p> <p>No other water bodies would be expected to be significantly affected by the proposed development.</p>
<p>Are there any groundwater source protection zones or areas that contribute to the recharge of groundwater resources?</p>	The site is not located within or adjacent to a groundwater SPZ.
<p>Are there any areas or features of high landscape or scenic value on or around the location which could be affected?</p>	The site is not located within an AONB and is surrounded by existing built development with a high percentage of the boundary protected with solid fencing reducing views into or from the site. There are no other known features of landscape importance

SCREENING CRITERIA	PROPOSED DEVELOPMENT
	on or adjacent to the site. The landscape and townscape character of the site reflects the local landscape context. A Townscape and Visual Impact assessment will be prepared and submitted alongside the planning application.
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected?	Cromwells Road, Udney Park Road and Kingston Lane form the southern, parts of the western and the eastern boundaries of the site. The A310 is located to the east of the site and connects Twickenham with Kingston upon Thames. The M3 motorway is located approximately 6km to the west of the site.
Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected?	The construction phases of the proposed development would involve changes to traffic movements (e.g. use of HGVs). There is likely to be an increased number of vehicles using the local road network once the proposed development is operational. A Transport Assessment would be submitted in support of the planning application.
Is the development in a location where it is likely to be highly visible to many people?	The potential for local views of the site exists from adjacent and nearby roads and residential development. A townscape and visual impact assessment will be submitted with the planning application which will address local and, where appropriate, long distance views.
Are there any areas or features of historic or cultural importance on or around the location which could be affected?	<p>The closest feature is a Grade II listed building, Oak Cottage, located approximately 185m to the north of the site. A Grade II* listed building, Church of St Alban, is also located approximately 270m to the north of the site. There are nine Scheduled Monuments located within 5km of the site, the closest to the site being Old Brew House located approximately 2km to the west. The site is not located within a conservation area.</p> <p>A Heritage Assessment has been prepared for the pavilion which is located on the site. This building has been assessed as having a negligible significance with any limited contribution that it might make to the surrounding townscape not linked to its specific form. It is a relatively modern building of functional vernacular design which has been altered and extended. This Heritage Assessment would be submitted alongside the planning application.</p>
Are there any areas on or around the location which are densely populated or built up, which could be affected?	Teddington is a town in the London Borough of Richmond and is mostly residential, containing 10,330 people (2011 census). Residential development surrounds the site. Noise from the development is likely to arise during the construction stage from construction plant however this would be managed in accordance with standard procedures. On completion of the development the main source of noise would be from traffic from users of the development however this will be small scale and where necessary will be addressed at the detailed design stage to mitigate any potential effects.
Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected?	The site is located within an Air Quality Management Area (AQMA) declared by the RBR due to levels of nitrogen dioxide (NO <sub>2</sub> ) and particulate matter (PM <sub>10</sub> ) exceeding national target levels for these pollutants.

SCREENING CRITERIA	PROPOSED DEVELOPMENT
Is the location of the development susceptible to earthquakes, subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the development to present environmental problems?	<p>According to the Environment Agency website, the site is located within Flood Zone 1 and is at low risk of flooding. A FRA would be submitted in support of the planning application.</p> <p>The site is not located within a groundwater SPZ.</p> <p>The site is located within an AQMA.</p> <p>The site is not considered susceptible to any other hazards.</p>
CHARACTERISTICS OF THE POTENTIAL IMPACT	
(a) Extent of the impact	
Will the effect extend over a large area?	No. This is confined to the site (approximately 5.2ha) and the land immediately adjacent.
Will many people be affected?	Residents/occupiers of surrounding properties and buildings will have the potential to be affected by the proposed development.
(b) Transboundary nature of the impact	
Will there be any potential for transboundary impact? (n.b. Development which has a significant effect on the environment in another Member State is likely to be very rare. It is for the Secretary of State to check Environmental Statements to decide whether there is likely to be such an effect in each case).	No.
(c) Magnitude and complexity of the impact	
Will there be a large change in environmental conditions?	No.
Will the effect be unusual in the area or particularly complex?	No.
Will many receptors other than people (fauna and flora, businesses, facilities) be affected?	This is considered to be unlikely. An Ecological Appraisal and Phase 2 bat survey will be submitted alongside the planning application.
Will valuable or scarce features or resources be affected?	No.
Is there a risk that environmental standards will be breached?	No.
Is there a risk that protected sites, areas, and features will be affected?	No.
d) Probability of the impact	
Is there a high probability of the effect occurring?	The effects of the proposed development can be clearly established and the probability of any effects determined with reasonable confidence.
Is there a low probability of a potentially highly significant effect?	As above.
(e) Duration, frequency and reversibility of the impact	
Will the effect continue for a long time?	Construction effects would be short term in duration and the operational effects would be long term.
Will the effect be permanent rather than temporary?	Construction effects would be temporary and the operational effects would be permanent.
Will the impact be continuous rather than intermittent?	Construction – intermittent Operation – continuous
If intermittent, will it be frequent rather than rare?	Frequent.
Will the impact be irreversible?	Construction – Yes Operation – No
Will it be difficult to avoid or reduce or repair or compensate for the effect?	No.

## 4.0 CONCLUSION

- 4.1 The screening assessment has considered whether the proposed development of up to 130 retirement living homes with associated communal facilities and parking, GP surgery, playing pitches, new clubhouse with community facilities, crèche and play area and a public park on the Former Imperial College Private Ground at Udney Park Road, is likely to give rise to significant effects on the environment.
- 4.2 The proposed development falls within Schedule 2, 10 (b) of the EIA Regulations, as an urban development project. The site is not located within a sensitive area as defined by the EIA Regulations but it falls above the indicative criteria and screening thresholds at more than 5 hectares in area. The proposed development's potential cumulation with other schemes in the vicinity of the site have been considered in the assessment.
- 4.3 With regard to the indicative criteria and thresholds identified in the PPG (set out in Table 2 above) it is considered that the proposals would be in keeping with the current nature and scale of the surrounding development. At up to 130 dwellings, the proposed development is significantly below the 1,000 dwelling threshold in the PPG where significant urbanising effects could occur. Due to the current use of the site as an athletics ground, high levels of contamination are not expected. It is considered that the principal environmental effects will relate to construction and operational increases in traffic movements and associated noise and air quality emissions, although as set out in Table 3, these effects could be managed in accordance with standard methods.
- 4.4 The screening assessment has identified that significant effects on the environment are not considered likely either alone or in combination with other development. The proposals would be small scale and effects could be managed in accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations.



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NOTES:



Rev	Date	Description	Initials

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Drawing Title:  
**Lease demise**

Discipline:  
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Drawn by: SH      Checked by:

Scale: 1:1000@A1      Date: Feb/16

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