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By email and post

12 January 2016

Dear Cathy,

**RICHMOND-ON-THAMES COLLEGE, SCHOOLS DEVELOPMENT ZONE:
REQUEST FOR A SCREENING OPINION UNDER REGULATION 5 OF
THE TOWN AND COUNTY PLANNING (ENVIRONMENTAL IMPACT
ASSESSMENT) REGULATIONS 2011 AND AMENDMENT
REGULATIONS 2015 (THE EIA REGULATIONS) FOR RESERVED
MATTERS PURSUANT TO OUTLINE PLANNING APPLICATION
15/3038/OUT, AT RICHMOND UPON THAMES COLLEGE,
TWICKENHAM.**

CgMs, part of RPS Group Plc, act on behalf of the London Borough of Richmond upon Thames (LBR, the 'Applicant') in respect of their interests at the above site.

We have been instructed to submit a formal request for a Screening Opinion from the Council under Regulation 5(1) of the Town and Country Planning (Environment Impact Assessment) Regulations 2011 and Amendment Regulations 2015 ("The Regulations") to establish whether or not the Council considers the proposed development constitutes EIA development in respect of the Schools Development Zone ('the site') at the Richmond upon Thames College (RuTC) site in Twickenham.

Background

LBR intend to submit Reserved Matters details (layout, scale, appearance, and landscaping) in respect of this development zone. The wider site is subject of an application for outline planning permission including access details (15/30308/OUT) for the proposed Richmond Education and Enterprise Campus (REEC) Development. The outline planning application for the REEC development was submitted in July 2015 and is currently awaiting determination. Upon receipt of outline planning permission, LBR will submit Reserved Matters at the earliest opportunity.

National Planning Practice Guidance (PPG) sets out procedures for pursuing 'multi-stage consents' such as outline planning applications followed by reserved matters in the context of Environmental Assessment. The PPG states that the *"likely significant effects of a project on the environment should be identified and assessed at the time of the procedure relating to the principal decision..."*



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However, if those effects are not identified or identifiable at the time of the principle decision, an assessment must be undertaken at the subsequent stage." (PPG paragraph 056, ID:4-056-20140306)

The PPG goes on to set out the criteria and thresholds representing 'exclusion thresholds' in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area). It also provides indicative criteria and thresholds to help to determine whether significant effects are likely. (PPG paragraph 057, ID:4-057-20140306).

For urban development projects such as that proposed at Richmond College (development type 10b in the PPG Annex) the Schedule 2 criteria is as follows:

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

The Annex further states that:

"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination." (PPG paragraph 058, ID:4-058-20140306).

To allow the Council to assess the proposed development and its possible effects on the environment and to accord with the requirements of Regulation 5(2) of the EIA Regulations, this letter provides a brief description of the site and its surroundings, a description of the nature and purpose of the development proposals, and a Site Location Plan (Ref: C1521 PL-01) to identify the extent of the proposed development site.

In accordance with Regulation 5(2), the following information is provided as part of this request:

1. A plan sufficient to identify the land; and,
2. A brief description of the nature and purpose of the development and of its possible effects on the environment.

The letter also provides additional information on the characteristics of potential impacts supporting the conclusions that the proposed development is not EIA development.

As set out below, it is considered that:

- The Environmental Statement submitted in support of the outline planning application tested the maximum parameters;
- The Reserved Matters submission for the School development zone entails development which falls squarely within these maximum parameters;
- The application site does include more than 1 hectare of urban development, but it will not result in a new development of significantly greater scale than the previous use or impacts of a markedly different nature; and
- The proposal does not constitute EIA development.

Description of the Site and Location

Site Location Plan (Ref: Ref: C1521 PL-01) identifies the site for the proposed development to which this Screening Opinion request relates. The wider REEC redevelopment site is bounded to the north by the A316 Chertsey Road, by Egerton Road to the east, residential properties on Craneford Way to the south and by a pedestrian footpath known as Marsh Farm Lane and The Stoop/Langhorn Drive to the West. The remainder of the wider site includes the existing College sports fields south of Craneford Way.

The Schools Development Zone lies within this wider site and comprises a site of approximately 1.79 hectares (4.4 acres). The site is an irregular shape forming the north-eastern part of the wider site wrapping around existing (and retained) residential dwellings on Egerton Road (odd nos. 3-33), and including vehicular access points to the north (near the A316 Chertsey Road) and south (opposite Heathfield South). The access arrangements are subject of determination as part of the outline planning application.

The site is currently occupied by the existing Richmond upon Thames College buildings and northern car-park area. The site is mainly level. The northern boundary is shared with the adjacent proposed College Main Building, with the A316 Chertsey Road beyond. To the south is the proposed Residential Building Zone. To the west are the proposed College STEM Building and combined College and Schools Sports Centre.

A large proportion of the School Development Zone site has been subject of a recent separate planning permission (15/4456/FUL) for demolition of existing buildings comprising the removal of 5 building blocks currently used for teaching and administration at RuTC.

This demolition application was also subject of a request for an Environmental Impact Assessment (EIA) Screening Opinion. On 11 November 2015, the Council confirmed that the proposed demolition does not have significant environmental impacts and therefore does not constitute Schedule 2 development requiring the submission of an Environmental Statement.

The Nature and Purpose of the Proposed Development

The proposed development seeks Reserved Matters approval pursuant to outline planning application 15/3038/OUT for a new five form entry Secondary School, incorporating Clarendon and Newhouse Special Educational Needs Schools, at Richmond Education and Enterprise Campus.

The outline planning application was subject of a comprehensive Environmental Statement (ES) prepared by Cascade Consulting in June 2015 which considered the effects during demolition and construction, during operation, and the cumulative effects in respect of the following topics:

- Transport
- Noise and Vibration
- Air Quality
- Ground Conditions
- Waste
- Water Resources and Flood Risk

- Daylight, Sunlight and Overshadowing
- Ecology
- Townscape and Visual Amenity
- Cultural Heritage
- Socio-Economics

Impacts on Sustainability/Climate Change, Health and Wellbeing, Telecommunications, Utilities, Micro-climate, and Design Evolution were scoped out of the EIA when the Council issued its EIA Scoping Opinion under Regulation 13 of the EIA Regulations in February 2015.

No significant residual environmental effects after mitigation were identified in connection with the outline proposals. This assessment was based on the 'worst case' impact the buildings, roads and other structures could have on people and the environment derived from maximum parameters. The parameter plans (PL-01 - PL-16) show fixed areas within which the buildings can be located; the access routes to those buildings and parking; and where the open spaces and recreational areas will be.

In terms of the Schools Development Zone, the Environmental Assessment was based on a maximum gross external area of 7,000m² for the new Secondary School and 4,000m² for the new Special Education Needs (SEN) School. The parameter plans assumed a maximum building length of 108m and a maximum width of 54m. The maximum height of the building was 18.5m (27.7m AOD).

These parameters have since been reduced to reflect the evolving design of the School, notably a reduction in maximum height of the School buildings to 14.5m (23.7m AOD), which would have a positive impact on the conclusions of the ES.

The outline Environmental Assessment established that, providing the development when taken forward at Reserved Matters stage, remains within these parameters, the environmental effects should be no greater than assessed in the June 2005 ES.

The ES in support of the outline application did however identify a few topics which would need to be reviewed at the Reserved Matters stage when more details are available. These include the issue of solar glare, which could not be fully assessed until facade treatments were known (although this principally relates to the proposed College building on the A316 frontage). Other such issues include landscape strategy, waste servicing, ground investigations (re groundwater levels), and townscape.

However, we do not consider these give rise to further environmental impacts above and beyond those fully tested at the outline application stage. Furthermore, these issues will be addressed in supporting documentation submitted with the Reserved Matters details.

The Need for Environmental Impact Assessment

The Department for Communities and Local Government (DCLG) guidance advises that the proposed works fall under Schedule 2.10(b) (urban development projects) of the EIA Regulations provided the threshold and criteria for this type of development are met. EIA Screening is required in this case as the area of demolition works is approximately 1.79ha, thus exceeding the 1 hectare threshold.

Having regard to the selection criteria set out in Schedule 3 of the EIA Regulations and the guidance provided in the PPG, additional information is provided to help inform the Screening decision. This includes information on the characteristics and location of the development, as well as the characteristics of potential impacts.

On the basis of the information provided in this letter it is not considered that the Reserved Matters submission for the Schools Development Zone constitutes EIA development and hence an EIA is not required.

a) Characteristics of development

The proposed development is for an educational building to be provided on the site in place of existing academic and facilities buildings associated with and wholly within the boundary of the existing Richmond Upon Thames College which are to be demolished.

The site is a developed, urban site which is currently in use. The proposed development is of a similar scale to the existing buildings to be demolished. The floorspace of the existing buildings on site extend to c. 6,645m² GIA, whilst the proposed new school is c. 7,800m² GIA. Most notably, this is substantially below the gross floorspace tested in the Environmental Statement at the outline application stage of 11,000m² (i.e. 7,000m² for the new Secondary School and 4,000m² for the new Special Education Needs School).

Therefore the proposed development, which will result in a net increase of c. 1,100m² on site, is not a significantly greater scale than the current uses of the site, the characteristics of development are similar, and the types of impact are not markedly different. Furthermore, the scheme subject of the Reserved Matters submission is substantially smaller than that tested in the ES at the outline application stage.

Accordingly, we do not consider that the scale of development, when considered in the context of the scale and nature of the existing uses of the site, is sufficient for it to have significant environmental effects which would justify EIA.

b) Location of development

The site is located within the RuTC site, to the north west of Twickenham town centre (see Site Location plan). It falls within the administrative area of the London Borough of Richmond upon Thames.

The site is not a site of Special Scientific Interest or land to which a Nature Conservation Order applies, an International Conservation Site, a National Park, an Area of Outstanding Natural Beauty, World Heritage Site or Scheduled Monument.

The site is a developed brownfield site which is currently in use for educational purposes. It is not therefore considered to be particularly environmentally sensitive. The site is not within a 'Sensitive Area' as defined by the EIA Regulations and is not covered by any statutory or non statutory wildlife or heritage designations.

c) Characteristics of the potential impact

An outline planning application for the REEC development was lodged in July 2015.

The potential environmental impacts of the proposed development have been fully tested in the Environmental Statement submitted in support of that outline planning application. The proposal is to submit Reserved Matters details pursuant to the outline planning permission once issued.

No significant residual environmental effects after mitigation were identified in connection with the outline proposals. This assessment was based on the 'worst case' impact the buildings, roads and other structures could have on people and the environment derived from maximum parameters.

The Reserved Matters details for the School Development Zone fall within or otherwise well below the maximum parameters tested at the outline stage. We therefore consider that the environmental impacts have been fully assessed on a worst-case basis.

Conclusion

In summary, the proposals are on land that is not an environmentally sensitive or vulnerable location. The site consists of previously developed land, the redevelopment of which will not give rise to hazardous environmental effects and the proposals are not of a significantly greater scale than the current uses of the site, and the types of impact are not markedly different.

The site is not within a 'Sensitive Area' as defined by the EIA Regulations, but is captured within Schedule 2.10(b) (urban development projects) of the EIA Regulations as the area of development is approximately 1.79ha. This exceeds the 1 hectare threshold.

Many of the key environmental considerations of our clients' proposals such as traffic, landscaping, ground conditions, and visual impacts have been addressed in the supporting material to the outline application to enable your Council to fully assess the implications of the development proposals. Where matters have not been able to be fully assessed at the outline application stage, these will be addressed in the supporting material to the Reserved Matters.

The content of this letter and the enclosed Site Location Plan (Ref: Ref: C1521 PL-01) should provide the Council with sufficient information to consider whether the proposed development is likely to have a significant effect upon the environment. In the circumstances, and taking into consideration the requirements and advice set out in the Regulations and PPG outlined above, we have concluded that this is not a development that is likely to have a significant effect on the environment and, as such, is not an EIA development. We request that the LBRuT take into account the contents of this letter when determining the Screening Opinion.

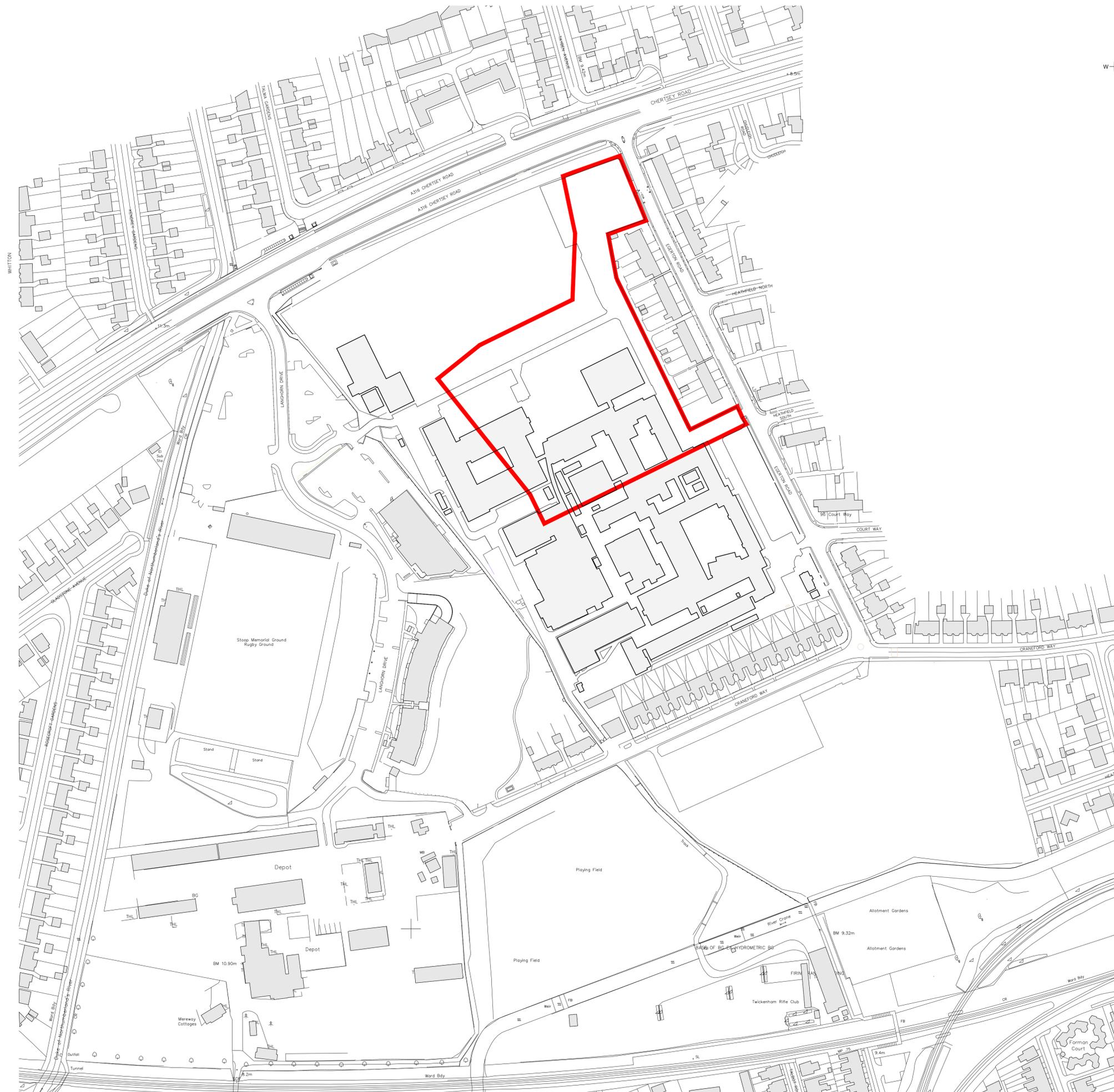
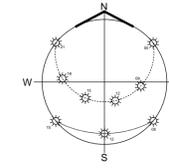
In the event that it is considered that the development proposal does constitute 'EIA development', thus requiring an Environmental Statement in support of the applications, we would appreciate your advice on the appropriate scope of the EIA under Regulation 13.

Should you wish to discuss this matter please do not hesitate to contact me.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Mark Buxton', with a stylized flourish at the end.

Mark Buxton
Director



Rev	Date	Revision Details	CL	SE
P1	11.01.16	Updated following feedback		

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Job Title
REEC Schools

Drawing Title
Site Location Plan

Scale
1:1250 @ A1 / 1:2500 @ A3



Drawn	Checked	Date
gjk	SE	01.12.15

Project	Drawing No	Rev
C1521	PL - 01	P1

Status
PRELIMINARY