



PLANNING STATEMENT

**RICHMOND-UPON-
THAMES COLLEGE,
EGERTON ROAD,
TWICKENHAM TW2 7SJ**

**RICHMOND UPON
THAMES COLLEGE**

June 2015

Planning • Heritage

Specialist & Independent Advisors to the Property Industry

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by CgMs on behalf of Richmond upon Thames College (RuTC) for the redevelopment of its existing site at Egerton Road in Twickenham.

1.2 In addition to this Introduction it includes six further Sections;

- **Section Two** provides the background to the College's redevelopment proposals;
- **Section Three** then describes the application site; the proposals themselves and the planning history of the College Site;
- **Section Four** then explains the form and content of the outline planning application and the material that is submitted in support of it;
- **Section Five** then sets out the planning policy framework within which the College redevelopment proposals should be considered. With reference to detailed technical assessments undertaken in support of the application, it then assesses the extent to which the proposals comply with relevant planning policies at national, strategic and local level;
- **Section Six** then draws conclusions on the application based on the preceding analysis.

1.3 This Statement forms part of a compendium of supporting documentation to the Outline Planning Application that includes the following:

- A **Design & Access Statement** prepared by the project architects, HOK;
- An **Environmental Statement** produced by Cascade Consulting in accordance with the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 – as amended;
- A **Transport Assessment** prepared by TPP;
- A **Flood Risk Assessment** prepared by ESI;

- An **Energy Statement** produced by NDY;
- A **Sustainability Statement** prepared by Cascade which incorporates the Council's Sustainability Checklist; and
- A **Statement of Community Engagement** prepared by RuTC.

1.4 The form and content of the outline planning application is discussed in more detail in Section Four; the structure of the application is shown in **Appendix 1**.

2.0 BACKGROUND TO THE COLLEGE REDEVELOPMENT

(i) Trends in Education

- 2.1 Demographic trends – including a higher than expected birth rate, greater rates of immigration and increase in the numbers of parents now staying in London after having children mean there is a growing shortage of school places in the Capital. Furthermore improvements in standards in many of London's schools (and in LB Richmond in particular) also means that, probably more than ever before, London is a destination of choice for parents wishing to offer their children the best possible education.
- 2.2 Across the Capital as a whole, school-age population (5-19) grew by 107,000 over the 10 years between 2001 and 2011 – a growth rate of 8.2%, compared with an overall reduction nationally of 0.2%¹. Over the same period the school age population in LB Richmond grew by just over 10% to 30,000 in 2011².
- 2.3 Pressure in both London and LB Richmond is expected to continue to grow; the pupil growth rate in London over the period 2012/13 to 2017/18 now being twice that of any other region.
- 2.4 The Mayor's Infrastructure Plan³ estimates that as London's population rises to 11 million and beyond, 600 new schools and colleges will be needed in the Capital by 2050. London Council's 'Do the Maths 2014' report on the number of school places that will be required across the London predicts that between 2012/13 and 2017/18 there will be a 23% increase in state-funded school population with LB Richmond, the fifth highest in London as a whole with a 15-17% increase in the primary phase and 24.5% in the secondary phase.
- 2.5 Although significant progress has been made in LB Richmond to make good the shortfall of places within primary schools, as this growth in the school-age population moves through the school system there is now growing demand for secondary school places.

¹ See 'Do The Maths: Tackling London's School Places Challenge'
London Councils July 2014

² Source: 2011 Census First Results: London Borough Population by Age and Sex
Census Information Scheme GLA Intelligence July 2012

³ London Infrastructure Plan 2050 – Update Mayor Of London

- 2.6 Department of Education figures⁴ shows that the number of secondary school pupils in LB Richmond is expected to increase from 6,701 in 2011/12 to 7,990 by 2018/19 – an increase of over 19%. At the same time demand for places in existing secondary schools in the Borough has grown considerably in recent years.
- 2.7 In January 2015, the Council adopted a revised 10-year School Place Planning Strategy which sets out the need, and plans, for additional primary and secondary school places to meet demand to 2024. The proposals for the redevelopment of the Richmond College site are a key component in the delivery of this strategy.

Richmond upon Thames College

- 2.8 Richmond-upon-Thames College is the Borough's main sixth form college and is presently one of London's top performing further education colleges⁵ for 16-18 year olds. It currently offers a wide range of courses and subjects - including the International Baccalaureate Diploma, A levels and an extensive choice of vocational qualifications from entry level through to level 3 including BTECs, NVQs and apprenticeships. The College also offers a number of higher education courses, as well as courses for adults, aimed at developing skills and enhancing employment opportunities.
- 2.9 The College currently comprises 13 buildings with a total gross GEA of 34,252 sq. metres (31,138 sq. metres GIA). However, the existing space is inflexible and inefficient. For example, a recent detailed space planning exercise undertaken by the College for its future curriculum identified that with 'ideal' accommodation there was a potential need for 20,032 sq. metres GIA.
- 2.10 Most of the existing buildings are now dated - with 80% over 30 years old and more than half over 50 years old. According to the IPD E-Mandate return for 2011/12, 45% of the buildings are classed as either Condition C 'Satisfactory' or D 'Inoperable'. An updated assessment in 2013 increased this proportion to 59%. In terms of 'functional suitability'⁶ just 2% of the College estate is graded I or II (sector median 61%). A building condition survey undertaken by the College in 2010, which was updated in 2012, identified that £13.1m of capital

⁴ Source: School Capacity Academic Year 2011/12 Department for Education March 2013

⁵ January 2014 - www.education.gov.uk (KS5 courses)

⁶ i.e. defined by the IPD as the space most functionally suited to use.

spend was required to meet basic maintenance and statutory requirements. The College has been addressing the most urgent items but there still remains over £10m to be spent for which the College currently has no current funding provision. Given its age, the estate is not inherently sustainable and is expensive to run as a consequence.

- 2.11 The configuration, age and appearance of the existing College buildings means that they do not represent either a stimulating or inspiring place to learn. Room sizes and room types are inappropriate for a modern learning environment and they cannot readily be adapted to meet the needs of either the current curriculum or the College's plans for the future.

Background to the Redevelopment

- 2.12 The College has been working with the Council to consider redevelopment options for the Egerton Road site for a number of years. As Section 3 will explain in more detail, the principle of redeveloping the existing site and upgrading the College playing fields on Craneford Way is now firmly established in the Council's adopted Development Plan.
- 2.13 As well as replacing College facilities, it has always been envisaged that the redevelopment would also include a new Secondary School for 11 to 16 year-olds. In June 2014, the Richmond upon Thames College Free School Trust (comprising the College, Harlequins Football Club, Haymarket Media Group, Waldegrave School for Girls, the LB Richmond upon Thames and Achieving for Children) obtained conditional approval from the Department of Education (DfE) to establish a five-form entry (150 pupils per year), non-selective, co-educational, non-faith secondary school. The DfE approved the application not just on the basis of the education merits of the proposal but because it would meet a 'basic' need for additional secondary school places within the Borough at a point where the Council's forecasts indicate that supply of places would otherwise be exceeded by demand.
- 2.14 Additionally, it is also envisaged that a new purpose-built Special Needs School would be included in the scheme. This would allow the existing Clarendon Special Needs School on Hanworth Road in Hampton to relocate and cater for a wide range of student ages and needs. In October 2014 the Cabinet at LB Richmond approved the expansion of Clarendon Special School with Newhouse

Centre coming under the management of Clarendon School and its pupils will be registered as pupils of Clarendon from September 2015. In addition the Gateway Centre will be expanded to allow provision for post-16 pupils. These changes enable the Council to deliver its commitment to improve SEN provision in the Borough.

- 2.15 In July 2013 Haymarket Media Group, a successful specialist international media and information company currently based in Teddington, indicated its ambition to also be part of the redevelopment project. Since that time the College, the Council and Haymarket have been exploring the opportunity to design a new campus for 'excellence in education and enterprise'. Having initially considered relocating their existing headquarters to the site, it was decided in July 2014 to place the technical aspects of Haymarket's business – a 'Tech Hub' – on the Campus, with the majority of its office space being based elsewhere in the borough. The provision of this facility is now a requirement of the planning permission Haymarket has recently obtained for the redevelopment of its existing headquarters⁷. The proposed 'Tech-hub' - and its relationship with the other educational facilities proposed on the College site – is described in more detail in Section 3.
- 2.16 As a neighbour to the site, Harlequins Football Club, one of the leading professional teams in the Rugby Premiership, has also committed to support the programme and is also exploring how its existing sport, fitness and community work might contribute to the campus.
- 2.17 All the Partners are now collaborating on the Richmond Education and Enterprise Campus (REEC) – with the aim of providing the new college buildings, a new secondary school, purpose-built accommodation for Clarendon Special Needs School, and Haymarket's new "tech hub" and digital media incubator – all on a single campus.

⁷

Ref 14/0914/FUL

Funding

- 2.18 Funding for the proposed redevelopment comes from a series of sources.
- 2.19 The College submitted a detailed application in January 2015 to the London Enterprise Panel's (LEP) Further Education Capital Investment Fund for £16m for the redevelopment and has now received approval (subject to due diligence) for this funding. In addition, the College also has approval in principle for the STEM centre and has been invited to make a detailed bid for £8m of funding for it.
- 2.20 It is envisaged that if planning permission is granted the land for the Secondary School will be acquired by the Council from the College and then transferred to the Free School Trust at a nominal price. The Education Funding Agency (EFA) will then provide significant capital funding for the school's construction costs.
- 2.21 As with the Secondary School, the land for the new SEN School will be acquired by the Council from the College. In contrast to the Secondary School the land will be retained by the Council. The construction costs for the SEN school will then be the subject of a grant application to the DfE.
- 2.22 Receipts from Haymarket for the land for the Tech Hub will also be used to provide 'match funding' towards the College applications to the LEP.
- 2.23 Finally, receipts from the sale of the residential development, which forms part of the proposals, will fund the remainder. Details of project funding, viability and the impact this has had on the deliverability of affordable housing on the residential element of the site are summarised in Section 5 of this report and also in a confidential Viability Report submitted by BNP Paribas on behalf of the College to the Council with this application.

3.0 THE APPLICATION SITE AND THE APPLICATION PROPOSALS

(i) The Application Site

3.1 The Application Site comprises 9.4 hectares. The existing Richmond upon Thames College site is bounded to the north by the A316 (Chertsey Road), Egerton Road to the East, residential properties on Craneford Way to the South and by a pedestrian footpath known as Marsh Farm Lane and The Stoop/Langhorn Drive to the West. The remainder of the Application Site includes the existing College sports fields south of Craneford Way. These are bounded to the east by residential properties located on Heatham Park Road. The southern boundary is formed by the River Crane whilst western boundary is formed by a second sports field and area of public open space including a childrens' play area. The two sports fields are separated by an unnamed footpath (an extension of Marsh Farm Lane) which runs from north to south providing access from Craneford Way to allotments and buildings located to the south of the River Crane. A copy of the site location plan is included as **Appendix 2**.

3.2 The site is currently accessed from the North West off Langhorn Drive, from the North East and from the East by three accesses/exits off Egerton Road and from the south from Craneford Way. The first of these is located approximately 30 metres south of the junction with Chertsey Road and the others further south – the first opposite Heathfield South (a one-way road eastbound) and the second opposite Court Way.

(ii) Planning History of the College Site

3.3 **Appendix 3** contains a Schedule setting out the various planning applications made on the College Site; the more significant permissions relate to the development and/or extension of existing College accommodation. There have also been a series of temporary consents for both College facilities as well as various temporary corporate hospitality facilities associated with events at Twickenham Stadium.

3.4 In the interests of completeness, it should be noted that on 5th July 2011 an application to register the College playing fields south of Craneford Way as a town or village green was made by the Friends of the River Crane Environment (FORCE) under section 15(2) of the Commons Act 2006. The application was objected to by the College and a public local inquiry into the application was held in December 2013. The appointed inspector found that although the “locality” test had been met (in that the land had been used by a significant number of persons from the immediate neighbourhood for a period in excess of 20 years) there had been periods when the public were excluded from all or part of the land - either by the college itself or other organisations to whom it had hired the land⁸. This resulted in the public’s use on all other occasions being by implied permission rather than as of right. Consequently the inspector recommended that the application for town or village green status should not be allowed. On 23rd July 2014, in accordance with the Inspector’s recommendation, the Council’s Regulatory Committee refused the village green application.

(iii) The Application Proposals

3.5 The formal Description of Development for the Outline Planning Application is set out in both the **Applications Forms** and in the **Development Specification**.

3.6 Essentially the proposals entail the comprehensive redevelopment of the existing College site to provide the following educational facilities:

- A new replacement College (Use Class D1) to accommodate up to 3,000 FTE day-time students, as well as facilities for up to 500 students undertaking evening and weekend courses;
- A new five form entry Secondary School (Use Class D1) for up to 750 students; and
- A new Secondary School for children with special needs (Clarendon School) (also Use Class D1).

⁸ The inspector, for example, specifically referred to a period of three weeks during October 1999 when it was licensed by the college for hospitality events for the Rugby World Cup.

- 3.7 These facilities will also include a replacement on-site sports centre (Use Class D2) designed to serve the College, schools and the wider community. This Sports Centre, the College playing fields and other facilities provided as part of the proposals will be made available for use by the wider community under the terms of an agreement under Section 106 should consent be granted.
- 3.8 The education facilities will be complemented by a 'Technical Hub' operated by Haymarket Media. As explained in Section 2 the provision of this facility is a requirement of the S106 Agreement associated with the planning permission Haymarket has recently obtained for the redevelopment of its existing headquarters at Broom Road in Teddington⁹. In accordance with the specifications set out Schedule 10 Annex A of this Agreement the facility will include digital labs for the company's new technology and product development, state-of-the-art photographic studios, a photographic archive, digital editing suite, listening rooms for its consumer electronics brands and a gallery space showcasing design and photographic work and a 'media incubator'. Around 20 of Haymarket's creative and digital experts would be based there full-time. It will also enable students at the College to access industry standard technology and work with media experts who will be on hand to provide 'master classes' and help shape curriculum content. It would also be the home to a new digital media incubator, which would see Haymarket provide space, seed funding equity investment to the brightest young media entrepreneurs and tech start-ups.
- 3.9 The application also proposes the upgrading and improvement of the existing College playing fields south of Craneford Way by the laying out of a new all-weather surface together with a new grass playing field and training area.
- 3.10 The application also proposes alterations to the existing means of access for vehicles, pedestrians and cyclists from the A316. This entails the upgrading of the existing junction of the A316 Chertsey Road with Langhorn Drive from a simple left in / left out junction, to a fully signal controlled left in / left and right out junction together with a new 'at grade' pedestrian crossing. Additionally, the proposals also include alterations to the existing means of access points on Egerton Road to provide access to the Secondary School and SEN school as well as the cycleway/footpath access from Craneford Way.

⁹ Ref 14/0914/FUL

- 3.11 The proposals also include the development of up to 180 residential units in a mix of unit sizes – 15% of which will be affordable. The residential element of the scheme will – in conjunction with the funding streams identified above - provide the finance to undertake the redevelopment.

4.0 THE FORM AND CONTENT OF THE PLANNING APPLICATION

4.1 The College redevelopment needs to take place in a series of phases in order to allow continuity of use of existing College facilities. The education elements of the scheme would also be developed by different occupiers/developers – each reliant on different funding and procurement regimes. The College and its development partners all need to retain a degree of flexibility over procurement, design and delivery of the eventual development. As a result the application is being made in outline with all matters - excluding means of access - reserved for subsequent approval.

4.2 If outline planning permission were then granted, the intention is that each occupier/developer would then make their own applications for the approval of Reserved Matters for each element of the scheme consistent with the outline consent.

4.3 It has always been acknowledged that the redevelopment proposals fall within Schedule 2 of the EIA Regulations. Based on the location of the site, the nature of the redevelopment and the potential for significant environmental effects it is accepted that the scheme would constitute 'EIA development' under the Regulations. A request for a 'Scoping Opinion' was submitted to the LB Richmond in July 2014. This explained how, in accordance with 'best practice' in these situations the outline 'scheme' would be defined through a combination of:

a) a detailed **Development Specification**,

b) a series of **Parameter Plans**; and

c) a **Design Code** for the proposed development to ensure that the scheme could be robustly assessed.

- 4.4 These 'Primary Control Documents' collectively define the form and content of the Outline Application and provide a set of clearly defined parameters within which the assessment of 'likely significant effects' would be conducted and, if then approved, within which the development must then take place.
- 4.5 The form and content of the planning application was discussed with the Local Planning Authority as part of the pre-application process. Concerns were raised about the tension between the flexibility of an outline planning application - and particularly the applicant's desire to reserve all matters concerning layout, scale, appearance, landscaping and (at that time) access for subsequent approval - and the rigours of the EIA Regulations.
- 4.6 In response to this the applicant sought advice from Leading Counsel, who was provided with copies of the draft planning application and the details of the proposed methodology the applicant intended to adopt to assess the 'likely significant effects' of the development in the EIA. This advice concluded that, with certain relatively minor amendments (most notably concerning details of the phasing of the proposed development), and a satisfactory design code and appropriate suite of conditions, the proposed scheme could be considered in a single Environmental Statement (ES) and, subject to due process, obtain planning permission – see **Appendix 4**.
- 4.7 Both the Primary Control Documents that form the basis of the outline planning application as well as the Secondary Control Documents (including the Environmental Statement) submitted in support of it have all had regard to this advice when being prepared.

1. The Form of the Application

- 4.8 The planning application seeks outline planning permission for the proposed development. It also provides details of all the proposed access arrangements for all vehicles, cyclists and pedestrians onto the site (whether these involve new arrangements or alterations to existing access to /exits from the site) and seeks approval of these details as part of the consent.

4.9 The design of the internal access arrangements, including layout to facilitate movement and circulation between and within each development zone will be submitted as Reserved Matters.

4.10 All the following matters are 'reserved' for subsequent approval - namely:

(i) Layout

4.11 This is defined DMPO as

"...the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development".

4.12 Although the detailed layout of the proposed development is reserved for subsequent approval, in order to demonstrate that the application site is capable of accommodating the quantum of development proposed in an acceptable manner, the application includes a series of parameter plans that define specific Development Zones within which the various built elements of the proposed development will be located.

4.13 These parameter plans together with the Design Code also establish the principles that will then govern the overall layout, orientation of the buildings within each Development Zone as well as the relationship between these buildings and those nearby.

(ii) Scale

4.14 This is defined in the DMPO as meaning

"...the height, width and length of each building".

4.15 In accordance with the DMPO, the application states, through the Description of Development and the Primary Control Documents, the maximum height, width and length of the buildings that may come forward within each of the defined Development Zones.

(iii) Appearance

4.16 As defined by the DMPO this means

“...the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.”

4.17 Details of the appearance of the buildings will be worked up for each of the Development Zones and will be submitted as reserved matters consistent with the Primary Control Documents that govern the outline planning consent.

4.18 Additionally, the Design and Access Statement submitted in support of the application includes illustrative material showing how the completed development may look. This – along with the Design Code - provides both a framework for the preparation of the detailed scheme plans and a qualitative ‘benchmark’ against which future applications for the approval of reserved matters can be assessed.

(iv) Landscaping

4.19 As defined by the DMPO this

“...means of treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated”.

4.20 Landscape details will be worked up for each Development Zone and are reserved within the outline planning application. Minimum areas of open space are defined in the Parameter Plans that form part of the Primary Control Documents.

4.21 The Design Code also sets qualitative rules and aspirations for the overall landscaping scheme and the indicative material provided within the Design and Access Statement accompanying the application provides an indication of how the final landscaping may appear. These rules and aspirations, coupled with the

indicative scheme, provide a framework for the preparation of detailed landscape schemes for each of the development zones plans as well as a qualitative 'benchmark' against which future applications for the approval of reserved matters can be assessed.

2. The Application Documents

4.22 The documents that therefore comprise the 'Primary Control Documents' for the outline Planning Application - and for which approval is sought - comprise the following:

1. The Completed Application Forms for Outline Planning Consent;
2. The Ownership Certificate & Agricultural Holding Certificate;
3. The Site Location Plan (HOK Plan Ref PL-01);
4. The Development Specification defining the extent to which approval is sought for the development as well as the proposed phasing of the development;
5. The Following Parameter Plans & Drawings:
 - (a) Site-wide Parameter Plans
 - Site Access Parameter Plan (PL-02)
 - Development Zones Parameter Plan (PL-03)
 - Building Zone Parameter Plan (PL-04)
 - Building Height Parameter Plan (PL-05)
 - External Space Parameter Plan (PL-06)

- (b) Individual Development Zone Parameter Plans
- College Development Zone
 - College Building Zones Parameter Plan 1 (PL-07)
 - College Building Zones Parameter Plan 2 (PL-08)
 - Tech-Hub Development Zone
 - Tech Hub Building Zone Parameter Plan 1 (PL-09)
 - Tech Hub Building Zone Parameter Plan 2 (PL-10)
 - Schools Development Zone
 - Schools Building Zones Parameter Plan 1 (PL-11)
 - Schools Building Zone Parameter Plan 2 (PL-12)
 - Residential Development Zones
 - Residential Building Zones Parameter Plan 1 (PL-13)
 - Residential Building Zones Parameter Plan 2 (PL-14);
 - Residential Building Zones Parameter Plan 3 (PL-15);
 - College Playing Fields Development Zone
 - College Playing Fields Sports Pitch Zone Parameter Plan (PL-16)
 - Detailed Access Plans
 - TPP Plan 30713/AC/038 - Langhorn Drive A316 Junction
 - TPP Plan 30713/AC/40 - Secondary School Access Egerton Road
 - TPP Plan 30713/AC/41 -SEN Access Egerton Road; and
 - TPP Plan 30713/AC/42 - Craneford Way Access
6. A Design Code for the proposed development.

4.23 The following additional information – or ‘Secondary Control Documents’ - is also submitted in support of the application but does not form part of the development for which approval is being sought; this includes.

- A Covering Letter from the Applicant;
- This Planning Statement that includes – in **Appendix 5** – a preliminary Draft of the Heads of Terms on behalf of the applicant for the Proposed Legal Agreement(s) that are likely to be required should the Council resolve to grant planning permission for the proposed development;
- A Design & Access Statement prepared by HOK Architects that explains the design evolution of the proposed development, and how the application proposals have responded to and evolved from that contextual analysis as well the consultation the applicant has undertaken prior to making the application. It defines the *development parameters* for which planning permission is sought. The Design & Access Statement also includes a *Illustrative Masterplan (PL-017)* to demonstrate how a scheme of the scale proposed might fit within the parameters for which permission is being sought. (This Illustrative Masterplan is not submitted for approval, but shows one way in which development of the type and scale proposed could comply with the Primary Control Documents);
- An Environmental Statement produced by Cascade Consulting in accordance with the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 – as amended. This undertakes an assessment of environmental effects in relation to the current ‘baseline’ environmental conditions and takes into account effects arising during the demolition of the existing college, the construction of the proposed development and during its subsequent operation. It also includes a Non-Technical Summary
- A Transport Assessment produced by TPP which assesses the detailed impact of the proposed development on local transport infrastructure and the measures the applicant intends to implement to improve accessibility of the proposed development by a choice of means of transport.
- A Flood Risk Assessment prepared by ESI. This identifies and assesses the risks of all forms of flooding and demonstrate how any flood risk can be

managed to ensure the development remains safe throughout its lifetime-taking into account the potential impact of climate change.

- An Energy Statement produced by NDY in order to demonstrate the extent to which the proposals comply with prevailing policies on energy use and generation;
- A Sustainability Statement prepared by Cascade (including a Sustainability Checklist) detailing the way in which the application proposals would comply with prevailing national, strategic and local policies on sustainable development; and
- A Statement of Community Involvement prepared by RuTC that documents the extensive pre-application engagement with the local community, stakeholders and interest groups.

5.0 PLANNING POLICY OVERVIEW AND ASSESSMENT

5.1 INTRODUCTION

5.1.1 Planning applications must be determined in accordance with the development plan¹⁰ unless other material considerations indicate otherwise¹¹. This section sets out the 'development plan' framework and conducts an appraisal of the proposal's relationship with these policies against which the outline planning application needs to be assessed.

5.1.2 The relevant Development Plan for the site REEC comprise the following:

- The London Plan (2015) incorporating further alterations (FALP);
- The LB Richmond Core Strategy – Adopted 2009;
- LB Richmond Development Management Plan – Adopted November 2011;
- The 'saved' policies of the LB Richmond Unitary Development Plan (UDP) – First Review - Adopted 2005; and
- Adopted Supplementary Planning Documents including those on Design Quality, Residential Development Standards and Sustainable Construction

5.1.3 Other policy documents that are also relevant to the determination of the application are:

- Mayor's Draft SPG on Social Infrastructure – July 2014
- Draft Minor Alterations to the London Plan on Housing and Parking Standards – May 2015

¹⁰ As defined in Section 38(6) of the Planning & Compulsory Purchase Act

¹¹ Section 70(2) of the Town & Country Planning Act 1990

- Draft LB Richmond-upon-Thames Site Allocations DPD (2013)
- The Richmond Upon Thames College Planning Brief – Dec 2008
- Crane Valley Planning Guidelines – April 2005

5.2 SITE SPECIFIC DESIGNATIONS

(i) Existing Designations

- 5.2.1 As Section 2 has explained, the need to redevelop the existing Richmond Upon Thames College site has been accepted for many years. The principle of redevelopment for a mix of education, open space/recreational use and 'enabling' residential development now forms part of the Adopted Development Plan.
- 5.2.2 The College site was allocated for education use in the original LB Richmond Unitary Development Plan (UDP) adopted in 1996. In this Plan the playing fields adjacent to the A316 and also those south of Craneford Way were designated as Metropolitan Open Land (MOL).
- 5.2.3 Representations were made by the College to the Review of the Unitary UDP which commenced in late 2003. These sought the removal of the MOL designation from the playing fields adjacent to the A316 as part of the wider redevelopment scheme. The Inspector at the examination of the UDP supported the College's representations and the main site - including the playing field adjacent to the A316 - was duly designated for redevelopment under **Policy T29** of the Adopted UDP – First Review when it was adopted in 2005.
- 5.2.4 **Policy T29** remains a 'saved' policy for the application site. It will remain material to determination of any application until it is replaced by a new policy in the emerging Site Allocations DPD (see (ii) below) and provides one of a number of site-specific policies relevant to the application site.

5.2.5 As well as the main College site the **Policy T29** designation also includes the College playing fields south of Craneford Way which remain as Metropolitan Open Land (MOL) – the assessment of which is dealt with under sub-section 3 below.

5.2.6 Saved **Policy T29** states:

Redevelopment to provide a new college and enabling residential development on the site of the existing college and playing field south of the A316. Retention & upgrading of Craneford Way East Playing Field.

5.2.7 The supporting text to this policy states:

“To provide rationalisation, expansion and improvements to the College (either on the site of the current buildings and/or on the College playing field to the immediate south of the A316) 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. All College facilities to have increased public use reflecting the Council’s dual use policy. Access to the trunk and local road network will be addressed at the development control stage.”

5.2.8 The Crane Valley Planning Guidelines were adopted as Supplementary Planning Guidance (SPG) to the UDP by the Council in April 2005. The stated design objectives for the College site are as follows:

- 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 and the building’s importance 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 existing College playing fields, to the south of Craneford Way, should be upgraded and designed to encourage natural surveillance; and
- The main vehicular access to the College should be from the A316 via Langhorn Drive and any residential development should be accessed off Egerton Road to separate College and residential traffic;
- 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.

5.2.9 In accordance with these Guidelines, the Council then issued a Draft Planning Brief specifically for the College site in May 2008. Following consultation with the public and statutory consultees¹² this Brief was formally adopted as Supplementary Planning Guidance for the College site by the Council in December 2008.

5.2.10 According to the Adopted Planning Brief, the Council and College will work to ensure any redevelopment proposal:

- Delivers a high quality college campus, offering improved learning and sporting facilities;

- Is achieved in a comprehensive manner, making best use of the site, with development at an appropriate density;
- Responds to the area's existing urban grain, building heights and landscape character and is of the highest architectural quality;
- Ensures appropriate pedestrian, cycle and vehicular access points, which reflect existing links and reduce traffic impacts in neighbouring residential streets;
- Promotes sustainable forms of transport and reduces car parking, through the implementation of a Green Travel Plan;
- Maximises the sustainability of all new buildings, in accordance with relevant national, regional and local sustainability targets;
- Delivers benefits for the wider area, including improving linkages between the main development sites in the Crane Valley and environmental improvements;
- Continues to play an important role in the community and maximises the opportunity for community use of facilities;
- Delivers an appropriate level of enabling residential development, including affordable housing, if required to contribute to the funding for the redevelopment¹³.

5.2.11 As the **Design & Access Statement** explains the provisions of the Adopted Planning Brief and the Crane Valley Planning Guidelines have now shaped the proposals contained in the 'Primary Control Documents' that comprise this outline planning application.

¹² Including GLA, CABE, TfL and the Environment Agency

¹³ See paragraph 2.1 of Planning Brief for Richmond upon Thames College Site Adopted 2008

5.2.12 It is also worth noting that the College site also forms part of the 'River Crane Area of Opportunity' designated under **Policy CP12 – River Crane Corridor** of the LB Richmond Core Strategy. **Policy 12A** states that:

“The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.”

5.2.13 The justification explains how the Crane Valley contains large areas of open land which could benefit from significant environmental improvement in order to provide an attractive walk and open wedge between LB Hounslow and the River Thames and, in doing so, form part of the much larger West London Green Chain between Harrow and Isleworth. In pursuit of these aims, and in order to secure improvements to the banks of the River Crane to enhance ecological interest and also provide a through pedestrian/cycle route, the Council will continue to use the Crane Valley Planning Guidelines to manage areas of potential change within the Corridor – including the application site. The Guidelines envisage that, along with other sites in the Corridor¹⁴ as well as those nearby, future development will provide an opportunity to contribute to these improvements through planning obligations.

5.2.14 The Guidelines explain how, in cases where Planning Briefs have been prepared (as in the case of the application site), these will be used to secure appropriate development and associated improvements.

(ii) Emerging Site-Specific Designations

5.2.15 The Council are currently preparing a Site Allocations Development Plan Document (DPD). This contains site-specific policies for a series of sites in the Borough (other than those in Twickenham Town Centre¹⁵); these include the College site. When adopted, the Site Allocations DPD will replace both the current Local Plan Proposals Map and 'saved' **Policy T29** for the College site.

¹⁴ Including the Stoop Memorial Ground, the remainder of the Craneford Way playing fields, the Council depot site and the former Post Office site (now being developed by St James as Brewery Wharf)

Once adopted the policy for the College will be read in conjunction with those already contained in the adopted Core Strategy and Development Management Plan.

- 5.2.16 The College Site is identified in the 'pre-publication' consultation draft of the Site Allocations DPD issued in October 2013 as draft designation **TW10 – Richmond College**. The draft designation for the site states: -

“Redevelopment to provide a new college, offices, secondary school and special school, residential including affordable and open space”

- 5.2.17 The draft supporting text suggests that a new College building and headquarters offices¹⁶ (should be located) fronting the A316 on the existing playing fields. If development takes place on the College playing field south of the A316 the College's Craneford Way playing field is to be upgraded. All College and School facilities to have public use reflecting the Council's dual use policy. Access to the trunk and local road network to be assessed at the development control stage. Any vehicular access through Heatham Estate must take account of residential amenity.

- 5.2.18 The Sustainability Appraisal undertaken in support of the pre-publication draft of the Site Allocations DPD also recognises that redevelopment of the College site represents a more sustainable option than the status quo. Having undertaken an assessment of the proposal against the relevant Sustainability Objectives, it is concluded that:

“Overall, there are many positive as well as negative impacts. Provision of modern HQ offices in a prominent location should boost the local economy and provide jobs. Improvements to the educational facilities are considered

¹⁵ Which are dealt with in the Twickenham Action Area Plan – adopted July 2013

¹⁶ The Justification for draft **Policy TW10**, contained in the Pre-Publication Draft of the Plan issued in October 2013, was amended in 2014 to delete reference to 'Headquarters.' Furthermore, in the light of the decision to approve the application for the redevelopment of the Teddington Studios site at Broom Road (Application Ref: 14/0914/FUL), it was confirmed that rather than relocate its offices to the College site, Haymarket would develop the 'Tech-hub' that now forms part this application. It is understood that following re-consultation on a series of additional sites, the Council intends to issue a Publication Draft of the Revised Site Allocations DPD later this year with the intention of submitting the DPD for Examination early next year and the applicant has requested that, in doing so, the Council amend the draft Policy and the Justification to accurately reflect prevailing circumstances.

positive as they increase the quality, range and accessibility of training, employment and education opportunities. There will also be some opportunity for housing. However, the loss of the playing field to the north is considered to have a negative impact depending on whether there are appropriate alternative provision or other arrangements to upgrade nearby space. Transport/travel impacts could be detrimental to the local/strategic network unless mitigated.^{17 18}

5.2.19 The Sustainability Assessment also recognises that some mitigation may be required as a result of the proposed designation; this includes:

- **Travel** – access to the trunk and local road network needs to be addressed to mitigate the problems of increased travel in conjunction with the intensification and additional development on this site;
- **Open space** – Some open areas should be provided in the new scheme as well as the opportunity taken to upgrade nearby playing area; and.
- Need to take account of adjacent development proposals and cumulative impacts on local area.

Site Designation Policy Assessment

5.2.20 The proposed development of the existing College site for new education use and enabling residential development clearly accords with the site's long-standing designation in the adopted Development Plan and Supplementary Planning Guidance and also in emerging policy for the site.

¹⁷ See LB Richmond Site Allocations Plan – Pre-Consultation Draft Sustainability Appraisal – Progress Report Sept 2013 page 120

¹⁸ In order to reflect the changes to the College scheme since the original Sustainability Appraisal of **Policy TW10** was undertaken, CgMs has requested that the Sustainability Appraisal for the Pre-Publication Draft of the Site Allocations Plan be reviewed and the latest proposals re-assessed against the relevant Sustainability Objectives. Clearly the inclusion of the proposed 'Tech-hub' is positive in terms of the way in which it will greatly improve the quality, range and accessibility to vocational education and training, and in doing so, enhance opportunities for future employment.

- 5.2.21 As explained in detail in the Design and Access Statement, the proposals are consistent with the provisions of the adopted Supplementary Planning Guidance for the College site, and will deliver a high quality college campus, offering improved learning and sporting facilities in a comprehensive manner making the best use of the site. Also in accordance with the SPG the development will also continue and enhance the role the College already plays in the community and will extend the existing opportunity for community use of new facilities that are being provided.
- 5.2.22 As Section 5.5 below will also demonstrate - with reference to the Townscape and Visual Impact Assessment contained in the ES - it also does so in a way that pays due regard to the character of the local area and protects the amenity of nearby residents.
- 5.2.23 Similarly as Section 5.8 below explains, with reference to the TIA, the proposals also ensures access - by all means of transport – makes the most of existing links. The only inconsistency between the application scheme and the SPG concerns the vehicular access arrangements to the proposed residential development scheme. This, as Section 3 and the Transport Impact Assessment explains, is now provided via an improved junction onto the A316 in order to minimise the potential traffic impacts of the new residential scheme on neighbouring residential streets. Additionally, through the implementation of a Framework Travel Plan for all the component elements of the scheme, the development will limit on-site parking provision in line with strategic and local policies and promote the use of sustainable forms of transport.
- 5.2.24 Furthermore, as Section 5.7 below explains and the Sustainability Assessment accompanying the application demonstrates, the proposals seeks to maximise the sustainability of all new buildings, in accordance with relevant national, regional and local sustainability targets.
- 5.2.25 The proposals also deliver benefits for the wider area by improving linkages along the Crane Valley and contributing towards planned environmental improvements in the area.

5.2.26 Finally, and also in accord with the adopted policy and SPG, the development – as Section 5.6 will demonstrate – is capable of delivering a level of enabling residential development, including an element of affordable housing, consistent with prevailing policies.

5.2.27 In all these respects the application proposals are consistent with prevailing adopted development plan policy as well as supplementary planning guidance for the site.

5.3 POLICIES FOR EDUCATION & SOCIAL INFRASTRUCTURE

5.3.1 The Government is committed to improving existing education facilities throughout the Country. The NPPF states: -

“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- i. give great weight to the need to create, expand or alter schools; and*
- ii. work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

5.3.2 The provisions of the NPPF in relation to Education were restated in the Coalition Government’s commitment to support the development of state-funded schools and their delivery through the planning system¹⁹. This Statement highlights the Government’s expectation that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools. The Government expects there to be a “presumption in favour of the development of state-funded schools.” Moreover, local authorities are expected to give full and thorough consideration to the importance of

enabling the development of state-funded schools in their planning decisions and make full use of their planning powers to support state-funded schools applications.

5.3.3 As explained in Section 2, London's growing school age population is placing an increasing demand on existing schools and fuelling a demand for new schools throughout the Capital. Land already in educational use should be safeguarded and any net loss of education space resisted unless there is strong evidence of a current or future lack of need. Consistent with the Mayor's Infrastructure Plan London Plan **Policy 3.16 - Protection and enhancement of social infrastructure**²⁰ supports proposals which provide high quality social infrastructure. Facilities should be accessible to all sections of the community and be located within easy reach of walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged. New developments should also, wherever possible, extend the use of facilities to serve the wider community especially within regeneration and other major development schemes.

5.3.4 Similarly London Plan **Policy 3.18** deals specifically with the provision of Education Facilities; it supports proposals which enhance education and skills provision - including new build, expansion of existing facilities or change of use to educational purposes. In particular, proposals for new schools (including free schools) should be given positive consideration and should only be refused where there are demonstrable local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through planning conditions or obligations. Additionally London Plan policy specifically encourages the co-location of services between schools and colleges as well as other provision.

¹⁹ See 'Policy Statement – Planning for New Schools and Development' issued jointly by the Secretary of State for Communities and Local Government and the Secretary of State for Education in August 2011

²⁰ It is noted that open space is considered as an important component of social infrastructure and - under the provisions of London Plan Policy 3.16 - should be protected. The impact of the proposals on existing open space and the relationship of the proposals to policies regarding open space more generally is dealt with under Sub-section 3

5.3.5 The above policies are also supported by the Mayor's Draft Supplementary Planning Guidance on Social Infrastructure; this underlines the Mayor's commitment to improve facilities in the light of demographic change and growing demand for both more, and improved, education facilities across the Capital.

5.3.6 At the local level, Core Strategy **Policy CP18 Education and Training** states:

"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.

Para 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 reduce inequalities and support the local economy.

Para 18.D states that developers will have to take into account the potential need to contribute to the provision of primary and secondary school places in the borough, as well as training opportunities for residents.

5.3.7 In relation to secondary schools, the supporting text to the policy recognises the Council's duty not only to meet demand for schools but also to modernise schools and to provide new facilities to meet changing curriculum requirements. Similarly with regard to post 16 education in the Borough, the Core Strategy explicitly recognises that additional need exists beyond that currently provided by Richmond Upon Thames College as well as Richmond Adult Education College

and St Mary's University. As with secondary education facilities there is an ongoing need to continuously update and refurbish existing facilities to provide modern and up to date facilities which meet the needs to community.

5.3.8 The Core Strategy explicitly recognises²¹ that the rebuilding of Richmond Upon Thames College represents an opportunity to extend and strengthen existing provision of post 16 education and training.

5.3.9 As Section 2 has explained, the College has already obtained approval for funding from the LEP's Further Education Capital Investment Fund for £16m for the first phase of the College redevelopment and been invited to also make a bid for the funding of the second phase.

5.3.10 Under 'Implementation' the Core Strategy, states: -

"The strategy towards providing services and facilities for education and training will primarily be taken forward through the implementation of the Education Strategy and the Richmond Upon Thames Strategic Plan for Children's Centres and Extended Schools Initiative, and the Building Schools for the Future programme, as well as achieving the targets set out by the Community Plan."

5.3.11 The policies for Education and Training in the Core Strategy are then echoed in the Council's Development Management Plan. Policy **DM SI 1 - Encouraging New Social Infrastructure Provision states** that planning permission will be granted for new or extensions to existing social infrastructure subject to the following 7 criteria:

- i. It provides for a identified need;
- ii. Where practicable it is provided in multi-use, flexible and adaptable buildings;

²¹ See Paragraph 8.3.6.11

- iii. It is in a location accessible by public transport, walking and cycling;
- iv. It is of high quality design providing access for all;
- v. It does not have significant adverse impact on residential character and amenity;
- vi. It does not have significant adverse impact on traffic levels;
- vii. It is in accordance with other policies.

5.3.12 The Council's Development Management DPD also promotes dual use of such facilities – including, for example, a school using its playing fields during the day and allowing community use outside of school hours. It defines 'community use' as use by individuals, sports and arts clubs, or private groups, and can range from informal/occasional bookings through to planned, professional activity. It confirms that the Council will promote dual use subject to appropriate management arrangements.

5.3.13 The potential for the re-use, refurbishment or redevelopment of existing sites will be maximised in relation to policy **DM SI2 - Loss of existing social infrastructure provision**. This policy resists the loss of existing social infrastructure unless it can be demonstrated that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere in a convenient alternative location. It is also noteworthy that the supporting text recognises there is a need to preserve a sufficient range and amount of social infrastructure across the Borough and, in making a more efficient use of land, there may be reduction in the overall need for land in community use while maintaining the same level of service provision.

Education and Social Infrastructure Assessment

5.3.14 The proposals to provide improved College and SEN School facilities as well as a new Secondary school are clearly compliant with national, strategic and local policies for education and social infrastructure. Moreover, the College's intention to make facilities available for use by the wider community is also consistent with strategic and local policies to improve social infrastructure.

5.3.15 Furthermore, the availability of funding to implement proposals should planning consent be granted, ensures the proposals are capable of delivery within prescribed timescales.

5.4 POLICIES FOR METROPOLITAN OPEN LAND, OPEN SPACE & RECREATION

5.4.1 As outlined in sub-section 2 above, the College playing fields south of Craneford Way are designated as Metropolitan Open Land (MOL). This section therefore considers policies for MOL as well as policies for open space and recreation and the proposals' relationship with them.

(i) Metropolitan Open Land

5.4.2 As explained above, the existing playing fields to the south of the A316 were removed from MOL designation in the Review of the UDP in 2005; the playing fields south of Craneford Way remain MOL.

5.4.3 MOL is a land use designation used in the London Plan that affords the same protection as that afforded to designated Green Belt. National policies for protection of the Green Belt/MOL are set out in paragraphs 79-92 of the NPPF. Once designated, planning authorities are encouraged to:

“plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance existing landscapes, visual amenity and biodiversity; or to improve damaged or derelict land.”

5.4.4 London Plan **Policy 7.17** states that the

“Mayor strongly supports protection for MOL from development that has an adverse impact on the openness of the MOL....and that the strongest protection to MOL should be given.”

Part B of the Policy states that essential ancillary facilities for appropriate uses within these areas will only be acceptable where they maintain the openness of the MOL.

- 5.4.5 In accordance with national planning policy guidance and the London Plan policy on MOL, Development Management Plan **Policy DM OS 2** states that MOL in Richmond will be protected and retained in predominately open use. Appropriate uses are identified as public/private open spaces; playing fields; open recreation & sport and biodiversity. The improvement and enhancement of the openness and character of the MOL, and measures to reduce visual impact, will be encouraged where appropriate and some development may be acceptable providing it does not harm the character and openness of the Metropolitan Open land and is linked to the functional use of the Metropolitan Open Land or supports outdoor open space uses. Any possible visual impacts on the character and openness of the MOL arising as a result of development nearby will also be taken into account.
- 5.4.6 The proposals for the College playing fields do not envisage any new buildings being constructed in this area. They do include the removal of the existing, largely unused, hardstanding on the College playing fields and the laying out of a new all-weather, permeable playing surface for both rugby and football. This will not only improve site drainage but also enhance the utility of the College playing fields for sport and recreation – for the College, schools and the wider community.
- 5.4.7 The application proposals also entail the laying out of a new grass pitch for football, rugby and hockey. Outside this there will be a grass training area together with open space to which the public will have access for informal recreation use.

- 5.4.8 Existing perimeter site fencing will be replaced with a new 4m mesh fence with additional retractable nets (up to 10 metres in height) at the goal ends to be used during games.
- 5.4.9 Paragraph 89 of the NPPF explicitly identifies the “provision of appropriate facilities for outdoor sport, outdoor recreation” is one of the exceptions allowed in Green Belt/MOL. Accordingly, rather than detracting from the site’s designation as MOL, the proposals for the existing College playing fields make a positive contribution to one of the main purposes of designating the site as MOL.
- 5.4.10 The issue in this case is whether the proposals will impact on the openness of this area and, in doing so, conflict with the MOL designation in any way. The proposals do not entail the introduction of any buildings on the playing fields and the laying out of the all-weather surface and new grass pitch would not, in themselves, materially affect the openness of the existing site.
- 5.4.11 The replacement perimeter fencing and enclosure of playing surfaces will have some visual impact but, as the Townscape and Visual Impact Assessment in the ES explains, this could be minimised by ensuring any fencing is visually permeable and is lightweight in appearance.
- 5.4.12 Any visual impact this fencing might have needs to be considered quite separately from any effect it may have the openness of the site. Indeed case law²² would indicate that it would be wrong to arrive to any conclusion on the proposals’ effect on openness simply by reference to their visual impact.
- 5.4.13 Policy for MOL also requires that impact on the character and openness of the MOL of development nearby also needs to be considered. The impact of the wider College redevelopment – both during construction and subsequent operation - has been explicitly considered as part of the Landscape and Visual Impact assessment undertaken as part of the ES accompanying the application. Based on this detailed assessment it is considered that the only possible impact the wider College redevelopment would have on the MOL is the potential effect that users of it would experience when looking north towards the College

²² See: *Timmins v Gedling Borough Council* [2014] EWHC 654 (Admin)

development which is visible to the north of the existing residential properties on Craneford Way; the assessment concludes that any impact on users of this area would be negligible.

5.4.14 The overall effect of the development proposed on the College Playing Fields on their openness will be limited and certainly not sufficient to conflict with the designation as MOL.

(ii) Open Space and Recreation

5.4.15 5.4.6 The NPPF recognises that access to high quality open spaces²³ and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

5.4.16 The NPPF recognises how open space can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development.

²³ which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks.

- 5.4.17 In London, the Mayor is also committed to work with Boroughs and strategic partners to protect, promote, expand and manage the extent and quality of, and access to, the network of 'green infrastructure'²⁴ across London. London Plan **Policy 2.18 - Green Infrastructure: The network of Open and Green Spaces** deals with this in relation to both plan making and development proposals. In the case of the latter the Mayor will seek enhancements to London's green infrastructure not only where there are identified deficiencies in the area but also encourage its incorporation into new development in a way that can be integrated into the wider network and encourage the linkage of green infrastructure to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening.
- 5.4.18 The policy is supported by the Mayor's supplementary guidance on the 'All London Green Grid' (ALGG) which sets out the strategic objectives and priorities for Green infrastructure across London. The ALGG promotes the greening of the urban environment and encourages the establishment of a multifunctional network of high quality open spaces connecting town centres, public transport hubs, major employment and residential areas with parks and open spaces, the Thames and the green urban fringe.
- 5.4.19 The Mayor has supported the identification of 11 Green Grid Areas (GGA) and the establishment of area-based partnerships (area groups) throughout London to promote cross boundary working. The area groups have, in turn, developed a programme of projects and opportunities, set out in Local Area Frameworks with the aim of enhancing and extending networks. These Area Frameworks identify projects that would deliver a multi-functional green infrastructure, as well as establish a comprehensive baseline understanding of each area; define a vision, area objectives and strategic opportunities for each area. They also aim to ensure that sub-regional and strategic policies relate to Borough level planning, regeneration, transport and open space strategies and initiatives. They are also

²⁴

Defined in the Glossary to the London Plan as:
"The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole."

used to 'sign-post' the resources required and form bidding strategies to deliver the funding for strategic projects, consolidate resources, coordinate efforts and facilitate partnership working.

- 5.4.20 London Plan **Policy 7.18 Protecting Local Open Space And Addressing Local Deficiency** states that, strategically, the Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency. In terms of planning decisions, the loss of local protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.
- 5.4.21 Core Strategy **Policy CP10 – Open Land and Parks** seeks to protect the open environment of the Borough in the interests of biodiversity, sport and recreation and heritage, and for visual reasons. As well as encouraging new provision in areas of identified open space deficiency, all developments will be expected to incorporate appropriate elements of open space that make a positive contribution to the wider network.
- 5.4.22 The Council's latest Assessment of Open Space²⁵ indicates that existing open space across the Borough generally scores above the thresholds set for quality and value. The Study concludes that Twickenham analysis area, where the application site is located, is well-provided for in terms of parks and gardens and natural and semi-natural greenspace and that any gaps are sufficiently served by other forms of open space.
- 5.4.23 Similarly, the 15 areas designated for play and social interaction involving children and young people in the Twickenham area are all assessed as high quality and value and the Craneford Way Recreation Ground Play Area to the west of the application site scored particularly high with respect to quality.

²⁵ Richmond upon Thames Sports, Open Space and Recreation Needs and Opportunities Assessment. Open Space Assessment Report, Knight Kavanagh & Page (April/May 2015)

- 5.4.24 Although the existing College playing fields are not public open space, they are currently used for informal recreation by local people. The proposed improvements mean that although public access to the new pitches and training area will need to be controlled, a new access will be provided to the east of the College playing fields to allow a circular walk around the pitches and along the river bank.
- 5.4.25 Given the amount and quality of public open space available in the vicinity, the restrictions on public access to the existing College playing fields to ensure security and safe use of the new pitches and training area cannot be considered significant or contrary to policy. Concerns have been raised about how limiting public access to College playing fields and increased population might lead to increase usage and unacceptable 'wear and tear' on the Craneford Way West playing fields and other open space in the immediate vicinity. This has been considered in detail as part of the Socio-Economic Impact Assessment in the ES. It has shown that, taking into account the open space being provided as part of the development and the improvements being made by the application proposals to improve linkages to the wider River Crane Corridor, any impact on existing open space is likely to be minor.

(iii) Recreation

- 5.4.26 With the context of national planning policy guidance to protect and develop facilities for sport and recreation, the Mayor's Sports Legacy Plan seeks to increase participation and tackle inequality in access to sport and recreation. Complementing Policy 3.16 (outlined in paragraph 5.3.3 above) London Plan Policy **Policy 3.19** states that:

"B. Development proposals that increase or enhance provision of sports or recreation facilities will be supported. Proposals that result in a net loss of facilities will be resisted.....Wherever possible, multi-use public facilities for sport and recreation activity should be encouraged...."

C. Where sports facility developments are proposed in existing open space, they will need to be considered carefully in the light of policies on Green Belt and protecting open space as well as the Borough's own assessment of needs and opportunities for both sports facilities and for green multi-functional open space."

5.4.27 Similarly, under the aegis of Core Strategy **Policy CP10**, the Council also seek to protect and enhance existing open space and playing fields located with it. Pursuant to this, the Council's Draft Playing Pitch Strategy seeks to:

- *protect playing pitches and ancillary facilities from loss as a result of redevelopment*;
- *enhance existing playing pitches and ancillary facilities through improving their quality, accessibility and management*; and
- *provide new playing pitches and ancillary facilities that are fit for purpose to meet demands for participation now and in the future.*

5.4.28 The loss of the existing College playing field south of the A316 may therefore be seen as contrary to prevailing policies and the Council's strategy to protect such facilities. However, the loss of this particular pitch has long been recognised as a consequence of the College redevelopment. Indeed, adopted Policy T29 envisages this loss and requires it to be compensated for by the upgrading of the existing College playing fields south of Craneford Way in the way now proposed.

5.4.29 Moreover, as the Socio-Economic Impact Assessment in the ES demonstrates, existing levels of community usage of this pitch are low and there is spare capacity to accommodate adult football teams to meet existing and future demand both across the Borough and the Twickenham area.

5.4.30 The College playing field south of Craneford Way currently accommodates one senior sized rugby pitch. The Council's 'Playing Pitch Assessment' gives this pitch a standard quality rating and indicates that it currently operates under capacity; there is also spare capacity for rugby pitches recorded across the Borough and the Twickenham area to meet existing and future demand.

5.4.31 The existing pitch on the College playing fields will be replaced with a new 3G pitch that meets International Rugby Board (IRB) standards. At the present time there is currently only one 3G pitch located within the Borough but due to

funding agreements it is predominantly programmed for football use and is only available in the peak period for limited rugby training. The Council's Recreation Assessment recognises the opportunity for the new rugby pitch at the College site and the role it could play in meeting some demand for additional training facilities across the Borough. The same report also recognises that the proposed pitch would help meet curriculum demand as well as community use.

- 5.4.32 Furthermore, the same Study confirms that the Borough is relatively well provided for in terms of sport and recreation facilities, which are both publically and privately run. Existing on-site sports facilities are used by both students and, outside College hours, by the wider community. This will be replaced with a new facility as part of the redevelopment. Additionally, there will also be some re-provision of all-weather sports surfaces within the main College site including new MUGA areas for tennis, basketball, football and netball. These will be lit and are suitable for use all year round and are not affected by inclement weather conditions or high-levels of usage to the same extent, particularly during winter months. As with the Sports Centre, these facilities will be made available for public/community use outside school operating hours.
- 5.4.33 A further MUGA is being provided within the SEN School providing a dedicated sports facility for this special needs group and, in doing so, promoting an inclusive approach.
- 5.4.34 On this basis it can be concluded that the loss of the existing playing field will not lead to a deficiency in provision. Moreover, in accordance with Policy T29, its loss is being compensated for with the improvement of existing facilities south of Craneford Way as well as the provision of new all-weather facilities as part of the wider redevelopment. On this basis the proposals are compliant with not only the site-specific policy for the College site but also generic policies promoting the improvement of recreational facilities consistent with identified needs.

5.5 POLICIES FOR DESIGN AND TOWNSCAPE

- 5.5.1 This sub-section considers the effect of the proposed development on local townscape and the relationship of the development to strategic and local design policies. Because the application is made in outline, it is done with reference to the 'Primary Control Documents' - including the Design Code - as well as the assessment of Townscape and Visual Impact assessment undertaken as part of the ES.
- 5.5.2 The NPPF stresses the importance of good design. It emphasises that design is a key requirement in all developments due to its contribution towards making places better for people.
- 5.5.3 London Plan **Policy 3.2** says that developments should be designed that would enable Londoners to live in well-designed homes, appropriately sized, energy efficient, warm, dry and safe. Further, **Policy 7.6** – Architecture - introduces a number of key design guidelines to which a development would have to adhere, in order to better increase its chances of securing planning permission. A development should:
- a. Be of the highest architectural quality;
 - b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
 - c. Comprise details and materials that complement, not necessarily replicate, the local architectural character;
 - d. Not cause unacceptable harm to the amenity of surrounding land and buildings;
 - e. Incorporate best practice in resource management and climate change;
 - f. Provide high quality indoor and outdoor spaces;
 - g. Be adaptable to different activities and land uses, particularly at ground level;
 - h. Meet the principles of inclusive design;

- i. Optimise the potential of sites.

5.5.4 **Policy 7.2** of the London Plan addresses inclusive design and notes that developments should be designed so as they can “be used safely and easily by all regardless of disability”. **Policy 7.4** explains how developments should relate to the existing site context. New buildings should respect the character and existing grain of the area. They should provide a “human scale” and go towards enhancing and encouraging positive activity at street level activity.

5.5.5 At the local level **Policy DM DC 1** deals with design quality. It states:

“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”*

5.5.6 **Policy DM DC3** deals with Taller Buildings and was cited by the Council as relevant to the application in its response to the request for the Scoping Opinion. Based on the definition contained in the study that informed the policy²⁶, ‘Taller Buildings’ are defined in this context as “Buildings that are significantly taller than their neighbours but less than 18m in height (below six storeys)” whilst ‘Tall Buildings’ are defined as “buildings of 18m in height (approximately six

²⁶ See Borough-wide Sustainable Urban Development Study Turley Associates 2008

storeys), or taller, above existing ground level." Tall Buildings are considered unacceptable in the Borough whilst Taller Buildings are considered to be inappropriate outside defined locations in Richmond and Twickenham town centres and within these areas and will only be acceptable "subject to a full design justification based on a comprehensive townscape appraisal and there being significant local community support."

- 5.5.7 That being said, the Adopted Planning Brief clearly envisages the College site accommodating *"a mix of heights generally 2-4 storeys up to a maximum of 5 storeys in an appropriate location"*²⁷ (my emphasis) – these include the potential 'gateway' entrance to the North West corner of the adjacent Harlequins site as well as the other potential 'gateway' location 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 to or abuts existing housing then the Brief notes that it should reflect the existing scale and grain of the residential area.
- 5.5.8 The Planning Brief does not then give any guide on what precise heights might be acceptable in these 'gateway' locations or indeed elsewhere on the site. It simply notes that "the design, height and massing of the college buildings will be appropriate to their setting, function, importance and location in the townscape, so as to not negatively impact on neighbouring uses."
- 5.5.9 Additionally, **Policy DM DC4** deals with Trees and Landscaping. As well as protecting and enhancing existing trees with the use of TPOs and encouraging new planting consistent with the Council's Tree Strategy, the policy also requires proposals for new development to include landscape strategies to retain existing trees and other important landscape features where practicable and include new trees and other planting. The policy requires appropriate replacement planting consistent with the Council's Tree Strategy where trees are removed and a presumption against schemes that result in a significant loss of trees, unless replacements are proposed and there is good reason such as the health of the trees, public amenity and street scene.

²⁷ see Paragraph 6.12 to the College Planning Brief, December 2008

Design and Townscape Assessment

- 5.5.10 The Design and Access Statement contains a detailed exposition of how the design and layout of the proposed scheme responds to the local context, reflects the provisions of prevailing guidance for the site and has evolved in response to consultation. This is not repeated here.
- 5.5.11 With reference to the Illustrative Masterplan, the D&A also shows how - through the controls exercised through the Primary Control Documents - the proposed development would be capable of delivering a high quality scheme consistent with the provisions of adopted policies and guidance for the site, making optimum use of it in way that is consistent with the layout and orientation envisaged in the Briefs.
- 5.5.12 It shows how the layout, scale and massing of the detailed scheme, and the landscaping and spaces between buildings would pay appropriate regard to local townscape and, in doing so, comply with the Mayor's design as well as those of LB Richmond.
- 5.5.13 The analysis contained in the D&A is then complemented by the Townscape and Visual Impact Assessment of the ES. This conducts a systematic and detailed visual appraisal of the proposed scheme in conformity with recognised methodologies. It considers the townscape and visual impact of the development in relation to character and quality of the local townscape – including the River Crane corridor, Rosecroft Gardens Conservation Area and the Grade I Listed Church at All Hallows as well as the visual impact of the proposed development on existing views and visual amenity – both during construction and in its completed, operational state.
- 5.5.14 The details of this assessment are not repeated here but can be found in Chapter 16 of the ES. The TVIA concludes that the scheme would not have any significant adverse townscape effects or visual effects.
- 5.5.15 Although a number of moderate adverse effects are identified, these are capable of mitigation – either through the CEMP during the construction phase or through the Design Code for the detailed design of the development. The key

measures being the careful positioning of contractors' compounds during the construction phase to mitigate some short-term impact and the need for replacement planting along Marsh Farm Lane. Effects on the outlook of existing residential properties overlooking the application site are minor and, although these views are protected, the effect is capable of being mitigated with an appropriate landscape scheme.

5.5.16 Having regard to the provisions of the Primary Control Documents, the TVIA also concludes that the impact of the development on visual amenity is beneficial or generally negligible – with the exception being the outlook from habitable rooms used in the day time of residential properties on the West side of Egerton Road and from Challenge Court, where a minor adverse impact is assessed but, in the case of the former, capable of mitigation through the introduction of appropriate landscape scheme in line with the Illustrative Landscape Plan and provisions of the Design Code.

5.5.17 Overall, it is considered the proposed scheme would have a moderate beneficial effect on local townscape and have positive benefits for views along Chertsey Road and from Marsh Farm Lane.

5.6 POLICIES FOR RESIDENTIAL DEVELOPMENT

5.6.1 This sub-section considers the residential element of the proposed development. It considers the principle of residential development in this location and the relationship between the outline planning application and relevant policies for affordable housing and more detailed aspects of residential design – including housing mix, density, space standards, privacy, open space provision, etc. – in so far as they can be assessed at this time.

5.6.2 Each sub-section conducts an assessment of the proposals against relevant policies before conducting a more general assessment of the extent to which the residential element of the development complies with relevant policies found in national planning guidance and strategic and local planning policies.

(i) The Principle of Residential Development

5.6.3 The NPPF states that Councils are expected to deliver a “wide choice” of homes that offer a mix of “sizes, types and tenures” and advocates the implementation of larger scale developments, where appropriate, in order to meet local housing targets.

5.6.4 The London Plan sets out the strategic housing requirement for London and for each Borough; Table 3.1 of the Adopted Plan sets out the individual Borough targets for the next ten years; for LB Richmond this is 3,150 additional dwellings by 2025 (or 315 dwellings/annum).

5.6.5 **Policy 3.3** of the London Plan explains the need for each London Borough to increase their housing stock in order to meet future change in population and to provide Londoners with a proper choice of housing. The Policy explains that the re-use of brownfield sites, mixed use schemes and the intensification of land should be encouraged.

5.6.6 In line with this the Adopted Core Strategy reflects housing targets set out in the London Plan prior to both the Alterations adopted in October 2013 and the Further Alterations adopted in 2015. **Policy CS 19** therefore currently states

“for the ten year period between 1 April 2007 and 31 March 2017, an additional 2,700 dwellings (Alterations to the London Plan, Dec 2006), annualised as 270 dwellings per year. In the ten years from March 2017, indicative capacity is expected to be in the range of 150-330 dwellings a year. An early alteration to the target contained in this strategy will be brought forward to reflect the updated London wide Housing Capacity Study /SHLAA”

5.6.7 **Policy 14B** the Core Strategy suggests an additional 700-1100 units by 2017 in the Twickenham area.

Residential Land Use Policy Assessment

5.6.8 As explained earlier the existing site designation envisages residential development on the southern part of the existing College site. The outline proposal indicates the potential to provide up to 180 residential units in a mix of sizes and tenures that would contribute towards increasing housing supply in both Twickenham area and the Borough overall.

5.6.9 The proposals therefore make an important and positive contribution to the Borough's future housing needs. Indeed, it is noteworthy that this contribution has already been recognised in the adopted Unitary Development Plan, in the evidence base for the Core Strategy²⁸ as well as in the Council's most recent Annual Monitoring Report²⁹.

(ii) Affordable Housing

5.6.10 The NPPF states that it is a requirement that developments address the current and future housing demands of the local population. In particular, there is a requirement for these developments to provide a degree of affordable housing.

5.6.11 The London Plan states that Local Authorities must ensure there are enough homes to meet the needs of Londoners at all stages of their lives and whatever their circumstances. This is supported by **Policy 3.8**, which explains that Londoners must be able to have a choice of homes to live in that cover different sizes, price ranges and tenures. These houses should be accessible to both current and future communities.

5.6.12 **Policy 3.9** goes on to say that development must be designed to cultivate mixed and well balanced communities and to discourage segregation. This can be achieved through the incorporation of heterogeneous housing tenures, sizes and costs.

²⁸ See, for example, Local Housing Availability Assessment – February 2008

²⁹ See LB Richmond Annual Monitoring Report for 2011/12 - Table 36 and Appendix 7a

5.6.13 **Policy 3.11** explains that affordable housing in a Borough should be maximised. London wide, 182,000 affordable homes should be delivered by 2017 with a minimum annual construction of 13,200 affordable homes with particular priority being given to affordable family homes.

5.6.14 Core Strategy **Policy CP15** deals with Affordable Housing.

15.A Housing provision is expected to include a range of housing to meet the needs of all types of households. Over the LDF period the Council:

- i. expects 50% of all new units will be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing.*
- ii. expects that the affordable housing mix should reflect the need for larger social rented family units and the Sub-Regional Investment Framework requirements. The Council will seek to bring forward affordable housing through development of new units, purchase of property in or outside the borough and through rent deposit schemes.*

15.B Some form of contribution towards affordable housing will be expected on all new housing sites. The contribution towards affordable housing on sites involving new-build housing will be as follows.

- i. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development. The amount involved will be set out in the Development DPD and will be reviewed annually.*
- ii. on sites capable of ten or more units gross, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.*

5.6.15 The supporting text to this policy advises that

“Where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site”.

Affordable Housing Assessment

5.6.16 The proposal is for a total of 180 residential units – 15% of which will be affordable. It is acknowledged that this is below the requirements of the London Plan and Core Strategy Policy CP15. However, in accordance with the provisions of these policies the planning application is supported by a Viability Appraisal prepared by BNP Paribas that demonstrates that this is the maximum amount of affordable housing that can be provided on the application site.

(iii) Housing Mix

5.6.17 London Plan **Policy 3.8** states the requirements for new dwellings to provide residents with a “genuine choice of homes” in a mix of housing sizes and tenures. Family housing is defined as any unit with 3 or more bedrooms. In order to meet current demand, developments across London should prioritise affordable family units.

5.6.18 Core Strategy **Policy CP14D** deals with Housing Standards and Types. It states that

“The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities”.

5.6.19 **Policy DM HO4** also deals with Housing Mix and Standards. It states:

“Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.”

Housing Mix Assessment

5.6.20 The scheme proposes a mix of dwelling sizes – see Table 5.1

Table 5.1 – Proposed Mix of Residential Units

Type	Number	Percentage
1 Bed flat (2 Person)	45	25%
2 Bed flat/maisonette (4 Person)	81	45%
3 Bed flat/house (5 Person)	36	20%
4 Bed flat/house (6 Person)	18	10%
Total	180	100%

5.6.21 The proposal therefore provides a range of dwelling types with an emphasis on smaller units (1 and 2-bed units) to reflect the location of the site and availability of facilities nearby.

(iv) Optimising the provision of new housing

5.6.22 London Plan **Policy 3.4** states that new developments should be of a type and density that respects the capacity of the existing transport network. Larger developments should be located so as to reduce the need to travel as much as is possible. Table 3.2 of the Plan sets out the recommended sustainable densities (habitable rooms per hectare) of residential developments with regards to their

proximity to public transport. (It is important to note, as the supporting paragraph for London Plan Policy explains, the density ranges are incredibly broad and should not be applied to development “mechanistically”. Site specific factors such as housing demand, Local Area Plans, design and context must also be taken into account.)

5.6.23 Core Strategy **Policy CP14** states

“The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan consolidated with Alterations since 2004 Density Matrix and other policies will be taken into account to assess the density of proposals.”

5.6.24 The supporting text advises that

“While The London Plan consolidated with Alterations since 2004 density matrix provides general guidance, local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site”.

Housing Density Assessment

5.6.25 The density of the proposed scheme is 285 habitable rooms per hectare. For a suburban location like this with PTAL 2 this is at the upper end of the densities contained in Table 3.2 but, as the Design & Access Statement explains (and the Design Code ensures) this makes the best use of the site taking into account the site context and the development’s impact on local townscape, etc - consistent with aims of London Plan and local residential development policies.

(v) Internal Residential Space Standards

5.6.26 **Policy 3.5** of the London Plan currently outlines the design requirements put upon all new houses in London, outlining that they must be attractive and spacious and “generally conform” with the minimum space standards contained in Table 3.3 of the Plan.

5.6.27 The Council’s Residential Development Standards SPD (2010) also sets out residential space standards; these pre-date both the London Plan and Mayor’s Housing SPG and are generally less. In order to demonstrate the scheme’s potential to comply with prevailing standards the applicant has adopted the standards contained in the London Plan and has also tested the scheme against these standards.

Residential Space Standards Assessment

5.6.28 As the Design and Access Statement and the parameter plans submitted with the application show, the proposed development is capable of meeting prevailing residential space standards. This ensures that the highest quality of internal amenity is provided for future residents, contributing valuably to the Borough’s market and affordable housing stock .

(vi) Privacy and Neighbourliness

5.6.29 The Mayor’s Housing SPG states:

“In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can sometimes unnecessarily restrict density”

5.6.30 **Policy DM DC 5** of the Core Strategy deals with Neighbourliness, Sunlighting and Daylighting. It states:

“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”.

5.6.31 Neighbourliness and Privacy and spaces between buildings are also addressed in the Residential Development Standards SPD, sections 3.1 and 3.2.

Privacy and Neighbourliness Assessment

5.6.32 The Illustrative Masterplan demonstrates how the residential element of the REEC proposal is capable of achieving acceptable levels of separation between the proposed main blocks consistent with prevailing policies and, in doing so, will ensure that the proposals will not cause any adverse impact on the future living conditions of existing or future residents through overlooking.

5.6.33 Moreover, Chapter 14 of the ES also contains a detailed Assessment of the impact of the proposed development (including the Illustrative residential scheme) on Sunlight, Daylight and Overshadowing, considering the relationship between the proposed development and surrounding buildings as well as between elements of the proposed development. It concludes that the development will not have a significant adverse impact - indeed the development’s compliance with prevailing guidance is seen as “exceptional” for an urban development project of this nature.

(vii) Accessibility and Lifetime Homes

5.6.34 The London Plan Housing SPG affirms that all new developments should have 10% of new units fully wheelchair accessible. These wheelchair accessible units must be distributed across all tenures and evenly spread throughout the development. Further, all new dwellings must adhere to the criteria of Lifetime Homes. This is a view shared by Core Strategy **Policy CP14E** that states that

“All housing should be built to Lifetime Homes standards and 10% of all new housing should be to wheelchair standards”.

Accessibility and Lifetime Homes Assessment

5.6.35 As the Illustrative Masterplan demonstrates (and Design Code requires) 10% of the proposed dwellings would be designed to comply with GLA policies regarding Lifetime Homes³⁰ and would be wheelchair accessible thereby optimising the potential for flexible rearrangement to suit future trends.

(vii) Residential Amenity and Open Space

5.6.36 The NPPF recognises the role that high quality open spaces and opportunities for sport and recreation can play in promoting the health and well-being of communities. It requires local authorities to identify specific needs and deficits or surpluses of open space as well as sports and recreational facilities. Paragraph 74 states:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

³⁰ Or any ensuing Guidance

- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."*

5.6.37 The NPPF states that developments must identify and address specific needs and deficits of open space, play space, sports and recreational facilities in the local area.

5.6.38 London Plan **Policy 3.5** states that all new dwellings should take into account the relationship between density and the "provision of public, communal and open spaces". Each resident should have access to a high quality amenity space that can be used safely without the fear of crime.

5.6.39 **Policy 3.6** deals with residential schemes that are likely to house young people and children. Such schemes will be resisted where they fail to make a provision for informal recreation, open spaces and good quality, well designed and accessible play spaces. **Policy 7.18** follows on from this, stating that all developments should provide, or else make a contribution towards, an adequate and accessible level of green and open space for existing and future residents.

5.6.40 Further to the provision of accessible play and informal spaces, the Mayor's Children and Young People's Play and Informal Recreation SPG explains that, on developments featuring 10 or more units, the recommended minimum provision of play space for those developments containing children should be 10sqm per child. If facilities are to be provided offsite, then they should still be within 400 metres of the development for 5-11 year olds or within 800 metres for 12 plus age groups.

5.6.41 The Mayor's Housing SPG explains that a minimum of 5sqm private outdoor space should be provided for 1-2 person dwelling with a further 1sq. metre for every additional occupant.

5.6.42 At the local level **DM Policy DC 6** deals with Balconies and Upper Floor Terraces. It states:

“Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors. They should be:

- *Sufficiently deep to allow adequate access and circulation around furniture.*
- *preferably located next to a dining or living space*
- *preferably receive direct sunlight*
- *designed to provide some shelter and privacy to neighbouring properties, either by using screens or by setting the balcony back within the façade*
- *balustrades designed to screen stored items from view*
- *designed for security and safety*

The addition of balconies and upper floor terraces to existing properties will not generally be permitted unless the above apply and they do not adversely affect neighbourliness (see Policy DM DC 5 'Neighbourliness, Sunlighting and Daylighting')”

5.6.43 **Policy DM OS 6** deals with Public Open Space. It states:

“Public Open Space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.

New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces. Financial contributions will be required for most new developments towards the provision of, or improvements to public open space.

Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semi-private and public open space provision”.

5.6.44 **Policy DM OS 7** deals with Children’s and Young People’s Play Facilities. It states:

“Children’s and young people’s play facilities will be protected and the improvement and enhancement of existing facilities and their accessibility will be encouraged. New children’s and young people’s play facilities will be provided or existing spaces enhanced where possible, particularly in areas poorly provided with play facilities. New developments must assess the needs arising from the new development by following the benchmark standards outlined in the Mayor’s Supplementary Planning Guidance on Providing for Children and Young People’s Play and Informal Recreation. All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. Where this provision cannot be met on-site or for developments yielding less than 10 children, the Council will seek an equivalent financial contribution to fund off-site provision”.

5.6.45 The Council’s Residential Development Standards SPD provides detailed guidance and states

“Sufficient on site outdoor amenity space must be provided in new residential developments. To provide adequate private amenity space, the Council will encourage a minimum of 5 sq. m of private outdoor space for 1-2 person dwellings plus an extra 1 sq. m should be provided for each additional occupant..... Ground level family units (of 3 or more bedrooms) within a block of flats should have larger private amenity spaces. Flats at upper levels may share a community garden and have a private balcony area, if of an acceptable design. In subdivided buildings, useable and accessible private outdoor space should be provided for as many new units as possible”.

Residential Amenity and Open Space Assessment

- 5.6.46 Chapter 5 of the ES sets out the detailed calculations of private outdoor space, shared amenity space and playspace. This clearly demonstrates that – based on the Illustrative Masterplan – the scheme is capable of exceeding all minimum requirements of prevailing policies.
- 5.6.47 Although a different layout could, of course, be proposed by the developer of the residential scheme it would still need to comply with the relevant planning guidance as well as the Design Code. Given the level of private and communal amenity space that can be provided, and the need for any development to provide playspace in accordance with adopted standards, the proposed development is likely to be self-sufficient and will not lead to additional pressure on existing facilities in the locality. (The impact of the proposed residential development on existing recreational facilities in the area has already been discussed in Section 5.4).

Overview of residential policy assessment

- 5.6.48 The development of part of the application site for new housing is consistent with adopted policies and supplementary planning guidance for the College site. This element of the proposed scheme would clearly assist housing supply in the Twickenham area and the Borough overall and make an important, and positive, contribution to the Borough's future housing needs consistent with both strategic and local policies.
- 5.6.49 Although the costs associated with the College redevelopment scheme mean that the residential element is unable to completely fulfil policy requirements in relation to affordable housing, the viability assessment demonstrates that what is being provided is the maximum possible in the circumstances. Any requirement to provide a greater proportion of affordable housing on the application site is likely to undermine the viability of the redevelopment project and, in doing so, jeopardise the delivery of much-needed education and community facilities consistent with adopted policy for the site.

5.6.50 Although the outline nature of the application means that a detailed assessment of the residential scheme's compliance with detailed residential design policies cannot be completed at this stage, the Illustrative Masterplan clearly demonstrates how the residential part of the site can accommodate the proposed number and mix of units proposed and the corresponding density is compliant with policy seeking to make the best use of available land. It also shows how the scheme would be able to fulfil requirements in terms of amenity and playspace. The Primary Control Documents – and, in particular, the Design Code – would then ensure that, if permission were granted, applications for Reserved Matters on the residential part would need to comply with these detailed residential design requirements.

5.7 ENERGY AND SUSTAINABILITY

5.7.1 The Mayor's policies on climate change are set out in Chapter 5 of the Plan. They collectively require new development to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy. The policies of the London Plan set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change.

5.7.2 **Policies 5.1** and **5.2** seek to achieve an overall reduction in London's carbon dioxide emissions through a range of measures including using less energy, supplying energy efficiently and using renewable energy.

5.7.3 Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's 'energy hierarchy' – namely:

“..by being lean (using less energy); being clean (supply energy efficiently); and being green (using renewable energy). As a minimum, new development proposals should meet the Mayor's targets for carbon dioxide emissions reduction in buildings – expressed as minimum improvements over the Target Emission Rate (TER). For residential

development this requires new development to improve on Building Regulations targets by 40% between 2013 – 2016.”

5.7.4 The first step in the Mayor’s energy hierarchy - to reduce energy demand - should be met through adopting the sustainable design principles outlined in **Policy 5.3** – this states:

- “B. 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.*
- C. Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance on Sustainable Design and Construction and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve the following sustainable design principles:*
 - (a) Minimising carbon dioxide emissions across the site, including the building and services (such as heating and cooling systems)*
 - (b) avoiding internal overheating and contributing to the urban heat island effect*
 - (c) efficient use of natural resources, including making the most of natural systems both within and around buildings*
 - (d) avoiding pollution (including noise, air and urban runoff)*
 - (e) minimising the generation of waste and maximising reuse or recycling*
 - (f) avoiding impacts from natural hazards (such as flooding)*
 - (g) ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions*
 - (h) securing sustainable procurement of materials, using local supplies where feasible, and*
 - (i) promoting and protecting biodiversity and green infrastructure”*

5.7.5 The second step, to supply energy efficiently, should be met by prioritising decentralised energy, as outlined in **Policies 5.5 and 5.6**. The third step, to use renewable energy, is outlined in **Policy 5.7** that requires major development proposals to provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where this is feasible.

5.7.6 **Policies 5.9 to 5.19** set out the Mayor’s policies in respect of climate change adaptation and decentralised energy systems, including low carbon and renewable energy; these are not reproduced in full here but include:

- Reduce the impact of urban heat island effect and avoid overheating and excessive heat generation (**Policy 5.9**);
- Green Roofs (and walls) and Development Site Environs (**Policy 5.11**);
- Flood risk management (**Policy 5.12**);
- Sustainable Drainage (**Policy 5.13**);
- Water Quality and Sewerage Infrastructure (**Policy 5.14**);
- Water Use and Supplies (**Policy 5.15**); and
- Construction, excavation and demolition waste (**Policy 5.18**).

5.7.7 At the local level, Core Strategy **Policy CP 1** deals with 'Sustainable Construction' and states:

"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".

5.7.8 Development Management **Policy SD1** also deals with 'Sustainable Construction'; it states:

"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.

New homes will be required to meet or exceed requirements of the Code for Sustainable Homes Level 3. 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 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”.

This policy is supported by the Councils Sustainable Construction Checklist SPD.

5.7.9 Policy DM SD 5 deals with Living Roofs. It states:

“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”.

Energy and Sustainability Policy Assessment

5.7.10 In accordance with the requirements of London Plan **Policy 5.2** and related guidance the application is supported by an Energy Assessment prepared by NDY.

5.7.11 Using thermal modelling of the concept design the Assessment envisages the incorporation of the following energy efficiency measures in the detailed scheme design:

- High performance facade balancing natural day lighting with minimum heat gains and losses;
- Low air permeability rates;

- High efficiency LED lighting with daylight linked dimming, zone and timer control;
- Air source heat pumps with high seasonal efficiency;
- High efficiency condensing boilers;
- Heat recovery on fresh air ventilation units

5.7.12 The Assessment also considers the feasibility of a range of renewable technologies. It concludes that the provision of an extensive series of energy conservation, energy efficiency measures and use of air source heat pumps and solar thermal, would be the most effective method of achieving the required reduction in carbon dioxide emissions over and above Part L (2013).

5.7.13 Based on the proposed building massing NDY's preliminary calculations indicate that the following CO₂ emission reductions could be targeted:

- Notional buildings - 1546 tonnes/annum;
- Lean buildings - 1307 tonnes/annum or 15.5 % reduction from notional
- Lean and clean buildings -1307 tonnes/annum or 15.5 % reduction from notional
- Lean, clean and green building - 1052 tonnes/annum or 32.0 % reduction from notional

5.7.14 There is also some scope for further reductions through the use of PV cells, although the available roof area is anticipated to be limited due to solar hot water heaters occupying a significant part of the available roof area.

5.7.15 The above figures indicate that compliance with items 4 and 5 of the Borough of Richmond upon Thames Sustainable Construction Checklist (see below) is achievable in that there is a 15.5% CO₂ emissions reduction due to design of the buildings and their services for minimum energy use (lean building) and a further 16.5% reduction due to use of on-site renewable energy (lean, clean and green building).

5.7.16 Overall a 32% reduction in CO₂ emissions compared to notional values appears achievable based on the concept design. It is acknowledged that this does not

fully accord with the current GLA target, but it is envisaged that further enhancements could be achieved at the detailed design stage in order to achieve the GLA target of 35% CO₂ emission reductions.

5.7.17 The application is also supported by a comprehensive Sustainability Statement (including a Sustainability Checklist) prepared by Cascade Consulting.

5.7.18 The Statement takes prevailing policies for sustainable development outlined above as a benchmark and assesses the application proposals against them under a series of nine sustainability themes. Additional themes are also included to cover transport, historic environment and economic development policies in order to reflect their inclusion as major policy headings in the NPPF. The 12 main sustainable development policy themes forming the basis of the assessment are as follows:

- Land use;
- Housing, living spaces and social infrastructure;
- Conservation of energy, materials and water resources;
- Maximising the use of natural systems;
- Reducing the impacts of noise, pollution and flooding;
- Promoting health and well-being;
- Conservation and enhancement of the natural environment and biodiversity;
- Sustainable waste management;
- Sustainable construction;
- Sustainable transport;
- Conserving of the local character and enhancing the historic environment;
and
- Economic development.

5.7.19 For brevity's sake the Assessment is not repeated here. It demonstrates that proposed redevelopment scheme largely complies with, or is supportive of, the identified policies. It does, however, identify that the enclosure of the existing College playing fields and the diminished opportunity to use this space for informal recreation by the community means there is not full compliance with London Plan Policy 7.17, DM OS 2 and the Crane Valley Planning Guidelines, although this can be offset with a financial contribution towards restoration of the River Crane as is proposed.

5.8 TRANSPORT, ACCESSIBILITY AND PARKING

5.8.1 The NPPF affirms that new developments should relate to existing sustainable transport hubs. It states that schemes generating "significant movement" should be located as such, to minimise car use and maximise sustainable modes of transport.

5.8.2 London Plan **Policy 6.1** encourages the integration of transport and development, stating that schemes should be located as such to reduce the need to travel, particularly by car, and should overall, improve the accessibility of public transport, walking and cycling.

5.8.3 As part of the overall strategy set out in **Policy 6.1**, specific policies seek to ensure:

- That the impacts of proposed developments are properly assessed and applications include workplace travel plans in accordance with relevant guidance, together with construction logistics plans and delivery and servicing plans (**Policy 6.3**);
- adequate facilities for: cyclists at new developments (**Policy 6.9**);
- the safety and quality of pedestrian environments at new development (**Policy 6.10**);
- adequate parking – together with the provision of electrical charging facilities, and disabled parking, delivery and servicing (**Policy 6.13**). It stresses that at new development there must be measures in place to prevent a reliance on cars where cycles or public transport could be used instead and parking provision must be proportional to the PTAL rating of a development. (In April 2015 the Mayor launched consultation on minor

amendments to this Policy recognising the opportunity to adopt a more flexible approach in Outer London and encouraging a more generous approach for housing development in areas with low public transport accessibility and taking into account current and projected pressures for on-street parking and associated impact on all road users.)

5.8.4 The London Plan Housing Guidance SPG provides guidance on the number of parking spaces required per habitable room, in relation to PTAL rating. In an area with a PTAL of 2-4, up to one space should be provided per unit with two or less beds and up to 1.5 spaces should be provided for units with 3 or more beds.

5.8.5 At the local level **Policy DM TP 2** deals with Transport and New Development. It states:

“The impact of new development on the transport network will be assessed against other plan policies and transport standards. All planning applications for major developments should be accompanied by a Transport Assessment.... Matters to be included are set out in DoT/TfL guidance. Developers should also take account of the Council’s SPD on Transport Standards”.

5.8.6 **Policy DM TP 8** deals with Off Street Parking - Retention and New Provision. It states:

“Developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. A set of maximum car parking standards and minimum cycle parking standards are set out in Appendix Four - Parking Standards 'Appendix Four - Parking Standards' for all types of development, these take into account bus, rail and tube accessibility as well as local highway and traffic conditions including demand for on-street parking. These standards will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking.”

5.8.7 Appendix 4 of the Development Management DPD sets out the Council's Parking Standards. The standards for residential development are set out in this Appendix and vary slightly from those contained in the London Plan.

Transport, Accessibility and Parking Assessment

5.8.8 In accordance with policy requirements the application is accompanied by a comprehensive Transport Impact Assessment prepared by TPP. The TIA also includes a site-wide Travel Plan Framework for the proposed development to reduce dependence on the private car and promote use of more sustainable modes – amongst students and staff at the College and schools, amongst residents and others. If consent is granted, this Framework Plan will be used to ensure that each element of the College development submits and then implements a travel plan consistent with the Framework's aims, objectives and targets.

5.8.9 With regard to traffic the TIA uses an array of surveys and recognised methodologies to establish prevailing traffic conditions in the area. In consultation with the Council, TfL and local stakeholders, TPP has then undertaken a detailed assessment of the impact of the proposed development on the road network and nearby on-street parking as well as on existing footways, the bus network and the rail network. This assessment has considered the potential cumulative impacts of the College proposals taking into account the developments currently taking place on the site of the former Royal Mail sorting office and the proposed redevelopment of Twickenham Station. The TIA also considered the potential transport impacts during construction and this has informed the proposed CEMP for the development that is included in the ES.

5.8.10 The proposed development brings forward a number of road improvements – most notably the upgrading of the A316 Chertsey Road / Langhorn Drive junction from a simple left in / left out junction, to a fully signal controlled left in / left and right out junction. Whilst this improvement is not considered necessary to provide mitigation of the transport effects of the development, its delivery as part of the College redevelopment scheme provides a number of important transport and environmental benefits – namely;

- It avoids vehicles exiting Langhorn Drive from having to complete a 3.7Km round trip to same point on the A316 when wishing to travel eastbound.

This in turn will release capacity at the A316 Chertsey Road / B358 Hospital Bridge Road signal controlled roundabout;

- It will provide at grade pedestrian crossings over the A316 and Langhorn Drive to provide a direct and safe crossing point from areas to the north of the A316 including the bus stops on Whitton Road and London Underground stations to the north of the development site; and
- It removes the need for the proposed residential site to use the Heatham Estate for vehicular access. As a result of the proposed development, the only vehicular traffic using the Heatham Estate will be cars and vans using the SEN School and some of the drop off and pick up car trips from the Secondary School. All other vehicular traffic accessing the site, including HGVs, will do so via Langhorn Drive.

5.8.11 The TIA demonstrates that all road links and junctions operate within capacity following development - taking into account cumulative development traffic as well as projected growth expected by the proposed year of opening in 2019 and for the future year of 2034. As a result the impact of the proposed development on the road network is expected to be negligible.

5.8.12 Car parking at the proposed development reflect local standards and existing CPZs around the site will prevent unauthorised parking on local roads. However, because of the improvements to links from north of the A316 and the absence of a daily CPZ in this area, funds will be made available through the proposed Section 106 agreement to undertake a study to extend the existing matchday CPZ in this area if deemed appropriate.

5.8.13 The development will also lead to the upgrade of the existing cycle/footway along Marsh Farm Lane. This, together with the proposed link through the Twickenham Rough being brought as part of the former Post Office sorting office site redevelopment, will provide a high quality desirable pedestrian and cycle route to Twickenham Station, the bus stops near it and to Twickenham town centre for users of the new college, schools, Tech Hub and residential site as well as the wider community.

5.8.14 These improvements to existing pedestrian and cycle infrastructure will – in combination with other planned improvements in the area - encourage future users and residents on the application site to use more sustainable modes of

travel to access the site and local area consistent with the policies for the College site and area more generally.

- 5.8.15 The encouragement of use of public transport means that the proposed development has the potential to increase the number of bus users. Initial discussions have taken place with TfL to develop bus service frequency improvements to accommodate this additional demand and, if required, funding can be provided to improve services where relevant through the proposed S106 agreement.

6.0 CIL AND SECTION 106

- 6.1 The College, Secondary School and SEN School elements of the development would not be liable to either the Mayor's or Council's Community Infrastructure Levy (CIL).
- 6.2 However, the applicant recognises that the Tech Hub and residential elements of the development would be liable. Calculations of the Mayoral CIL liability is based on the precise 'net chargeable area,' i.e. the gross internal floorspace being applied for less the gross internal area of any development on the land when permission is granted less any building³¹ that is to be demolished as a result of the proposals. Because this is an outline application, the precise 'net chargeable area' for CIL calculations cannot be confirmed at this time. It is however recognised that the Tech Hub and residential elements would incur a Mayoral CIL charge of £50/sq metre.
- 6.3 Additionally, in accordance with the Borough's CIL Charging Schedule, the private residential element of the final development scheme would also be liable to the lower band charge of £250/sq metre.
- 6.4 Finally, **Appendix 5** contains a preliminary Draft of the Heads of Terms on behalf of the applicant that endeavours to capture the array of potential obligations that may be required to ensure policy compliance and/or mitigation of possible effects identified in the ES or other documentation accompanying the application. It is envisaged that this would form the basis of more detailed discussions on the legal agreement(s) the applicant may be required to enter into should the Council be minded to resolve to grant planning permission for the proposed development.

³¹ For the purpose of the Regulations such a 'building' is defined as in use if it "contains a part that has been in lawful use for a continuous period of at least six months within the period of 3 years ending on the day planning permission first permits the chargeable development."

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This Statement has described the application site, the surrounding area and explained the background to the proposals. It has outlined the planning policy context at national, strategic and local level within which the application proposals should be considered.
- 7.2 First and foremost it must be recognised that the principle of redevelopment for a mix of education and recreational uses funded by a residential development scheme is entirely consistent with long-established and adopted policy for the College site. These principles are not only included in adopted Policy T29 but also in two Planning Briefs for the College site.
- 7.3 Furthermore the principle of improving existing College facilities, providing a new Secondary School, replacement SEN School together with related recreational facilities all accord with national, strategic and local policies to enhance and improve much needed social infrastructure in the face of rising demand.
- 7.4 Although the existing playing fields south of the A316 are lost as a result of the development, this has always been envisaged in adopted policy. Moreover, the loss of the pitch here will not, in itself, create a deficiency in playing field provision. Furthermore, it is more than compensated for with the improvement of existing pitch facilities south of Craneford Way, the provision of new all-weather facilities as part of the wider redevelopment and also the enhancement of community access to facilities for sport and recreation on the College site.
- 7.5 In accordance with requirements of adopted policy for the College redevelopment, a careful assessment has been undertaken of the environmental impact of the development. This has clearly demonstrated that, with appropriate mitigation, the proposed development will not have any significant environmental effects.
- 7.6 With regard to the proposed housing development, it not only provides funding to facilitate the delivery of the College redevelopment, but also helps to deliver new homes as well as an element of affordable housing. It has also been shown how, through the Design Code, appropriate controls can be placed on the detailed

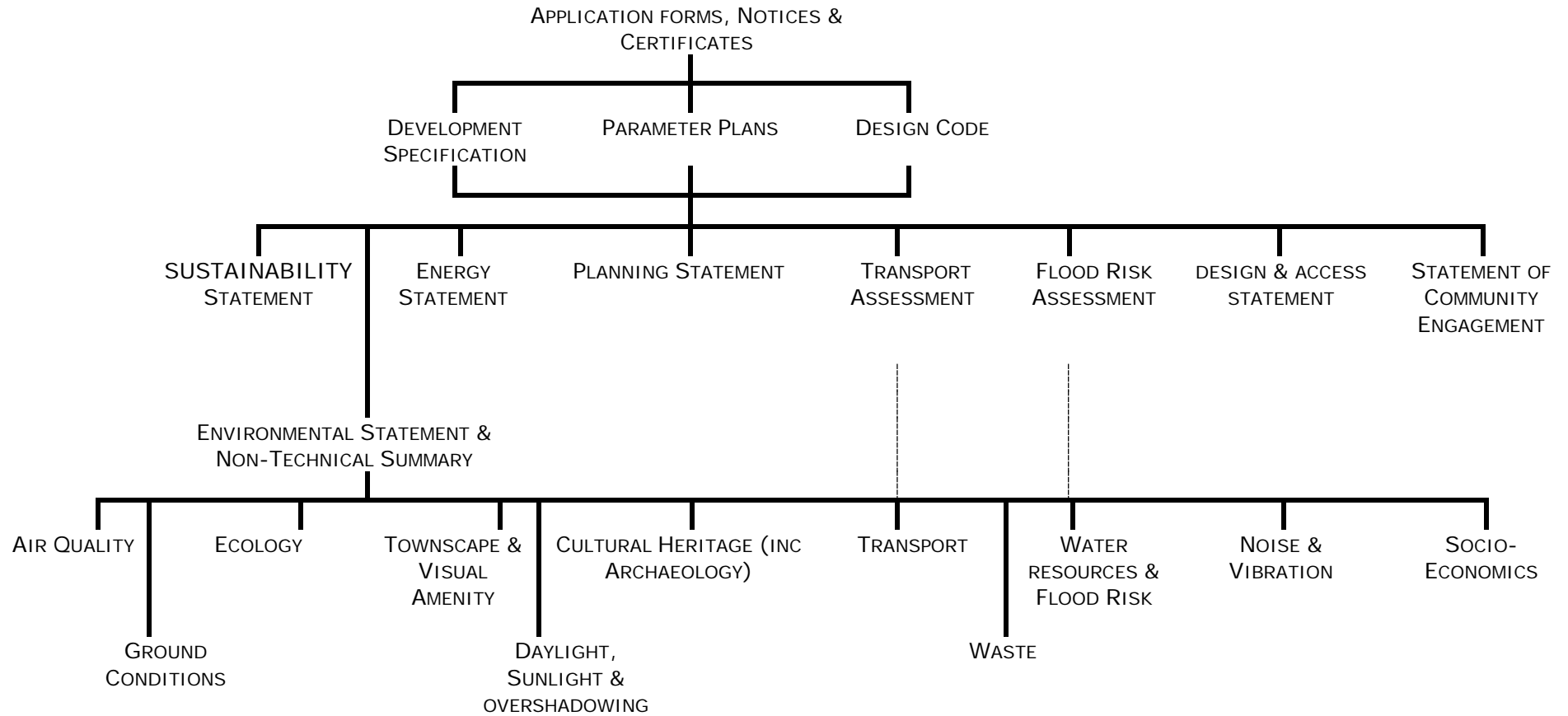
design of the residential scheme to ensure it meets all relevant residential design policy requirements.

7.7 The proposals are also capable of meeting energy and sustainability policies and would be accessible by a choice of means of transport.

7.8 On this basis, and subject of course to appropriate conditions and obligations, it is recommended that outline consent consistent with the provisions contained in the 'Primary Control Documents' should be granted.

APPENDIX 1

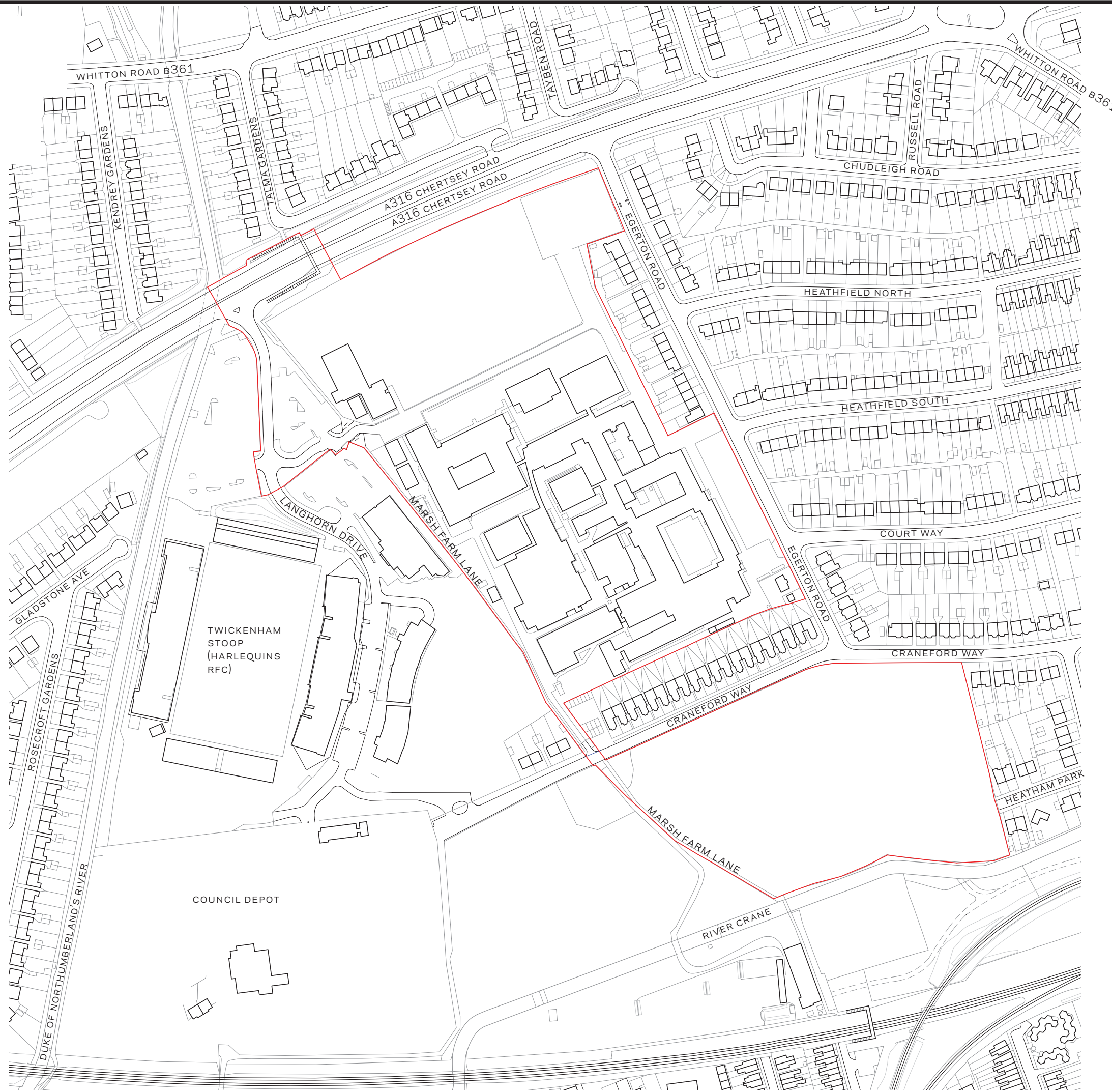
STRUCTURE OF PLANNING APPLICATION



APPENDIX 2
SITE LOCATION PLAN

KEY TO DRAWING

- APPLICATION SITE BOUNDARY
- EXISTING BUILDINGS



Project
REEC Richmond Education & Enterprise Campus

Prepared for
Richmond-upon-Thames College

Client Location
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Red Line based on 3Sixty Measurement's Topographic Survey
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No.	Description	Date
-	OPA SUBMISSION	2015.06.15

Drawn by: **æ** Reviewed by: **AA**
 Scale: **1:2500 @ A3**
 Project No: **12.33036**

Sheet Title:
Site Location Plan

Original drawing is A3. Do not scale this drawing.
 Sheet Number:
PL-01

APPENDIX 3

RICHMOND UPON THAMES COLLEGE – PLANNING HISTORY

Richmond upon Thames College

Planning Statement

Appendix 3 - Planning History

1. Larger Developments

Application Number	Status	Proposal
03/2642/FUL	granted permission 13/10/2003	Extension of workshop - erection of a steel, portal framed building with a 10 degree roof pitch
03/2239/FUL	granted permission 13/08/2003	Extension of canopy/roof of existing courtyard and removal of existing canopy roofs
94/2210/FUL	granted permission 14/10/1994	Erection of a Quiet Study Area
94/1108/FUL	granted permission 23/06/1994	Erection of children's crèche, erection of two quiet study areas and erection of bricklaying and construction block
94/0912/FUL	granted permission 16/06/1994	Erection of a three-storey teaching block
92/1064/FUL	granted permission 15/07/1992	Erection of single-storey extension to south side of quadrangle within 'd' block
90/1883/FUL	granted permission 13/12/1990	Construction of new single-storey extension to provide additional study facilities
84/0248	granted permission 16/04/1984	Erection of a double garage for motor vehicle maintenance.
83/0897	granted permission 10/10/1983	Erection of a double garage for motor vehicle maintenance
79/1538	granted permission 11/01/1980	Erection of a 3 storey extension to College building to provide an additional teaching block
79/0833	granted permission 21/08/1979	Erection of a single storey administration block
78/0799	granted permission 24/11/1978	Erection of a single storey music facility building
78/0798	granted permission 12/10/1978	Erection of a sports hall with single storey changing rooms annex
77/0135	granted permission 09/03/1977	Erection of single storey classroom unit
80/1652	granted permission 12/03/1981	Erection of single storey extensions to kitchen building
76/1264	granted permission 21/01/1977	Erection of single storey classroom unit
85/0669	granted permission 25/07/1985	Construction of extension to brickwork shop to house mixer
79/0832	granted permission 21/08/1979	Erection of a part two-storey, part three-storey extension to existing College building to provide an additional teaching block
76/1265	granted permission 21/01/1977	Erection of single storey classroom unit

2. Temporary Developments

Application Number	Status	Proposal
12/0548/FUL	granted permission 01/06/2012	Temporary change in the use of rugby pitch (north of college) to camping and shower/toilet facilities during the 2012 Olympics
11/1098/FUL	granted permission 20/05/2011	Installation of 20 cycle stands under one bank of four shelters
09/0400/NMA	granted permission 27/11/2009	Erection of a prefabricated modular building for teaching. 2 classrooms, 2 stores and a lobby
09/1682/FUL	granted permission 06/10/2009	Use of land for siting of corporate hospitality tents for a period of 5 years
09/0400/FUL	granted permission 27/04/2009	Erection of prefabricated modular building for teaching. 2 classrooms, 2 stores and a lobby
05/2432/FUL	granted permission 29/09/2005	Erection of temporary brick building to provide enhanced teaching/learning facilities for the college's construction crafts department. Roof and external brickwork will be continually rebuilt
04/0292/FUL	granted permission 06/09/2004	Proposed use of land for siting of corporate hospitality tents for a period of 5 years
02/2547	granted permission 14/11/2002	Erection of interconnecting Portakabin 'ultima' units to form additional classroom accommodation
02/2548	granted permission 14/11/2002	Erection of three interconnecting Portakabin 'titan' office units to form additional office accommodation within existing site boundaries
01/2469	granted permission 30/07/2002	Use of land for siting of corporate hospitality tents
99/1449	withdrawn by the applicant 01/10/1999	Use of land for A) for not more than 28 days in total in any Calendar year for the purpose of erecting temporary hospitality tents in connection with events at the rugby football union stadium, B) additional use during 1999
99/1398	granted permission 05/08/1999	Mixed use comprising A) Playing fields in connection with Richmond College. B) hospitality tents in connection with events at the nearby Rugby Football Union stadium.
97/2359	refused permission 15/12/1998	Continued use for temporary erection of marquees for hospitality use for up to ten occasions per year
96/3166/FUL	granted permission 08/05/1997	Temporary retention of two demountable classroom units and permanent retention of five security huts
91/1809/FUL	granted permission 10/02/1992	Erection of temporary classroom
90/1429/FUL	granted permission 22/04/1991	Retention of three demountable classrooms
90/0351/FUL	unknown - historic data no records 12/04/1990	Use of two car parks adjacent to Chertsey Road for up to 5 car boot sales a year on Saturdays and Sundays
90/0310/FUL	unknown - historic data no records 05/04/1990	Retention of three no. temporary classrooms and one no. garage

89/1862/FUL	unknown - historic data no records 27/10/1989	Retention of two no. temporary double dismountable classroom units
89/0781/FUL	Unknown - historic data no records 26/05/1989	Erection of two double demountable classrooms
89/0605/FUL	Unknown - historic data no records 03/05/1989	Erection of two double demountable classroom units
80/0966	granted permission 24/11/1980	Retention of seven re-locatable classroom units fronting Eggerton Road.
78/0779	granted permission 12/10/1978	Repositioning of three existing temporary classroom buildings and erection of a new temporary classroom extension
77/0381	granted permission 07/07/1977	Erection of seven re-locatable classroom units fronting Eggerton Road
77/0370	granted permission 24/06/1977	Erection of 6 temporary classrooms

3. Miscellaneous/Other

Application Number	Status	Proposal
12/1023/ADV	granted permission 08/06/2012	Application to display adverts – PVC banners 5 months per year
05/0999/FUL	granted permission 07/07/2005	Proposed extension to existing building to provide a personal care room for disabled persons
03/0214/FUL	granted permission 26/02/2003	Increase in height of front boundary fence by means of steel extension pieces and straining cables
02/3649	granted permission 27/01/2003	Erection of a 21 metre monopole supporting six sectored and three omnidirectional antennae. Plus equipment cabins and meter cabinets
02/1546	granted permission 01/10/2002	Installation of 3 no. omni antennae and 1 no. GPS antennae and external cabinet for emergency services
00/3368	decided as no objection raised 28/12/2000	Proposed BT Cellnet rooftop telecommunications installation
00/1678	granted permission 01/08/2000	Removal of external cabinets and replacement with single 3f cabin. Replacement dishes and replacement and additional antenna and heat management units
98/0624	granted permission 18/08/1998	Erection of non-illuminated hoarding facing A316
97/1907	decided as no objection raised 24/04/1998	Alteration to existing telecommunications apparatus
94/1629/FUL	granted permission 08/08/1994	Replacement of existing windows
12/1023/ADV	granted permission 08/11/1993	Erection of 4 no. non-illuminating free-standing signs
91/1005/CON	permitted development 25/07/1991	Installation of a radio base station
90/0227/FUL	unknown - historic data no records 26/03/1990	Re-instatement of tennis courts and erection of wire mesh fence around courts
89/1429/FUL	granted permission 25/08/1989	Erection of 1.5 metre diameter satellite dish and 1.75 metre aerial mast to flat roof
85/1180	granted permission 02/12/1985	Change of use of part of ground floor from Educational to Radio Studio use. Erection of transmitter aerial on tower roof
84/0994	granted permission 25/10/1984	Alterations and addition to buildings to provide student social areas

APPENDIX 4

**ADVICE RECEIVED FROM LEADING COUNSEL ON OUTLINE
PLANNING APPLICATION AND EIA PROCESS**

IN THE MATTER OF
RICHMOND UPON THAMES COLLEGE RE-DEVELOPMENT

ADVICE

Introduction

1. Richmond upon Thames College (“the College”), together with some development partners, intends to seek planning permission for a major re-development of its existing site at Egerton Road, Twickenham (“the site”). The proposed re-development comprises a multi-use and multi-phase scheme which will probably be delivered by different parties over a number of years. Planning permission is to be sought in outline form. The scheme comprises Environmental Impact Development (“EIAD”) and requires an Environmental Statement (“ES”) setting out the likely significant environmental impacts of the proposal.
2. This Advice deals with the concerns expressed by the local planning authority, LB Richmond on Thames (“the Council”) as to the way that the outline planning permission sought relates to the ES for the scheme.

Basic legal issues

3. Planning permission in outline form is in principle consistent with EIAD: *R v Rochdale MBC ex p Tew*[2000] Env LR 1; *R v Rochdale MBC ex p Milne (No 2)* [2001] Env LR 22. The key is to ensure that any flexibility required in the permission is constrained by clearly-established parameters and then assessed. In *ex p Milne (No 2)*, Sullivan J said this:

“If a particular kind of project, such as an industrial estate development project (or perhaps an urban development project) is, by its very nature, not fixed at the outset, but is expected to evolve over a number of years depending on market demand, there is no reason why a ‘description of development’ for the purposes of the [EIA] Directive should not recognise that reality. What is important is that the environmental assessment process should then take full account at the outset of the implications for the environment of this need for an element of flexibility. The assessment process may well be easier in the case of projects that are ‘fixed’ in every detail from outset, but the difficulty of assessing projects that do require a degree of flexibility is not a reason for frustrating their implementation. It is for the authority responsible for granting the development consent ... to decide whether the difficulties and uncertainties are such that the proposed degree of flexibility is not acceptable in terms of its potential effect on the environment.

...

Provided the outline application has acknowledged the need for details of a project to evolve over a number of years, within clearly defined parameters, provided the environmental assessment has taken account of the need for evolution, within those parameters, and reflected the likely significant effects of such a flexible project in the environmental statement, and provided the local planning authority in granting outline planning permission imposes conditions to ensure that the process of evolution keeps within the parameters applied for and assessed, it is not accurate to equate the approval of reserved matters with *modifications* to the project. The project, as it evolves with the benefit of approvals of reserved matters, remains the same as the project that was assessed.”

4. The *ex p Milne (No 2)* judgment also confirms that

“[t]he assessment may conclude that a particular effect may fall within a fairly wide range. In assessing the ‘likely’ effects, it is entirely consistent with the objectives of the directive to adopt a cautious “worst case” approach. Such an approach will then feed through into the mitigation measures envisaged under paragraph 2(c) [of the directive]. It is important that they should be adequate to deal with the worst case, in order to optimise the effects of the development on the environment.”

5. It is also acceptable in principle for environmental effects which cannot be assessed at the outline stage to be assessed at the reserved matters stage. In *R(Barker) v Bromley LBC* [2007] 1 AC 470. As a result, changes were made to the UK EIA regulations, in the form of reg 9 to the 2011 EIA Regulations. However, the House of Lords made it clear in *Barker* that such later EIA is only applicable either where “the need for an

EIA was overlooked at the outline stage” or where “because a detailed description of the proposal to the extent necessary to obtain approval of reserved matters has revealed that the development may have significant effects on the environment that were not anticipated earlier.”

The issues in this case

6. The scheme of re-development proposed for the site involves the phased demolition and re-provision of educational facilities, and the development of business and residential units. The timespan of the development itself, were it to proceed as currently predicted, is some seven years (from 2015 to 2022, according to paragraph 2.4.4 of the scheme’s *EIA Scoping Report*, July 2014, although this is subject to a caveat in paragraph 3.3 of the document).
7. There are several development ‘parcels’, which are intended to be brought forward at the detailed stage by different developers or end-users; these comprise the Haymarket Technology Hub, the Schools, the main College building(s), and the residential area. So, in addition to a lengthy period of development, there is the possibility – indeed likelihood – of the scheme evolving to some degree after the grant of outline permission.
8. The four different parcels are currently intended to be ‘phased’ (see paragraphs 2.23 to 2.38 of the draft *Development Specification* document of November 2014) as follows:
 - (1) Phase 1 – preparation and then development of main College buildings, Gateway building, Lifestyle building, Sports Hall, Secondary School and Clarendon School – Months 1 to 21
 - (2) Phase 2 – Months 18 to 36 – preparation and then development of final College buildings and Technology hub. Start of the residential development

- (3) Phase 3 - completion of all College and school development [although the *Development Specification* draft at paragraph 2.37 and Table 1 are ambiguous, in the sense that “[a]ll College and school development is concluded by this phase” could mean ‘before the start of this phase’ or ‘by means of this phase’]. Residential development is completed.
9. Subject to the ambiguity observed above, and which in my view should be clarified, it would appear that the different developers of the College and School buildings are developing in Phases 1 and 2 (and perhaps 3); the Tech Hub is developed in Phase 2 only; and residential development is developed in Phases 2 and 3. The development of the different areas or zones within the site is therefore programmed to take place not in strict sequence, but to some extent in overlapping sections.
10. Unless the submission of reserved matters and commencement of development for the different phases or uses are the subject of conditions, it would be possible for reserved matters approvals to be obtained either all at once, or at a variety of different times. This makes assessing the impacts of the construction phase more difficult.
11. There is a draft *Parameter Plan* for each area of the site. These are referred to in the draft *Development Specification* at section 3. These divide the overall site up into:
- (1) The College Development Zone;
 - (2) The College Fields Development Zone;
 - (3) The Tech Hub Development Zone;
 - (4) The Secondary School Development Zone;
 - (5) The Special Education Needs School Development Zone; and
 - (6) The Residential Development Zone;
12. As I understand it, Zones 1 and 2 correlate to Phases 1 and 2; Zone 3 to Phase 2 only; Zones 4 and 5 to Phase 1, and Zone 6 to Phases 2 and 3.

Analysis

13. Before turning to specific questions posed in my instructions, I would make the following overall observations:

- (1) There seems to me to be little reason, having looked at the proposed uses, for huge uncertainty over the likely format or scope of the final scheme that comes forward, if one assumes the mix of uses (and users) currently involved. Although the permission is not sought on a ‘personal’ basis, restricted to those users (the College, Haymarket, etc), there is an operational assessment of the educational elements which is unlikely to change much if the overall project remains in place. Plainly, if there is a radical re-think of the educational provision (either College or schools), then the emerging scheme will simply not relate to the outline which is currently sought and a fresh permission (either outline or full) would have to be obtained. I do not consider that it is necessary to split the scheme into 2 outline planning permissions as suggested at point (D) of the email from Chris Tankard of the Council on 6 November 2014. Although that might simplify the issue of zones and conditions, the ES for both notional permissions would have to cover the entire scheme to avoid the charge of project-splitting and to assess cumulative impact.
- (2) There may be more room for doubt over the Haymarket technology hub – its development seems to be tied to a particular commercial operator, which might for some reason change its requirements. The residential development is unlikely to change in principle.
- (3) It follows that there should be no insuperable difficulty in assessing the likely significant environmental effects of this overall scheme, in line with the case law. Reliance on later ES at the reserved matters stage should not, in my view, form part of any ‘strategy’ – it would be very much a last resort if things turned out markedly different from how they are envisaged today.
- (4) The basic shape of the permission ought to be:

- (a) Description of development as proposed (see *Development Specification* draft, paragraph 3.2), accompanied by a schedule of the proposed uses with floorspace maxima (see paragraph 3.3).
- (b) Parameter Plans as proposed.
- (c) Conditions requiring the reserved matters applications to be made by a certain date or dates, depending on the Phase or Zone to which they relate (see below), and to be in broad or general conformity with the (i) Parameter Plans, (ii) Development Specification; and (iii) the design code.

Question 1

14. As indicated above, I consider that the combination of Development Specification, Parameter Plans and Design Code is in principle capable of providing sufficient information on the scheme to enable its lawful EIA without unduly compromising the necessary flexibility.

Question 2

15. The only real weakness in the draft documents I have seen is the ambiguity/lack of clarity over the exact relationship between the Zones and their development, and the Phasing (see above, paragraph 8(3) in particular). I see the general caveat that these details will be progressed, but plainly there needs to be greater clarity before the ES can be written. In addition, the phasing needs to be crystal clear if it is to be referred to in a condition.
16. In addition, the residential parameter plan (SK-143 A) is very much worst case, in that it assesses the residential area as a notional block of development 153 metres long, 75 metres wide and between 4 and 20 metres high. Given that the usual form of parameter condition requires the reserved matters applications to come forward in a

form which is broadly in accordance with the parameter plans, I have some concern that, by attempting to allow maximum flexibility, the parameter might be misunderstood as sanctioning a form of development which would be unacceptable in design or townscape terms. However, it is clearer from other parameter plans, for instance the open space plan (SK-126 A) that the residential area is to “incorporate residential amenity spaces, childrens’ play spaces and private outdoor areas as well as buildings”. Perhaps SK-143A might be amended to cross-refer to SK-126A, thereby removing any possibility of misunderstanding. Careful thought needs to be given to how the design code specifies building typologies, so that the Council can more readily see what likely built forms are being assessed.

Question 3

17. The key issues for the ES, in terms of likely significant impact, seem to me likely to encompass:

- (1) Impact on the character and appearance of the area, including any heritage impacts on nearby heritage interests (views of and from Grade I Listed Building in this case), views from open spaces etc. The scheme will need to pass the test in paragraph 64 of the NPPF, and therefore with a large-scale redevelopment of this kind, a substantial positive effect is sought.
- (2) Traffic and movement, including sustainable transport. The introduction of what might be fairly intense residential development will affect the peak hour performance of nearby roads.
- (3) Ecology, given the proximity of open spaces, trees, and watercourses (I have in mind foraging areas for bats in particular).
- (4) Socio-economic effects, which are likely to be significant and beneficial.
- (5) Flooding and drainage.

(6) Air quality.

(7) Cumulative effects with other schemes, particularly those in Twickenham which are listed in the draft work.

Question 4

18. I would suggest the following, although there are several ways to achieve the twin aims of EIA compliance and flexibility:

(1) The outline permission is subject to an overall commencement condition, ie, the commencement of the entire scheme can be achieved by the first material start.

(2) A phasing plan is needed (to be submitted and approved in writing) before commencement of any of the scheme.

(3) The reserved matters approval applications should be tied to the agreed phases.

(4) The reserved matters approval applications should be broadly in accordance with the details shown in the *Development Specification, the Parameter Plans and the Design Code*.

(5) The reserved matters applications should be made and approved before commencement of each phase.

19. There is no need in my view to make the conditions any more cumbersome than that. The ES for the outline is able to reach a sufficiently clear view of the likely significant effects of the overall scheme. If reserved matters come forward in a way – ie proposing a form of development – which does not broadly accord with the parameter plans, etc, then it will need a fresh full or outline permission to authorise it. If it does fall within the parameters, but due to some unforeseen matter (for instance the redevelopment of major sites in the area, necessitating a fundamental review of traffic

impacts), then the Council may take the view that the reserved matters application should be the subject of a further ES against the changed base line.

20. I do not share the concern at paragraph (C) of Chris Tankard's 6 November 2014 email, namely that "the early phases of construction by REEC [ie Phase 1 and its college development] could be rendered unlawful by the later residential phase by parties outside of REEC's control once the residential land sale is completed". If the early phases are completed lawfully, then it is highly unlikely that later residential development could somehow invalidate it – that would involve treating the entire scheme as a single development, which it is not, and involves the hypothesis that the residential scheme is developed either in breach of the outline permission or without EIA. I cannot see in any event how either of these events would invalidate development which has taken place lawfully in accordance with the outline and the conditions which apply, or applied, to it.

Conclusion

21. I am satisfied that with certain relatively minor amendments, and a satisfactory design code and suite of conditions, the scheme can be considered in a single ES and, subject of course to due process, gain planning permission.

RUPERT WARREN QC

**Landmark Chambers
180 Fleet St
London EC4A 2HG**

16 January 2015

APPENDIX 5

DRAFT HEADS OF TERMS FOR PROPOSED S106 AGREEMENT

Richmond upon Thames College

Proposed Heads of Terms for S106 Agreement

FOR DISCUSSION

1. Site-wide Obligations

	Responsibility*
<p>(a) Proposed Access Improvements</p> <ul style="list-style-type: none">• Details of proposed improvements to the junction of A316 and Langhorn Drive and other vehicular access points – including phasing etc - consistent with the detailed access plans, Development Specification, TIA and ES.• Details of proposed improvements to Mill Farm Lane and its environs to promote pedestrian and cycle access to proposed development – including the phasing of works - consistent with that included in Development Specification, TIA and ES.	Applicant
<p>(b) Site-wide Framework Travel Plan</p> <p>Setting out the REEC's overarching aims and objectives in managing travel to/from the proposed development – including:</p> <ul style="list-style-type: none">• means of promoting travel choices – including, if required, contributions towards increased bus services during morning peak;• minimising use of private car (including contributions, if required, to extend existing CPZ north of A316, etc.)• plan monitoring mechanisms (including potential penalties for non-compliance) consistent with TIA and ES.	Applicant
<p>(c) Site-wide Drainage Strategy</p> <p>Setting out REEC obligations with regard to site-wide drainage based on results of FRA and any recommendations it makes to mitigate future flood risk and/or promote SUDS, etc.</p>	Applicant
<p>(d) Site-wide Landscape Strategy</p> <p>Setting out REEC obligations with regard to site-wide landscape strategy based on the ES and recommended mitigation – including protection of existing trees, habitats and watercourses - as well as enhancements included as part of scheme (e.g. improvements / naturalisation of River Crane, etc.)</p>	Applicant
<p>(e) Community Access to Facilities</p> <p>Setting out the REEC Partners' obligations to provide access to the wider community to sports and other facilities on the education and playing fields sites consistent with those included in the application and assessed in ES.</p>	Applicant

<p>(f) Obligations related to the Residential Element of the Scheme</p> <p>Including:</p> <ul style="list-style-type: none"> • the level of affordable housing being provided by the REEC scheme consistent with that shown the viability assessment and agreed with LB Richmond and GLA. • Any contributions arising directly from the residential scheme in relation to provision of community facilities, open or playspace, etc. • Costs associated with either new CPZ and/or extension of existing Heatham Estate CPZ to prevent additional parking pressure. 	Applicant
<p>(g) CIL Liabilities arising from the Scheme</p> <p>Setting out the CIL contribution(s) required as a result of the development (and agreed with LB Richmond and GLA) together with phasing of any such contributions.</p>	Applicant
<p>(h) Mitigation measures required as result of ES</p> <p>Setting out College's obligations to mitigate 'significant environmental effects' of the development. Based on mitigation proposed in the Environmental Statement accompanying the application these could include the following:</p> <ul style="list-style-type: none"> • Financial contribution towards restoration of the River Crane to improve access, protect ecology and biodiversity, to compensate impact of reduced public access to Craneford Way playing fields; • Detailed measures to protect/enhance ecology biodiversity across the site as a whole (including, for example, along the River Crane); • Detailed measures to mitigate visual impact – for example screen planting (if necessary/appropriate); • Detailed measures to control noise/disturbance during construction and/or operation of the development - for example in relation to noise associated with servicing or increased usage of Craneford Way playing fields, etc. 	Applicant

- it is assumed that although the College will be the main (only) signatory to the S106, but the various obligations (and associated costs) it contains will then need be conveyed in the land transactions to the various Partners as well as the future residential developer.

2. Education Campus

	Responsibility
(a) College	
(i) College Travel Plan Setting out the College obligations in managing travel by students, staff and visitors consistent with the Site-wide strategy in 1(b) above (could be amalgamated with 3(a) below)	College
(ii) Community Access to College Facilities Setting out the College obligations to provide access to the wider community to both sports and other facilities (including teaching accommodation, spa, health centre, café/restaurant, etc.) consistent with those outlined in 1(e) above (could be amalgamated with 3(b) below)	College
(b) Secondary School	
(i) Free School Travel Plan Setting out the measures the College will implement to manage travel by students (and their parents), staff and visitors consistent with the Site-wide strategy in 1(b) above.	Free School Trust
(ii) Community Access Setting out the Free School's obligations to provide access to the wider community to both sports and other facilities consistent with those outlined in 1(e) above	Free School Trust
(c) SEN School	
SEN School Travel Plan Setting out the measures the SEN School will to implement to manage travel by students (and their parents), staff and visitors consistent with the Site-wide strategy in 1(b) above.	SEN School

3. College Playing Fields

	Responsibility
(a) Playing Fields Travel Plan Setting out the College's obligations in managing travel to/from the development, promoting travel choices, minimising use of private car, etc. – with particular regard to when the fields are being used by wider community in order to prevent disturbance to local residents.	College
(b) Community Access to Playing Fields Setting out College's obligations in providing access to local community for informal use (including dog walking etc) as well as the wider community for sports - consistent with those included in the application and assessed in ES.	College

4. Tech Hub

<p>(i) Tech Hub Travel Plan</p> <p>Setting out the measures Haymarket will implement to manage travel by staff and visitors consistent with the Site-wide strategy in 1(b) above.</p>	Haymarket
<p>(ii) College/Community Access</p> <p>Setting out Haymarket's obligations to provide access facilities for College use consistent with those outlined in its application at Broom Road.</p>	Haymarket

5. Residential Scheme

	Responsibility
<p>These are likely to predominantly flow from those set out in 1(f) above – namely:</p> <ul style="list-style-type: none"> • the level of affordable housing being provided by the REEC scheme consistent with that shown the viability assessment and agreed with LB Richmond and GLA. • Any contributions arising directly from the residential scheme in relation to provision of community facilities, open or playspace, etc; as well as • Mitigation required to mitigate any 'significant environmental effects' directly associated with the residential element of the development. <p>Additionally, the residential developer (and subsequent owners) will also be bound by the terms of the Site-wide travel plan set out in 1(b) and its specific provisions for the residential scheme – including, for example Costs associated with introduction of CPZ to prevent additional parking pressure on Heatham Estate.</p>	Residential Developer

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