

GREATER LONDON AUTHORITY

Rachel Crick
GVA
65 Gresham Street
London
EC2V 7NQ

Department: Planning
Our reference: GLA/2020/6252
Date: 24 August 2020

Dear Rachel Crick

**Town & Country Planning Act 1990 (as amended); Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 (As Amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008
Environmental Impact Assessment Updated Screening Opinion**

TAKE NOTICE that the Greater London Authority, as Local Planning Authority (pursuant to the Mayor's direction) under the above legislation, hereby determines that:

AN ENVIRONMENTAL IMPACT ASSESSMENT IS NOT REQUIRED

At: Homebase, 84 Manor Road, North Sheen, London TW9 1YB

The plans accompanying this application are:

- Environmental Impact Assessment (EIA) Screening Report dated October 2019 prepared by Avison Young.

The reasons for this decision are as follows:

CONSIDERATIONS

Relevant legislation and guidance

- Greater London Authority Act 2007 & the Mayor of London Order 2008
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As Amended) (the 'Regulations');
- National Planning Policy Guidance for Environmental Impact Assessments published 15 March 2019

Description of the existing site

The site is located in North Sheen on Manor Road in the London Borough of Richmond upon Thames, approximately 1 kilometre to north east of Richmond town centre. The site is 1.5 hectares in size and bounded by railway lines (mainline, underground and overground lines) to the north and south. The east of the site is bounded by Manor Road. North Sheen Bus Terminus is located within the site at its northernmost end. The site contains a single storey building with high ratio of associated parking and is currently in retail use (occupied by Homebase and Pets at Home).

Access to the site is off Manor Road with a dedicated access point to the north for vehicles, serving the car parking and the bus terminus, and one for pedestrians nearer the store entrance to the south. The surrounding area comprises a mix of uses, mainly being residential but also the Sainsbury's superstore to the east, North Sheen Bus Terminus to the north and commercial premises.

Description of the proposals

Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

The Regulations

The Regulations apply to two separate lists of development project. 'Schedule 1 development' for which the carrying out of an Environmental Impact Assessment (EIA) is mandatory and 'Schedule 2 development' which require the carrying out of an EIA if the particular project is considered likely to give rise to significant effects on the environment.

The development described in the documentation submitted is not considered to be of a description identified in Schedule 1 of the regulations.

The development described in the documentation is considered to be of a description identified in column 1 of the Schedule 2 of the Regulations, 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 development described in this report is deemed to fall within the description of 'infrastructure projects' and more specifically 'urban development projects' (paragraph 10(b)).

The site identified in the plan accompanying the screening opinion request is not considered to be in or partly in a sensitive area as defined in the Regulations.

As a development falling within the description of an urban development project does not fall in or partly within a sensitive area, the relevant threshold and criteria in column 2 of 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.

The site is of 1.5 hectares and the proposals comprises more than 150 residential units. The proposal is therefore Schedule 2 development.

The GLA as the local planning authority for the purposes of determining this application as prescribed by the Greater London Authority Act 2008 has rescreened the application under the provisions of the relevant legislation stated above. Where a local planning authority has to decide whether Schedule 2 development is EIA development the authority must take into account in making that decision such of the selection criteria set out in Schedule 3 of the Regulations as are relevant to the development. The selection criteria for screening Schedule 2 developments identified in Schedule 3 are as follows:

Characteristics of development

1. The characteristics of development must be considered with particular regard to—
 - (a) the size and design of the whole development;
 - (b) cumulation with other existing development and/or approved development;
 - (c) the use of natural resources, in particular land, soil, water and biodiversity;
 - (d) the production of waste;
 - (e) pollution and nuisances;
 - (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
 - (g) the risks to human health (for example, due to water contamination or air pollution).

Location of development

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—
- (a) the existing and approved land use;
 - (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
 - (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

Types and characteristics of the potential impacts

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, 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 National Planning Policy Guidance sets out indicative criteria and thresholds for Schedule 2 EIA developments:

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.

On sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5 hectares; or
- (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or

(iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

The proposals do not exceed any of the above thresholds. Each proposal should be assessed on its own circumstance.

The proposal is considered and evaluated against these criteria, as far as they are relevant, below. For avoidance of doubt this report does not consider the planning merits of the proposed development. Instead it deals solely with determining whether there is a need for an Environment Statement to be submitted with a subsequent application to carry out development of the nature set out in the information submitted. An Environmental Statement will need to accompany an application where a development is likely to give rise to significant effects on the environment in the sense intended by the Regulations.

SCREENING OPINION

Assessment of the development against the criteria found in Schedule 3 of the Regulations

The development described in the information submitted comprises the demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

The site comprises 1.5 hectares of previously developed land in a built-up area with a mixture of uses. The land does not fall within or partially within a sensitive area as defined in the Regulations.

It is recognised that the whole of the London Borough of Richmond-upon-Thames (and therefore the site of the proposal) has been designated as an Air Quality Management Area. However, it is not considered that a proposal of the nature put forward would be likely to have a significant effect on air quality. The site does not fall within any of the other 'areas' identified under paragraph 2 (c) of schedule 3 of the Regulations.

The nature of the proposal is not deemed to be such that it would result in a use of natural resources or produce a level of waste, pollution or risk of accidents that would be likely to result in a significant effect on the environment, in the sense intended by the Regulations, in this regard.

The key likely potential environmental effects of a development of the nature proposed are considered to arise from:

- The cumulative impact alongside other developments in the locality;
- The impact of demolition and construction works on the amenities of neighbouring occupiers in terms of noise, air quality and vehicle movements;

- The design, size, height and scale of the built form proposed and the impact of the proposal on the amenities of neighbouring occupiers and other users;
- The density and amount of development proposed;
- Townscape and heritage impacts;
- Use of natural resources; production of waste; and pollution and nuisances;
- The parking and traffic implications of the development; and
- Social infrastructure.

Each of these points is therefore considered in greater detail below.

The cumulative impact alongside other developments in the locality

Committed developments (developments with planning permission and under construction/complete) in this area are listed below:

1. **Richmond College - 15/3038/OUT** – approved. Redevelopment of the site to provide a replacement campus for education and enterprise purposes, and a new residential development of up to 180 units together with associated parking, open space and landscaping; and
2. **Kew Biothane Plant – 18/3310/FUL** – approved. Redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 89 units, communal healthcare, therapy, leisure and social facilities, provision of car and cycle parking, associated landscaping and publicly accessible amenity including a children’s play area;

The following developments are still pending decision by the Mayor:

3. **Stag Brewery redevelopment** – Redevelopment to provide secondary school with sixth form; 443 residential apartments; 150 units of either assisted living or residential; 224-unit care / nursing home; flexible commercial uses, community and leisure; and hotel, cinema, gym and office floorspace; and associated parking.

There are considered to be no other major committed developments in the vicinity of the site that could lead to cumulative impacts with the proposed development.

The impact of demolition and construction works on the amenities of neighbouring occupiers in terms of noise, air quality and vehicle movements

The proposed development is expected to result in environmental impacts and have some impact on the amenities of neighbouring occupiers in the locality of the development site in terms of noise, air quality and vehicle movements during the demolition and construction phase of the development. However, it is considered that this can be planned, programmed and controlled and any planning application submitted would need to be ensure it carefully addressed mitigation of potential impacts.

Whilst assessing the impacts as part of this screening does not diminish the substantial effects possible from a development of this scale, these are not considered to be

significant enough to be of more than local importance when considered in the context of the Regulations.

The design, size, height and scale of the built form proposed and the impact of the proposal on the amenities of neighbouring occupiers and other users

It is recognised that the scheme by nature of its design, size, height and scale is likely to result in environmental, microclimate and visual impact on neighbouring occupiers in the locality of the development site and any future users of the site and surroundings. Any planning application submitted would need to be ensure such matters were carefully addressed.

Whilst assessing the impacts as part of this screening does not diminish the substantial effects possible from a development of this scale, these impacts are not considered to be significant enough to be of more than local importance when considered in the context of the Regulations.

The density and amount of development proposed

The submitted screening report indicates that the density of residential development proposed would equate to 302 dwellings per hectare (based on 453 units and a site area of 1.5 hectares).

The public transport accessibility of the site (PTAL) is 5. the site could be considered to have an urban or suburban context. Given the proximity of the site to the North Sheen train station, and in light of its varying context and PTAL, it is expected that the site should be optimised, with a high density.

The residential density is an important matter in terms of assessing the acceptability of the proposal against planning policy, and an excessively dense scheme could result in substantial issues (such as the provision of inadequate amenities for future occupiers), it is not considered that the magnitude, extent of complexity of this impact is such that it would result in significant effect on the environment, in the sense intended by the Regulations.

Townscape and heritage impacts

The site is not within a conservation area nor does it contain any statutory or non-statutory listed buildings. The Site is not subject to any statutory or locally protected view. The site is not considered to be archaeologically sensitive.

The applicant has set out the potential heritage assets within the Zone of Theoretical Visibility (ZTV). This demonstrates that the scheme is of a size that could affect the townscape and historic environment; however, this is not deemed to be of a scale that would give rise to significant environmental effects when considered under the Regulations.

Use of natural resources; production of waste; and pollution and nuisances

The proposed development does not contain any hazardous or contaminative land uses, although there could be some land contamination associated with historic uses on the site. It does have the potential to result in impact on effects of production of waste, pollution and nuisances from traffic generation and the plant (heating and power) when in operation. The site is within Flood Zone 1 and the development is not considered likely to cause significant adverse impact that cannot be mitigated.

The amount of development proposed would be substantial, resulting in new infrastructure and impacting on existing infrastructure. The development would be futureproofed in the event of a district heat network being implemented in the area, and whilst the development would give rise to the use of natural resources, creation of waste, pollution and noise, this is not expected to be of a magnitude, extent or complexity that it would result in significant effect on the environment when considered in the context of the Regulations.

The parking and traffic implementations of the development

The proposed development has the potential to impact on the road network during the construction. This can be planned, programmed and controlled in line with a Construction Traffic Logistics Plan, which would be required as part of any planning application. The development is car free with the exception of 12 blue badge parking spaces. As such, it is not considered the completed development would have a significant impact on the local road network.

Any planning application submitted would need to ensure it carefully addresses the transport, traffic and parking issues raised by the proposal put forward. Whilst it cannot be assessed at this stage if the proposal is acceptable in these regards, it is not considered that the transport, traffic and parking impacts of the development of the nature proposed would be more than localised in nature, or of a magnitude, extent or complexity that they would have a significant impact on the environment in the sense intended by the Regulations.

Social infrastructure

The proposed development has the potential to impact on core social infrastructure as a result of the additional 439 dwellings. The applicant has set out the current situation with regards to school and GP places in the EIA screening report which demonstrates there is sufficient capacity. When considering the potential impacts of the proposals in light of the Regulations, they are considered to not have a significant or wide-ranging impact in this regard.

Documents and mitigation measures to accompany any application

Although it is not determinative in assessing whether the proposal would have a significant effect on the environment, any application made would need to be accompanied by an appropriate suite of technical documents that clearly set out the

proposal put forward and enable its full assessment against all relevant planning policies. This would be likely to include the following documents:

- Draft CEMP
- Draft CTLP
- Transport Assessment (including for a Draft Travel Plan and a Draft Delivery and Servicing Plan)
- Townscape and Visual Assessment
- Heritage Statement
- Preliminary Ecology Appraisal
- Phase 1 Contamination Assessment (including for a UXO Risk Assessment)
- Depending on the outcome of the Phase 1 Contamination Assessment, a Phase II Contamination Assessment
- Assessment and Remediation Strategy
- FRA (focussing on surface water drainage and foul water drainage only and including a Surface Water Drainage Strategy)
- Air Quality Assessment
- Noise and Vibration Assessment
- Desk-Based Wind Microclimate Assessment
- Daylight, Sunlight and Overshadowing Assessment
- Lighting Strategy
- Operational Waste Management Plan
- Sustainability Statement

Conclusion

The above analysis evaluates the proposal in terms of the characteristics of development, location of development and the characteristics of the potential impacts of the proposal. For the reasons identified it is concluded that in each of these respects and taken in totality the proposal would not be likely to give rise to significant effects on the environment in the sense intended by the Regulations, despite the scheme's potential to conflict with several aspects of planning policy without potential mitigation to be discussed during the application.

Decision: negative screening opinion

Date of opinion: 2020

Yours sincerely



John Finlayson

Head of Development Management