



Nathaniel Lichfield
& Partners

Planning. Design. Economics.



**London Borough of Richmond upon
Thames: Planning application to extend
the time limit for implementation of the
detailed part of the extant hybrid
permission (Ref: 08/1760/OUT) in
relation to the staff accommodation at St
Paul's School, Lonsdale Road, Barnes**

Planning Statement

10 June 2013

06620/09/NT/JL/SS/4806375v1

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1.0 **Background**

- 1.1 St Paul's School was granted planning permission for the phased refurbishment, enhancement and redevelopment of the School on 16 January 2009 (Ref: 08/1760/OUT). The permission was subject of a S106 legal agreement.
- 1.2 In relation to the outline component of this permission, the School has obtained reserved matters approval for the first phase of the refurbishment and redevelopment of existing buildings (Ref: 08/1760/DD01), has discharged relevant conditions and completed some of the infrastructure that will support the proposed new buildings. Following a review of development priorities, a different implementation sequence of development emerged (focusing on the renewal of core teaching facilities) which resulted in minor amendments to the external appearance of the science block, approved on 22 August 2011, and now implemented (Ref: 08/1760/DD24) and minor amendments to the Drama Centre, approved on 8 January 2013 and due to be implemented later this year (08/1760/DD31).
- 1.3 The detailed part of the hybrid planning permission (Ref: 08/1760/OUT) relates to:
- “Full planning permission for the area east of the access road to provide 2,758sqm floorspace/1,084sqm footprint of buildings (3 to 4 storeys including basement and attic levels) comprising a total of 33 residential units for full time school personnel (including immediate family) with part underground car parking (25 spaces) and cycle parking (54 spaces), associated servicing, hard and soft landscaping and boundary treatments.”*
- 1.4 Condition U22119 states that:
- “the development of the staff accommodation for which full planning permission is hereby granted (Blocks A, B and C) must be begun no later than the expiration of five years beginning with the date of this permission.”*
- 1.5 The permission for the staff accommodation is therefore due to expire on 16 January 2014. In advance of this date, the School is seeking to extend the time limit for implementation of the detailed part of this permission pursuant to provisions within the Town and Country Planning (General Development Procedure) (Amendment No 3) (England) Order 2009, as amended by Article 18 of the Development Management Procedure Order, and Government guidance set out in “Greater Flexibility for Planning Permissions” (November 2009).
- 1.6 Economic conditions have not significantly improved since planning permission was granted and, as a consequence, funds available for development projects remain restricted both in terms of lending conditions and donations. For this reason, the School has decided to focus its priorities on the renewal of core teaching facilities, over the development of staff accommodation. The School remains committed to the provision of staff accommodations to meet its needs

but there are insufficient funds to implement this project by January 2014. Accordingly this application seeks an extended period of time for implementation of the staff accommodation development once economic conditions improve.

- 1.7 The guidance also notes that under sections 91 and 92 of the Town and Country Planning Act 1990, local planning authorities have the discretion to grant planning permission for longer time periods. Given the likelihood of the current economic uncertainty continuing we consider that it would be appropriate for a longer time period than three years to be granted in the renewal of this element of the permission. Accordingly a further five year period for implementation is requested.
- 1.8 The application was accompanied by an Environmental Impact Assessment and a review has been undertaken to consider whether any updates to the Environmental Statement (ES) are required as a result of changes in circumstances. Whilst the policy context has changed, the requirements of planning policy remain very similar. It has been concluded that none of the changes to the planning policy context would result in any significant environmental effects that were not considered in the original ES.

2.0 Policy Context

2.1 In response to the recession and the impact that the lack of availability of credit has had on the implementation of major development schemes, the Government introduced procedures to safeguard existing planning permissions granted prior to 1 October 2010 (as amended by the 2012 Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order. The measure, which enables applicants to apply to replace an extant permission, is designed to allow for greater flexibility and certainty in the planning system and to ensure that economic recovery is not hindered should schemes which are not implemented subsequently lapse.

2.2 The Government Guidance set out in “*Greater Flexibility for Planning Permissions*” (October 2010) remains relevant with the exception of changes introduced by the 2012 Order stating that :-

“In current circumstances, LPAs should take a positive and constructive approach towards applications which improve the prospect of sustainable development being taken forward quickly. The development proposed in an application for extension will by definition have been judged to be acceptable in principle at an earlier date. While these applications should, of course, be determined in accordance with s.38(6) of the Planning and Compulsory Purchase Act 2004, LPAs should, in making their decisions, focus their attention on development plan policies and other material considerations (including national policies on matters such as climate change) which may have changed significantly since the original grant of permission” [Para 23]

2.3 In terms of planning conditions and s106 Agreements, the Guidance considers that:-

“As most s.106 agreements/unilateral undertakings are linked to a particular named planning application, there may well be a need to consider a simple supplementary deed to link the obligation to the new permission.”

2.4 A Deed of Variation of the existing S106 agreement to the new permission will be prepared on behalf of the School and will be submitted separately during the application process for agreement with the Council.

2.5 Considering this guidance, and its relevance to the St Paul’s School proposals, we set out our understanding of any planning policy or material changes since January 2009 which may impact on the extant planning permission.

Updated Planning Policy

2.6 In terms of planning policy considerations, at the time of determination of the hybrid planning application (08/1760/OUT), the development plan comprised the London Borough of Richmond upon Thames Unitary Development Plan (UDP) (March 2005) and the Spatial Development Strategy – The London Plan (February 2004). The relevant planning policy context has changed since

submission of the previous Planning Statement (May 2008) in relation to the hybrid planning permission (Ref: 08/1760/OUT).

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The current statutory development plan is:

- 1 The London Plan: Spatial Development Strategy for Greater London (July 2011)
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In addition, on 28 March 2012 the Government published the National Planning Policy Framework (NPPF) which replaced all previously issued Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs) with a single national planning policy document.

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A comparison of the key policy requirements relating to the staff housing is provided below.

| Planning Issue | Previous Policy | Current Policy | Comment |
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| Metropolitan open land | 3D.9 STG2 ENV1 | London Plan 7.16 CP10 OS2 | Policy maintains protection of openness of MOL except for small scale uses associated with the use of MOL and in very special circumstances |
| Heritage assets | PPG5 4B.10,11 BLT1 BLT2 BLT3 | NPPF paras 128, 131, 132, 138 London Plan 7.8 CP7 HD1 | Requirement for the significance of heritage assets to be set out |
| Residential amenity | BLT15 BLT16 | DC5, DC6 | Relates to the same amenity considerations. Provision of balconies and terraces supported providing no amenity impacts |
| Design Quality | PPS1 4B.1 BLT11 | NPPF section 7 London Plan 7.4, 7.5, 7.6 CP7, DC1, HO2, HO4 | Similar requirement for high quality design and layout appropriate for context |
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| Transport and parking | PPG13 London Plan 3C1-2, 3C.21,22 and 23 BLT11, BLT12, TRN2, TRN4, TRN8, TRN11 | NPPF section 9 London Plan 6.3 CP5 DM TP2, TP6, TP7, TP8 | Similar objectives/ requirements. Increase in maximum parking standards for residential development |
| Flooding and flood risk | PPS25 London Plan 4C.20 4A.12, 13, 14 ENV34 ENV35 | NPPF paras 99, 103 London Plan 5.12 CP3 SD7, SD8 | Requirements as before in terms of exception/sequential test and need for FRA with consideration being given to climate change and sustainability benefits |
| Sustainability and energy | 4A.3 4A.7 4A.6 | NPPF including paras 7, 11, 14 London Plan 5.1, 5.3, 5.6, 5.7, 5.9, 5.11, 5.15 CP1, CP2, CP3 SD1, SD2, SD4, SD5 | General sustainability and energy principles as in previous policy. A presumption in favour of sustainable development is introduced in the NPPF. CP2 requires 20% reduction in carbon by on site renewables. Policies to mitigate climate change require reductions in carbon dioxide versus 2010 Building Regulations of 25% to 2013, 40% by 2016 and zero carbon after 2016 or off site contributions |

2.10 An update to the planning policy considerations is provided below, incorporating updated information and responding to changes in planning policy at national, regional and local level, since outline planning permission was granted in January 2009.

Planning Policy Considerations

Sustainable Development

2.11 The adoption of the NPPF illustrates the commitment of the Government to achieving sustainable development. Economic growth is highlighted as one of three dimensions to sustainable development, with the Government keen to ensure "...that the planning system does everything it can to support sustainable economic growth" in order to create jobs and prosperity (paragraphs 18 and 19).

2.12 The key principle of the NPPF, set out at paragraph 14, is a presumption in favour of sustainable development (unless material considerations indicate otherwise). Where the statutory development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or when specific policies in the NPPF indicate development should be restricted.

2.13 The core land use principles promoted by the NPPF encourage planning to proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs.

2.14 The Government also emphasises the requirement to “...give great weight to the need to create, expand and alter schools...” (Para 72).

The Need for Staff Housing

2.15 Affordability of housing for School staff was a key issue at the time of determination of the hybrid planning application. This situation continues, with house prices within the Borough increasing, and now considerably higher than the London average. This creates ongoing problems associated with the recruitment and retention of staff in both public and private sector organisations as a result of the cost of housing and lack of affordable provision.

2.16 An analysis of the prohibitive cost of housing in the Borough, and consequently accommodation issues for teaching staff at the School, was provided with the previous application. This information has been reviewed and updated and is set out below:

- 1 St Paul’s School and Colet Court continue to attract staff - both teaching and non-teaching - of high ability and exceptional commitment. To continue to do this is fundamental to the future success of the School;
- 2 Despite a recent increase in graduates entering the teaching profession, the School experiences on-going problems employing high quality, subject specialist, graduates with the ability to educate highly able pupils in those subjects deemed by the Government as strategic and important—maths, chemistry, biology, physics, economics and modern languages. These teachers remain scarce, and much sought after in the job market.
- 3 Teachers’ salaries remain below commercial and city salaries. The School has to put together an attractive package to recruit them.
- 4 The age profile of teachers at the School means that (as of 2013) 50 members of teaching staff at Colet Court and SPS reach the retirement age for the Teachers’ Pension Scheme within the next ten years. The age profile has worsened since the previous application. This exacerbates an already difficult problem of rising demand in the face of shrinking supply;

- 5 Average house prices in London are significantly above the average for England and Wales (£373,207 and £160,180 respectively¹) and have continued increase since the previous permission.
- 6 The average house price in Richmond upon Thames is £489,741 – this figure reflects an 8.7% annual increase.
- 7 The average price of a 2-bedroom flat costs £491,633 in Barnes (SW13) (an increase of approximately £15,000 in price since the previous application), £552,355 in Hammersmith (W6) (an increase of approximately £139,000), and £501,613 in Chiswick (W4) (an increase of approximately £112,000).

2.17 Whilst housing has always been expensive in London, house prices have dramatically increased over the last few decades, and continued to increase since the previous permission, without commensurate growth in teaching salaries. The School has noted that, in the past year, four teachers offered jobs at the School have confirmed that they would turn down the positions if no help with accommodation was available. Therefore, the development of some additional on-site accommodation continues to be the only affordable approach given the prohibitive cost of the local property market.

Metropolitan Open Land

2.18 The proposed staff accommodation continues to be included within the land currently designated as Metropolitan Open Land (MOL) within the Richmond Core Strategy (London Plan Policy 7.17 and CP10). Inappropriate development within the MOL will only be approved if “*very special circumstances*” can be justified.

2.19 The character and quality of this area of MOL proposed for staff accommodation has not changed. It continues to comprise an area of hard-surfaced car park. This is visually separated by mature trees along the school drive from the areas of open playing fields to the west. As previously agreed by London Borough Richmond upon Thames, it continues to contribute very little to the open character of MOL and the development respects the perceived boundaries of the MOL.

2.20 The need for affordable staff accommodation was previously agreed to comprise part of the “*very special circumstances*” to justify the development. The situation has not changed since that time. In summary:

- i The School relies on being able to attract the teaching staff of the high calibre to maintain the standards of teaching and the record of academic achievement.

¹ Land Registry House Price Index (February 2013)]

- ii Like many schools in London, St Paul's is facing significant issues in the recruitment and retention of teachers, particularly high quality specialist teachers at the start of their career, as a result of the lack of affordable housing in the area.
- iii Many independent schools, particularly those outside London, are able to offer accommodation to new staff. To be competitive in attracting high calibre staff, St Paul's considers that the ability to match this is vital. The issue of recruitment is of particular importance owing to the significant number of staff that will reach retirement age in the next 10 years and the need to recruit replacements.
- iv There is an amount of accommodation already on site and owned or rented by the School in the surrounding area. This is not enough to match demand.
- v There is limited availability of affordable shared ownership schemes provided by registered social landlords both in Richmond and Hammersmith and Fulham and there are long waiting lists with priority being given to key workers. Independent school teachers are not eligible for key worker status.

2.21 Other elements that comprised the very special circumstances case remain unchanged and are secured by a combination of conditions and s106 obligations.

2.22 The policy considerations of MOL issue have not materially changed. The site continues to not meet the criteria for MOL, and does not function as MOL. It is visually discrete, being screened from view by a combination of the alignment of the road, trees and wall along the driveway and on the Lonsdale Road frontage. The replacement of the concrete wall on the site frontage will enhance the visual amenity of the MOL. The staff accommodation will be visually discrete and the (albeit limited) impact on the MOL will be substantially outweighed by the positive benefits of the development of staff accommodation at the School (together with the other benefits proposed in the masterplan).

Heritage Assets

2.23 The proposed staff accommodation continues to be located, in part, within the Castelnau Conservation Area. At the time of the determination of the original planning permission, the impact of the staff accommodation on the character and appearance of the conservation area was considered in full within the context of national planning policy guidance provided by PPG15 and UDP policy BLT2. These policies have now been replaced by guidance within the National Planning Policy Framework (NPPF) (2012) and the Core Strategy policy CP7 "Maintaining and improving the Local Environment".

2.24 Both the NPPF, and policies within Richmond's Core Strategy, provide an on-going commitment to the conservation of the historic environment, with the NPPF recognising the necessity to "...conserve heritage assets in a manner

appropriate to their significance” as a key principle (para. 17). Applicants are required to describe the significance of heritage asset affected by proposals including the contribution setting (para 128) made by their setting. The NPPF confirms that:

“Local Planning Authorities should take account of ... the desirability of new development making a positive contribution to local character and distinctiveness”(Paragraph 131).

- 2.25 It further recognises that *“not all elements of a Conservation area will necessarily contribution to its significance”.*
- 2.26 Core Strategy policy CP7 also emphasises that conservation areas *“...will be protected from inappropriate development and enhanced sensitively”.* The Castelnau Conservation Area Study also remains unchanged since the original grant of permission.
- 2.27 In light of the updated policy position, a statement of significance is provided. Castelnau Conservation Area is a designated heritage asset. Its significance derives primarily from the architectural and historic interest associated with buildings that reflect development of the area in the mid 19th century following the construction of Hammersmith Bridge. There is interest in the pattern and architecture of the Victorian villas (including those along Lonsdale Road) and the more modest, slightly taller terraces on Lillian Road and Glenthan Road. The car park beyond the boundary of the Conservation Area forms part of its setting but makes no contribution to the significance of the area.
- 2.28 Given the Conservation Area has not significantly changed the conclusion drawn in 2009 remains valid. The character and appearance of the conservation area will continue to be preserved:
- 1 The proposed staff housing has been carefully designed and remains sympathetic to the existing pattern of development
 - 2 The proposed Lonsdale Road frontage continues to respects the alignment, height, scale, massing and spacing of the existing villas
 - 3 The materials and details, although contemporary, are appropriate within the street
 - 4 The brickwork colour is still consistent with the colour of the London Stock brick of the existing villa
 - 5 Details such as the projecting frame still echo the pattern of projecting bays
 - 6 The removal of the frontage wall and its replacement with a new wall and gardens, with trees and widened paving in front of the School still enhance the public realm.
 - 7 The extension to 80 Lonsdale Road still detracts from the area and occupies an area that is currently a car park and does not contribute to its significance. Its removal will continue to be a benefit.

- 2.29 The proposals clearly comply with policy CP7, HD1 and guidance within the NPPF by preserving or enhancing the character and appearance of Castelnaud Conservation Area.

Flood Risk

- 2.30 Flood risk and the implications of climate change were fully assessed in the original application in 2008 and flood protection designed for the lower ground level housing and bedroom accommodation in Block A having regard to existing flood defences and climate change over the lifetime of the development as required by PPS25. The previous Flood Risk Assessment (contained within the ES, Volume 3 Appendix C1) remains valid and sustainable drainage will be provided as part of the wider School development.
- 2.31 Richmond's Strategic Flood Risk Assessment (SFRA) indicates the site remains in the same flood zone as previously assessed (Zone 3a).
- 2.32 The proposed development would not give rise to increase flood risk. It cannot be located elsewhere owing to the functional relationship with the School and has appropriate flood defences for the lifetime of the development taking climate change into account in accordance with policies CP3, SD7 and SD8 and requirements of the NPPF.

Transport and Parking

- 2.33 Parking provision for the staff residential element is as previously permitted. The mix of units gives a maximum parking requirement of 36 spaces. Car parking provision therefore remains below the maximum consistent with policy TP8. 54 covered, secure cycle spaces are provided within the basement consistent with policy TP7. The s106 confirms that occupiers will not be eligible for car parking permits and this will prevent any off-site parking effects.

Sustainability and Energy

- 2.34 The Sustainability Statement submitted with the original application confirms the specific measures that would be incorporated as part of the development of the staff accommodation including a green roof, the use of natural ventilation and other energy efficient design. It confirms that the aim is to achieve Ecohomes 'excellent' (or other superseding standard) as required in conditions U21884 and U21885. This remains the case. As ecohomes has since been replaced the proposals would now aim to achieve BREEAM 'excellent'.
- 2.35 As required by condition U21863 and U21864 there would be the potential to connect to future CHP systems within the school development.
- 2.36 The provision of renewables relates to the site as a whole rather than the staff accommodation specifically. The scheme as a whole will continue to comply with Condition U21865 in respect of provision of renewables.

- 2.37 It is acknowledged that standards have altered now requiring a minimum 25% reduction in CO² emissions over the Building Regulation 2010 with efficiency measures being prioritised as a means of meeting these targets. It is proposed that the detailed design of the staff housing will seek to meet these standards through energy efficiency.
- 2.38 It is considered that this would fulfil the requirements of Core Strategy policies CP1, CP2, CP3 and Development Management Plan Policies SD1, SD2, SD4 and SD5.

3.0 **Summary and Conclusion**

- 3.1 This report has been prepared to assist London Borough of Richmond upon Thames Council in its consideration of an application to extend the time limit for implementation of the detailed part of the hybrid planning permission dated 16 January 2009 (ref. 08/1760/OUT) relating to the proposed staff accommodation at St Paul's School.
- 3.2 Whilst the implementation of the staff accommodation has been delayed, due to the School's refocused priorities on bringing forward the core teaching facilities that were proposed within the masterplan, it remains an essential part of the masterplan for the School with considerable importance for the recruitment and retention of the required quality of teaching staff, especially bearing in mind the existing age profile of teachers which indicates that this issue will remain over the next 10 years. In light of this and the on-going uncertainty surrounding economic climate which has led to a focus on upgrading teaching accommodation an extended time limit of a further five years is requested to give a sensible time period for implementation.
- 3.3 In accordance with the relevant guidance, this report has reviewed the policy framework since the original consent, January 2009. Overall, there have been no material changes to the planning and environmental context at St Paul's School that would amount to justifying different conclusions being drawn.
- 3.4 The detailed part of the permission remains in overall accordance with the development plan and the application should be positively assessed to allow for the implementation of the staff accommodation at a later date.



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1.0 **Background**

- 1.1 St Paul's School was granted planning permission for the phased refurbishment, enhancement and redevelopment of the School on 16 January 2009 (Ref: 08/1760/OUT). The permission was subject of a S106 legal agreement.
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2.10 An update to the planning policy considerations is provided below, incorporating updated information and responding to changes in planning policy at national, regional and local level, since outline planning permission was granted in January 2009.

Planning Policy Considerations

Sustainable Development

2.11 The adoption of the NPPF illustrates the commitment of the Government to achieving sustainable development. Economic growth is highlighted as one of three dimensions to sustainable development, with the Government keen to ensure “...that the planning system does everything it can to support sustainable economic growth” in order to create jobs and prosperity (paragraphs 18 and 19).

2.12 The key principle of the NPPF, set out at paragraph 14, is a presumption in favour of sustainable development (unless material considerations indicate otherwise). Where the statutory development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or when specific policies in the NPPF indicate development should be restricted.

2.13 The core land use principles promoted by the NPPF encourage planning to proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs.

2.14 The Government also emphasises the requirement to “...give great weight to the need to create, expand and alter schools...” (Para 72).

The Need for Staff Housing

2.15 Affordability of housing for School staff was a key issue at the time of determination of the hybrid planning application. This situation continues, with house prices within the Borough increasing, and now considerably higher than the London average. This creates ongoing problems associated with the recruitment and retention of staff in both public and private sector organisations as a result of the cost of housing and lack of affordable provision.

2.16 An analysis of the prohibitive cost of housing in the Borough, and consequently accommodation issues for teaching staff at the School, was provided with the previous application. This information has been reviewed and updated and is set out below:

- 1 St Paul’s School and Colet Court continue to attract staff - both teaching and non-teaching - of high ability and exceptional commitment. To continue to do this is fundamental to the future success of the School;
- 2 Despite a recent increase in graduates entering the teaching profession, the School experiences on-going problems employing high quality, subject specialist, graduates with the ability to educate highly able pupils in those subjects deemed by the Government as strategic and important—maths, chemistry, biology, physics, economics and modern languages. These teachers remain scarce, and much sought after in the job market.
- 3 Teachers’ salaries remain below commercial and city salaries. The School has to put together an attractive package to recruit them.
- 4 The age profile of teachers at the School means that (as of 2013) 50 members of teaching staff at Colet Court and SPS reach the retirement age for the Teachers’ Pension Scheme within the next ten years. The age profile has worsened since the previous application. This exacerbates an already difficult problem of rising demand in the face of shrinking supply;

- 5 Average house prices in London are significantly above the average for England and Wales (£373,207 and £160,180 respectively¹) and have continued increase since the previous permission.
- 6 The average house price in Richmond upon Thames is £489,741 – this figure reflects an 8.7% annual increase.
- 7 The average price of a 2-bedroom flat costs £491,633 in Barnes (SW13) (an increase of approximately £15,000 in price since the previous application), £552,355 in Hammersmith (W6) (an increase of approximately £139,000), and £501,613 in Chiswick (W4) (an increase of approximately £112,000).

2.17 Whilst housing has always been expensive in London, house prices have dramatically increased over the last few decades, and continued to increase since the previous permission, without commensurate growth in teaching salaries. The School has noted that, in the past year, four teachers offered jobs at the School have confirmed that they would turn down the positions if no help with accommodation was available. Therefore, the development of some additional on-site accommodation continues to be the only affordable approach given the prohibitive cost of the local property market.

Metropolitan Open Land

2.18 The proposed staff accommodation continues to be included within the land currently designated as Metropolitan Open Land (MOL) within the Richmond Core Strategy (London Plan Policy 7.17 and CP10). Inappropriate development within the MOL will only be approved if “*very special circumstances*” can be justified.

2.19 The character and quality of this area of MOL proposed for staff accommodation has not changed. It continues to comprise an area of hard-surfaced car park. This is visually separated by mature trees along the school drive from the areas of open playing fields to the west. As previously agreed by London Borough Richmond upon Thames, it continues to contribute very little to the open character of MOL and the development respects the perceived boundaries of the MOL.

2.20 The need for affordable staff accommodation was previously agreed to comprise part of the “*very special circumstances*” to justify the development. The situation has not changed since that time. In summary:

- i The School relies on being able to attract the teaching staff of the high calibre to maintain the standards of teaching and the record of academic achievement.

¹ Land Registry House Price Index (February 2013)]

- ii Like many schools in London, St Paul's is facing significant issues in the recruitment and retention of teachers, particularly high quality specialist teachers at the start of their career, as a result of the lack of affordable housing in the area.
- iii Many independent schools, particularly those outside London, are able to offer accommodation to new staff. To be competitive in attracting high calibre staff, St Paul's considers that the ability to match this is vital. The issue of recruitment is of particular importance owing to the significant number of staff that will reach retirement age in the next 10 years and the need to recruit replacements.
- iv There is an amount of accommodation already on site and owned or rented by the School in the surrounding area. This is not enough to match demand.
- v There is limited availability of affordable shared ownership schemes provided by registered social landlords both in Richmond and Hammersmith and Fulham and there are long waiting lists with priority being given to key workers. Independent school teachers are not eligible for key worker status.

2.21 Other elements that comprised the very special circumstances case remain unchanged and are secured by a combination of conditions and s106 obligations.

2.22 The policy considerations of MOL issue have not materially changed. The site continues to not meet the criteria for MOL, and does not function as MOL. It is visually discrete, being screened from view by a combination of the alignment of the road, trees and wall along the driveway and on the Lonsdale Road frontage. The replacement of the concrete wall on the site frontage will enhance the visual amenity of the MOL. The staff accommodation will be visually discrete and the (albeit limited) impact on the MOL will be substantially outweighed by the positive benefits of the development of staff accommodation at the School (together with the other benefits proposed in the masterplan).

Heritage Assets

2.23 The proposed staff accommodation continues to be located, in part, within the Castelnau Conservation Area. At the time of the determination of the original planning permission, the impact of the staff accommodation on the character and appearance of the conservation area was considered in full within the context of national planning policy guidance provided by PPG15 and UDP policy BLT2. These policies have now been replaced by guidance within the National Planning Policy Framework (NPPF) (2012) and the Core Strategy policy CP7 "Maintaining and improving the Local Environment".

2.24 Both the NPPF, and policies within Richmond's Core Strategy, provide an on-going commitment to the conservation of the historic environment, with the NPPF recognising the necessity to "...conserve heritage assets in a manner

appropriate to their significance” as a key principle (para. 17). Applicants are required to describe the significance of heritage asset affected by proposals including the contribution setting (para 128) made by their setting. The NPPF confirms that:

“Local Planning Authorities should take account of ... the desirability of new development making a positive contribution to local character and distinctiveness”(Paragraph 131).

- 2.25 It further recognises that *“not all elements of a ... Conservation area will necessarily contribution to its significance”*.
- 2.26 Core Strategy policy CP7 also emphasises that conservation areas *“...will be protected from inappropriate development and enhanced sensitively”*. The Castelnau Conservation Area Study also remains unchanged since the original grant of permission.
- 2.27 In light of the updated policy position, a statement of significance is provided. Castelnau Conservation Area is a designated heritage asset. Its significance derives primarily from the architectural and historic interest associated with buildings that reflect development of the area in the mid 19th century following the construction of Hammersmith Bridge. There is interest in the pattern and architecture of the Victorian villas (including those along Lonsdale Road) and the more modest, slightly taller terraces on Lillian Road and Glenthan Road. The car park beyond the boundary of the Conservation Area forms part of its setting but makes no contribution to the significance of the area.
- 2.28 Given the Conservation Area has not significantly changed the conclusion drawn in 2009 remains valid. The character and appearance of the conservation area will continue to be preserved:
- 1 The proposed staff housing has been carefully designed and remains sympathetic to the existing pattern of development
 - 2 The proposed Lonsdale Road frontage continues to respects the alignment, height, scale, massing and spacing of the existing villas
 - 3 The materials and details, although contemporary, are appropriate within the street
 - 4 The brickwork colour is still consistent with the colour of the London Stock brick of the existing villa
 - 5 Details such as the projecting frame still echo the pattern of projecting bays
 - 6 The removal of the frontage wall and its replacement with a new wall and gardens, with trees and widened paving in front of the School still enhance the public realm.
 - 7 The extension to 80 Lonsdale Road still detracts from the area and occupies an area that is currently a car park and does not contribute to its significance. Its removal will continue to be a benefit.

- 2.29 The proposals clearly comply with policy CP7, HD1 and guidance within the NPPF by preserving or enhancing the character and appearance of Castelnau Conservation Area.

Flood Risk

- 2.30 Flood risk and the implications of climate change were fully assessed in the original application in 2008 and flood protection designed for the lower ground level housing and bedroom accommodation in Block A having regard to existing flood defences and climate change over the lifetime of the development as required by PPS25. The previous Flood Risk Assessment (contained within the ES, Volume 3 Appendix C1) remains valid and sustainable drainage will be provided as part of the wider School development.
- 2.31 Richmond's Strategic Flood Risk Assessment (SFRA) indicates the site remains in the same flood zone as previously assessed (Zone 3a).
- 2.32 The proposed development would not give rise to increase flood risk. It cannot be located elsewhere owing to the functional relationship with the School and has appropriate flood defences for the lifetime of the development taking climate change into account in accordance with policies CP3, SD7 and SD8 and requirements of the NPPF.

Transport and Parking

- 2.33 Parking provision for the staff residential element is as previously permitted. The mix of units gives a maximum parking requirement of 36 spaces. Car parking provision therefore remains below the maximum consistent with policy TP8. 54 covered, secure cycle spaces are provided within the basement consistent with policy TP7. The s106 confirms that occupiers will not be eligible for car parking permits and this will prevent any off-site parking effects.

Sustainability and Energy

- 2.34 The Sustainability Statement submitted with the original application confirms the specific measures that would be incorporated as part of the development of the staff accommodation including a green roof, the use of natural ventilation and other energy efficient design. It confirms that the aim is to achieve Ecohomes 'excellent' (or other superseding standard) as required in conditions U21884 and U21885. This remains the case. As ecohomes has since been replaced the proposals would now aim to achieve BREEAM 'excellent'.
- 2.35 As required by condition U21863 and U21864 there would be the potential to connect to future CHP systems within the school development.
- 2.36 The provision of renewables relates to the site as a whole rather than the staff accommodation specifically. The scheme as a whole will continue to comply with Condition U21865 in respect of provision of renewables.

- 2.37 It is acknowledged that standards have altered now requiring a minimum 25% reduction in CO² emissions over the Building Regulation 2010 with efficiency measures being prioritised as a means of meeting these targets. It is proposed that the detailed design of the staff housing will seek to meet these standards through energy efficiency.
- 2.38 It is considered that this would fulfil the requirements of Core Strategy policies CP1, CP2, CP3 and Development Management Plan Policies SD1, SD2, SD4 and SD5.

3.0 **Summary and Conclusion**

- 3.1 This report has been prepared to assist London Borough of Richmond upon Thames Council in its consideration of an application to extend the time limit for implementation of the detailed part of the hybrid planning permission dated 16 January 2009 (ref. 08/1760/OUT) relating to the proposed staff accommodation at St Paul's School.
- 3.2 Whilst the implementation of the staff accommodation has been delayed, due to the School's refocused priorities on bringing forward the core teaching facilities that were proposed within the masterplan, it remains an essential part of the masterplan for the School with considerable importance for the recruitment and retention of the required quality of teaching staff, especially bearing in mind the existing age profile of teachers which indicates that this issue will remain over the next 10 years. In light of this and the on-going uncertainty surrounding economic climate which has led to a focus on upgrading teaching accommodation an extended time limit of a further five years is requested to give a sensible time period for implementation.
- 3.3 In accordance with the relevant guidance, this report has reviewed the policy framework since the original consent, January 2009. Overall, there have been no material changes to the planning and environmental context at St Paul's School that would amount to justifying different conclusions being drawn.
- 3.4 The detailed part of the permission remains in overall accordance with the development plan and the application should be positively assessed to allow for the implementation of the staff accommodation at a later date.