

Civic Centre, 44 York Street, Twickenham TW1 3BZ  
tel: 020 8891 7300 text phone 020 8891 7120  
fax: 020 8891 7789  
email: envprotection@richmond.gov.uk  
website: www.richmond.gov.uk

Our ref: TP.W/R2B

Contact: Bryan Staff  
Telephone: 0208 891 7300  
Email: b.staff@richmond.gov.uk

Mr Kevin Goodwin  
CGMS Consulting  
140 London Wall  
London  
EC2Y 5DN

30 August 2013

Dear Mr Goodwin,

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 – Regulation 5 Screening Opinion.

**Teddington Studios, Broom Road, Teddington: Redevelopment of the site including demolition of all buildings and erection of buildings comprising up to 250 units.**

Thank you for your letter dated 22 July 2013 requesting a formal screening opinion of the Local Planning Authority under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 in respect of the aforementioned development proposals.

#### Preamble

I can confirm that the local planning authority is of the view that the redevelopment proposals would be an Urban Development Project as defined in part 10 of Schedule 2 of the Regulations. The site is identified in your letter as 1.86ha, I can confirm that the area outlined on the site plan is in excess of 1.8ha and that the proposed scheme therefore constitutes Schedule 2 development for the purposes of the 2011 Regulations.

Schedule 3 of the Regulations requires the consideration of three matters in screening Schedule 2 developments, as follows:

- Characteristics of development
- Location of development
- Characteristics of the potential impact

#### Characteristics of Development

Having regard to the criteria set out in (a) to (f) of this part of Schedule 3, in particular (a) the size of development (compared with and notwithstanding the existing

development on site), (d) in relation to the production of waste resulting from demolition and (e) pollution and nuisances, it is considered that the proposed development is of sufficient size to potentially have significant effects on the environment.

With respect to the above, it is noted that paragraph A.18 of Circular 02/99 (Environmental Impact Assessment) states that 'particular consideration should be given to the potential increase in traffic, emissions and noise' and it is considered in respect to the size of the redevelopment that the development is on a 'significantly greater scale' than existing and that 'the type of impact would be markedly different in nature'.

### Location of Development

Criteria (c) (vii) and (viii) from this part of the schedule are of relevance in this case. The area surrounding the site, is relatively densely populated and whilst I agree that the proposal site does not lie within or adjacent to a 'sensitive area' as defined in Part I, the proposed development is in an environmentally sensitive location, designated an Archaeological Priority Zone, lying within the Thames Policy Area and Flood Zone 3a (a high probability of flooding) and adjacent to the River Thames (designated Metropolitan Open Land and an Other Site of Nature Importance) and bounded to the south east, north west (in part) and south west (albeit bisected by Broom Road) by Metropolitan Open Land. Teddington footbridge is a Grade II listed structure and designated as a landmark on the Proposals Map (July 2013) and the site lies adjacent to the Teddington Lock Conservation Area.

It is noted that paragraph 39 of Circular 02/99 (Environmental Impact Assessment) states that in certain cases other statutory and non statutory 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 EIA is required.

### Characteristics of the Potential Impacts

Having regard to the above factors, the development, both during its construction and future operation, could have a significant impact upon a number of areas of acknowledged interest. Broadly speaking these would include visual impact, air quality and noise pollution, traffic generation, land contamination, flood risk, socio economics and the wildlife corridor/habitat. Some of these potential impacts would not be reversible and would not be limited to the immediate locality, potentially affecting a significant number of people.

### Conclusions

For the reasons above, the local planning authority consider that the proposed redevelopment would potentially have significant effects on the environment and that the proposal does require an Environmental Statement, under the terms of the EIA Regulations 2011, to accompany any future planning application.

The proposed scale and massing of the new buildings, their impact with surrounding development and the impact on traffic, in particular during the construction phase, will be the major factors which need to be evaluated.

The EIA process will provide an opportunity to test these impacts in a more rigorous fashion and in so doing contribute to the bringing forward of an appropriate and beneficial form of development.

Yours sincerely

**Paul Chadwick**  
Director of Environment