

The Russell & Strathmore Schools, Richmond

Planning application for the co-location of
Strathmore and Russell schools onto a single
site in purpose built facilities

ATKINS

Planning Statement and Statement of Community
Involvement

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Plan Design Enable

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1. Introduction and Background to the Development

- 1.1. On behalf of the London Borough of Richmond upon Thames (LBRuT), planning permission is being sought for the co-location of Strathmore and Russell Schools onto a single site in purpose built facilities with associated car parking and landscaping.
- 1.2. The Proposed Development involves the construction of a new purpose built school to house the existing Russell Primary School with an expanded size from its existing one form entry (FE) provision, to a one FE plus a shared FE (an additional four classrooms) (as discussed further below). The new school would also accommodate part of the existing Strathmore Special Educational Needs (SEN) School provision so that these schools are co-located. The existing nursery on the Russell School site would also be accommodated in the new school building.
- 1.3. The proposed new purpose built school would be constructed first so that the existing schools and nursery can remain in use during construction. Following the move to the new school, the existing Russell School (the junior building, annex building and modular staff building) together with the nursery building would be demolished. The site would be landscaped to include a playground, car parking, SEN play area, teaching spaces and soft landscaped areas. The existing playing field would be retained.

Background

Russell Primary School Background Information

- 1.4. The existing Russell School is a one FE Primary School, which opened in 1980. The school was formed by the amalgamation of The Petersham Russell Infant School and The Orchard Junior School. The school currently has 239 pupils (including a Key Stage 1 SEN provision) plus 26 nursery children, together with 44 staff. The proposal is to expand and consolidate the school from one FE to one FE plus four additional classroom spaces as part of a 'shared form of entry', with total capacity to be increased to 330 pupils.

Strathmore School Background Information

- 1.5. The Strathmore School is a community special school for pupils aged 7 to 19 with severe and complex learning difficulties. The school on its current site has 35 staff members and 57 pupils. The proposal is to relocate Strathmore School from its current site and split the provision as follows:
 - Strathmore at The Russell Primary School: 18-24 primary places which includes four new classrooms for The Russell School (with independent living facilities);
 - Strathmore at Grey Court School: 18-24 secondary places plus independent living provision and a hydrotherapy pool (the subject of this planning application); and
 - Strathmore at St. Richard Reynolds Catholic College: 18-24 primary places and 18-24 secondary places.
- 1.6. The current Strathmore School facilities are not fit for purpose and LBRuT has a large expenditure each year to send pupils to schools outside the Borough.
- 1.7. Statutory proposals for the creation of additional places (total of 96) for Strathmore School was approved by Cabinet on 18 July 2013.
- 1.8. Funding has been approved from the Education Funding Agency (EFA) towards these proposals, however there are deadlines attached to the spending (some by August 2014 and August 2015).

Project Background

- 1.9. Demand for school places has increased substantially in all areas of the Borough in recent years, largely due to a 21% rise in the birth rates between 2000 and 2007.
- 1.10. The expansion of Russell Primary School will meet high demand for school places particularly in the area. The LBRuT's reception class forecasts indicate that there will be a consistent shortfall of places per year in that area from 2011/2012 onwards.
- 1.11. Without the additional places that this proposal will provide, the LBRuT would be wholly reliant upon a strategy of providing temporary additional places, which is considered to be a less than ideal solution compared with permanent expansion, given that the shortfall of places is predicted to continue for the next decade, unless additional places are made available. It would also represent poor value for money compared with permanent expansion.
- 1.12. LBRuT has agreed with several schools a policy of a 'shared form of entry'. This strategy groups schools to provide the seven extra classes needed for a full form of entry between them. The children admitted each year stay in the school for the full seven years of primary provision and do not move, but each year the school admitting the additional class rotates (depending on their available provision).
- 1.13. The proposal is also to include some designated specialist educational needs (SEN) provision, as part of the re-provision of the adjacent Strathmore School.
- 1.14. The SEN is to be provided for in specialist teaching areas, as part of mainstream provision.
- 1.15. Provision is proposed for 18-24 primary aged children. The SEN provision, though co-located, is to remain part of The Strathmore School, a specialist school that is to be separated onto three school sites.

2. Site Location and Description

- 2.1. The site is located in the London Borough of Richmond upon Thames (LBRuT) on the A307 Petersham Road which is a busy main road in the Petersham area of the Borough. To the north of the site is a German language School, residential areas and the River Thames. To the west of the site lies Ham Polo Club and Ham House and Garden. To the south are residential areas and to the east of the site lie residential areas which abut Petersham Park and Richmond Park.
- 2.2. The site is bounded to the south by Sandpits Road and Meadlands Drive, which are predominantly residential in nature and to the north, by an access road which provides an approach to a German language school and the grounds of Ham Polo Club. The site is also bounded by a copse to the east, polo grounds to the north-west, and a residential area on the opposite side of Petersham Road to the west.
- 2.3. Russell School and the nursery are located on the site. To the west of the site, on land within the same ownership, is Strathmore School. The Russell Primary School is roughly located at the northern central boundary of the site, and borders playing fields to the west and south, the access road to the north, and Petersham Road to the east. The Russell School Nursery building is located at the south-eastern boundary of the site, adjacent to the Strathmore School. There is also an auxiliary building for The Russell School located roughly northeast of the Nursery and southwest of The Russell Primary School.
- 2.4. An existing site layout plan is provided in the Design and Access Statement submitted to support this planning application.
- 2.5. There are currently four pedestrian access points from the footway into the site; one, which serves The Russell Primary School, is located on Petersham Road, while the others, which serve The Russell Nursery School and Strathmore Schools, are situated along Meadlands Drive.
- 2.6. Vehicle access onto the site is also made via separate access points. The main vehicular access point for The Russell School is located on Petersham Road. The access road runs from Petersham Road, along the northern boundary of the site, and provides access to dedicated staff / visitor parking to the west of the site. The second vehicle access point is on Meadlands Drive, and provides dedicated access to the main entrance and parking facilities of both The Strathmore School and The Russell Nursery School. Vehicular access onto the site from both access points is normally restricted to staff; and also visitors (not including parents picking-up / dropping-off children), refuse collections and deliveries.
- 2.7. The LBRuT proposals map shows that the site has the following designations:
 - The site is located within the Petersham Conservation Area;
 - The site lies within an Archaeological Priority Area;
 - The site lies within Metropolitan Open Land;
 - The site is adjacent to Listed Buildings and Buildings of Townscape Merit;
 - The site to the west and north is designated as 'Other Site of Nature Importance';
 - The Avenue to the north of the site is a Historic Park and Garden;
 - The Copse, Ham (to the west of the site) is designated as a Public Open Space;
 - No public rights of way transverse the site; and
 - The site is within Flood Zone 2.

3. The Proposed Development

- 3.1. The Proposed Development includes expanding the current Russell Primary School from its current one FE system to a one FE plus an additional four classes under a shared form entry provision, while the nursery is retained as existing. The expansion of The Russell School is phased, so there will be an increase in one class per year group every other year, starting with the youngest age pupils. It is forecast that, once the phased increase of pupils is completed, there will be 356 full time places at The Russell School (including full time equivalent part time nursery places) (see Table 1 below).
- 3.2. Part of the existing Strathmore SEN School would co-locate with The Russell Primary School in the new building. The Strathmore School is also being expanded. It is forecast that the number of pupils at the Strathmore School will increase, with places being distributed to three Strathmore School sites co-located on mainstream schools, including at The Russell School. It is therefore proposed that, once co-location is complete, The Strathmore School will comprise of 18-24 full time places (depending on children’s needs). For the purposes of analysing the full effects of the Proposed Development, the maximum number of 24 pupils has been applied.
- 3.3. As part of the Proposed Development, there will be an increase in staff (both teaching and support staff) within The Russell School. It is assumed the number of full time equivalents (FTE) members of staff would increase by ten, from 44 to 54. The number of staff at The Strathmore SEN School co-located at the site will decrease by 15, with 20 staff remaining at the new School. The total number of staff working between the two schools at the site will therefore decrease, from 79 at present, to 74.
- 3.4. The existing, proposed and net change in staff and pupil numbers for both the Russell and Strathmore Schools are provided in Table1 below.

Table 1. Existing and Proposed Pupil and Staff Numbers

	Existing	Proposed	Net Change
Pupils			
Russell Primary School	239	330	+91
Russell Nursery School (full time equivalent)	26	26	0
Strathmore School	57	24	-33
Total Pupils	322	380	+58
Staff			
Russell Primary School	44	54	+10
Strathmore School	35	20	-15
Total Staff	79	74	-5

- 3.5. The Proposed Development would operate the typical daily timetable as shown in Table 2 below:

Table 2. School Start and Finish Times

	Russell Primary School	Russell Nursery School	Strathmore SEN School
School Starts	08:45	08:30 / 12:30	09:05
School Finishes	15:15	11:30 / 15:30	15:20

Design

- 3.6. The proposed purpose built facilities building has been carefully designed in collaboration with the key users (school staff and governors) taking into account comments made by local residents during consultation and by LBRuT’s planning team during the pre-application consultation. The overall height and bulk of the building has been reduced from the pre-application design to make the design more acceptable in planning terms.

- 3.7. The proposed building has a pitched roof with single storey and two storey elements. It has a maximum ridge height of 8.74 metres with the single storey elements having a ridge height of 5.29 metres. The building would be constructed of brick with large vertical glass panels to create a cohesive, visually interesting design.
- 3.8. A full appraisal of the design and the planning drawings are contained within the Design and Access Statement (DAS) which is submitted to support this planning application.

Landscaping

- 3.9. The landscaping proposals are contained within the DAS and on drawing number 5127940/COL/LA003 (also within the DAS). Following the construction of the new school building the existing buildings on the site would be demolished to allow for the site to be landscaped. Under the footprint of the existing Russell School there would be a new Key Stage 1 and 2 playground and a green space. The existing playing field would be retained with improved vegetation screening. The main vehicular access to the site would be from Petersham Road which would lead to car parking and mini bus parking and drop off areas. The landscape proposals also show soft landscaping around the buildings with enhanced screening to all boundaries. There is also provision for SEN play, teaching spaces, nature areas and an allotment, orchard and forest area.

Proposed Access Arrangements

Pedestrian Access

- 3.10. There are currently four pedestrian access points for the schools. One, which serves The Russell Primary School, is located on Petersham Road, while three further access points, which serves the Strathmore and Russell Nursery Schools, are located along Meadlands Drive.
- 3.11. It is proposed to retain two of the access points; the Petersham Road access and one of the Meadlands Drive access points. The Petersham Road gate will continue to provide access to the new school from the main road and bus stops, while the second gate will allow pupils who have walked from, or have been driven to, the streets adjacent to Meadlands Drive, where a large proportion of parents have been found to park to drop off / pick up pupils.

Vehicular Access

- 3.12. The main vehicle access onto the Russell Primary School Site from Petersham Road is to remain as existing, and will serve as the only vehicular access / egress. There will be an access from Meadlands Drive but this would be for emergency vehicles only, however the main emergency access to the site would be from Petersham Road.

Parking

- 3.13. The existing site has a total of 27 on-site car parking spaces; 12 are designated for The Russell Primary School and are accessed from Petersham Road, while a further 15 are for the use of Strathmore and Russell nursery staff, and are accessed by Meadlands Drive.
- 3.14. The proposed car park would be located from the Petersham Road access and would provide the following parking provision:
- Standard car parking spaces – 35 no.
 - Blue badge car parking spaces – 2 no.
 - Cycle parking spaces – 90 no.
 - Minibus parking spaces – 5 no.
- 3.15. The DAS accompanying this planning application contains a full description of the Proposed Development including the landscape proposals and provides full justification of the location and

design of the Proposed Development. It is not intended to repeat this information in this Planning Statement.

4. Planning Policy Context

- 4.1. This section outlines the planning policy framework and the policies and guidance relating to issues which are likely to warrant further consideration in the planning application.

Introduction

- 4.2. The Planning and Compulsory Act 2004 (the 2004 Act) requires that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise.
- 4.3. Local planning authorities are also required to have regard to other material considerations, so it is appropriate to consider first the national planning policy guidance with which all development plans must be in broad conformity.

The National Planning Policy Framework

- 4.4. The National Planning Policy Framework (NPPF) was published on 27th March 2012 and immediately replaced all existing Planning Policy Guidance Notes (PPGs), Planning Policy Statements (PPS), Circulars and Letters to Chief Planning Officers as the Government's single planning policy framework. It sets out the Government's planning policies for England and how these are expected to be applied.
- 4.5. The NPPF is now a material consideration in the determination of planning applications as part of the statutory development plan.
- 4.6. The key theme running through the NPPF is the 'Presumption in favour of Sustainable Development'. In terms of decision making the NPPF states (Paragraph 14) that development proposals that accord with the Development Plan should be approved without delay, where the Development Plan is up to date, or where the Development Plan is absent, silent or material considerations indicate otherwise. Paragraph 19 explains that planning should operate to encourage and not act as an impediment to sustainable growth.
- 4.7. Paragraph 17 outlines a set of core land-use planning principles that should underpin both plan-making and decision-taking. Relevant to the proposal are:
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
 - Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
 - Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; and
 - Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

- 4.8. Section 7 of the NPPF talks about the requirement for good design. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Under paragraph 58 of the NPPF it requires that planning decisions should aim to ensure developments:
- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - Are visually attractive as a result of good architecture and appropriate landscaping.
- 4.9. Metropolitan Open Land (MOL) is given the same protection as Green Belt land, as such Section 9 'Protecting green belt land' is relevant. This states that as with previous green belt policy, inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the green belt. 'Very special circumstances' will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 4.10. Section 9 confirms that new buildings are inappropriate in the green belt; however, exceptions include (paragraph 89):
- The replacement of a building, provided that the new building is in the same use and not materially larger than the one it replaces; and
 - Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 4.11. Section 10 'Meeting the challenge of climate change, flooding and coastal change' requires under paragraph 100 that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 4.12. Section 11 'Conserving and enhancing the natural environment' requires the planning system to contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, geological conservation interests and soils;
 - Recognising the wider benefits of ecosystem services;
 - Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and

- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.13. Paragraph 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- Proposed Development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;
- Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
- Opportunities to incorporate biodiversity in and around developments should be encouraged;
- Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and
- The following wildlife sites should be given the same protection as European sites:
 - ◆ potential Special Protection Areas and possible Special Areas of Conservation;
 - ◆ listed or proposed Ramsar sites; and
 - ◆ sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

4.14. Paragraph 123 deals with noise and aims to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.

4.15. Section 12 of the NPPF deals with 'conserving and enhancing the historic environment' and requires that heritage assets are recognised as being an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 128 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

4.16. Paragraph 131 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- The desirability of new development making a positive contribution to local character and distinctiveness.

The Statutory Development Plan

- 4.17. Russell and Strathmore Schools lie within the London Borough of Richmond upon Thames (LBRuT).
- 4.18. The LBRuT's Local Development Framework (LDF) was adopted in 2009 with the Development Management Plan being adopted in 2011, these documents replaced the majority the LBRuT Unitary Development Plan (UDP).
- 4.19. The Development Plan for the Proposed Development, therefore, comprises :
- The London Plan (July 2011) and
 - LBRuT's Local Plan which consists of a set of planning documents including:
 - ◆ LBRuT LDF Core Strategy (2009);
 - ◆ LBRuT LDF Development Management Plan (2011); and
 - ◆ LBRuT UDP (2005) (Saved Policies) – There is only one saved policy in the UDP, this is not relevant to the planning application so this document will not be discussed further.

Regional Policy

The London Plan (2011)

- 4.20. The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the Development Plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by Councils and the Mayor.
- 4.21. The policies listed below are relevant to the determination of the planning application.
- 4.22. Policy 3.18 'Education Facilities' states that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand. Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged. Development proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college's offer. On-site or off-site sharing of services between schools and colleges should be supported.
- 4.23. Policy 5.1 'Minimising Carbon Dioxide Emissions' states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- Be lean: use less energy;
 - Be clean: supply energy efficiently; and
 - Be green: use renewable energy.
- 4.24. Policy 5.3 'Sustainable Design and Construction' states that development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

- 4.25. Policy 5.7 'Renewable Energy' states that within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 4.26. Policy 5.11 'Green Roofs and Development Site Environs' states that major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.
- 4.27. Policy 5.12 'Flood Risk Management' states that development proposals must comply with the flood risk assessment and management requirements set out in PPS25 over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 and Catchment Flood Management Plans.
- 4.28. Policy 7.14 'Local Character' at a strategic level requires that development proposals should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. There should be a high quality design response that contributes to a positive relationship between the urban structure and natural landscape and should be informed by the surrounding historic environment.
- 4.29. Policy 7.6 'Architecture' requires architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 4.30. Policy 7.8 'Heritage Assets and Archaeology' requires that development proposals should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their setting should be sympathetic to their form, scale, materials and architectural detail. The policy also requires that new development should make provision for the protection of archaeological resources.
- 4.31. Policy 7.14 'Improving Air Quality' requires that sustainable design and construction is promoted to reduce emissions from the demolition and construction of buildings follows the best practice guidance contained in the GLA and London Councils' 'The Control of Dust and Emissions from Construction and Demolition'.
- 4.32. Policy 7.15 'Reducing Noise and Enhancing Soundscapes' seeks to minimise the existing and potential adverse impacts of noise on, from, within or in the vicinity of development proposals.
- 4.33. Policy 7.17 'Metropolitan Open Land' provides the strongest protection to London's Metropolitan Open Land (MOL) and inappropriate development should be refused, except in very special circumstances, giving the same level of protection as Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of the MOL. The guidance contained in the NPPF relating to Green Belts should be applied equally to MOL.
- 4.34. Policy 7.19 'Biodiversity and Access to Nature' requires that development proposals should make a contribution to the protection, enhancement, creation and management of biodiversity; assist in achieving targets in BAPs and not adversely affect the integrity of European sites. Protection is given to sites of nature conservation importance and this will apply to all areas of ancient woodland. Strong protection is given to Sites of Metropolitan Importance for Nature Conservation (SMIs); these sites are jointly identified by the Mayor and the London Boroughs as being of strategic nature conservation importance. The policy goes on to say that when considering proposals that would affect a site of recognised nature conservation interest, the proposal should avoid adverse impacts to the biodiversity interest and if impact is unavoidable minimise impact and seek mitigation.
- 4.35. Policy 7.21 'Trees and Woodlands' states that existing trees of value should be retained and any lost as the result of development should be replaced and wherever appropriate the planting of additional trees should be included in new developments.

Local Policy

LBRuT's LDF Core Strategy (2009)

- 4.36. LBRuT's LDF Core Strategy is the principal document in the LDF and provides vision, objectives and spatial policies to guide development in the borough.
- 4.37. The key policies of relevance in the Core Strategy are detailed below.
- 4.38. CP1 'Sustainable Development'
- 1.A The policy seeks to maximise the effective use of resources including land, water and energy, and assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist, including the requirement to meet the Code for Sustainable Homes level 3 (for new homes), Ecohomes "excellent" (for conversions) or BREEAM "excellent" (for other types of development). This requirement will be adjusted in future years through subsequent DPDs, to take into account the then prevailing standards in the Code for Sustainable Homes and any other National Guidance, and ensure that these standards are met or exceeded.
 - 1.C Making best use of land requires the use of existing and proposed new facilities should be maximised through management initiatives, such as co-location or dual use.
 - 1.D Reducing environmental impact requires that development should seek to minimise the use of open land for development and seek to maintain the natural vegetation, especially trees, where possible. Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.
- 4.39. CP2 Reducing Carbon Emissions
- 2.A The Borough will reduce its carbon dioxide emissions by requiring measures that minimize energy consumption in new development and promoting these measures in existing development, particularly in its own buildings.
 - 2.B The Council will require the evaluation, development and use of decentralised energy in appropriate development.
 - 2.C The Council will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible, and by promoting its use in existing development.
- 4.40. CP4 Biodiversity
- 4.B Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats in the UK, Regional and London Borough of Richmond upon Thames Biodiversity Action Plans.
- 4.41. CP5 Sustainable Travel
- 5.A The need for travel will be reduced by the provision of employment, shops and services at the most appropriate level locally, within the network of town centres identified in CP 8. To implement this policy the Council will:
 - ◆ Protect and enhance local facilities and employment to reduce the need to travel.
 - ◆ Require developments which would generate significant amounts of travel to be located on sites well served by public transport.
- 4.42. CP7 Maintaining and Improving the Local Environment

- 7.B All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:

(i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity; and

(ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.

4.43. CP16 Local Services/Infrastructure

- 16.A The overall strategic approach is to ensure the provision of services and facilities for the community.
- 16.B The Council in working with other partners will ensure the adequate provision of such services and facilities, especially in areas of relative deprivation. The Council will aim to facilitate co-location of council, health, library and school facilities where opportunities arise.
- 16.C Loss of community facilities will be resisted unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere.
- 16.D New developments will be expected to contribute to any additional infrastructure and community needs generated by the development. New development will also have to take account of the requirements set out in the Planning Obligations Strategy (Supplementary Guidance to the UDP). Obligations will be sought in accordance with Circular 05/05 and any superseding advice.

4.44. CP18 Education and Training:

- 18.A The Council will ensure that the provision of schools, pre-schools and other education and training facilities are sufficient in quality and quantity to meet the needs of residents. Demand for primary places is currently particularly high in Richmond/ East Sheen, St Margaret's/ East Twickenham and Teddington.
- 18.B Land in educational use will be safeguarded and new sites may be identified in the Site Allocations DPD. The potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs.
- 18.C Facilities and services for the education and training of all age groups should be in locations that are conveniently accessible to users. The Council will work with partners to ensure the provision of post 16 education and training to help to reduce inequalities and support the local economy.
- 18.D Developers will have to take into account the potential need to contribute to the provision (Planning Obligations Strategy) of primary and secondary school places in the Borough, and training opportunities for residents.

London Borough of Richmond upon Thames LDF Development Management Plan (2011)

4.45. The policies contained within the Development Management Plan contribute towards delivering the Core Strategy by setting out detailed planning policies that the Council will use for determining planning applications. The relevant policies are considered to be as follows:

4.46. Policy DM SD 1 'Sustainable Construction' states that all development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs. New buildings should be flexible to respond to

future social, technological and economic needs by conforming to the Borough's Sustainable Construction Checklist SPD. They also must achieve a minimum 25 per cent reduction in carbon dioxide emissions over Building Regulations (2010) in line with best practice from 2010 to 2013, 40 per cent improvement from 2013 to 2016, and 'zero carbon' standards (2) from 2016. It is expected that efficiency measures will be prioritised as a means towards meeting these targets. These requirements may be adjusted in future years to take into account the then prevailing standards and any other national guidance to ensure the standards are met or exceeded. New non-residential buildings over 100sqm will be required to meet the relevant BREEAM 'excellent' standards.

- 4.47. Policy DM SD 2 'Renewable Energy and Decentralised Energy Networks' requires new development will be required to conform with the Sustainable Construction Checklist SPD; and:
- Maximise opportunities for the micro-generation of renewable energy. Some form of low carbon renewable and/or de-centralised energy will be expected in all new development, and developments of 1 dwelling unit or more, or 100sqm of non-residential floor space or more will be required to reduce their total carbon dioxide emissions by following a hierarchy that first requires an efficient design to minimise the amount of energy used, secondly, by using low carbon technologies and finally, where feasible and viable, including a contribution from renewable sources.
 - Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where there is no over-riding adverse local impact.
 - All new development will be required to connect to existing or planned decentralized energy networks where one exists. In all major developments and large Proposals Sites identified in the (forthcoming) Site Allocations DPD, provision should be made for future connection to a local energy network should one become available.
- 4.48. Policy DM SD 5 'Living Roofs' states that living roofs should be incorporated into new developments where technically feasible and subject to considerations of visual impact. The onus is on the applicant/developer for proposals with roof plate areas of 100sqm or more to provide evidence and justification if a living roof cannot be incorporated. The aim should be to use at least 70% of any potential roof plate area as a living roof. The use of living roofs in smaller developments, renovations, conversions and extensions is encouraged and supported.
- 4.49. Policy DM SD 6 'Flood Risk' requires that development will be guided to areas of lower risk by applying the Sequential Test as set out in paragraph 3.1.35. Developments and
- 4.50. Policy DM OS 2 'Metropolitan Open Land' states that the borough's Metropolitan Open Land will be protected and retained in predominately open use.
- 4.51. Policy DM OS4 'Historic Parks, Gardens and Landscapes' states that parks and gardens as well as landscapes of special historic interest included in the Register compiled by English Heritage, and other historic parks, gardens and landscapes referred to in the text accompanying the policy, will be protected and enhanced. Proposals which have an adverse effect on the settings, views, and vistas to and from historic parks and gardens, will not be permitted.
- 4.52. Policy DM OS 5 'Biodiversity and new development' requires that all new development will be expected to preserve and where possible enhance existing habitats including river corridors and biodiversity features, including trees. All developments will be required to enhance existing and incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments with the aim to attract wildlife and promote biodiversity, where possible. When designing new habitats and biodiversity features, consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change. New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network, including de-culverting rivers, where possible.
- 4.53. Policy DM OS6 'Public Open Space' states that Public Open Space will be protected and enhanced.

- 4.54. Policy DM HD 1 'Conservation Areas' - designation, protection and enhancement' states that buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area.
- 4.55. Policy DM HD 4 'Archaeological Sites' states that the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.
- 4.56. Policy DM HD 7 'Views and Vistas' states that the Council will seek to protect the quality of views indicated on the Proposals Map. It will also seek opportunities to create attractive new views and vistas and, where appropriate, improve any that have been obscured.
- 4.57. Policy DM DC 1 'Design Quality' requires that new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context. In assessing the design quality of a proposal the Council will have regard to the following: compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form sustainable development and adaptability, subject to aesthetic considerations, layout and access, space between buildings and relationship to the public realm, detailing and materials.
- 4.58. Policy DM DC 4 'Trees and Landscape' states that the boroughs trees and landscape will be protected and enhanced. This policy requires landscape proposals to be submitted for all developments to retain existing trees and other important landscape features and include the planting of new trees and other planting.
- 4.59. Policy DM DC 5 'Neighbourliness, Sunlighting and Daylighting' states that in considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. To protect privacy, for residential development there should normally be a minimum distance of 20 m between main facing windows of habitable rooms. The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards.

5. Development Appraisal

Introduction

- 5.1. The following section examines the Proposed Development in the context of the Development Plan, national policy guidance and other material considerations.
- 5.2. The planning and environmental considerations relevant to this application include:
- The Principle of Development;
 - Metropolitan Open Land;
 - Traffic, Transport and Highways;
 - Impact on Residential Amenity;
 - Design;
 - Heritage;
 - Landscape and Trees;
 - Flood Risk;
 - Sustainability; and
 - Ecology.
- 5.3. The Statement examines how these issues are considered and mitigated where necessary in such a way as to minimise the impact on the surrounding environment, including the amenity of nearby land uses. These issues and justifications for development are now considered in turn below.

The Principle of Development

- 5.4. The NPPF under paragraph 17 sets out its core land-use planning principles which should underpin decision making, these include delivering sufficient community infrastructure to meet local needs. The London Plan under Policy 3.18 states that development proposals which enhance education and skills will be supported including new build and extension of existing facilities. It goes on to state that development proposals that encourage co-location of services should be encouraged in order to maximise land use, reduce costs and develop what schools offer. At local level policy CP18 states that the Council will ensure provision of schools of sufficient quality and quantity to meet the needs of residents.
- 5.5. The Proposed Development involves the construction of a new school to replace the existing Russell School and nursery and to provide part of the SEN provision currently provided at Strathmore School. The Proposed Development involves building new high quality facilities on an existing school site, which would provide a high quality shared facility. The Proposed Development is therefore strongly supported in principle at all levels of planning policy. However, the need for the Proposed Development in terms of the Russell School and Strathmore SEN provision and its in principle support under planning policy needs to be balanced against its impacts in terms of other considerations, such as impacts on MOL, traffic, transport and parking, residential amenity, design, heritage, landscape, flood risk, sustainability and ecology which are discussed further in sections below.

Metropolitan Open Land

- 5.6. The entire site lies within Metropolitan Open Land (MOL), a plan showing the MOL boundary can be found in the DAS. All levels of planning policy provide protection for MOL, which is given the same

protection as green belt land. At national level, the NPPF states that inappropriate development is harmful and should not be approved except in very special circumstances. It states that very special circumstances will not exist unless the potential harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations. Section 9 of the NPPF confirms that new buildings are inappropriate development, however exceptions include the replacement of a building (provided the new building is in the same use and not materially larger than the one it replaces) and partial or complete redevelopment of a previously developed site which would not have a greater impact on openness and the purposes of including land within the MOL.

- 5.7. The Proposed Development is for the replacement of four buildings (the junior building, the annex building, nursery, and the modular staff room) with a single building. The nursery building is being demolished and re-provided within the new school building. The part of the site that the nursery is on is outside of MOL land it isn't included within the MOL assessment which follows, however its removal will have a positive impact on the openness of the MOL and views into it.
- 5.8. The replacement of a building is an exception under MOL policy provided that the new building is not materially larger than the one(s) it replaces. The existing buildings on the site (within MOL land) have the following gross external areas (footprint):
- Russell School Junior building – 988 m²
 - Russell School Annex building – 233 m²
 - Modular staff room – 67 m²
 - **Total existing gross external area – 1288 m²**
- 5.9. All of the above buildings would be demolished as part of the Proposed Development. The new combined Strathmore SEN and Russell Primary School building would have the following gross external area (footprint):
- **Proposed building gross external area– 2040 m²**
- 5.10. The **net additional building gross external area** within the MOL would therefore be **752 m²**.
- 5.11. The **percentage increase** from existing to proposed gross external area would be **58%**.
- 5.12. The Proposed Development would result in a 58% increase in gross external area (floor area) over the existing buildings on the site (all within MOL land), this is not considered to be a material increase over the size of the existing buildings on the site. In addition, due to the reduction in the number of buildings on the site from three (junior building, annex building and infant building) to a single purpose built building, this would reduce the spread of buildings across the site which would reduce the visual impact on the openness of MOL over the existing situation which is spread out and poorly planned. The new building would be surrounded by well-designed planting to partially screen and buffer the development from surrounding land, further reducing any impact on MOL land. Additionally the proposed design of the development would represent a visual enhancement in the MOL and would benefit the site and the surrounding MOL land. It is therefore concluded that the Proposed Development is not inappropriate development within the MOL and is therefore acceptable in this regard.
- 5.13. Notwithstanding the above assessment which concludes that the Proposed Development is not inappropriate development in the MOL, very special circumstances also exist to justify the Proposed Development, as described below.

Educational Benefits

- 5.14. The educational benefits of the Proposed Development should be measured in the context of the following:
- A demonstrable need for additional pupil places at The Russell Primary School. There is a lack of land available outside of the MOL to provide the places required. The Proposed Development

represents a far more efficient use of the site as when measured against the existing junior school building, only 5m² of ground floor foot print is provided compared to 10.7 m² as existing;

- A demonstrable need to expand and devolve the Strathmore SEN provision across three separate (main stream) school sites;
- A lack of availability of land outside of the MOL boundary;
- A demonstrable shortfall in the standard of accommodation provided within the existing Strathmore SEN building (not fit for purpose) and the large expenditure incurred each year by LBRuT sending pupils to schools outside of the borough; and
- There is a pressing need for additional primary school places within the immediate vicinity of the site is very real. This is occasioned by a 21% increase in the birth rate between 2000 and 2007. Furthermore, LBRuT's forecasts for reception classes indicated that there would be a shortfall of places per year in this district of Richmond from 2011/2012 onwards.

5.15. The combined pupil capacity of the two schools and nursery is currently 322 pupils. The total pupil capacity of the proposed combined Russell Primary School and Strathmore SEN School including nursery would be 380 pupils. A capacity of 380 pupils represents a significant and much needed increase in existing pupil capacity of over 14%.

5.16. The Proposed Development would enable LBRuT to meet its commitments and obligations with regard to increased primary pupil numbers and co-locating SEN provisions both within and alongside an established main stream educational provision.

Why the Proposed Development must be sited on MOL

5.17. The reason for locating the Proposed Development on the portion of MOL land where it is currently sited is as follows:

- The portion of the site outside of the MOL is currently occupied by the existing Strathmore SEN School and the existing Russell Infant and Nursery School buildings. These need to remain in operation until the new school is provided.
- There is insufficient land available within the land in school ownership outside the MOL for the new co-located school complex to be constructed, without demolishing the existing school buildings first. For this approach to be possible, the respective school facilities within these existing buildings within the MOL would need to be re-provided within temporary buildings sited on the MOL. This approach was not considered to be viable due to financial, phasing and programme parameters and constraints.

Why the school must be sited in this location

5.18. The reasons for locating the Proposed Development in the location proposed is as follows:

- The site has a long history of providing mainstream primary school provision to the local community, dating back to before 1943 and has been permitted over many years to develop and mature to its current state, to meet the needs of the immediate local community. The co-located Strathmore SEN School on the adjacent site to The Russell Primary School is also well established - the Strathmore SEN School was founded on the site in 1980. Therefore it is essential that it stays in this location;
- To allow all of the existing buildings on the site to remain in operation, whilst the new building is being constructed. This ensures that pupil's education is not disrupted during the construction period;
- To allow the existing sports pitches to remain in place during and following construction providing adequate external curriculum opportunities;

- To allow the existing Strathmore School buildings on the adjacent site to remain operational as, this site will remain in occupation until mid/late 2018, when all the Strathmore development projects are targeted to complete. Hence the new school cannot be sited there as would require the relocation of the 57 of the most vulnerable children;
- To meet high demand for school places particularly in the local area, within a school site that has sufficient external area to meet guidance requirements. Without the additional places that this proposal will provide, the Authority would be wholly reliant upon a strategy of providing temporary additional places, which is considered to be a less than ideal solution compared with permanent expansion, as this would not provide for the ancillary spaces and adequate sized hall and kitchen spaces required and would result in additional dislocated buildings on site. Additional capacity is also being proposed at neighbouring schools, to meet the high demand for school places, in addition to those required at Russell School. It would be insufficient without the expansion at the Russell School;
- To maintain direct access for vehicles from Petersham Road and access to community facing facilities such as halls and open space to the front of the site;
- To locate the new two storey building as far back from Petersham Road as practicable to minimise it's visual impact and respect the openness of MOL when viewed from the east;
- To reduce the impact on neighbouring residents - with the main bulk of the buildings being to the north east of the site; and
- The site area to the south-west of the site was considered for the location of the new school building, however, it was considered too small an area for the collocated provision would limit access to the site and was believed a two story school building would have a greater impact on the local residents on Meadlands Drive.

Why other schools cannot take the SEN pupils to reduce the size of the proposed development

- 5.19. Strathmore and The Russell Schools already operate an integrated Early Years Foundation Stage delivery, which is based within the Russell School nursery and reception classes.
- 5.20. There is an existing good working relationship between The Russell and Strathmore staff, who operate a peer to peer observation scheme and share skills and expertise to provide continuous improvement to their primary SEN delivery.

Why a new build is required instead of a refurbishment and extension

- 5.21. The existing buildings on site are not fit for purpose in a number of areas. Issues include DDA accessibility, high running costs occasioned by poor u-value performances and antiquated and defective heating and ventilation plant, poor natural day lighting and natural ventilation occasioned by small windows, low ceiling heights, instances of damp and condensation and likely asbestos content.
- 5.22. The above issues could be addressed within a carefully designed programme of refurbishment, remodelling and repair, however this approach would represent poor value for money and would never produce the type of modern teaching and building performance that would be secured by way of a new build.

Benefits of the proposed development

- 5.23. The site has a long history of providing primary education to the local community and has been permitted over many years to develop and mature to meet the needs of the local community. The Proposed Development represents a necessary and vital redevelopment of the schools on site to ensure that the additional facilities and space required is provided in a modern and appropriately sized teaching facility.

Why the proposed development cannot be sited on the adjacent Strathmore School site

- 5.24. It was suggested that the new school could potentially be sited on the current Strathmore School site which is located outside of MOL land. However, there is a need to keep the existing Strathmore School operational until its replacement provision is provided at the three schools identified (Russell School, Grey Court and St. Richard Reynolds Catholic College). Due to the splitting of the Strathmore provision, all of the new sites will need to be constructed and in operation before the existing school building is demolished. Therefore the new building cannot be sited on the Strathmore School site as the existing Strathmore School needs to be retained until after its replacement provision is provided over the three sites to ensure continuity in teaching for the pupils, which is not targeted until 2018.

Why SEN needs to be provided in the Borough

- 5.25. LBRuT have carried out a SEN public consultation and Councillor led Scrutiny Task Group about its SEN delivery, the outcome of which identified:
- Perceptions about in-borough provisions were very positive, with the majority of parents said they would not seek for their Children and Young People to go out-of-the-borough if possible, giving the parents' choice.
 - The transport costing for placing a child in SEN education out of the borough are much higher than it would be if the child remained in borough: For a child to have individual transport, it can cost the LBRUT approximately £22,000 p.a. The cost of transport can in some cases be as much as the cost of the placement, which could be better managed within borough.
 - SEN delivery strategy has highlighted the benefits of co-location of SEN provisions alongside mainstream school provision. There are proven educational benefits for SEN pupils, in receiving their education within a mainstream school with access to additional facilities, social benefits from regular interaction with mainstream children, as well as recognised benefits to SEN delivery within the main stream school, sharing of good practices and working methods across both schools and the social benefits for the mainstream non SEN school children.
 - A key recommendation of the Scrutiny Task Group, which has formed part of the Council's commitments to residents was to: ascertain if Clarendon and /or Strathmore Schools can be rebuilt so as to ensure purpose built buildings for children with special educational needs. If this is feasible, this should go ahead.

Why the existing Strathmore SEN School needs to be replaced

- 5.26. The current Strathmore Special School is not fit for purpose and LBRuT has a large expenditure each year sending pupils out of the borough, because adequate facilities and number of available places do not currently exist within the borough. In order to continue to deliver the Strathmore SEN provision, it is imperative that the capacity (i.e. numbers of pupils that the Strathmore SEN School) can accept increases and that the facilities within which the pupils are educated are 'fit-for-purpose'. LBRuT is committed to devolving an expanded Strathmore SEN provision across three separate sites as follows:
- Strathmore at The Russell Primary School – up to 24 SEN primary places, within a new purpose built combined SEN and mainstream primary school complex.
 - Strathmore at Grey Court School – up to 24 SEN secondary places, within two new purpose built SEN buildings, located within the campus of the existing mainstream Grey Court Secondary School. The new buildings will include a hydro-therapy pool (this is just one of the inadequate facilities within the existing building).
 - Strathmore at St Richard Reynolds Catholic College – up to 24 SEN primary places and up to 24 SEN secondary places, within a new purpose built SEN complex, located within the campus of the existing mainstream St Richard Reynolds Catholic College. This is the last phase of the Strathmore SEN devolution and will provide a much needed presence to the portion of the borough that lies to the north of the River Thames. The strategy aims to provide parents with choice on both sides of the borough, with access to similar quality facilities.

- 5.27. The number of transport journeys and the length of the journeys is expected to reduce with the expansion of the offer at Strathmore, meaning that the children's journeys would be shorter and would mean a less disruptive start to the school day.
- 5.28. The proposals therefore represent a necessary and vital next chapter in the development of The Russell Primary School and Strathmore SEN School. The proposals are also part of a wider strategy for developing the two schools that extends beyond the existing site boundary.

Summary

- 5.29. The above assessment concludes that the proposed replacement school building is not materially larger than the existing buildings on site and is therefore not inappropriate development in the MOL and as such, is acceptable in this regard. Notwithstanding the above assessment which concludes that the Proposed Development is not inappropriate development in the MOL, very special circumstances also exist to justify the Proposed Development, as described above.
- 5.30. The Proposed Development is therefore in accordance with section 9 of the NPPF (2012), policy 7.17 of the London Plan (2011) and policy DM OS2 of the Development Management Plan (2011).

Traffic, Transport and Parking

- 5.31. A Transport Statement (TS) for the Russell and Strathmore Schools proposals (WYG Transport, September 2014) has been prepared and is submitted to support this application for planning permission. The findings are set out briefly below.
- 5.32. The Proposed Development includes the expansion of the current Russell Primary School from its current one FE to a one system plus an additional four classes under a shared form entry provision. The number of nursery place will remain as existing. It is forecast that, once the phased increase in pupils in complete, there will be 356 full time equivalent places at Russell School (including 26 nursery places). The proposal also includes the disposal of the existing Strathmore SEN School on the site and co-locate part of its provision at the Russell School site, once this is complete there will be up to 24 full time Strathmore places at Russell School. Therefore the total student full time places at the combined site (Russell School, Strathmore School at Russell and the nursery full time equivalent) would be 380 places. Overall between the two schools the number of staff will decrease overall from 79 at present to 74.
- 5.33. The TS looked at the accessibility of the site and confirmed that the PTAL value of the site is identified as 2 ('poor'). Currently there are two vehicular access points to the School, one from Petersham Road and another from Meadlands Drive. There are four existing pedestrian access points, each serving different buildings and areas within the site. The Proposed Development would retain the Petersham Road vehicular access along with two pedestrian access points serving Petersham Road and Meadlands Drive.
- 5.34. In terms of road safety, traffic collision statistical data for the area in the vicinity of the schools for the previous five years was collected. None of the incidents recoded in the area involved pedestrians or people of school age and all but one accident occurred outside of the morning and afternoon pick up and drop off periods. The TS therefore concluded that there are no significant road safety issues associated with the school.
- 5.35. In terms of parking, the Proposed Development would provide 35 car parking spaces, two blue badge spaces, five mini bus parking spaces and 90 cycle spaces. The LBRuT's Development Management Plan provides car and cycle parking standards for the Borough for schools, it requires 1 car parking space per 2 staff and 5 cycle spaces per classroom. The Proposed Development provides 37 car parking spaces in total (including the blue badge provision) which meets the Council's car parking standards (74 staff, one space per two staff, therefore 37 car parking spaces required). For cycle parking, 90 spaces are proposed, the Council's parking standards require 5 spaces per classroom. 14 classrooms are proposed and therefore 70 cycle spaces are required, the cycle parking standard is a minimum so the provision of 90 spaces is acceptable.
- 5.36. A car parking survey was undertaken for the TS using the LBRuT car park survey methodology, which detailed the occupancy rates and availability of parking within 200 metres of the site. It was found that

even at peak times there is currently a high level of availability for free, unrestricted car parking spaces within a short walking distance of the schools.

- 5.37. The TS undertakes a multi-modal trip assessment which shows that the majority of pupils currently travel to school via sustainable modes, such as walking, cycling and public transport, while approximately 30% of pupils travel in a car. Staff journey trends are different, in that a greater proportion travel by car; approximately 50%, while less use sustainable modes. The trip assessment showed that there are likely to be more trips made by car in the future with the proposed increase in pupil numbers travelling to the school, although, as the number of staff is proposed to decrease, there is likely to be less staff journeys made by car.
- 5.38. The TS demonstrates that there is sufficient space for additional cars to park on-street if necessary. An analysis of the parking survey data and the multi-modal trip assessment concluded that, even assuming a worst case scenario at peak periods during term time, parking is still readily available within 200m of the site, with occupancy rates not exceeding 78% even at peak times during the day. Any increase in parking is also likely to be limited to short 10-15 minute periods at the beginning and end of the school day.
- 5.39. It is also important to recognise that, as the primary school increases in size, there is the likelihood that a greater proportion of pupils attending the school will be siblings or will live within close proximity to one another. This further reduces the potential for additional car trips and increases the potential for car sharing and for parents walking more than one pupil to the school at any one time.
- 5.40. The TS concludes that the Proposed Development would not have any unacceptable impacts in terms of transport or highways and is therefore acceptable in this regard. The Proposed Development is therefore in accordance with the NPPF (2012) and Policy CP5 of the Core Strategy (2009).

Impact on Residential Amenity

- 5.41. All levels of planning policy aims to protect the amenities of adjoining properties and Policy DM DC5 of the Development Management Plan (2011) requires that adjoining properties should be protected from unreasonable loss of privacy, pollution, visual intrusion and noise and disturbance.
- 5.42. The Proposed Development has been designed so that all new build is at least 20 metres from the closest residential properties and enhanced boundary planting including trees has been included on the western, northern, eastern and much of the southern boundaries of the site to further screen the Proposed Development. The Proposed Development would not be considered to be over dominant, over bearing or result in a loss of light to any neighbouring properties.
- 5.43. In terms of potential overlooking of nearby residential properties, it is considered that due to the positioning of the building on the site and the large separation distances involved, there would be no potential unacceptable overlooking / loss of privacy issues to the north, east and west. The south elevation of the building would be located in closer proximity to residential properties and therefore could potentially cause unacceptable overlooking / loss of privacy issues. However, the proposed building has been carefully designed to ensure that unacceptable overlooking / loss of privacy issues do not result. The part of the building closest to residential properties on the south side is single storey, having ground floor windows only which would not result in any loss of privacy. Behind this single storey element is a two storey element with first floor windows, the view from which is blocked by the roof of the single storey element.
- 5.44. In terms of noise and disturbance, the Proposed Development is the same use as the existing development on the site and schools do not generally give rise to noise issues. Any plant required for the Proposed Development would be located internally within the building therefore attenuating any noise to an acceptable level.
- 5.45. The Proposed Development would not be considered to have any adverse effects on neighbouring residential amenity and as such is acceptable in this regard and is in accordance with the NPPF (2012) and Policy DM DC5 of the Development Management Plan (2011).

Design

- 5.46. The design of the Proposed Development including landscaping and the analysis in terms of site constraints, architecture, location of the Proposed Development and the specification of the Proposed Development are detailed in the DAS which accompanies this application for planning permission. The DAS fully discusses the design principles and reasoning behind the Proposed Development and discusses why it is acceptable in terms of design. It is not intended to repeat this information here. The final design has been shaped by the pre-application responses that have been received from LBRuT's Development Management team and the design is considered to be in keeping with the character of the existing buildings and their surroundings and is sensitively designed in terms of its Conservation Area setting and its setting in terms of nearby Listed Buildings, Buildings of Townscape Merit, protected views and the Historic Park and Garden. As such the Proposed Development is in accordance with the design requirements of the NPPF (2012), policies 7.14 and 7.16 of the London Plan (2011), Policy CP7 of the Core Strategy (2009) and Policy DM DC1 of the Development Management Plan (2011).

Heritage

- 5.47. The site is located within the Petersham Conservation Area and lies within an Archaeological Priority Area. There are no designated built heritage assets on site, however the site is close to Listed Buildings, Buildings of Townscape Merit and a Historic Park and Garden.
- 5.48. All levels of planning policy support the protection of heritage assets, the NPPF (2012) sets out the conservation of heritage assets as a core principle. The London Plan (2011) provides for the protection of heritage under Policy 7.8 'Heritage Assets and Archaeology'. The LBRuT Core Strategy (2009) under Policy CP7 'Maintaining and Improving the Local Environment' provides for the protection of heritage assets and requires new development to recognise the distinctive character of an area. LBRuT's Development Management Plan (2011) contains several relevant policies, these are, Policy DM HD1 requires the protection of Conservation Areas; Policy DM HD2 requires the conservation of Listed Buildings and their setting; Policy DM HD3 seeks to conserve Buildings of Townscape Merit; and Policy DM HD4 relates to archaeological sites.
- 5.49. Due to the sensitive nature of the site in terms of heritage, an Archaeological Desk Based Assessment (DBA) for Russell and Strathmore School (AOC Archaeology, April 2014) has been prepared and is submitted to support this planning application.
- 5.50. The DBA has assessed a study area of 1km from the application site to assess the likely nature and extent of archaeological and built heritage resource, in addition to the desk based element of the assessment a site walkover was also undertaken.
- 5.51. Telephone consultations were undertaken with LBRuT's Conservation Officer who confirmed that heritage assets potentially affected by the Proposed Development should be assessed on their own merits. Consultation was also undertaken with the Greater London Archaeology Advisory Service (GLASS) who highlighted the potential of the site for general prehistoric period activity. This activity included the study of the early medieval hamlet of Ham; the influence of Ham House on the surrounding landscape; and recent excavations at Grey Court School which found evidence of brick manufacture, possibly associated with the construction of Ham House.
- 5.52. The DBA confirmed that no previous archaeological investigations have been recorded on the site and noted a considerable number of Listed Buildings, Buildings of Townscape Merit and Registered Parks and Gardens within the study area (1km from site), some of which are in close proximity of the site with some visible from the site boundary.
- 5.53. A walkover survey of the site was undertaken on the 27th March 2014 to assess the existing land use and the potential for heritage constraints.
- 5.54. In terms of the potential impact of the Proposed Development, the DBA reports that further information regarding the below ground deposits and a more detailed design of the Proposed Development (to include information, for example, on foundations) would be required to fully assess the degree of potential impact of the Proposed Development. However it can be stated that ground works would be

required for the foundations of the Proposed Development, where ground works extend beyond the depth of made ground, there may be an impact on archaeological deposits, should any be present.

- 5.55. There would be no physical impact from the Proposed Development to the designated heritage assets in close proximity to the site, though it could impact on their wider settings. However the DBA confirms that most of the heritage assets are partially shielded from view by vegetation, or was not visible from the area of the site to be developed or is located a distance from the site. The DBA therefore concludes that it is likely that the change to the setting from the proposed development would be low / negligible.
- 5.56. Additional designated and undesignated heritage assets are present within the study area, however as these are separated by a good distance with no immediate views between the assets and the Proposed Development site it is concluded that there would be no impact on such heritage assets.
- 5.57. The DBA suggests the following recommendations and mitigations are undertaken for archaeology and built heritage:

Archaeology

- Due to the potential for below ground remains, Gillian King, the Greater London Archaeological Advisor to LBRuT by email (08/04/14) indicated that an evaluation stage by trial trenching would be required, and would be subject to an approved Written Scheme of Investigation (WSI). It is therefore recommended that a programme of archaeological evaluation targeted in the proposed areas of impact is prepared, prior to the commencement of any development groundworks. Such works would identify and record the nature and extent of any surviving archaeological remains encountered (preservation by record). Should no archaeological remains be encountered during these works, then no further works may be required.

Built Heritage

- The current school buildings are considered to be of negligible heritage value and no further work, such as historic building recording is advised during, modification or demolition.
 - The site is located within a Conservation Area and is surrounded by numerous listed buildings, particularly on the western side, some of which are within view of the site. There are also Registered Parks and Gardens and Buildings of Townscape Merit nearby. Although there will be no physical impact upon these heritage assets, there may be some change to their setting. It should be ensured that the final design scheme makes a positive contribution to the Conservation Area through high quality design and use of appropriate traditional materials and architectural details as specified in the Conservation Area Character Appraisal and Management Plan (Richmond Borough Council 2008). (It should be noted that the final design has been carefully designed to ensure that it is of high quality and preserves the character of the Conservation Area).
- 5.58. The above assessment confirms that the Proposed Development would not have an adverse effect in relation to heritage provided that the recommendations and mitigations proposed are implemented, as such the Proposed Development is considered to be in accordance with the NPPF (2012), Policy 7.8 of the London Plan (2011), and Policy DM HD1, DM HD2, DM HD3 and DM HD4 of the Development Management Plan (2011).

Landscape and Trees

Landscape

- 5.59. The landscaping proposals are contained within the DAS and on drawing number 5127940/COL/LA003 (also within the DAS). Following the construction of the new school building the existing buildings on the site would be demolished to allow for the site to be landscaped. Under the footprint of the existing Russell School there would be a new Key Stage 1 and 2 playground and a green space. The existing playing field would be retained with improved screening planting. The main vehicular access to the site would be from Petersham Road which would lead to car parking and mini bus parking and drop off areas. The landscape proposals also show soft landscaping around the buildings with enhanced screening to all boundaries. There is also provision for SEN play, teaching spaces, nature areas and an allotment, orchard and forest area.

- 5.60. The proposed landscaping scheme has been designed carefully to integrate the new building and hardstanding areas into the site. The buildings and hardstanding have purposely been proposed to be sited as far away from the boundaries of the site as possible. The majority of the site boundary screening is proposed to be reinforced to partially screen the Proposed Development from outside of the site and to provide enhanced greening to the Proposed Development to take account of its sensitive location.

Trees

- 5.61. In relation to trees, this planning application is accompanied by an Arboricultural Impact Assessment (AIA) (Atkins, November 2014) and a tree protection plan (drawing number 5127940/DG/ARB/001 Revision A).
- 5.62. The Proposed Development would require the removal of trees as a result of direct impact by being located in the footprint of the proposals and due to potential for tree root severance during construction. The following trees would be felled:
- 14 no. individual and groups of British Standard (BS) Category B trees;
 - 10 no. individual trees and groups of BS Category C trees; and
 - 3 no. BS Category U trees.
- 5.63. The Proposed Development would require the removal of a number of trees as described above. The AIA assessed the loss of the trees and recorded that, ten of the trees to be removed are Category C trees which are of low quality and provides the opportunity for replacement tree planting to offer species of greater longevity, where the trees are of fair to poor form, or young trees to be transplanted or replaced. Similarly, Category U trees should not hinder the Proposed Development given that the trees should be removed on the grounds of safety and sound arboricultural management regardless of the proposed works.
- 5.64. The design of the Proposed Development has been modified to preserve trees where feasible. However, the Proposed Development would require the removal of a 14 trees of moderate quality (Category B). Mitigation for the loss of these trees (and the Category B trees noted above) is proposed as part of the Proposed Development and involves the planting of 55 no. trees on the site. In addition the AIA recommends the management of the existing tree resource to provide continuity of cover and to promote longevity. The AIA suggests that these works could include under-planting of two groups of trees to reinforce the screening potential of these groups.
- 5.65. The AIA suggests that an Arboricultural Method Statement (AMS) is produced to ensure that trees to be retained are protected during construction. The AMS would include for example, details of protective barriers, construction exclusion zones and storage of plant and materials. In addition the AMS should detail mitigation measures to ensure the safe retention of trees which have works proposed within their root protection zone, for example hand excavations and / or no dig construction methods. The AMS should also define the requirements for any facilitation pruning. The AIA recommends that the AMS is produced once planning permission has been granted, this could be secured by way of a planning condition attached to the planning permission.
- 5.66. The Proposed Development has been carefully designed to ensure that it is acceptable in terms of trees and landscaping. The Proposed Development is therefore in accordance with the NPPF (2012), policy 7.21 of the London Plan (2011) and policy DM DC4 of the Development Management Plan (2011).

Flood Risk

- 5.67. RAB Consultants has undertaken the 'Russell and Strathmore Schools, Richmond, Flood Risk Assessment (FRA) (September, 2014) which is submitted to support this application for planning permission, the key findings are detailed below.
- 5.68. The existing Strathmore School site is located entirely within the Environment Agency's Flood Zone 1 with a risk of flooding from tidal and fluvial sources less than 0.1% (1 in 1,000 year). However, a large part of Russell School is located within Flood Zone 2; which has a risk of tidal flooding from the adjacent

River Thames between 1% and 0.1% annual probability (1 in 100 to 1 in 1,000 year). This does not take defences into account that offer protection from flooding up to and including a 0.1% annual probability flood event. There is no residual risk of flooding to the site associated with these defences.

- 5.69. The site is at low risk of flooding from all other sources.
- 5.70. The site is within an Environment Agency Flood Warning Area meaning occupants will have access to flood warnings of up to two hours before onset.
- 5.71. The eastern portion of the site lies within Flood Zone 2, while the western part of the site lies within flood zone 1. The proposed educational building would be located in Flood Zone 1, which is low risk. The proposed educational development would be categorised as 'more vulnerable' development in accordance with Table 2 of the Technical Guidance to the NPPF. The area of the site within Flood Zone 2 would be used for green space and the access road, these uses are considered less vulnerable in accordance with the NPPF and consequently would be appropriate in Flood Zone 2. There is therefore no need for either the sequential or exceptions test to be carried out for the Proposed Development.
- 5.72. The FRA has estimated the greenfield runoff rate for the site using the IH124 method for determining greenfield runoff rate revealing a surface water runoff rate of 1.5 l/s per ha. The greenfield runoff volume was also calculated, revealing a value of 151.265m³ per ha during a 1 in 100 year 6 hour duration storm event.
- 5.73. The Proposed Development may result in an increase in hard-standing as on site. The FRA therefore requires the use of suitable SuDS techniques to ensure that the Proposed Development has no effect on surface water runoff in accordance with Policy 5.13 of the London Plan. If there is no increase in hard-standing, opportunities for implementing suitable SuDS should still be sought as part of the Proposed Development.
- 5.74. The site is within an Environment Agency Flood Warning Area meaning occupants will have access to flood warnings of up to two hours before onset.
- 5.75. The FRA concludes that the Proposed Development is appropriate in terms of flood risk and is not expected to increase the risk of flooding elsewhere. However a number of recommendations are made (those that are not complete can be required through a planning condition attached to the planning permission):
- The development's final occupants should sign up to the Environment Agency's flood warning service in operation in the local area.
 - A surface water drainage strategy must accompany this flood risk assessment to ensure that post-development surface water runoff from any additional hard-standing created as a result of the development during a 100 year return period storm event including the effects of climate change is controlled to 1.5l/s to ensure that flood risk is no greater to the surrounding area as a result of the development.
 - The surface water drainage strategy should incorporate SuDS, that meets the requirements of Policy 5.13 of the London Plan should be developed to limit the rate of surface water run-off to the greenfield rate of 1.5 l/s per ha and improve the quality of the run-off.
 - A SuDS maintenance plan and schedule should be written to ensure efficient operation of the SuDS at all times.
 - Regular maintenance of existing drainage infrastructure at the site should be carried out including desilting and unblocking of drains.
 - Whilst Falling Head Tests show that infiltration SuDS are favourable, full infiltration tests must be carried out in accordance with BRE Digest 365 to confirm the permeability of the soil if infiltration SuDS are to be considered.
- 5.76. The FRA concludes that, provided its recommendations are implemented, which can be secured by way of planning conditions, the Proposed Development is appropriate in terms of flood risk and would

not be expected to increase the risk of flooding elsewhere. The Proposed Development is therefore in accordance with the NPPF (2012), policy 5.12 of the London Plan (2011) and Policy DM SD6 of the Development Management Plan (2011).

Sustainability

- 5.77. A 'BREEAM Design Stage Pre-assessment (Method, August 2014) has been prepared and submitted to support this application. The pre-assessment concludes that a BREEAM rating of 'Very Good' will be achieved for the Proposed Development. Due to the nature of the Proposed Development it has not been feasible to achieve a BREEAM rating of 'Excellent'.
- 5.78. The Proposed Development has been designed with sustainability in mind, to include the following features:
- Reduced building energy requirements by 15% through efficient building and services design and the inclusion of micro CHP linked to the heating and hot water generation.
 - Reduced building energy requirements by additional 20% through addition of PV panels (total 35%), the PV panels are shown on the planning drawings.
 - The Proposed Development is designed for natural and passive ventilation and cooling wherever possible, this reduces cooling and auxiliary energy use.
 - The lighting in the Proposed development would be switched to take advantage of natural daylight obtained through windows.
 - Intelligent automatic switching systems would be used to control the lighting in each space combining both presence and photocell technology to automatically turn lights off where daylight will provide sufficient lighting levels, dim lights (up or down) to maintain the required lighting levels with minimum energy consumption and switch lighting off in unoccupied rooms.
 - Lighting within the Proposed Development will be designed to be efficient and suitable for the given task and use high efficiency luminaires with lamps selected to suit the particular requirements of each space.
 - External lighting would be photocell and time clock controlled, with a form of manual control over the external lighting.
 - High frequency regulated control gear for lighting.
 - Method of lighting control (Absence PIR Detection).
 - Split metered lighting & power distribution.
- 5.79. The Proposed Development has been designed to be sustainable, with a pre-assessment BREEAM level of 'Very Good', 35% reduction in carbon dioxide emissions beyond Building Regulations 2013 of which 20% is achieved through renewable energies. The buildings have also been designed to include sustainable features as described briefly above.
- 5.80. The Proposed Development is therefore considered to meet the sustainability criteria laid out in the NPPF (2012), Policies 5.1, 5.3, 5.7 and 5.11 of the London Plan (2011), Core Strategy (2009) Policies CP1, CP2 and CP5 and Policies DM SD1, DM SD2 and DM SD5 of the Development Management Plan (2011) and is acceptable in this respect.

Ecology

- 5.81. An Ecology Phase 1 Report (Mouchel, April 2012) has been prepared to support the Proposed Development. The ecological assessment reported in the Phase 1 Report comprised a desk-based assessment, an assessment of habitat structures that may support roosting bats or nesting birds, a

Habitat Suitability Index of a water body in terms of its likelihood to support great crested newts (GCN) and a Phase 1 habitat survey to inform the likelihood of the site supporting protected species.

5.82. The desk based assessment noted the following:

- There are two local nature reserves within 2.5km of the site, these are Ham Common and Ham Lands.
- Richmond Park lies within the 2.5km buffer surrounding the site, the park is designated as a National Nature Reserve (NNR), a Site of Special Scientific Interest (SSSI) and a European Special Area of Conservation (SAC).
- Strathmore School has a man-made badger sett on the site within the nature area and there is evidence to suggest that it is in current use.
- The nearby Richmond Park has recorded many protected species, including 9 species of bats.
- There are no non statutory designated sites within the 2.5km buffer zone around the site. However there are several priority S41 (formally UK BAP) habitats within the buffer zone. Richmond Park has extensive lowland dry acidic grassland and there is an area of undetermined grassland to the south west of the site.
- There are six designated traditional orchards within the 2.5 km buffer zone, including one within the grounds of Strathmore School.
- Within the mosaic of habitats within the 2.5 km buffer zone there are 81 areas of deciduous woodland, including an area adjacent to the western boundary of the site known as The Copse.

5.83. The field survey revealed the following:

- There is a man-made badger sett on site which appears to be in use and there is a bird box on a Pear tree towards the southern boundary of the site. However as neither the area around the badger sett or bird box will be affected by the works there should be only limited ecological constraints to the works going ahead.
- The Phase 1 survey found the following habitats on site: semi-improved grassland, amenity grassland, hard standing / buildings, mixed species hedge with standard trees, standing water (ponds).

5.84. The Phase 1 Report confirms that no habitats of high significance are found within the boundary of the site. There is some scope to suggest that birds could be using the mixed species hedge and trees and the scattered trees around the site for nesting during the spring and early summer months.

5.85. The Phase 1 Report makes the following recommendations for further work:

- Birds – If sections of mixed hedge or trees are to be removed as part of the Proposed Development this should be undertaken outside of the bird breeding season (March to July) if possible. If such work needs to be undertaken during breeding season then an ecologist should be present to check the habitat for active nests prior to removal. If breeding birds are found, work in the vicinity of a nest should be avoided until young birds have fledged.
- Removal of Pear tree on southern boundary of site should be avoided.

5.86. Provided that the recommendations detailed in the Phase 1 Report (listed above) are complied with there would be no adverse effects on habitats or species as a result of the Proposed Development, as such it is in accordance with the NPPF (2012), Policy 7.19 of the London Plan (2011), Policy CP4 of the Core Strategy (2009) and Policy DM OS5 of the Development Management Plan (2011).

6. Statement of Community Involvement

- 6.1. During the preparation of this planning application consultation has been undertaken with the public the parents and pupils of Strathmore and Russell Schools and the Planning Department at LBRuT. The aim has been to engage with the community, parents, pupils and Council early in order to provide an explanation of the proposals and to receive views on the Proposed Development with the aim of addressing concerns that may be raised and gaining support for the proposal.
- 6.2. Four consultation events were held to present the draft proposals and to gather feedback, as follows:
- 9th July 2014 - Public / Parent Consultation Event held at the Strathmore School, Richmond;
 - 16th July 2014 - Parent / Public Consultation Event held at Russell School, Richmond;
 - 20th August 2014 – Public Consultation Event held at Ham Youth Centre, Richmond; and
 - 9th September 2014 - Parent / Public Consultation Event held at Russell School, Richmond.
- 6.3. At each consultation event feedback forms were available to be completed in order to record the feedback from these events. An email address was also available for comments to be sent to after the events. The tabulated results from the feedback forms and emails is contained in Appendix A. The findings are briefly described below.
- 6.4. The feedback form contained four questions / statements which asked whether the respondent agreed or disagreed with a statement. The majority of respondents (64%) liked the design of the building and only 27% disagreed with the proposed building's layout providing the facilities required for Strathmore and Russell School. 55% of respondents agreed that the design of the buildings were sympathetic to its environment, with only 27% disagreeing (the remainder were unsure). 41% of respondents agreed that they liked the landscaping with only 23% disagreeing. The responses to the set questions showed that the majority of the respondents liked the building design and felt it was sympathetic to its environment. The results showed that the minority of respondents didn't like the landscaping or layout.
- 6.5. The feedback from also contained space for general comments on the proposals to be made, both positive and negative, these are listed in Appendix A.
- 6.6. In terms of positive comments, the respondents were happy with the mini bus access from Petersham Road; the provision of a single facility; high quality design; vehicular access; modern facilities; and SEN provision on both sides of the river.
- 6.7. It is noted that there were overall more negative comments than positive, however this is a usual response from consultation events as respondents tend to highlight the things they are unhappy with more than any positive comments. The highest number of comments stated a dislike for an element of the scheme which related to increased traffic and congestion followed by an objection to the re-development of the existing Strathmore site for residential as respondents felt that this should be retained for play space (it should be noted that the re-development of the Strathmore site is not included in this planning application, so this comment isn't relevant). Other concerns raised are documented in Appendix A but include the size of the proposed building and its pupil numbers; requesting the retention of the ponds and habitats; design; building on MOL and landscaping.
- 6.8. In addition to the consultation with the public, parents and pupils as described above, consultation with LBRuT's Development Management team was undertaken to gain comments on the acceptability of the proposal.
- 6.9. The consultation undertaken prior to submission of this planning application has helped shape the final Proposed Development as far as possible to take account of concerns raised.

7. Conclusion

- 7.1. Planning permission is sought for the construction of a new school with associated hardstanding, parking and landscaping to replace the existing Russell School and provide SEN co-location with part of Strathmore School on a single site.
- 7.2. Section 54A of the Town and Country Planning Act 1990, requires that all planning applications should be determined in line with the policies and proposals of the Development Plan unless other material considerations determine otherwise. The emphasis of the plan-led system continues to provide the policy context for the consideration of planning applications for the development or use of land under Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 7.3. It has been demonstrated that the proposals are in conformity with relevant national, regional and local planning policy and it is considered that the Proposed Development would have no adverse impact on MOL, highways considerations, residential amenity, heritage, landscape and trees, flood risk, sustainability and ecology.
- 7.4. For the reasons set out above, the Proposed Development accords with the provisions of the Development Plan and no material considerations have been identified which indicate that a decision on the application should be other than in accordance with the Development Plan. Therefore the Council is respectfully requested to support this full planning application for the reasons outlined.

8. Appendices

Appendix A – Tabulated Data from Public Consultation Events

- 8.1. Below is the tabulated data from the four public consultation events undertaken for the proposed development. 94 people signed in during drop in sessions held on 9th July, 16th July, 20th August and 9th September. Each attendee was offered a feedback form, 22 people completed the feedback forms and 11 emails responding to the events were also received. The results are presented in the tables below.

	Strongly Disagree	Disagree	Don't Know	Agree	Strongly Agree
To what extent do you like the proposed building design?	2	0	5	10	4
To what extent do you agree or disagree that the buildings layout provides the facilities required for the Strathmore and Russell pupils	0	3	5	6	2
To what extent do you agree or disagree that the design of the buildings are sympathetic to its environment?	1	4	3	7	3
To what extent do you like the proposed landscaping and external works shown around the new buildings?	2	2	6	4	3

What aspects of the design do you like?	
Comment	Number of Respondents
Very happy to see a clear presentation	1
Layout looks sensible	2
Access for mini buses from Petersham Rd	1
Existing buildings remain until build completes	1
Meadlands Drive remains as an entrance	1
Like everything in one building	1
Will replace old dilapidated buildings	1
Having SEN provision on both sides of river	1
Sympathetic to its environment	2
Modern facilities welcome	2
High quality design, like the pitch & roof details	3
The new future for the Russell	1
Orientation and use of canopy as shade	1
Ventilation strategy	1

What aspects of the design do you dislike?	
Comment	Number of Respondents
Increased traffic and congestion	15
Building is too big, and too many pupils	3
Do not sell the land, loss of play space	8
Why is the Caretakers house out of the scope?	5

Access has not been considered properly	2
Choice of materials will be crucial	1
Provide entrance away from Meadlands Drive	1
German school add to pressures of congestion	1
Do not make the school a 2FE	1
Make the school a 2FE	2
Improve the pathway through the copse	3
Include cycle & pedestrian improvements	1
Re-site the cycle store	1
Ensure the ponds and habitat site remain	3
Separation of field and playground not good	1
Design too utilitarian	1
Add some primary colours to the design	1
School should connect to the common land	1
Invasion into MOL	1
Entrance dull and uninspiring	1
Car parking dismissed - not enough	4
Landscaping could be improved	4
Not enough affordable housing*	1
Too many houses on likely residential site*	1
Make residential plot face Petersham Road	1
Include houses rather than flats on residential site*	1
Residential proposal too intrusive*	1
Better options available for the residential site*	2
Move school entrance to Petersham Rd	1
Pinch points - congestion at west entrance	1
Concerned about loss of trees	2
Redirect Gloriana funding to this development	1
Suggest a 20mph zone around school	1
Increase cycle parking	1
Through traffic allowed through sold off land	1
Would like after school provision	1
Flatten roof and provide roof top classroom	1
Include a drop off point?	1
Building height and density a concern*	4
Vehicles should not be allowed to heart of the site	1
Design needs to be semi-rural not urban	1
Classrooms seem smaller than existing	1
Noise pollution will increase	1

*These comments refer solely to the potential residential scheme on the land at Strathmore School that was also shown at the consultation events. These comments are therefore not relevant to the consideration of the proposed development.

Data from completed feedback forms	
Type of Respondent	Number
Student	1
Parent	46
Staff/Governors	13
Resident	31

Councillors	3
Total	94
Male	8
Female	3
Disability - Yes	0
Disability - No	10
White/White British	10
Asian/Asian British	
Mixed/Mixed British	
Black/Black British	
Website	2
Letter	6
Library	1
School newsletter	1

Note – It is assumed that not all of the forms were completed with the information on gender, disabilities, and ethnic origin.

Vicky Evans
Atkins Ltd
Euston Tower
30th Floor West
286 Euston Road
London
NW1 3AT

Vicky.evans@atkinsglobal.com
Mobile: 07803 2259972
Fax: 020 7121 2806

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