

4.1 LONDON PLAN

A brief synopsis of the London Plan and its policies that most significantly impact the redevelopment.

4.1.1 LONDON PLAN

"The London Plan : The Spatial Development Strategy For London Consolidated With Alterations Since 2011 (March 2015)" (as amended to include the "Minor Alterations To The London Plan") (hereafter referred to as 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 2036. 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.

The London Plan brings together the geographic and locational (although not site-specific) aspects of the Mayor's other strategies, and sets the framework for the development and use of land in London.

While the London Plan has been taken into account generally, the following policies are those that have the most specific impact on the proposed redevelopment:

- 2.18 Green infrastructure: the network of open and green spaces
- 3.3-3.15 Housing
- 3.18 Education Facilities
- 3.19 Sport Facilities
- 5 London's Response to Climate Change
- 6 London's Transport, in particular 6.3, 6.6, 6.9, 6.10 and 6.11

- 7 London's Living Places & Spaces, notably: 7.24-7.28 & 7.30 Blue Ribbon Network

Policy 2.18 is discussed as part of the All London Green Grid SPG in further detail in section 4.1.4.

Policies 3.3-3.15 are discussed in further detail in section 4.6 of this report.

Policies 3.18 and 3.19 are discussed in further detail in section 4.1.2.

Chapter 5 will affect aspects of the project related to the environmental performance and the design & construction standards of the project.

Chapter 6 will affect aspects of the project relating to access and transportation routes, including any streets, paths and car parking provided on the site.

Chapter 7 and its policies will affect the design and organisation of the site. These are too wide ranging to describe in detail here, but cover areas including neighbourhoods, development, crime, local character, public realm, architecture, heritage and open spaces. Many of these policies overlap with and support local policies.

Policies 7.24-7.28 and 7.30 are discussed in further detail in section 4.1.4.

4.1.2 EDUCATION & SPORT

Policy 3.18 is intended to support development of educational facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice.

The Mayor's policy supports the development of new schools, and in particular co-location of multiple schools of different types on shared sites. Additionally, the policy encourages the multiple-use of school facilities for community or recreational use.

Policy 3.19 supports the development of additional or enhanced sporting facilities, and as a corollary resists the net loss of the same.

4.1.3 BLUE RIBBON NETWORK

The Blue Ribbon Network is a strategically important series of linked spaces. The River Crane forms part of this network, and consequently the Craneford way sites are affected by the policies relating to the network.

The starting point for consideration of development and use of the Blue Ribbon Network and land alongside it must be the water. The water is the unique aspect and consideration must initially be given as to how it can be used, maintained and improved.

Policies 7.27 and 7.28 support the improvement for recreational use, and the restoration of the Blue Ribbon network respectively.

4.1.4 ALL LONDON GREEN GRID

The All London Green Grid (ALGG) Supplementary Planning Guidance (SPG) provides guidance on the implementation of London Plan policy to:

- 1) Protect, conserve and enhance London's strategic network of green and open natural and cultural spaces;
- 2) Encourage greater use of, and engagement with, London's green infrastructure;
- 3) Secure a network of high quality, well designed and multifunctional green and open spaces.

The Duke of Northumberland's River, the River Crane, and Marsh Farm Lane are all identified as part of the ALGG.

The ALGG policies specifically seek to:

- Improve access to the river and canal corridors to create a green network centred on the River Crane and the Duke of Northumberland's River.
- Develop an integrated approach to water management.
- Support river naturalisation and waterside habitat improvement projects, especially along lengths of the River Crane.
- Strengthen and integrate pedestrian & cycling connectivity both along and between the river corridors, public transport nodes and walking & cycling routes.
- Create a new 100ha metropolitan scale Crane Riverside Park to provide a continuous, accessible link between Hounslow Heath and Twickenham Station, which includes a long distance footpath, and improved access into the linear park for surrounding communities, and an enhanced wildlife corridor.

4.2 LOCAL PLAN

A brief synopsis of the Local Plan and its policies that most significantly impact the redevelopment.

4.2.1 LOCAL PLAN

The Local Plan, formerly known as Local Development Framework (LDF), provides a starting point for the local community to find out what the Council's planning policies are for the borough and sets out the current documents which form the Local Development Plan (LDP).

The London Borough of Richmond-upon-Thames Core Strategy, the Development Management DPD adopted November 2011, the Twickenham Area Action Plan and the saved Unitary Development Plan Review 2005 (UDP) (proposal sites only still saved) are Borough Local Plans - and the London Plan - are the statutory development plans for the Borough.

The UDP (proposal sites) referenced above will be replaced by the Site Allocations Plan when it is adopted.

The saved UDP specifically designates the College's Site "[t]o provide rationalisation, expansion and improvements to the College ... with enabling development and associated open space. If development takes place on the College playing field south of the A316 the College Craneford Way playing field to be upgraded."

4.2.2 CORE STRATEGY

The Core Strategy sets out the key planning policies which will, within the broader context of the London Plan, determine the future development of Richmond-upon-Thames.

The Core Strategy has 3 inter-related themes of 'A Sustainable Future', 'Protecting Local Character' and 'Meeting People's Needs'. These describe the vision, objectives, spatial strategies and strategic policies of the borough with regards to planning.

The Core Strategy specifically addresses redevelopment opportunities at Richmond College, as well as improvement of the River Crane Corridor, indicating that the redevelopment of these sites is part of overall borough spatial strategy.

As mentioned above, the Core Strategy includes numerous strategic policies with which the redevelopment will be expected to comply. These are too numerous to be detailed within this report.

4.2.3 DEVELOPMENT MANAGEMENT PLAN

The Development Management Plan (DMP) builds on the Core Strategy and includes more detailed policies for the management of development.

The DMP includes information on which development management policies apply for which developments, and identifies the relevant supplementary planning documents which further inform these policies where appropriate.

Further detail on the Development Management Plan, including details on the DMP Proposals Map for the area near the College can be found in section 4.3.

4.2.4 TWICKENHAM AREA ACTION PLAN

The Twickenham Area Action Plan covers the commercial town centre and provides a framework for achieving its revitalisation. The plan includes:

- Policies for the use of land and buildings
- Development and design guidance for key sites
- Public realm strategy and proposals for new parks and civic spaces and other environmental improvements
- Transport strategy and proposals for traffic management and improving the pedestrian environment
- An Implementation Strategy and Action Plan

The area covered by the Action Plan covers the town centre and abuts the Playing Field Site. This part of the action plan is referred to as the Northern Approach. The primary aspect of the plan that is seen as affecting the redevelopment is the policy goal to "enhance the Crane corridor for environmental and community benefits as well as creating a new route and providing, public access to open areas alongside the River Crane which will link the town to a much larger east/west linear park." This is specifically intended by the plan to provide a better pedestrian route to the College.

4.2.5 SITE ALLOCATIONS PLAN

The Site Allocations Plan (SA Plan) includes site specific proposals for the whole Borough, other than Twickenham town centre. The proposals will reflect the needs of the Borough, existing National, Regional and local policies, site specific constraints and opportunities and will be subject to public consultation as part of the statutory planning process. The SA Plan is currently in consultation draft form.

The SA Plan specifically allows for the redevelopment proposals that are being applied for, namely the "redevelopment to provide a new College, offices, secondary school and special school, residential including affordable and open space." The College site is referred to as TW10, and the draft form of the site specific policy for the site are found in the draft SA Plan.

When adopted the Site Allocations Plan will replace the UDP (proposal sites) referenced in section 4.2.1, and is relevant as a reflection of evolving policy.

4.2.6 SUPPLEMENTARY PLANNING GUIDANCE / DOCUMENTS

Numerous local SPGs and SPDs will have to be considered as part of the redevelopment. These include Site Specific Briefs, as discussed in sections 4.4 and 4.5, as well as more general guidance. Some of the SPDs/SPGs that are likely to be most relevant include:

- Design Quality;
- Residential Development Standards;
- Affordable Housing;
- Sustainable Development;
- Telecoms Equipment (due to the existing communications equipment on the College site);
- Design for Maximum Access;
- Nature Conservation & Development;
- Secure by Design;
- Sustainable Construction Checklist;
- Recycling for New Developments; and
- Trees.

Summary of each of these SPGs would distract from the core purpose of this report; however, the key implications of the most pertinent of these policies are covered in sections 4.4, 4.5, and 4.6.

In addition, the redevelopment will have to take into account the Draft Richmond-upon-Thames Sports, Open Space and Recreation Needs and Opportunities Assessment (2015) and Draft Playing Pitch Strategy.

4.3 DEVELOPMENT MANAGEMENT PLAN

The Development Management Plan (DMP) includes the detailed policies which will be used when new developments are considered. The DMP takes forward the strategic objectives in the Core Strategy and is consistent with it and with National and Regional Policies.

Source: Richmond DMP, page 8

4.3.1 OVERVIEW

The Development Management Plan forms the detailed planning policy framework which is built upon the local authorities Core Strategy. The DMP includes the detailed policies which provide the framework for local development. The DMP specifically allows for supplementary planning documents as further guidance for specific sites, two of which are applicable to the College site - The Crane Valley Supplementary Planning Guidance, and the Richmond-upon-Thames College Planning Brief.

The DMP Proposals Map indicates that the open areas on Craneford Way are classified as Metropolitan Open Land. This essentially precludes development on these sites, excepting "essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL."

The western portion of the Craneford Way Site, and the Open Land to the west of the site are classified as Public Open Space. The Open Land to the west of the site is also covered by an Other Open Land of Townscape Importance Designation.

Twickenham Rough is classified as an Other Site of Nature Importance. The Rosecroft Conservation Area is to the far side of the Duke of Northumberland's River. There are no other notable planning constraints in the immediate area.

4.3.2 DEVELOPMENT MANAGEMENT PLAN PROPOSALS MAP

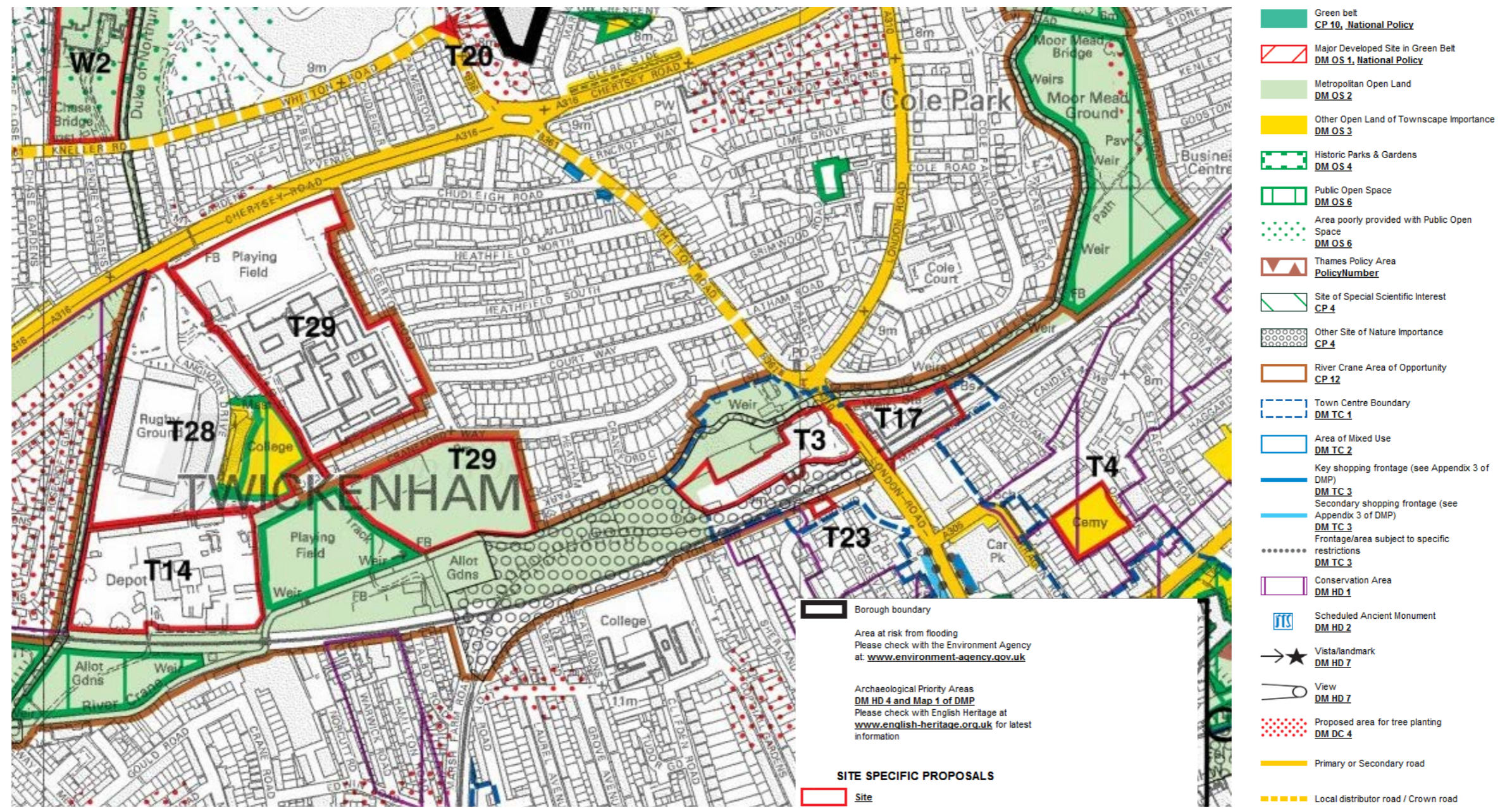


DIAGRAM 4.3.1 EXTRACT OF DMP PROPOSALS MAP FOR TWICKENHAM

4.4 CRANE VALLEY SPG

A positive policy of environmental improvement, improved access and sympathetic development will be applied to the River Crane “area of opportunity” as shown on the proposals map.

Source: Crane Valley SPG, page 3

4.4.1 OVERVIEW

The Crane Valley Planning Guidance covers the development of the College Main Site, the Harlequins Site, the Council Depot, the Craneford Way playing fields (east and west) and the former Post Office sorting office site.

4.4.2 VISION

To develop the area to the highest environmental standards based around an improved riverside, a riverside walkway and improved open spaces, meeting the housing, recreational and educational needs of the area.

4.4.3 DEVELOPMENT OBJECTIVES

- To maximise the opportunities for improvements by ensuring that the area is planned in a comprehensive manner;
- To protect and enhance the natural environment of the River Crane, the Duke of Northumberland River and their banks as part of the wider west London Green Chain and Blue Ribbon network as identified in the London Plan;
- To improve the appearance and recreational value of the open space including the provision of a river walk and the associated pedestrian/cycle linkages, taking account river corridor ecology;
- To ensure that new development is compatible in scale and character with the local area, minimising any adverse impacts including flood risk;
- To minimise traffic and other impact on the surrounding area, particularly on the Heatham estate, to reduce severance and to improve pedestrian and cycle linkages within the area and to the surrounding area;
- To seek to secure improved sports facilities and possible improvements but not a significant expansion of student numbers at the College;
- To contribute towards meeting a range of housing needs
- To ensure the provision of appropriate local community facilities including for education and health and the community use of buildings and playing fields;
- To ensure that developers take account of the Council's Planning Contributions Strategy.

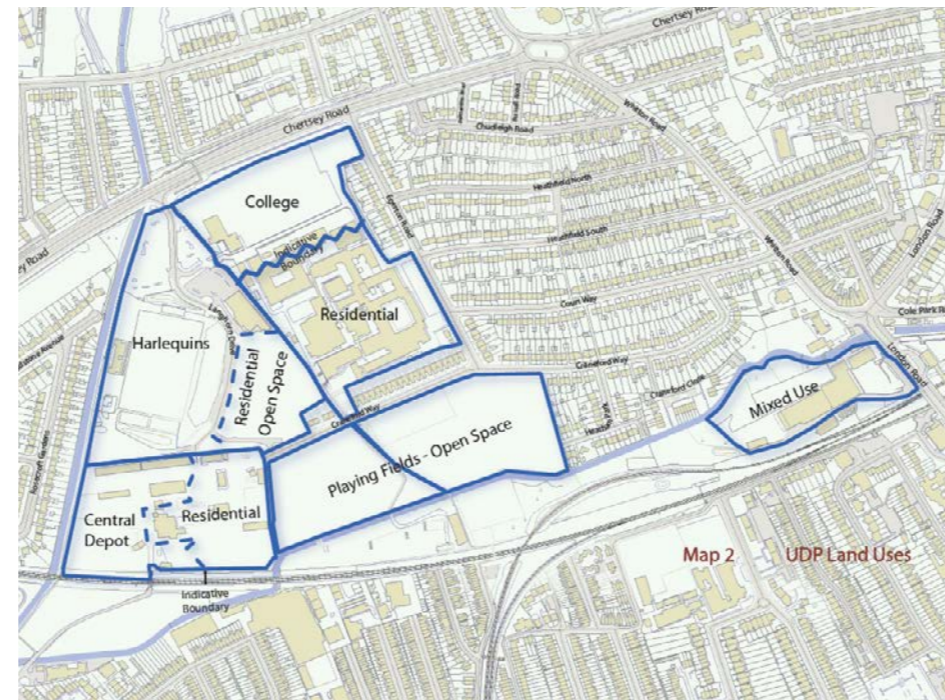


DIAGRAM 4.4.1 PLANNED LAND USES
(Source: Crane Valley Planning Guidelines)

4.4.4 KEY GUIDANCE

The guidance within the brief pertains to:

- Traffic and transport
- Land Use
 - Open Space
 - Education
 - Housing
 - Sports Stadia
 - Other Community Facilities
- Employment
- Waste and Recycling
- Urban Design - Layout Principals
- Urban Design - Building Height and Design Principles
- Connections and Access
 - Transport Assessment
 - Travel Plan
 - The Movement Framework
 - Vehicular Access
 - Public Transport and Bus Access
 - Non-Vehicular access
- Flood Risk and River Restoration

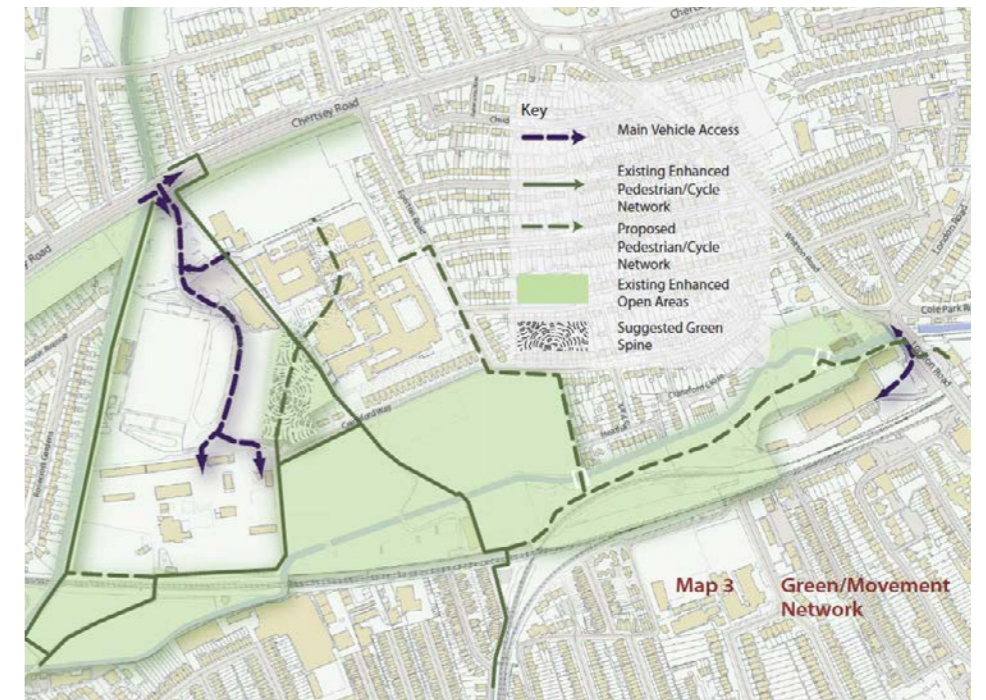


DIAGRAM 4.4.2 PLANNED GREEN MOVEMENT NETWORK
(Source: Crane Valley Planning Guidelines)

4.4.5 COLLEGE SITE

The Crane Valley Planning Guidance covers the College site in less detail than the Richmond-upon-Thames College Planning Guidance. There is substantial overlap between the two.

The most notable area covered in greater detail than in the RuTC Guidance are that the Crane Valley Guidance clearly indicates an extent of Residential Development that may be acceptable, and speaks at greater length about non-vehicular access routes.

The Crane Valley SPG proposes additional pedestrian/cycle routes to the College site as identified in diagram 4.4.2.

4.5 RUTC PLANNING BRIEF SPG

The Richmond-upon-Thames College Site is covered by a specific planning document - which sets out useful guidelines for any future project on the College Site.

4.5.1 FORWARD

As the Planning Brief was specifically directed towards the redevelopment of the site for a new College it does not explicitly provide for all the different educational uses now being promoted. However, it remains very relevant particularly in relation providing for an educational/residential mixed use approach and to matters such as building heights & massing and access & movement.

4.5.2 OVERVIEW

The planning brief identifies the playing fields to the north of the site as being allocated for redevelopment, and the College playing fields on Craneford Way as Metropolitan Open Land ("MOL"). The site is not within a conservation area, and contains no listed buildings, nor any of particular townscape interest. The planning brief describes the existing buildings as being "incoherent and poor quality" and advocates their replacement.

RESIDENTIAL DEVELOPMENT

Residential development on the site as a secondary aspect of delivering improved educational and sporting facilities would be in accordance with the Council's UDP policy T29. This would have to be distinct from the College and with separate road access. The report envisages residential development on the southern end of the site. This would be expected to accord with Council policies on residential development including affordable housing.

COLLEGE PLAYING FIELDS

The planning brief identifies the opportunity for a small sports pavilion on the College Playing Field Site.

4.5.3 OBJECTIVES

The planning brief identifies the following key objectives for the site:

- For the purposes of access to the College and the desirability of screening residential development from the A316, it is anticipated that College buildings will be located on the northern part of the site.
- Building design, massing and height should be appropriate to the site's characteristics, setting, civic function, importance, setting and location in the townscape.
- The highest densities and storey heights will be appropriate opposite Twickenham Stadium and next to Harlequins Rugby Ground. Heights should be lower next to existing two-storey housing;
- Gateways should mark out the transition to the site and where appropriate may take the form of a landmark building;
- The College playing fields, to the south of Craneford Way, should be upgraded and designed to encourage natural surveillance;
- The main vehicular access to the College should be from the A316 via Langhorn Drive;
- The trees fronting the College should be protected;
- Development should protect and enhance Metropolitan Open Land and the west London Green Chain; and
- Development in the floodplain should ensure that flood storage is not reduced and should not increase flood risk elsewhere.

4.5.4 CONSTRAINTS

The planning brief identifies the following key constraints of the College site:

- The layout of the buildings on site is inefficient and the buildings themselves do not currently provide a suitable level of accommodation;
- The southern and eastern parts of the site are located next to an area of low density, two storey residential development;
- The main College campus requires a secure boundary because of the presence of 14-16 year old students on the site;
- The site requires access from a number of directions, which will influence the design in terms of the location of the main entrance or entrances;
- The main approach to the site for vehicles differs from the main approach to the site for pedestrians;
- The main pedestrian approach to the College is via residential streets;
- Current car parking on site is operating over-capacity; and
- Parts of the site are potentially in the River Crane floodplain, which may restrict the type of development which can be accommodated on the site.

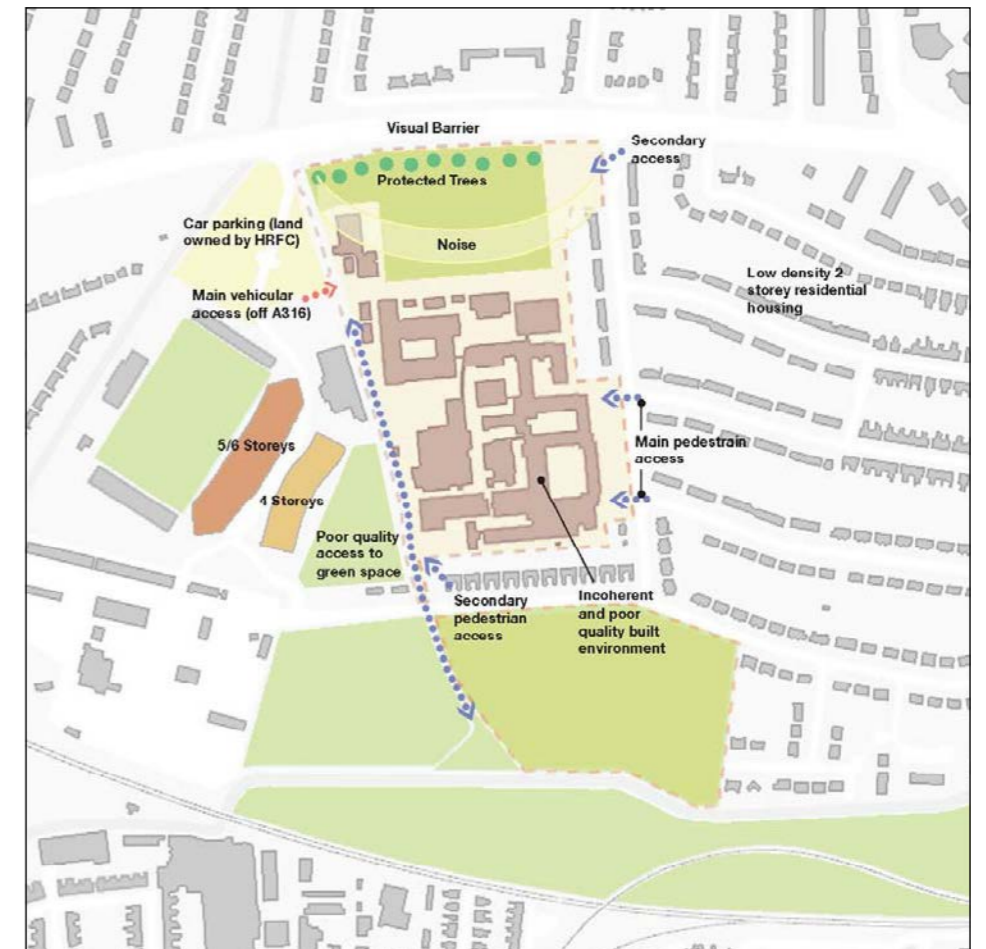


DIAGRAM 4.5.1 PRINCIPAL SITE CONSTRAINTS

(Source: RuTC Planning Brief)

4.5.5 OPPORTUNITIES

The planning brief identifies the following key opportunities of redeveloping the College site:

- Reduce car parking requirements for the College and need to provide car parking off site at Harlequins;
- Improve the existing Public Right of Way running along the western edge of the site;
- Maintain access for possible future provision of a new Public Right of Way along the River Crane; and
- Create natural surveillance and improve security, through design of buildings and greater use of open space and Public Rights of Way.
- Improve facilities for education, including sports facilities, and create a coherent and high quality College campus;
- Ensure that the College continues to play an important role in the community, by providing opportunities for community use of facilities and sports pitches;
- Increase the sustainability of the College buildings and operations;
- Potential to contribute towards the provision of market and affordable housing in the Borough of high quality sustainable architecture and urban design
- Ensure that the development fits within the existing townscape and visual character of the surrounding area, in terms of building heights and density, especially on the western boundary to include 'gateway' buildings or markers, development sites in the area and areas of public open space;
- Create and enhance views into and from the site being visually permeable with a range of building footprints;
- Improve the frontage along the A316, whilst retaining the line of protected trees;
- Create gateways to mark the transition to the site, at the main vehicular and pedestrian access points;
- Improve accesses to the site from the A316 via Langhorn Drive, as the main access point for vehicular traffic;
- Improve cycle linkages into the site to help encourage bike use;
- Minimise traffic impacts along residential streets to the east of the College;

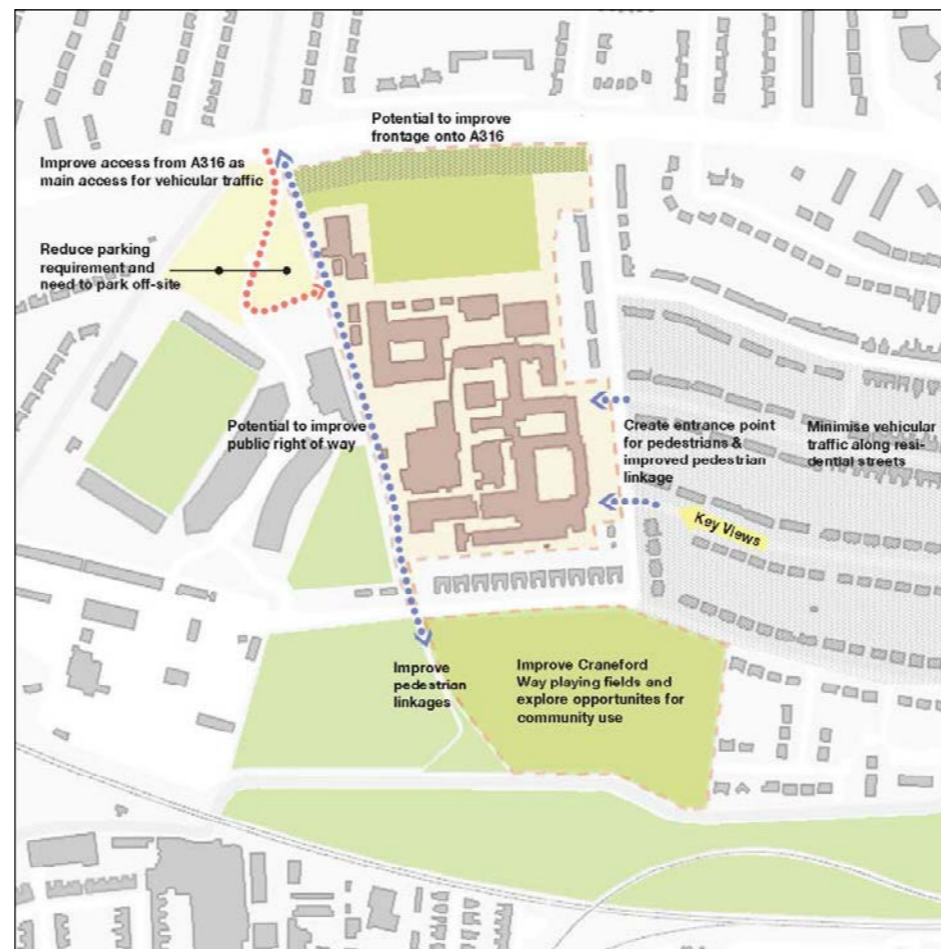


DIAGRAM 4.5.2 PRINCIPAL SITE OPPORTUNITIES
(Source: RuTC Planning Brief)

4.5.6 HEIGHTS AND MASSING

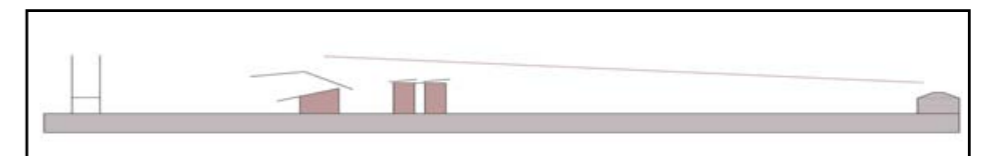


DIAGRAM 4.5.3 BUILDING HEIGHTS
(Source: RuTC Planning Brief)

The planning brief provides specific guidance on the heights and massing of the redevelopment:

6.10 Building heights and massing within the area surrounding the site varies and reflects the mix of uses in the area. In contrast to the low-rise 2 storey residential development to the east are the 4 storey apartment block to the west and the 5-6 storey Harlequins Rugby Ground.

6.11 Building heights and massing increase from east to west. The design of the redeveloped College would seek to reflect this pattern, increasing in height from the residential scale of Egerton Road to wards the A316 and the Harlequins site. The exception to this general rule may be two marker buildings as referred to in paragraph [6].12. Any residential development should also reflect this pattern depending on its location on the site, particularly the scale of properties on Craneford Way.

6.12 It is envisaged that the site could accommodate a mix of heights generally 2-4 storeys up to a maximum of 5 storeys in an appropriate location, such as 'gateway' entrance to the North West corner of the adjacent Harlequins site. The design, height and massing of the College buildings will be appropriate to their setting, function, importance and location in the

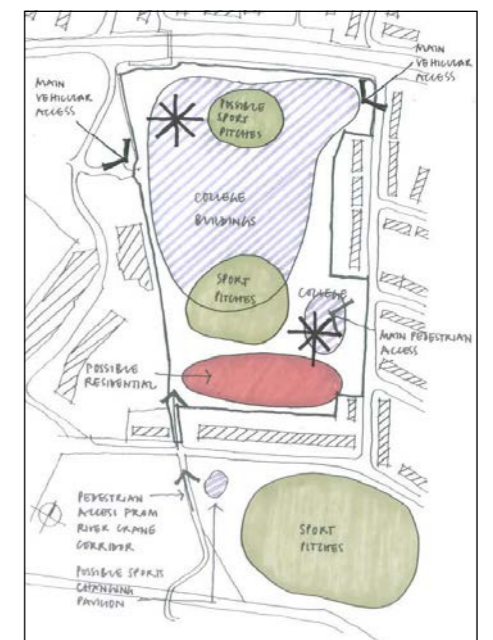


DIAGRAM 4.5.4 OPPORTUNITIES
(Source: RuTC Planning Brief)

townscape, so as to not negatively impact on neighbouring uses. Another 'gateway' location exists at the end of Court Way where a replacement building can act as a marker for the main pedestrian entrance to the College. Where residential development relates or abuts existing housing it should reflect the existing scale and grain of the residential area.

4.6 HOUSING GUIDANCE

A number of planning regulations and guides will impose specific expectations, including density expectations and design standards, upon the enabling residential component of the project.

4.6.1 LONDON PLAN

As referenced in section 4.1, the London Plan contains specific policies relating to housing. These have helped shape the proposed enabling residential redevelopment.

Policy 3.4, Optimising Housing Potential, in particular identifies the scale of redevelopment that should be provided on the site. This policy sets out a range of densities, described in habitable rooms per hectare, that are expected in developments in different circumstances (suburban, urban, central) depending on their public transit access level (PTAL).

While these densities do not prescribe a particular built form, given the PTAL and existing context of the proposed enabling development (near a mixture of uses, large open spaces and large & small buildings), they suggest a range of appropriate development densities that correspond to a dense suburban or smaller urban redevelopment; in built-form terms these densities would typically suggest a mid-rise development.

Policy 3.5, Quality & Design of Housing Developments, sets expectations on the standards, including minimum sizes of new housing. These expectations correspond with those of the London Housing Design Guide which is intended to exemplify the standards set out in the London Plan and London Housing Strategy.

Other policies in the London Plan affect the open space expectations and the mix of residences that will be expected, in terms of both size and tenure. These include targets for shared amenity spaces, including children & young people's play spaces, which should be provided (taking into account the existing open space network) as part of the proposed residential redevelopment.

4.6.2 LONDON HOUSING STRATEGY

The overriding aim of the London Housing Strategy is to increase the supply of well-designed housing of all tenures. To meet this goal the current draft version of the policy proposes various policies, including:

1. Targets for affordable housing, including expected mix of tenancies;
2. Expectations that all housing meets or exceeds the London Housing Design Guide Standards;
3. Expectations that at least 10% of housing be wheelchair housing.

These policies contained within the London Housing Strategy should be reflected in the design of the proposed residential redevelopment.

4.6.3 LONDON HOUSING DESIGN GUIDE

As mentioned in 4.6.1, the London Housing Design Guide (LHDG) is intended to illustrate the exemplary application of the standards in the London Plan and London Housing Strategy. The LHDG incorporates other standards, including Lifetime Homes, Building for Life, Secure by Design, Code for Sustainable homes and Wheelchair Housing. It includes both firm requirements and strongly recommended standards.

Many of the requirements are too specific for consideration in an outline application, though they will be required where detailed proposals are submitted. Nevertheless the illustrative masterplan incorporates LHDG standards relating to open space, density, housing mix, car/cycle parking, space standards, and climate change mitigation/adaptation.

4.6.4 RESIDENTIAL DEVELOPMENT STANDARDS

LBRuT has specific Residential Development Standards SPD which is intended to guide and promote high quality sustainable design. It seeks to balance needs and impacts to achieve good design in residential developments.

The standards relate to neighbourliness; privacy; amenity space; space standards; parking, landscaping & recycling; and sustainable design.

Generally the standards can be considered best practice and non-prescriptive. While there are specific space standard expectations, these are generally lower than those in the LHDG, although the expectations for the principal living space are in some cases greater.

4.6.5 AFFORDABLE HOUSING

LBRuT's specific affordable housing expectations are indicated in the Affordable Housing SPD, adopted in 2014. While in some cases these may not appear to correspond with the expectations in the London Housing Strategy, the London Plan provides flexibility in affordable mix to meet local needs, therefore these requirements are in line with London Plan.

The proportion of the affordable housing tenure expected in the local SPD is 80% social rent and 20% intermediate housing, while within the London Plan the ratio is 60/40 (Policy 3.11). Both indicate expectations of 50% as a basis for determining affordable housing levels, though the final figure should be determined based on affordability calculations, taking into account other community benefits proposed by the redevelopment.

The Affordable Housing SPD indicates that the need in the borough is weighted towards larger social rent units.

The level of affordable housing that will be required will impact the valuation of the enabling residential redevelopment.