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02.01.2019

Dear Mr Robinson,

**Re: Land West of Hospital Bridge Road, Whitton  
Formal request for screening opinion under Regulation 6 of The Town and Country  
Planning (Environmental Impact Assessment) Regulations 2017 (As Amended)**

Thank you for your letter dated 4<sup>th</sup> October 2018 requesting a screening opinion from the Local Planning Authority for the following development at Land West of Hospital Bridge Road, Whitton.

*The redevelopment of the above site to accommodate a new 5FE secondary school and 300 place sixth form, associated internal and external sports facilities, new pedestrian and vehicular access and servicing.*

Whilst your letter was received on the 4<sup>th</sup> October, given this was outside office hours (17:45) and via dropbox, which the Council cannot access, the start date for the request was taken as 5<sup>th</sup> October.

I attach the Local Planning Authority's Negative Screening Opinion adopted on 2<sup>nd</sup> January 2019, which concludes that the Authority does not consider the above development requires an Environmental Impact Assessment. In accordance with Regulations (5) and (6) of Part 2 of the Regulations, the accompanying screening opinion provides clear and precise reasons for this conclusion.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Angus', with a long horizontal flourish extending to the right.

Robert Angus  
Head of Development Management

## LONDON BOROUGH OF RICHMOND UPON THAMES

### ENVIRONMENT AND COMMUNITY SERVICES, PLANNING AND TRANSPORT – DEVELOPMENT MANGEMENT (PLANNING)

#### FORMAL EIA SCREENING OPINION IN CONNECTION WITH LAND WEST OF HOSPITAL BRIDGE ROAD, WHITTON.

#### PROPOSED DEVELOPMENT:

*The redevelopment of the above site to accommodate a new 5FE secondary school and 300 place sixth form, associated internal and external sports facilities, new pedestrian and vehicular access and servicing.*

#### PREAMBLE:

##### The EIA Regulations Threshold:

A screening exercise has been undertaken in accordance with Regulation 5 and 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Local Planning Authority has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise.

“Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- (a) any part of that development is to be carried out in a sensitive area; or
- (b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;

“sensitive area” means:

- land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981;
- a National Park ;
- the Broads(c);
- World Heritage List ;
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(d);
- a Scheduled Monument ;
- Archaeological Areas Act ;
- an Area of Outstanding Natural Beauty ;
- a European site;

The LPA is of the view that the proposal would be an Urban Development Project as defined under Schedule 2 part 10 (B) of the Regulations. The site is not located in a ‘sensitive area’ and therefore the thresholds set out in Schedule 2 of the Regulations have been applied:

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

I can confirm that the area outlined on the site plan is 6.7 ha and that the portion of the site to be developed is 1.4 ha (1.9ha for the resultant ‘hard’ areas). The proposal therefore exceeds the applicable threshold and so constitutes Schedule 2 development for the purposes of the 2017 Regulations. It therefore needs to be screened to determine whether it is likely to have significant effects on the environment, and hence whether an Environmental Impact Assessment is required.

**National Planning Policy Guidance (NPPG):**

When screening Schedule 2 projects, the LPA must take account of the selection criteria in Schedule 3 of the 2017 Regulations, however, the NPPG notes not all of the criteria will be relevant in every case. Each case should be considered on its own merits in a balanced way:

- Characteristics of development
- Location of development
- Types and characteristic of the potential impact

When the LPA issues its opinion, they must state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3.

The NPPG advises only a very small proportion of Schedule 2 development will require an EIA. While it is not possible to formulate criteria or thresholds which provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid LPA to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced, which includes an indication of the types of impact that are most likely to be significant for particular types of development.

<b>Development type</b>	<b>Schedule 2 criteria and thresholds</b>	<b>Indicative criteria and threshold</b>	<b>Key issues to consider</b>
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	(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.	Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless: <ul style="list-style-type: none"> <li>• the new development is on a significantly greater scale than the previous use, or</li> <li>• the types of impact are of a markedly different nature or there is a high level of contamination.</li> </ul> Sites which have not previously been intensively developed: <ol style="list-style-type: none"> <li>i. area of the scheme is more than 5 hectares; or</li> <li>ii. it would provide a total of more than 10,000 m<sup>2</sup> of new commercial floorspace; or</li> <li>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).</li> </ol>	Physical scale of such developments, potential increase in traffic, emissions and noise

However, it should not be presumed, that those falling above the indicative threshold should be subject to assessment, or those falling below these thresholds could never give rise to significant effects, and therefore each development will need to be considered on its merits.

Where it is determined that the proposed development is not EIA development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment. Local planning authorities will need to consider carefully how such measures are secured. This will usually be

through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance.

### **REGULATION 6**

Under Regulation 6 (2) of the EIA Regulations, the person making a request for a screening opinion, must provide the following:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular—
  - i. a description of the physical characteristics of the development and, where relevant, of demolition works;
  - ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
  - i. the expected residues and emissions and the production of waste, where relevant; and
  - ii. the use of natural resources, in particular soil, land, water and biodiversity; and
- (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.

The request for a Screening Opinion has been accompanied with:

- Screening letter
- Transport Scoping Report and Transport Mitigation Strategy
- Site location plan
- Air Quality Assessment
- Arboricultural survey
- Baseline noise survey
- Ecological appraisal
- Flood Risk Assessment
- Landscape general arrangement
- National vegetation survey
- Preliminary ground assessment
- Reptile survey report
- Site Investigation

**These:**

(a) ***Identify the site.***

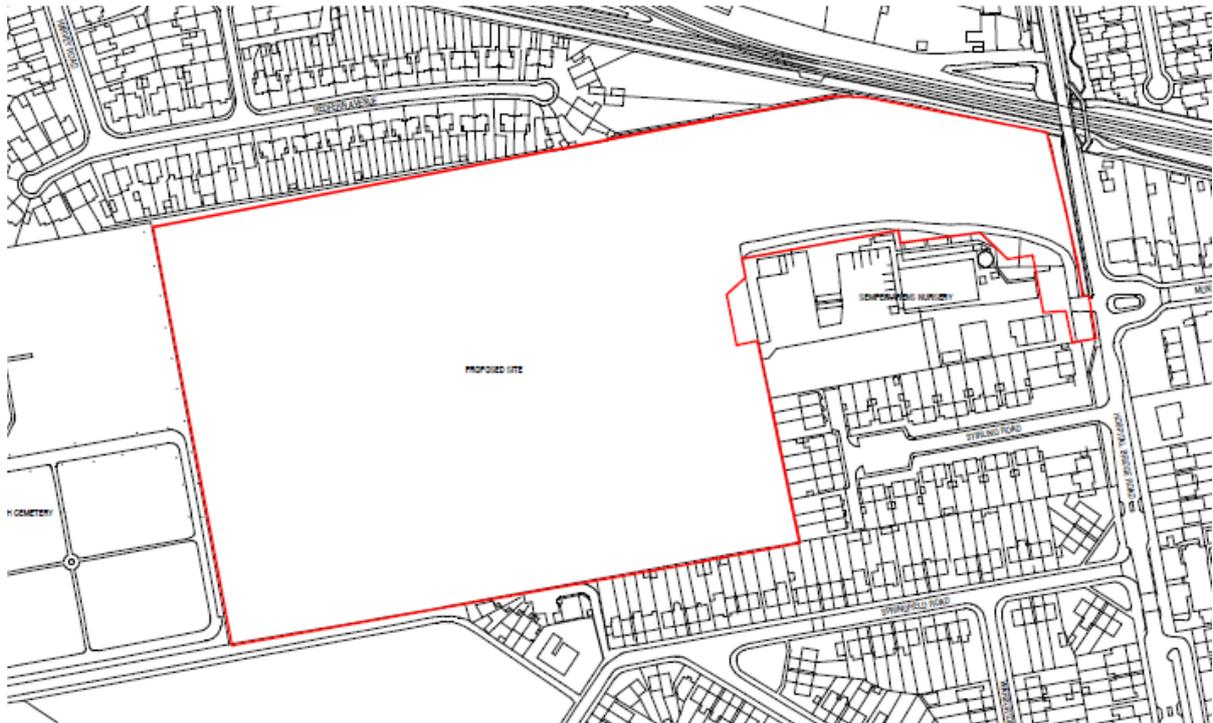
The total site covers an area of 6.7 hectares and is shown edged in red on the plan. The site predominantly comprises grassland and is currently utilised in part for open storage, however, it is unclear as to whether there is planning consent for this activity. The applicants have also confirmed that Sempervirens is not an agricultural tenancy.

- To the south east, the site adjoins a horticultural nursery business. The Nursery business is to be consolidated within its formal site prior to the proposed development. The balance of the southern boundary to the site adjoins the rear gardens of houses on Stirling Road and

Springfield Road, an undeveloped frontage to Berwick Close and a public footpath which separates the site from Heathfield Recreation Ground.

- To the west the site adjoins Borough Cemetery
- To the north, the bulk of the boundary is adjoined by the rear gardens of properties on Redfern Avenue. In the north-eastern corner however, the site adjoins the rail line.
- To the east, the site abuts Hospital Bridge Road which at this point rises relative to the site from south to north leading to the vehicular bridge across the railway. Beyond Hospital Bridge Road lie further residential properties.

Vehicular access to the site is from Hospital Bridge Road via the access serving the nursery. The site has a Public Transport Accessibility Level (PTAL) rating of between 0 and 1b.



**(b) Provides description / overview of the development:**

- The proposed development would provide an entirely new build secondary school and sixth form for 1050 pupils (at full capacity). The school would be made up of a 5FE secondary school for 750 pupils and a post 16 sixth form for 300 pupils. Approximately 100 members of staff will be employed.
- The proposed development is proposed to be the permanent home for The Turing School which has been established in temporary accommodation in Teddington since September 2015 and Hampton since September 2018.
- It is proposed that the school buildings be located on the eastern part of the site, close to the Hospital Bridge Road frontage. The western part of the site is identified partially for open playing field use as part of the overall school development. The precise usage of the balance of the site is under discussion but will be an MOL compatible use.

**(i) And (ii) Provides a description of the physical characteristics of the development and demolition works; and description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;**

- The works proposed include the demolition of existing structures and the construction of a new school facility contained broadly within the eastern part of the site north of the existing horticultural nursery use.
- The school will comprise two linked buildings (teaching block and sports hall). The school buildings range from 2 to 3 storeys in height.
- The western area of the site will be utilised for soft, formal and informal recreation space.
- The primary pedestrian and vehicle access to the school would be taken from Hospital Bridge Road to the east of the site utilising the existing access point to the Nursery. A staff car park and servicing facilities including a bus drop off area would be provided to the east of the proposed school building.
- There is also potential for a pedestrian only link to the public footpath which runs adjacent to the southern boundary of the site connecting to Powder Mill Lane and Springfield Road.
- An indicative layout drawing shows the currently proposed layout of the site and indicative areas given over to the different elements of the proposed scheme are as follows.
  - MUGA = 2,000m<sup>2</sup>
  - Ped Tarmac = 2,300m<sup>2</sup>
  - Vehicle tarmac = 1,200m<sup>2</sup>
  - Ped paving = 800m<sup>2</sup>
  - Vehicle paving = 700m<sup>2</sup>
  - Grass = 48,700m<sup>2</sup>
  - Planting = 6000m<sup>2</sup>
- Wider community usage of both internal and external sports facilities and the school hall is proposed under the terms of a community use agreement.
- The letter and accompanying documents recognise the environmental sensitivities of the geographical areas likely to be affected.

**(c) a description of the aspects of the environment likely to be significantly affected by the development.**

**(d) a description of any likely significant effects of the proposed development on the environment resulting from—**

- 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***

The Screening letter considers the likely effects of the development, having regard to the selection criteria contained within Schedule 3 of the regulations and the key considerations set out in the NPPG in relations to the physical location of the proposal.

- Physical scale of the development
- Traffic and transport
- Noise emissions
- Air Quality
- Ecology
- Flood risk and Hydrology
- Ground conditions

- Daylight / sunlight and lighting
- Cumulative impacts

and considers the following environmental affects arising from:

- Construction work
- Operational impacts

**(f) Features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.**

The reports include mitigation measures that are recommended to avoid or prevent potential significant effects.

## **SCREENING OPINION**

Regulation 5(4) of the Regulations and NPPG requires the LPA to take into account the screening criteria set out in Schedule 3 of the Regulations:

- *Characteristics of development*
- *Location of development*
- *Type and characteristics of the potential impact*

Key issues to consider are physical scale of such developments, potential increase in traffic, emissions and noise. The NPPG clarifies that mitigation measures can also be taken into account at the screening stage and that where such measures have enabled them to conclude that there will not be significant effects on the environment, and an Environmental Impact Assessment is not required, that their screening decision states those features of the development and those measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

### **(1) Characteristics of the Development**

The principal designation for the site is 'Metropolitan Open Land' (MOL). Adjacent to the site are:

- Heathfield Recreation Ground – designated MOL and Public Open Space
- Redfern Avenue and housing to the north of the railway line – Proposed Area for Tree Planting
- Railway line and embankment – Other Site of Nature Importance and Area poorly provided with Public Open Space
- East of Hospital Bridge Road – Area poorly provided with Public Open Space

### **(a) The size of the development**

The site, approximately 6.7 hectares, is currently largely undeveloped and is surrounded by the train line to the north east, a horticultural nursery to the south, the Borough Cemetery to the west, properties along Stirling Road and Springfield Road to the south east and Redfern Avenue to the north west. Residential properties in Powder Mill Lane and Cobbett Road are sited to the south, beyond Heathfield Recreation Ground. The prevailing pattern of development in the surrounding area is low density suburban residential development with 1.5 storey nursery buildings to the south. The applicants have confirmed that the main Nursery business is not part of the development site.

The proposal is for a secondary school with sixth form and associated works. Whilst the development will change the land use and cause physical changes through the construction of the development, the proposal is to only develop a relatively small portion of the site (approx. 1.9 Ha) adjacent to Hospital Bridge Road with the remainder of the site remaining open for either sport use or public open space. The scale (including development footprint and 2 - 3 storey height – approximately 14.5m) and characteristics of the development are not uncommon for the Borough

and are not considered to result in significant environmental or urbanising effects given the surrounding pattern of development, especially given the built form is limited to the eastern part of the site, similar to general pattern of development fronting Hospital Bridge Road. A Visual Assessment will be provided to demonstrate no significant effects.



The site is on Hospital Bridge Road, where the main access will be. A pedestrian access is also proposed off Heathfield Recreation Ground.

It is understood that the operation of the school at full capacity will be 1,050 pupils and 100 staff. The site of the proposed development is located approximately 900m from the A316 Chertsey Road which forms part of the Transport for London Road Network (TLRN) and so consideration will be given to the impact on the performance and/or safety of the TLRN. TfL is the highway authority for the TLRN. They have been consulted and do not consider an EIA to be required.

The low public transport accessibility of the location (1b) and the constrained surrounding highway network raises concerns as to whether the traffic and pedestrian impacts of the development on the local highway network can be satisfactorily managed. Vehicular access to the site is from Hospital Bridge Road. Potential levels of traffic and pedestrians near the site at school starting and leaving times will be far greater than existing. The applicant has submitted a Transport Scoping Report and a Transport Mitigation Strategy which identify mitigation measures including highway improvements on Hospital Bridge Road, contributions towards highways and parking measures around the site and a new traffic-free pedestrian entrance to Heathfield Recreation Ground which would reduce average journey distances, encourage walking to school and reduce demand at the Hospital Bridge Road entrance. Staff management, staggered start and finish times (through before and after school activities) can also mitigate the transport impact of the development at peak hours and the planning and highway authority have powers to help manage transport impacts of development through the use of appropriate conditions and highways and traffic management legislation. Furthermore, mitigation aimed at encouraging sustainable modes of travel is also proposed including a robust travel plan, reduced parking provision below maximum parking standards, cycle parking and infrastructure.

Although there will be additional movements of vehicles and HGVs during the construction phase, the LPA can secure a Construction Logistics / Management Plan, and in any event, this would be

short term in duration. On the evidence available, however, it is not considered that these issues amount to potentially significant environmental impacts.

A Construction Management Statement, Construction Logistics Plan, Transport Assessment (including Mitigation Strategy), Car Park Management Plan, Travel Plan and Delivery and Servicing Plan would be required through any future applications and conditioned accordingly.

The mitigation measures, required reports and design features of the site are deemed sufficient to avoid significant adverse impacts, and can be secured either through condition or legal agreement.

The site is currently largely undeveloped and so the proposal (with approx. 1.9ha being building or 'hard surface') will result in considerable run-off and foul water output (as a result of the proposed use). The site is also a principal Aquifer and so there is a potential for the contamination of Groundwater. A Phase 2 Site Investigation Report has been provided which considers this matter which can be considered further (and potentially mitigated/conditioned) through the planning application process. In terms of flood risk, a Flood Risk Assessment and Drainage Strategy has been provided which confirms the site is in Flood Zone 1 but, as identified on Environment Agency mapping, areas of the site are thought to be at risk of groundwater and surface water flooding. Notwithstanding such, these matters are not deemed to be complex or of greater magnitude. The FRA concludes that the risk of groundwater flood risk is low, and that surface water flood risk can be mitigated by on-site drainage systems and attenuation. Foul and surface water connections can be made to the available public sewers on Hospital Bridge Road, as confirmed by Thames Water. Given the information provided at this stage, and the ability to secure mitigation through conditions and legal agreements, it is not considered likely that the development would have a significant impact on the site and surrounding area in this regard.

Based on the information provided (which would be required through future planning applications), potential mitigation measures, the physical scale of the development, location of the site, and nature of such, the proposal is not deemed to raise significant environmental effects to warrant an EIA.

## **(b) The cumulation with other developments**

The EIA Regulations require consideration of cumulative effects of the proposed development with other existing and approved developments. The submitted letter advises the applicants have considered the cumulative impacts.

The following approved developments are considered of relevance, in particular with regard to air quality and transport due to their scale, proximity to the site and the A316.

### Richmond College

15/3038/OUT (16/3293/RES) - Outline application for the demolition of existing college buildings and redevelopment of the site to provide:

- (a) A new campus for education and enterprise purposes, comprising; Replacement College to accommodate up to 3,000 FTE day time students and a Science, Technology, Engineering and Maths of up to 6,100sqm;
- (b) A new Secondary School for up to 750 students;
- (c) A new Special Educational Needs (SEN) School for up to 115 students;
- (d) A new ancillary 'Technical Hub' for Haymarket Media of up to 1,700sqm;
- (e) Replacement on-site sports centre of up to 3,900sqm
- (f) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316.
- (g) associated on-site parking (non-residential) for up to 230 vehicles
- (h) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

The above development was approved in outline subject to various transport mitigation measures and highway works recommended by TfL due to the location of the site on the A316.

### Imperial College

Erection of a new extra-care community, with new public open space and improved sports facilities, comprising: 107 extra-care apartments (Class C2 Use), visitor suites, and associated car parking; 12 GP surgery (Class D1 use) and associated car parking; new public open space including a public park, and a community orchard; improved sports facilities (Class D2 use) comprising a 3G pitch, turf pitch, MUGA, playground, pavilion and community space, and associated parking (68 spaces); paddock for horses; and a new pedestrian crossing at Cromwell Road; and all other associated works.

The above application is currently the subject of an appeal but the Council, at Planning Committee on 26<sup>th</sup> September 2018, resolved to refuse planning permission. The application was not refused on transport / highway grounds but was refused on air quality grounds, primarily due to insufficient information and mitigation measures.

TfL were consulted on this EIA Screening Opinion request and did not consider an EIA necessary. The Council's air quality officer also came to the same conclusion. Overall, there are not considered to be any existing or approved developments in the vicinity of the site that cumulatively might give rise to significant environmental effects subject to the mitigation measures (including highway works, travel plans, air quality assessments etc) proposed through the approved development and the scheme subject to this EIA screening.

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

#### Land and soil:

The site is an area of grassland which has seemingly been previously used for horse grazing. Part of the site is currently being used by the neighbouring horticultural business. However, the applicants have confirmed this is not an agricultural tenancy. The site is not a designated biodiversity site but is within the vicinity of statutory designated Hounslow Heath, Pevensey Road and Crane Park Island Local Nature Reserves. The railway, to the north of the site, is designated an Other site of Nature Importance. There are several trees and hedgerows along the perimeter and within the site.

#### Biodiversity:

The current site is not the subject of any specific ecological designation, however, the applicants have submitted several specific ecology reports, which have considered both potential flora and fauna. These reports have noted the location of both statutory and non-statutory designated sites and the location of waterbodies including the waterbodies at the rear of properties on Montrose Avenue. Further the Ecological Appraisal has regard to the Greenspace Information for Greater London (GIGL) data:

- Preliminary Ground Level Bat Roost Assessment and Badger Survey. This survey found some habitats of 'moderate' and 'low' potential for supporting roosting bats. However, the current proposal includes the retention of these four trees. No badgers were recorded within 2km of the site, but one potential badger sett was identified to the east of the site which was later found to be showing no signs of use. On the back of these findings, a series of mitigation measures were set out in the report para 1.2.1, including the retention of potential bat roost and badger habitats, dark corridors along the boundaries of the site and further survey work.
- Arboricultural Survey and Impact Assessment has been undertaken which identifies the tree quality of all individual trees and groups of trees on the site and recommends the retention of all Category A and B trees and for an Arboricultural Method Statement to be carried out once detailed plans of the proposed layout are available.
- A Preliminary Ecological Appraisal has been undertaken which identifies the habitats and species on and within the vicinity of the site and makes a series of recommendations including further surveys and ecological enhancements to be provided.

- A Reptile Survey was undertaken which found no evidence of reptiles on the site. The applicants state, “whilst they note the claims for sighting of a GCN at the rear of properties on Montrose Avenue, this itself does not confirm their presence. If felt necessary, the LPA can secure the provision of exclusion fencing on the appropriate boundary of the application site could address any potential for GCN access”.
- A Vegetation Survey has been provided which states that two grassland stands were identified on the site which are considered important at the local level and sets out several recommendations and mitigation measures/ecological enhancements.
- GIGL data identified that there have been no recorded sightings of Great Crested Newts within 2km of the site.

The site contains (and has the potential to contain) various habitats and wildlife and is of local ecological importance and the above reports and documents would be required to be submitted through any future planning applications.

A letter was received a local residents group making various comments in response to the reports submitted by the applicant and ecological concerns. Some of the points relate to habitats and protected species that have not been identified through the applicant’s ecology reports that are thought to have been spotted in the area. The applicants have provided a response, including:

- *The ecology reports note the presence of the Hounslow, Feltham and Whitton Junctions SINC (Feltham Railsides) as a habitat corridor but the character of these areas is very different to the application site, the designation being based upon the presence of rough grassland, bramble and thorn and scattered deciduous trees. This vegetation is not impacted by the proposed development. Muntjac deer are known to use this corridor for moving between larger sites but again no evidence of their activity was found on the application site.*
- *The ditch referred is at the fringe of the site and is to form part of the habitat corridor along the north of the site.*
- *In terms of any seasonal ‘wetting’ this is only of significance if reflected in the vegetative communities on the site. The National Vegetation Classification Survey undertaken identified two distinct grassland communities on the site OV23d Lolium perenne- Dactylis glomerata sub-community Arrhenatherum elatius – Medicago lupulina grassland and MG7e Lolio-Plantaginion community subcommunity Lolium perenne – Plantago lanceolata grassland. Both these communities are typical of past grassland improvement and are typically widespread in the UK. Recommendations made in the report mitigate for the loss of an area of moderately species rich grassland in an urban setting, this is particularly true now that a much larger area of habitat enhancement is included in the proposed plans.*
- *The statement in the letter that boggy land supports a richer array of insects, whilst in part correct, is a generalisation and many more factors other than the wetness of the ground will influence the diversity of invertebrate’s present, the diversity of plants and structural diversity within the habitat as well as connectivity with other habitats.*
- *Potential air quality impacts on the Feltham Railsides SINC during the construction phase of the proposed development have been considered. The applicants advise IAQM guidance on construction dust indicates that such an ecological site is of a low sensitivity to dust deposition.*

With respect to dust emissions associated with construction activities at the site, this will only be temporary, and with the proposed mitigation, including a Construction and Dust Management Plan, and applying standards contained within the GLA’s SPD on The Control of Dust and Emissions, the air quality impacts will be insignificant. It is also worth noting that only a small section of the SINC is located adjacent to the site of proposed development and will thus be affected, and that any potential air quality effects during the construction phase will be temporary.

The Council's Ecologist has considered the points raised by the residents group, acknowledging the validity of the various points raised, and made the following comments:

- The site is acknowledged as having some local importance as a grassland resource due to its size and moderate diversity of common and widespread grasses / flora, but on the basis of information provided by the applicant, there are no notable features upon which the development would have a significant ecological impact.
- The site boundaries will have existing value as linkages across the wider MOL but neither the boundaries nor the areas of wildlife importance are adversely impacted by the proposal. The proposal includes widening the habitat corridor along boundaries, including the linkage between the site and the SINC, and creating a reasonably large area of species-rich grassland which arguably improves the wildlife resource and linkages.
- Reference is made to the impact of the development on potential wildlife interest on Montrose Avenue and on the railsides outside the current SINC but it is unlikely that the development would impact on these sites.
- The embankments at Whitton station are not relevant to this application, other than reinforcing the potential value of the Hounslow, Feltham and Whitton Junctions (aka Feltham Railsides) SINC as a habitat corridor.
- Sighting of Great Crested Newts - the Council's Ecologist confirmed that there are no formal records of GCNs in the area surrounding the site and that the information provided is not regarded as sufficient to achieve a definite conclusion that Great Crested Newts are present.
- Air Quality - With regard to the ecological impacts on the SINC, given the conclusions overall of the air quality report, and the limited connection of the site to a small part of a linear site, a significant impact is not expected. The SINC should be protected from dust during construction and there should be a buffer zone to prevent construction activities and storage directly adjacent (which can be secured through a Construction Management Plan)
- Based on the information provided by the applicant and residents group, the Council's Ecologist remains of the opinion that the proposed development is unlikely to have a significant impact ecologically.

Overall, in light of the scale and nature of the proposal, the proposed layout (including the provision of public open space) and mitigation measures recommended through the various reports and as shown on the general arrangement plan (i.e. further survey work, ecological enhancements i.e. the public open space/planting and green corridors etc) it is not considered that a significant environmental impact is likely subject to the matters above being appropriately dealt with through any future planning applications (including conditions).

Natural England were consulted on this application and determined that there were not likely to be any significant impacts on statutory designated sites because of the proposed development but deferred to the local authority's ecology experts in relation to protected species. The Council's Ecologist acknowledges the validity of the various points raised and agrees that further information (and corrections where necessary) is required but that this can be dealt with through the planning application process, and where necessary appropriate conditions, including mitigation measures.

#### Water:

The site is in Flood Zone 1 (lowest risk of flooding) and contains Areas Susceptible for Surface Water Flooding. There is no evidence that the site contains any important, high quality scarce resource.

#### **(d) Production of waste**

Any scheme will produce waste during Works, and therefore this is not deemed complex. The duration will be limited, and frequency and magnitude can be controlled through measures such as a Construction Management and Waste Management Plan (which will be required with a submission). Waste from operational use is not uncommon, complex or of great magnitude. Given the scale and specifics of this proposal, waste from the operational use of the site are not deemed likely to result in a significant effect on the environment on the basis that appropriate conditions could be applied in relation to refuse and recycling. Waste collection disposal would be developed in accordance with the Waste Management Hierarchy set out in the Waste Framework Directive.

### **(e) Pollution and nuisance**

#### Air Pollution:

The entire Borough is designated as an Air Quality Management Area (AQMA) for both nitrogen dioxide and PM10 and the site fronts a road where existing levels of pollutants are likely to be at or above EU limit values of 40 µg/m<sup>3</sup> for nitrogen dioxide (based on NO<sub>2</sub> diffusion tube results in the surrounding area). The construction phase and the proposed use (for example the increase in trip generation resulting from the proposed use) are likely to affect levels of NO<sub>2</sub> for all receptors (existing and proposed). The plans provided with this EIA application show classrooms fronting Hospital Bridge Road and the site context means that there is likely to be a poorer dispersion of pollutants and could result in emissions being blown back towards the school site, especially as the prevailing wind is westerly/south westerly.

A letter has been received by a local action group raising concerns over the impact of the proposal in terms of air quality towards the A316 junction. The letter also raises concern over the impact of dust from the neighbouring nursery site on the proposed development. The Council is currently investigating the use at the adjoining site to determine whether the occupiers are complying with the lawful use of the site (which may include consideration of the necessary permits from the Environment Agency). The applicants have advised that the topsoil stored at the garden centre to the south of the proposed school will mainly comprise of coarse particulates, with only a small proportion in the PM10 fraction. There may be occasional impacts in terms of amenity (i.e. deposition of dust on windows and surfaces) under certain weather conditions, but these would be short-term and temporary. Furthermore, the Council has powers that can be enforced through the relevant Environmental and Health and Safety legislation to ensure acceptable environmental conditions are being met across the Borough.

An Air Quality Assessment has been prepared in support of this EIA screening. The Air Quality Assessment considers the impact of the development on receptors in the immediate vicinity of the site as well as the wider vicinity (including near to the A316 junction). The assessment sets out the mitigation for both construction (Dust Management Plan) and in the design of the development and concludes that the construction and operational air quality effects of the proposal (including dust emissions and vehicle movements to/from the site) would be 'not significant'. The submitted letter also advises that the development has been shown to meet London Plan's 'Air Quality Neutral' requirement.

An Air Quality Assessment would be required to be submitted with any future planning applications and should comply with requirements of the EU Directive 2008/50/EC, the draft London Plan 2018, The Mayor's Control of Dust and Emissions during Construction and Demolition SPG 2014, LBRUT's 2017- 2022 Air Quality Action Plan, LBRUT's draft Air Quality SPD and the latest Government Plan to reduce nitrogen dioxide in towns and cities published on 18th January 2016 - <https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions>

As previously concluded, the temporary nature of the construction works, and the proposed mitigation will avoid any significant impacts on the biodiversity value of the site arising from air pollution.

Whilst the site is not sustainably located (PTAL 1b), the development provides an opportunity to establish sustainable travel patterns and reduce the reliance on private transportation which has air quality implications also. The Transport Scoping Report and Transport Mitigation Strategy identify various mitigation measures including a robust travel plan (encouraging walking/cycling/public transport for all users of the school site), discussions with TfL to provide additional bus services to/from the school, provision of the minimum number of vehicular parking spaces, electric vehicle parking spaces, cycle parking and infrastructure, delivery and service plans and the Local Planning Authority will have the opportunity to consider whether any further mitigation is necessary through any future planning applications (for example other planning obligations) to reduce the impact of the proposed development in air quality terms as well as transport and highway terms.

Furthermore, various other supporting documents would be required through future planning applications including a Construction Management Statement, Construction Logistics Plan, Car Park Management Plan and a Delivery and Servicing Plan that would allow further consideration of the pollution and nuisance implications of the construction and operation of the development, details of which could be secured through conditions. The Environmental Health Specialist (Air Quality) was consulted on the Opinion Request and does not deem the scheme to generate the need for an EIA.

#### Noise pollution:

The site is surrounded by noise sensitive development, particularly along the northern boundary, and the proposed use itself is a noise generating development (in particular from the external play areas). Existing vegetation along the boundaries of the site is to be retained and a wildlife corridor is also proposed which would assist in mitigating any noise and disturbance to neighbours. A Baseline Noise Survey has been submitted which identifies noise sources in the vicinity of the site and potential mitigation measures to reduce break-in noise to the classrooms. This recommends siting the least sensitive rooms nearest to the noise sources, acoustically attenuated natural ventilation and/or mechanical ventilation and fencing to the sports pitches to reduce noise impacts for neighbours. It is also noted that some community use of the site is proposed. Although no details have been provided, the Council would have control over hours etc through a Community Use Agreement. It is considered that noise from the construction process could be effectively managed through appropriate conditions to avoid harm to neighbouring residential dwellings and protected species (i.e. bats). Again, Environmental Health have been consulted on the submitted information and do not deem the scheme to trigger an EIA.

#### Light pollution:

The existing site is currently not open to the public, and the site itself is exposed to minimal light pollution. Existing trees therefore may be suitable for roosting and foraging bat species. No details have been provided of external lighting, but it is expected that some security lighting or way finding would be installed around the site (including car park). No flood lighting is proposed for the MUGA. External lighting could potentially impact on protected species (i.e. bats), however, the letter provided by the applicant confirms that any lighting will be in accordance with the recommendations set out in the Preliminary Bat Roost Assessment. These particular elements are unlikely to represent a significant part of the overall scheme and, without pre-determining the assessment that would be carried out through the application process, further details could be secured and appropriate conditions and mitigation could be applied including to control the hours of use and thus the impact.

#### Land / soil contamination:

There is only a very small section of the site that is identified as contaminated land (far SW corner). However, the site was formerly in equestrian-related use and an area of the site is currently used by the neighbouring horticultural nursery. Furthermore, since drainage of all roads and car parks will need to ultimately discharge into the ground, there will be potential contamination issues that will need to be addressed. A Phase 2 Geotechnical Site Investigation Report has been submitted which concludes that the potential risk to human health receptors is low. Further reports and sampling are required given the sensitive proposed use but it is considered that this matter could appropriately be dealt with through the planning application process. Also, Sustainable Drainage

and Foul Sewage and Utilities statements would be required through any future planning applications.

The Council consider that concerns in relation to pollution and nuisance can be adequately addressed through the planning application process, including through the submission of the reports referred to above. Taking into account mitigation measures that could be applied and controlled through relevant Environmental and Health and Safety legislation as well as planning conditions, the development is not deemed to give rise to significant effects.

**(f) and (g) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change; and risks to human health (due to water contamination or air pollution).**

As previously identified

- A very small section of the site (far west) is within a contaminated land area, and so there may be potential for sources of industrial related contamination beneath the site;
- Contaminants of concern were not recorded within groundwater samples
- The site and whole Borough is within an Air Quality Management Area
- Parts of the site are areas susceptible to Surface Water Flooding

Whilst there is always the possibility of accidents during the construction and operational phase of any development which might affect human health or the environment, there is no evidence to suggest that accidents are likely or that the impacts are likely to be significant. It is the authorities' opinion that such risks can be suitably prevented / avoided through the following reports and measures contained within them, that the Authority can require at point of Validation, and secure through either condition or Section 106 Legal Agreement;

1. Contamination Report / Site Investigation Report - further reports, sampling and mitigation
2. Implementation of a Construction Management Plan, to ensure:
  - Dust strategy – hours, dampening, monitoring, type of plant – in compliance with Local and Regional policy and guidance
  - Noise and vibration management
3. Flood Risk Assessment and Sustainable Drainage Strategy
4. Foul sewerage and utilities statement
5. Climate change – any application would need to be accompanied with:
  - Construction Method Statement – dust, air quality, noise and vibration
  - Draft CTLP
  - Transport Assessment – Travel Plan and Delivery and Servicing Plan
  - Flood Risk Assessment
  - Air Quality Assessment
  - Statement of Sustainable Drainage System
  - Sustainable Construction Checklist
  - BREEAM Pre-Assessment
  - Energy Report: 35% reduction, or from 2019 achieving zero carbon. (Any shortfall in on-site reductions can exceptionally be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD).

Concern has been expressed regarding the health effects from air pollution, both from the existing nursery and proposed use.

- The applicants advise, *“existing PM10 concentrations within the local vicinity are low as described in Paragraph 5.11 of the submitted AQA, with a baseline annual mean PM10 concentration of 18.9µg/m3. The 24-hour mean PM10 objective is 50 µg/m3 not to be exceeded more than 35 times a year. Given existing baseline conditions in the study area and small size of the facility, it is considered highly unlikely that wind-blown emissions of PM10 from the garden centre topsoil storage piles would be capable of leading to*

*exceedances of the 24-hour mean PM10 objective for future occupants of the proposed school. Overall, dust and PM10 impacts from the neighbouring nursery (and in particular from the top soil stockpiles located at the boundary with the proposed school) on amenity and health for future occupants of the school will be weather-dependent and short-lived and will likely be not significant.*

- *The submitted AQA has considered the air quality impacts at a range of worst-case existing receptors within the local area, as outlined in Table 2 of the report. The consultants have assessed the combined road traffic and energy plant impacts at these receptor locations and the outcome of their work has concluded that the air quality effects will be not significant. When considering road traffic impacts, they have undertaken a sensitivity test which assumes there to be no improvement in vehicle emissions (i.e. no reduction) in future years and the air quality effects from this sensitivity test, representing a worst-case scenario, are also not significant.*
- *When considering energy plant impacts, a worst-case assumption has been made that the boilers will run continuously and at full (100%) load. This will have over-predicted the concentrations, yet the air quality effects from the energy plant are not significant. Overall, the air quality assessment, which has adopted a conservative approach, has demonstrated that the proposed development will not have a significant effect on air quality at nearby existing receptors”.*

The Council's Air Quality Officer does not deem the impacts to be sufficient to warrant an EIA. An Air Quality Assessment and mitigation contained within will be required at validation of the application and can be secure through conditions and / or legal agreement.

On the basis of the above as well as the measures that could be applied and controlled through relevant Environmental and Health and Safety legislation, the development is not deemed to give rise to significant effects either through construction or the completed development.

**Summary – On the basis of the information provided in support of this screening, the scale and nature of the proposed development, the duration, reversibility and intensity of any impacts (as identified above), in addition to the environmental context of the site and potential mitigation measures as set out in the submitted documents, significant environmental effects are not considered likely.**

## **(2) Location of Development**

The site is within a relatively densely populated area and is considered to be highly visible from Hospital Bridge Road, and from Heathfield Recreation Ground. There are no known public rights of way crossing the site. The land comprises around 6.7ha of open grass land

**The environmental sensitivity of geographical areas likely to be affected by development must be considered with regard to the following:**

### **(a) The existing and proposed land use**

The site is currently in open use, formerly used as grazing land for an equestrian-related use. Part of the site is currently being used as open storage for the adjoining nursery use, however, the LPA is investigating the lawful use of such. The site (as well as the neighbouring nursery, Heathfield Recreation Ground and Cemetery) is designated as Metropolitan Open Land (MOL) and so plays an important strategic role as part of the Borough's and London-wide multi-functional green infrastructure network as well as being of value to the local community.

There is some doubt as to the operations currently taking place on the adjoining nursery site which has seemingly expanded beyond its lawful use and has also expanded its operations on to the site

itself. Whilst this neighbouring site does not form part of EIA site itself, it is of relevance in terms of the overall assessment of the impact on MOL.

Of relevance is the local pattern of development:

- Hospital Bridge Road runs north to south. This is categorised as a built up townscape.
- Along the west of Hospital Bridge Road, residential properties line the road, from the roundabout on the A316 to the application site (and adjacent nursery). It is here where there is an anomaly in the streetscape, with open views of the application site. The railway line is immediately north of this, and against, beyond residential properties border the road.
- The east side of Hospital Bridge Road, whilst still built up, has a more varied townscape, with residential properties, Two churches, a Health centre, and Twickenham Cemetery. Immediately to the east of the Health Centre and St Augustine of Canterbury Church is Twickenham Academy.

As discussed in more detail earlier in this report, only a relatively small proportion of the site is proposed to be developed (with the majority of the site remaining open – the footprint of the school is approximately 6% of the overall site, and the footprint of buildings when combined with the external hard areas equates to 28% of the site) with this area, broadly speaking, being contained within the established building line and pattern of development along Hospital Bridge Road. On this basis, and given the pattern of development in the locality (both in built form and uses) the proposal is not considered to have a significant urbanising effect on the site as a whole but this matter (impact on MOL) will be fully assessed through the planning application process, including any necessary mitigation (for example the public open space being proposed to the west of the site).

The existing land uses on the site and the proposed land uses (education) will have a different character, in terms of impact on local sensitivities, including, Transport, Traffic, core social infrastructure, (such as impacts on schools, health, recreation use etc).

#### Transport:

The site has a PTAL rating of 1b. The applicants have confirmed that the road infrastructure near the site has been reviewed and assessed in the Transport Assessment. Further, the application will be accompanied with a comprehensive Transport Assessment and Travel Plan.

It is recognised that inevitably the Work will give rise to some disruption to the normal operation and functioning of the local road network. However, it is deemed that such can be planned, programmed and controlled to avoid significant effects. The following will both be required at validation of an application and can be conditioned / secured in a Legal Agreement:

- Construction Management Plan: Accesses, routes, hours; pedestrian routes and signage etc.

With regards to the completed development, the scheme provides 45 car parking spaces. The Transport Scoping Report outlines the following Trip Generation for students:

Mode of travel	Opening Year (2020)		Full occupation (2024)	
	%	Students	%	Students
Car/Motorcycle	12.0%	87	0.0%	0
Car Share	0.9%	7	1.0%	10
Park and Stride	2.2%	16	3.8%	40
Rail	4.3%	31	1.3%	13
Public Bus	56.3%	410	60.5%	635
Cycle	9.2%	67	9.9%	104
Scooter	1.2%	9	0.6%	7
Walking	13.8%	101	22.9%	241
<b>Total</b>	<b>99.9%*</b>	<b>728</b>	<b>100.0%</b>	<b>1050</b>

As the Table shows, trip generation will be highest when the school opens, and with the introduction of management measures (School travel Plan), this will have reduced. (The School advise they currently benefits from STARS Gold Accreditation in terms of their current travel plan achievements and it is anticipated that this will be carried across to the proposed site by the introduction of a range of measures). The School does not currently have a sixth form and therefore the applicants have referred to data from Orleans Park School, which indicated 2.4% of car travel by sixth formers (7).

With respect to staff, in October 2017 71.4% travelled by private care, and if following this travel mode, it is anticipated that a total of 64 car trips will be generated by staff. However, a survey in March 2018 showed a mode shift, which resulted in the proportion of car trips reducing to 34.4% (25). Applying the census details, this would be approx. 51% and generate the need for 45 car parking spaces.

The scheme will no doubt have an impact on the flow of traffic and the local road network, however, in the context of the nature of the scheme, age of the pupils, and with the following documents that will be required with the submission, and mitigation measures, it is deemed this will not generate significant adverse impacts. Further, with such, it is not deemed this will cause significant effect on existing land uses.

Documents	Mitigation measures
<ul style="list-style-type: none"> <li>• Transport Assessment</li> <li>• Travel Plan</li> <li>• Heathy Streets Assessment</li> <li>• Parking surveys</li> <li>• PERS</li> <li>• CERS</li> <li>• Road Safety Audit</li> <li>• Delivery and Service Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Travel Plan</li> <li>• Provision of cycle stores</li> <li>• The school will not permit students to park on site</li> <li>• Encourage students to travel by non-car modes.</li> <li>• Promotion of a CPZ on local roads</li> <li>• Provision of pedestrian access from both Hospital bridge Road and Powder Mill Lane.</li> <li>• Funding enhancement to local bus services (if required).</li> <li>• Staggered start / finish times with use of breakfast and afterschool clubs</li> </ul>

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### Schools:

The Works will not generate any significant effects. Given the scheme is providing a School, which AfC, are aware of, the completed development will not have a significant adverse impact on education.

The Infrastructure Delivery Plan 2017 states:

- Secondary Education: In the October 2015, the Council updated the School Place Planning Strategy and identified the need for one more free school to be provided as part of the redevelopment of the Stag Brewery site in Mortlake. This was to meet the localised forecast demand in the eastern areas of the borough. It is noted that the forecast for additional places in the west of the borough has been met by the provision of the three new schools.

### Health:

The Works nor the completed development are deemed to generate any significant effects. However, given the scheme is deemed a 'major', the local validation checklist will require a Health Impact Assessment to be submitted.

### Recreation facilities

The Works will not generate any significant effects.

Heathfield Recreation Ground is located immediately to the south of the site. The proposed use may result in increased recreational use, and wear and tear (given the provision of a pedestrian entrance from within Heathfield Recreation Ground). However, the scheme also proposes a new area of public open space, and with such, and mitigation measures such as a management plan and / or contribution towards wear and tear (that can be secured through legal agreement), this is not deemed to generate significant adverse impact on such provision. Nor is the construction or the operation use deemed to impact on the access to such recreational facilities.

### Future land uses:

The LPA is not aware of any plans for future land uses within the proximity of the site that could be significantly affected through the development.

### Employment:

This proposed development will be likely to generate short term (through construction) and long term (school) employment opportunities.

### Demographics:

Given the nature of the proposal – especially daytime use only, the proposed school and sixth form are not deemed to significantly change the demographics in the area.

### Wind climate:

The Works (demolition of existing building) are not deemed to significantly impact upon wind conditions, given their relatively low and contained nature.

The completed development is proposed to be three stories. Given its limited height, and distance to residential properties and other buildings, it is deemed significant impacts can be avoided.

### Daylight, sunlight, overshadowing, light pollution and solar glare

The Works are not deemed to give rise to significant changes to light, and significant light pollution can be controlled through a Construction Management Plan.

The completed development may change light conditions within the site and adjacent to the site. However, given the limited scale of the built development, in terms of footprint, height, and with the provision of a sunlight and daylight assessment and Lighting Strategy (both required at validation), the impacts are not deemed to be significant.

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

Whilst an area of open grassland may be a scarce resource within an urban area, a vegetation classification assessment has identified that the type of grassland present is itself commonplace within the UK and as such the site is of no more than local significance.

The site or surrounding area is not known to contain high quality or scarce resources. The construction of the development would have an impact in terms of the use of natural resources, but the proposal overall would not have a significant environmental effect in this regard. Comments relating to biodiversity apply.

**(c) the absorption capacity of the natural environment, paying particular attention to the following areas**

- wetlands, riparian areas, river mouths

No likely significant effect – the site is not within the immediate vicinity of any such areas.

- coastal zones and the marine environment

No likely significant effect - the site is not within the vicinity of any such areas.

- mountain and forest areas

There are a number of trees and hedgerows on the site. An Arboricultural Survey and Impact Assessment has been undertaken which recommends the retention of all Category A and B trees. Additional planting is also proposed along the perimeter and to the south of the site. The Council can secure further details of mitigation (including replacement planting) through the planning application process. No significant environmental effects are considered likely.

- nature reserves and parks

The site is not a designated biodiversity site of local or national importance but is within the vicinity of Hounslow Heath, Pevensey Road and Crane Park Island Local Nature Reserves. Various ecological reports have been provided which identify the wildlife and habitats on the site and within the vicinity. These reports make various recommendations including mitigation measures/ecological enhancements. Some questions have been raised about the contents of these reports by a local residents group and the applicant has provided a response to these points. The Council's Ecologist has considered the information provided by the applicant through the various reports provided, as well as the further information provided by a local residents group, and is of the opinion that the proposed development is unlikely to have a significant impact ecologically with consideration to proposed mitigation measures (i.e. further survey work, ecological enhancements i.e. the public open space/planting and green corridors etc) and subject further consideration of ecological matters being appropriately dealt with through any future planning applications (including conditions).

The majority of the site would remain undeveloped in the form of newly formed playing pitches, public open space and wildlife corridors which would provide ecological linkages through the site. The proposal includes a secondary pedestrian access through the recreation ground to the south. The proposal would impact on this park but mitigation (for increased usage, maintenance etc) can be secured through the planning application process. No significant environmental effects on nature reserves or parks in the vicinity are considered likely.

- European sites and other areas classified or protected under national legislation;

The proposed development is not considered likely to affect birds protected through the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds). Various sites and species are also protected through the Habitats Directive (92/43/EEC) as set out in Schedule 2 of the Habitats Regulations 2017 which transposes the Habitats Directive into UK law. The site is not within close proximity to any European protected sites (the nearest being Richmond Park SAC).

The site is within the vicinity of Hounslow Heath, Pevensey Road and Crane Park Island Local Nature Reserves. This matter has been considered through the various ecological reports provided which identify the wildlife and habitats on the site and within its vicinity and details have been provided of the biodiversity mitigation measures that are likely to be incorporated into the scheme which can be secured through the planning application process.

Natural England confirmed the application site is not located within, or partly within any Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significantly affect the interest features for which they are notified. The location of the proposal is not within, nor is it sufficiently close to a National Park, Area of Outstanding Natural Beauty or Heritage Coast to impact upon the purposes for which these sites are designated.

Natural England has been consulted, and confirmed, based on the material supplied with the consultation, that, in so far as statutory designated sites, landscapes and protected species are concerned, that there are no potential significant impacts.

The developer must provide information supporting this application sufficient for the authority to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

- 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;

The entire Borough is designated as an Air Quality Management Area (AQMA) for both nitrogen dioxide and PM10 and the site fronts a road where existing levels of pollutants are likely to be at or above EU limit values of 40 µg/m<sup>3</sup> for nitrogen dioxide. However, as discussed, the development is not likely to have significant environmental effects in this regard, subject to conditions and mitigation measures; and the relevant Environmental Health officer also does not deem the scheme to trigger an EIA.

- densely populated areas;

The site is in a relatively low density area outside of the Borough's town centres. However, the development may cause impacts on the surrounding population in terms of the following:

- Noise, emissions, dust during construction
- Noise, light pollution, air quality and transport impact from proposed use
- Visual impact on townscape
- Flood risk and contamination

The above matters have been discussed elsewhere in this report. Given the scale and siting of the development, the surrounding context (in terms of adjoining neighbours and land uses) and taking into account 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.

- landscapes and sites of historical, cultural or archaeological significance.

The site is not located within (or within the vicinity of) a Conservation Area, locally or nationally listed buildings and is not within an Archaeological Priority Area. However, it does comprise of a large site where major development of scale could harm heritage assets of archaeological interest. Furthermore, a lack of previous archaeological work has been undertaken within this part of the Borough. Historic England (GLAAS) has been consulted on this EIA screening and considers that the desk based archaeological assessment provided by the applicant provides sufficient information needed to make a decision about archaeological fieldwork necessary on this site to mitigate the impacts of the development which could be secured through the planning application process. On this basis, no significant environmental effects are likely.

The site is located in Metropolitan Open Land (MOL) and so plays an important strategic role as part of the Borough's and London-wide multi-functional green infrastructure network as well as being of value to the local community. The site's current use is therefore considered to have various environmental and social benefits, however, as already described, whilst the proposal is for a significantly different use of the site (including the intensity of its use), and introduction of built form and hard surfacing, only a relatively small proportion of the overall site is proposed to be developed and this particular area to the north east of the site is, broadly speaking, contained within the established development zone line to the south of the site and so the proposal is not considered to have a significant urbanising effect on the site as a whole. The remainder of the site would remain open (i.e. playing fields and habitat/public open space). No significant environmental effects are considered likely.

**Summary – Given the scale and nature of the proposed development, the duration, reversibility and intensity of any impacts (as identified above) and in addition to the environmental context of the site and potential mitigation measures, significant environmental effects are not considered likely.**

**(3) Type and characteristics of the potential impact - The likely significant effects of the development on the environment must be considered in relation to criteria set out in points 1 and 2, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—**

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

The criteria set out in part 3 of Schedule 3 of the Regulations have been considered in the assessment above. The proposed development, both during construction and future operation, could impact upon several areas of acknowledged interest both in this borough and neighbouring borough's (notably the London Borough of Hounslow). These include visual impact, bus service, air quality, traffic, character, street scene and openness.

The scheme is not deemed to have a significant effect on the following during the course of the construction:

- Human Health:
  - No evidence to suggest there is a risk of an accident, however, any possibility can be reduced through Construction Management Plans, FRA etc.
  - Such schemes are not deemed of great complexity, the duration will be limited, and measures can be applied to reduce impact.
  - Contamination: The site may be contaminated in parts. However, with appropriate investigations and remediation, this is not deemed to give rise to significant effect.
- High quality, or natural or scarce resource.
- Land stability and climate.
- Future land uses around the site.
- Existing land uses: No significant impacts deemed during Works, given nature; limited duration; reversibility; and the ability to secure conditions / Heads of Terms that will avoid significant effect.

Any Works have a consequential impact on the physical environment:

- Pollution through operating machinery, transport, plant, dust. Whilst these will occur on a frequent basis, these are not uncommon on a construction site, and will be for a limited duration, and measures can be secured to reduce impacts, such as travel plans, Construction and Dust management plan, to avoid significant effect.
- Generation of noise, vibration, pollution. However, this is not significant or complex. Measures can reduce any impact to avoid significant impact, and the duration will be limited.
- Air pollution. The Works will inevitably add to this. However, given the limited duration, measures to control and measure this, it is not deemed to lead to significant effect.
- Openness of the MOL / physical changes to topography / visibility: The Works equipment will impact on the townscape, openness of the MOL and will be visible from various viewpoints and receptors. However, this will be in a relatively contained area, is not complex, uncommon, of any great magnitude, and is temporary and reversible, and thereby not significant.

Any Works will impact upon the transport network:

- There is a recreation site to the south of the site, cemetery to the west, and school to the south. With appropriate conditions, such as a construction management plan (to avoid deliveries during drop off and pick up times), the impact on the transport network will not be significant. Such measures are not uncommon.
- Hospital Bridge Road and the A316 can be susceptible to congestion and the whole Borough is located within an Air Quality Management Area. The Works will inevitably add to this. However, given the reversibility of such impact, limited duration, measures to control and measure this, it is not deemed to lead to significant effect.

In summary, whilst the impacts through the works will be frequent, given the duration of the impacts will be limited to just construction; not being complex or uncommon for the Borough; temporary in nature; a number being reversible (construction waste, air, noise, traffic, visual impact), with the mitigation measures put forward and recommended (to avoid significant effect), these are not deemed significant. It is probable the Works will generate short term employment opportunities.

Several impacts arising from the completed Development will not be reversible and due to the visible location of the development, proximity to residential properties, and siting adjacent to Heathfield Recreation Ground and Cemetery, would not be limited to the immediate locality, potentially affecting a significant number of people. However, the Council:

1. Does not consider the development is particularly uncommon for the Borough or magnitude that will generate significant environmental impacts.
2. Does not consider that the characteristics of the site and development would be likely to result in any significant effect on natural resources.

3. Whilst there is always the risk of pollution (air, noise, light, waste, contamination) being generated through operation, with the use of appropriate conditions, documents, and design measures will avoid significant impact or significant risk; nor deemed to be complex, or of magnitude.
4. Does not consider, based on the evidence submitted, the Development would raise significant impact on protect and sensitive areas of biodiversity and protected landscapes.
5. Recognises that significant effects on transport have been and can be addressed through design (limited parking), cycle storage facilities, management plans, Travel Plans, cycle infrastructure; and legal agreements to secure such.

In addition, as discussed elsewhere in this report, the information that has been submitted for this screening (including mitigation measures), the measures that could be applied and controlled through relevant Environmental and Health and Safety legislation, the information required in support of any future planning applications and mitigation that could be secured through planning conditions are considered to reduce the extent, duration, probability, frequency, magnitude, intensity of potential impacts (as described above).

The Completed development will have an urbanising effect on the townscape, towards the east of the site. However, given the character of the area (form, built nature and height); the limited evidence of likely significant impacts on sensitive landscape or archaeological or nature conservation interests; the Council does not, conclude that the scale and characteristics of the proposed development is so indifferent to the pattern of development that would be likely to result in any significant loss of natural resources and the impact is not deemed to be sufficient to warrant an EIA.

Various consultees which consider transboundary matters (including TfL, LB Hounslow, Natural England etc) have been consulted on this screening opinion. TfL did not request an EIA. Natural England determined that there were not likely to be any significant impact.

Therefore, it is of the Authorities opinion the development would not trigger the need for an Environmental Statement, under the terms of the EIA Regulations, to accompany any future planning application and any environmental effects associated with the Development can be adequately dealt with via the normal planning application process. The detailed planning application will need to be supported by an extensive suite of environmental technical studies and operational management plans.

**On this basis, significant environmental effects are not considered likely.**

### **Mitigation measures**

The EIA Regulations (5.5b) and NPPG state, *“Where it is determined that the proposed development is not Environmental Impact Assessment development, the authority must state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment”*. Further, *“Local planning authorities will need to consider carefully how such measures are secured. This will usually be through planning conditions or planning obligations, enforceable by the local planning authority which has powers to take direct action to ensure compliance”*.

Taking into consideration the environmental information submitted and measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment, the type and characteristics of the potential impact are effectively reduced. The table below (column 2) identifies the features of the development / mitigation measures put forward by the applicants to avoid or prevent what might otherwise have been significant adverse effects on the environment. The third column identifies further reports / mitigation, recommended by the LPA. These would either be secured by condition or a Section 106 Legal Agreement, and / or be necessary at the time of submission.

Issue	Features / mitigation / documents to be submitted to avoid or prevent potential significant effects:	Additional mitigation / reports recommended by the Local Planning Authority:
<b>Transport and connectivity</b>	<p>Transport Assessment</p> <p>Temporary:</p> <ol style="list-style-type: none"> <li>1. Construction Management Statement</li> <li>2. Construction Logistics Plan</li> </ol> <p>Permeant:</p> <ol style="list-style-type: none"> <li>1. Highway improvements on Hospital Bridge Road,</li> <li>2. Contributions towards highways and parking measures around the site</li> <li>3. On site highway and access works to ensure safe access to the site for pedestrians and vehicles and in relation to neighbouring nursery use</li> <li>4. New traffic-free pedestrian entrance to Heathfield Recreation Ground</li> <li>5. Staff management,</li> <li>6. Staggered class times, with before and after school activities</li> <li>7. Appropriate conditions</li> <li>8. Highways and traffic management legislation.</li> <li>9. Robust travel plan,</li> <li>10. Cycle parking.</li> <li>11. Car Park Management Plan,</li> <li>12. Travel Plan</li> <li>13. Delivery and Servicing Plan</li> </ol>	<ul style="list-style-type: none"> <li>• Contributions towards highways measures and parking controls around the site</li> <li>• Highways and traffic management legislation.</li> <li>• Community Use Agreement</li> </ul>
<b>Core Social Infrastructure</b>	<ol style="list-style-type: none"> <li>1. Appropriate quantum of outdoor space will be provided within the school grounds</li> <li>2. Additional area of Public Open Space</li> <li>3. Health Impact Assessment</li> </ol>	
<b>Townscape and visual Effects</b>	<ol style="list-style-type: none"> <li>1. Visual Assessment</li> <li>2. Evidence to demonstrate Very Special Circumstances.</li> </ol>	<ul style="list-style-type: none"> <li>• Construction Management Plan</li> </ul>
<b>Heritage Effects</b>	<ol style="list-style-type: none"> <li>1. Desk based archaeological assessment</li> <li>2. Archaeological fieldwork necessary</li> </ol>	
<b>Biodiversity / Ecological Effects</b>	<p><u>Biodiversity</u></p> <ol style="list-style-type: none"> <li>1. Preliminary Ecological assessment</li> <li>2. Preliminary Ground Level Roost Assessment</li> <li>3. Bat Roost Assessment</li> <li>4. Ecological Appraisal</li> <li>5. National Vegetation Classification survey</li> <li>6. Botanical survey</li> <li>7. Removal of trees outside nesting bird season or bird nesting check.</li> <li>8. Development avoid areas where badgers are known</li> <li>9. Method Statement for removal of longer swards around perimeter of boundary.</li> <li>10. Removal of vegetation in months when reptiles are most active.</li> <li>11. Removal of vegetation in a successional manner</li> <li>12. Toolbox talk – for hedgehogs and foxes, prior to construction.</li> <li>13. Provision of new public open space</li> <li>14. Retention of potential bat roost and badger habitats,</li> <li>15. Dark corridors along the boundaries of the site</li> <li>16. Further survey work.</li> <li>17. Lighting will be in accordance with the recommendations set out in the Preliminary Bat Roost Assessment.</li> </ol>	<ul style="list-style-type: none"> <li>• Arboricultural Method Statement</li> </ul>

	<ol style="list-style-type: none"> <li>18. Use of low pressure sodium lamps, LEDS or high-pressure sodium instead of mercury or metal halide lamps.</li> <li>19. Lighting directed to where it is needed, and light spillage avoided.</li> <li>20. Lighting columns to be as short as possible.</li> <li>21. Lighting in accordance with guidance with Bat Conservation Trust</li> <li>22. Limit timings for lighting</li> <li>23. No floodlighting to Muga</li> <li>24. Ecological enhancements – bird boxes, bat boxes, suitable habitat for invertebrates, native species planting, soil capped log piles, soil scrapes for invertebrates, green roof.</li> <li>25. Sports pitches are composed of coarse native grasses</li> <li>26. Provision of a 20-25m grassland buffer is maintained / enhanced.</li> <li>27. Treelines and hedgerows enhanced to ensure that commuting and foraging habitat is maintained.</li> </ol> <p><u>Trees:</u></p> <ol style="list-style-type: none"> <li>1. Arboricultural Survey and Arboricultural Impact Assessment</li> <li>2. Root / Tree protection</li> <li>3. Tree works undertaken in accordance with BS3998:2010 ~Recommendations for Tree Work</li> <li>4. Additional planting / landscaping plan</li> <li>5. Post Development Management Plan</li> </ol>	
<b>Geology, Ground Conditions and contamination</b>	<ol style="list-style-type: none"> <li>1. A stage 2 Site Investigation Report - potential mitigations and conditions contained within</li> </ol>	
<b>Water Resources and flood Risk</b>	<ol style="list-style-type: none"> <li>1. Flood Risk Assessment and Drainage Strategy</li> <li>2. Positive drainage system</li> <li>3. Foul and surface water connections.</li> <li>4. Antennation tank – geo-cellular tank and sub-base storage in the car park</li> <li>5. Careful consideration of the levels and drainage features to the north east of the site</li> <li>6. Drainage features placed at localised low points should have sufficient capacity to deal with excess runoff</li> <li>7. S106 applications for the new foul and surface water connections</li> </ol>	
<b>Air Quality</b>	<ol style="list-style-type: none"> <li>1. An Air Quality Assessment and mitigation measures set within</li> <li>2. Dust Management Plan</li> <li>3. Construction Management System</li> <li>4. Setting back of building by at least 40m</li> <li>5. Travel Plans</li> <li>6. Use of PV systems</li> <li>7. Installation of low NOx boilers</li> <li>8. Any flues 1m above roof level</li> <li>9. Design of the development</li> <li>10. Potential additional bus services to/from the school, subject to TfL approval</li> <li>11. Provision of the minimum number of vehicular parking spaces,</li> <li>12. Electric vehicle parking spaces,</li> <li>13. Cycle parking and infrastructure,</li> </ol>	<ul style="list-style-type: none"> <li>• Potential additional bus services, subject to TfL approval</li> <li>• Provision of the minimum number of vehicular parking spaces,</li> <li>• Electric vehicle parking spaces,</li> <li>• Cycle parking and infrastructure</li> </ul>
<b>Noise and Vibration</b>	<ol style="list-style-type: none"> <li>1. Noise Survey / Assessment.</li> <li>2. Acoustic performance subject to critical of BB93</li> </ol>	<ul style="list-style-type: none"> <li>• Community Use Agreement.</li> </ul>

	<ol style="list-style-type: none"> <li>3. Application subject to SPD 'Development Control for Noise Generating and noise Sensitive Development'</li> <li>4. Orientation and layout of the school – locate more sensitive uses away from transport noise source.</li> <li>5. Fencing to the sports pitches to reduce noise impacts for neighbours.</li> <li>6. Acoustically attenuated natural ventilation and/or mechanical ventilation</li> </ol>	
<b>Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare</b>	<ol style="list-style-type: none"> <li>1. Conditions and mitigation could be applied including to control the hours of use and thus any impact.</li> <li>2. Lighting directed to where it is needed, and light spillage avoided.</li> <li>3. Lighting columns to be as short as possible.</li> <li>4. Lighting in accordance with guidance with Bat Conservation Trust</li> </ol>	<ul style="list-style-type: none"> <li>• Construction Management Plan</li> <li>• Lighting Strategy</li> <li>• Daylight / sunlight assessment</li> </ul>
<b>Waste</b>	<ol style="list-style-type: none"> <li>1. Construction Management Statement</li> <li>2. A Waste Management Plan.</li> </ol>	<ul style="list-style-type: none"> <li>• Refuse and recycling facilities</li> </ul>
<b>Risk of Major Accidents and disasters</b>	<ol style="list-style-type: none"> <li>1. Contamination Assessment and Remediation Strategy.</li> <li>2. An FRA</li> </ol>	<ul style="list-style-type: none"> <li>• Construction Management Plan</li> <li>• Foul sewerage and utilises assessment</li> </ul>
<b>Health and Wellbeing</b>	<ol style="list-style-type: none"> <li>1. Dust management plan</li> <li>2. Air Quality Assessment</li> <li>3. Contamination Assessment and mitigation / recommendations contained within.</li> </ol>	<ul style="list-style-type: none"> <li>• Health Impact Assessment</li> <li>• Construction Management Plan</li> </ul>
<b>Climate Change</b>	<ol style="list-style-type: none"> <li>1. A Transport Assessment</li> <li>2. Travel Plan</li> <li>3. Delivery and Servicing Plan</li> <li>4. FRA</li> <li>5. An Air Quality Assessment.</li> <li>6. Use of PV system</li> <li>7. Mechanical ventilation</li> </ol>	<ul style="list-style-type: none"> <li>• Sustainable Construction Checklist</li> <li>• Sustainable Drainage Strategy</li> <li>• BREEAM Pre-Assessment</li> <li>• Energy Report.</li> <li>• Construction Management Plan</li> </ul>

### **Conclusion**

For the reasons set out above, and given the scale and nature of the proposed development, the duration, reversibility and intensity of any impacts and in addition to the environmental context of the site and potential mitigation measures (which will assist in avoiding any significant effects), the Council does not consider that the proposed development will result in any unusually complex, significant or potentially hazardous environmental effects. It is deemed there no other factors in this case in this specific location, including urbanising effects, traffic, noise, and air quality effects, loss of best land and effects on local receptors, that either in isolation or together, would necessitate EIA. As such, an Environmental Impact Assessment would not be required for any future planning applications under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

### **Decision: Negative Screening Opinion**

**Date of Opinion: 2<sup>nd</sup> January 2019**

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Angus', with a long horizontal flourish extending to the right.

Robert Angus  
Head of Development Management