



LONDON BOROUGH OF  
RICHMOND UPON THAMES

# AGENDA

*For a meeting of the*

## PLANNING COMMITTEE

*to be held on*

**WEDNESDAY 29 APRIL 2015**

*at*

**7:00 PM**

*in the*

**SALON, YORK HOUSE, RICHMOND ROAD, TWICKENHAM**

Gillian Norton, Chief Executive

**Committee  
Members:**

Councillor Curran (Chairman), Councillor Head (Joint Vice-Chairman), Councillor Seymour (Joint Vice-Chairman), Councillor Allen, Councillor Boyle, Councillor Chappell, Councillor Churchill, Councillor Coombs, Councillor Dias, Councillor Elengorn, Councillor Fleming, Councillor Frost, Councillor Hambidge, Councillor Healy, Councillor Hill, Councillor Howard, Councillor Linnette, Councillor Marcel, Councillor Martin, Councillor Dr Mathias, Councillor Nicholson, Councillor O'Malley, Councillor Percival, Councillor Roberts, Councillor Sale, Councillor Speak, Councillor Thompson and Councillor Tippett.

**Expected  
Attendance:**

Councillor Gemma Curran (Chairman), Councillor Clare Head (Joint Vice-Chairman), Councillor Mark Boyle, Councillor Susan Chappell, Councillor John Coombs, Councillor Martin Elengorn, Councillor Pamela Fleming, Councillor Helen Lee-Parsons and Councillor David Linnette

**Committee  
Manager:**

Jonathan Regal, Democratic Services Officer, 020 8891 7244,  
[jonathan.regal@richmond.gov.uk](mailto:jonathan.regal@richmond.gov.uk)

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speak:**

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### **1. Apologies**

To receive any apologies for absence.

### **2. Declarations**

In accordance with the Members' Code of Conduct and the Planning Protocol, Members are requested to declare any interests orally at the start of the meeting and again immediately before consideration of the matter. Members are reminded to specify the agenda item number to which it refers and the nature of the interest.

Members are also asked to declare whether they have been subject to lobbying from interested parties, if they have carried out any site visits and whether they have predetermined their view on any item to be considered.

### **3. Minutes**

To consider the minutes of the Planning Committee held on 1 April and 15 April 2015 **TO FOLLOW**

### **4. Applications for Development Permission; Listed Building Consent; and Enforcement of Planning Control**

Reports of the Development Control Manager attached – see list below.

The recommendations contained in the attached reports are those of the officers and are not binding upon the Committee.

The Chairman will confirm the order in which the attached reports are to be heard at the start of the meeting. Members are asked to note that there may be an adjournment of the meeting for a period of approximately 10 minutes starting at a convenient time from 8.30pm.

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5 - 38

**14/5076/FUL - The Russell School, Petersham Road  
(Mr Simon Wright)**

**Ham, Petersham and  
Richmond Riverside**

Co-location of Strathmore and Russell Schools onto a single site in purpose built facilities with associated car parking and landscaping. Construction of a new purpose built school to house the existing Russell Primary School with an expanded size from its existing one form entry (FE) provision, to a one FE plus a shared FE (an additional four classrooms). The new school would also accommodate part of the existing Strathmore Special Educational Needs (SEN) School provision so that these schools are co-located. The existing nursery on the Russell School site would also be accommodated in the new school building.

Officer's recommendation: **PERMISSION, subject to Stage 2  
Referral to the  
Greater London Authority.**

39 - 66

**14/3780/FUL - Richmond Film Services, Park Lane, Richmond  
(Mr David Evans on behalf of Halebourne Land  
and Planning Ltd)**

**South Richmond**

The conversion and restoration of the Old School building to form five residential apartments and 90m<sup>2</sup> of B1a Office space; including the erection of three terraced townhouses with basement accommodation at the rear of the site with car parking, landscaping, and use of the existing vehicular access.

Officer's recommendation: **PERMISSION**

**PLEASE NOTE:**

1. The next scheduled meeting of the Planning Committee is **Wednesday 13 May 2015** at 7:00 pm.
2. Members are reminded that they are required to securely dispose of agenda packs that contain private information.
3. For those members of the public with hearing difficulties infra-red hearing systems have been fitted in the Council Chamber, Terrace Room, Salon and Room 7. Neck loops and headsets are available in the Reception Office.

York House  
Twickenham  
TW1 3AA

21 April 2015

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Nese keni veshtersi per te kuptuar kete botim, ju lutemi ejani ne receptionin ne adresen e shenuar me poshte ku ne mund te organizojme perkthime nepermjet telefonit.

Albanian

এই প্রকাশনার অর্থ বুঝতে পারায় যদি আপনার কোন সমস্যা হয়, নিচে দেওয়া ঠিকানায় রিসেপশন-এ চলে আসুন যেখানে আমরা আপনাকে টেলিফোনে দোভাষীর সেবা প্রদানের ব্যবস্থা করতে পারবো।

Bengali

જો તમને આ પુસ્તિકાની વિગતો સમજવામાં મુશ્કેલી પડતી હોય તો, કૃપયા નીચે જણાવેલ સ્થળના રિસેપ્શન પર આવો, જ્યાં અમે ટેલિફોન પર ગુજરાતીમાં ઈન્ટરપ્રીટિંગ સેવાની ગોઠવણ કરી આપીશું.

Gujarati

اگر در فهمیدن این نشریه مشکل دارید، لطفاً به میز پذیرش در آدرس قید شده در زیر رجوع فرمایید تا سرویس ترجمه تلفنی برایتان فراهم آورده شود.

Farsi

إذا كانت لديك صعوبة في فهم هذا المنشور، فنرجو زيارة الإستقبال في العنوان المعطى أدناه حيث بإمكاننا أن نرتب لخدمة ترجمة شفوية هاتفية.

Arabic

اگر آپ کو اس اشاعت کو سمجھنے میں کوئی مشکل ہے تو، براہ کرم نیچے دیئے ہوئے ایڈریس کے استقبالیے پر جا کر ملیئے، جہاں ہم آپ کیلئے ٹیلیفون انٹرپرائیٹنگ سروس (ٹیلیفون پر ترجمانی کی سروس) کا انتظام کر سکتے ہیں۔

Urdu

ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਸ ਪਰਚੇ ਨੂੰ ਸਮਝਣ ਵਿਚ ਮੁਸ਼ਕਲ ਪੇਸ਼ ਆਉਂਦੀ ਹੈ ਤਾਂ ਹੇਠਾਂ ਦਿੱਤੇ ਗਏ ਪਤੇ ਉੱਪਰ ਰਿਸੈਪਸ਼ਨ 'ਤੇ ਆਓ ਜਿੱਥੇ ਅਸੀਂ ਟੈਲੀਫੋਨ ਤੇ ਗੱਲਬਾਤ ਕਰਨ ਲਈ ਇੰਟਰਪ੍ਰੀਟਰ ਦਾ ਪ੍ਰਬੰਧ ਕਰ ਸਕਦੇ ਹਾਂ।

Punjabi

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Polish

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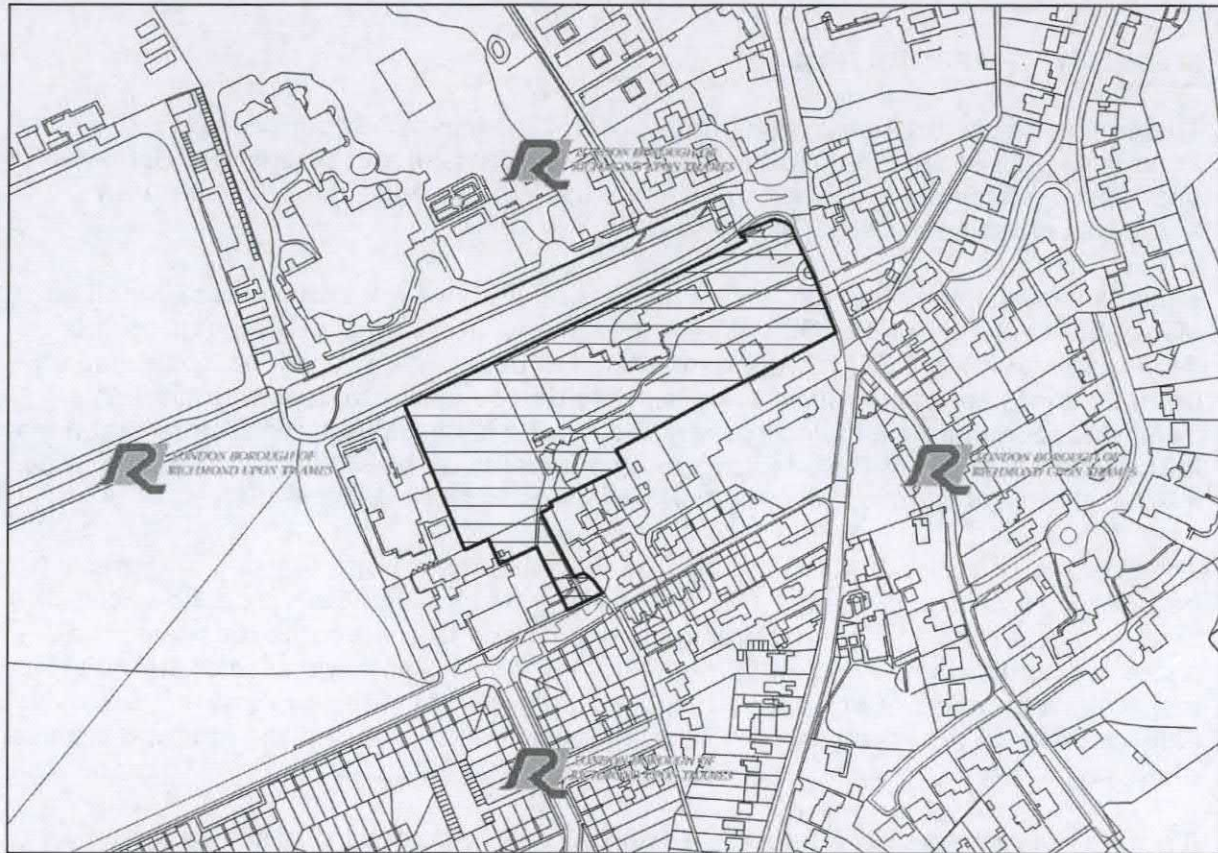
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14/5076/FUL  
 THE RUSSELL SCHOOL  
 PETERSHAM ROAD

HAM, PETERSHAM and RIVERSIDE WARD  
 Contact Officer:  
 L Thatcher

[http://www2.richmond.gov.uk/PlanData2/Planning\\_CaseNo.aspx?strCASENO=14/5076/FUL](http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=14/5076/FUL)



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**Proposal:**

- Co-location of Strathmore and Russell Schools onto a single site in purpose built facilities with associated car parking and landscaping.
- Construction of a new purpose built school to house the existing Russell Primary School with an expanded size from its existing one form entry (FE) provision, to a one FE plus a shared FE (an additional four classrooms). The new school would also accommodate part of the existing Strathmore Special Educational Needs (SEN) School provision so that these schools are co-located. The existing nursery on the Russell School site would also be accommodated in the new school building.

**Applicant:** Mr Simon Wright

**Application received:** 08.12.2014

**Main development policies:**

- Core Strategy: CP1, CP2, CP3, CP4, CP5, CP7, CP10, CP18
- Development Management Plan: DM SD1, SD2, SD6, SD7, OS2, OS4, OS5, OS8, HD1, HD2, HD3, HD4 HD7, SI1, TP1, TP2, TP7, TP8, DC1, DC4, DC5.
- National Planning Policy Framework (NPPF)

- The London Plan 2015, including: 3.18; 3.19; 5.2; 5.3; 5.12; 5.13; 6.3; 6.9; 6.19; 7.4; 7.5; 7.6; 7.8; 7.17; 7.19
- Supplementary Planning Guidance and Documents
- Character appraisal and management plan – conservation areas – Petersham No. 6; Ham Common No.7; Ham House No. 23 & Parkleys Estate No. 67.

#### **SUMMARY OF APPLICATION**

The scheme is for the demolition and rebuild of the Russell School campus, to create a purpose built school to accommodate both The Russell and Strathmore Schools. In doing so, the scheme proposes to increase the Russell pupil roll to allow for an additional shared form entry (4 classes).

The site is sensitively located, with a number of land designations, one of which is Metropolitan Open Land (MOL). Whilst the scheme is deemed as an inappropriate development within MOL, resulting in additional floor area, and will no doubt impact upon its character, the applicants have submitted evidence to demonstrate Very Special Circumstances, including, why the rebuild is necessary, the factors that have influenced the siting of the building, and the benefits of the scheme. In this instance, it is felt the harm is outweighed by these benefits to allow an exception.

The existing school is housed in a number of buildings around the site, and this will be replaced with one building. This will have a greater visual presence, however, the design is acceptable, and measures have been made to ensure this preserves the character, appearance and setting of the area (including heritage assets) and nearby residential amenities. Such as, setting the building within the site, lowering the eave heights towards the boundary, incorporating the first floor within the roof and the use of glazing to break up the massing and provide visual interest.

A parking survey has been undertaken and an assessment carried out on the travel modes of existing pupils. Whilst the scheme results in an increase in the school roll, it is not deemed to cause unacceptable additional parking, congestion or traffic implications, subject to a condition for a robust travel plan.

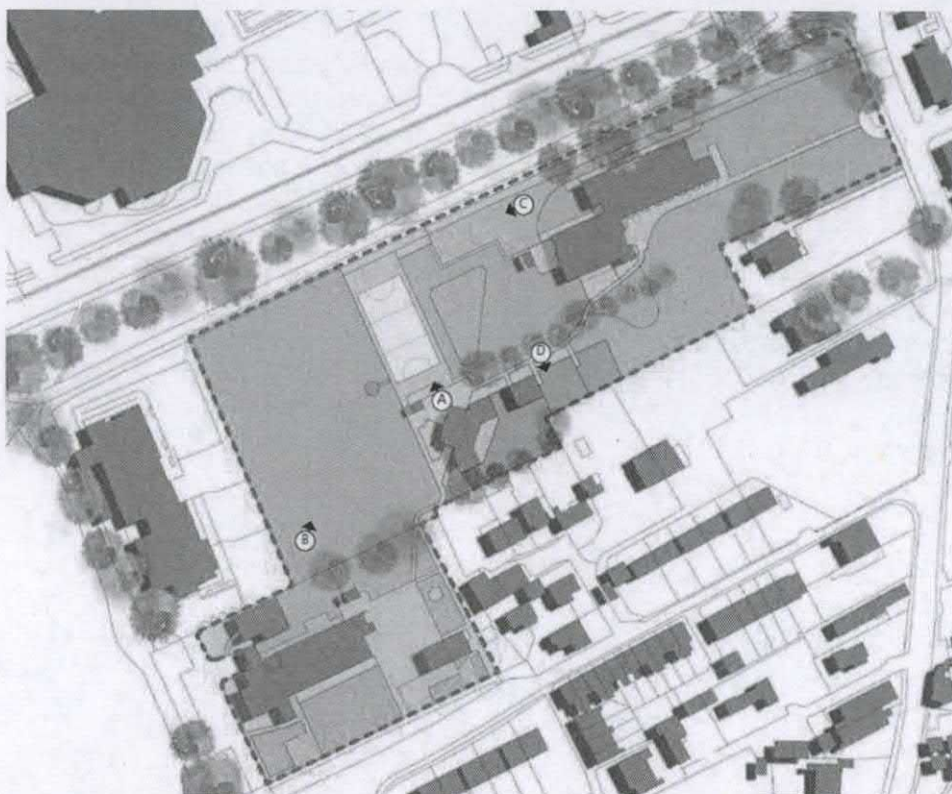
**RECOMMENDATION: PERMISSION, subject to Stage 2 Referral to the Greater London Authority.**

#### **Site and proposal:**

1. The Russell School campus is located in the Petersham area of the Borough (and within the Ham and Petersham Neighbourhood Area). The site is bounded to the east by the A307 Petersham Road, to the south by Sandpits Road and Meadlands Drive, which are predominantly residential in nature, and to the north by Ham House Avenues which provides an approach to the German language school and the grounds of Ham Polo Club. To the west of the site is the existing Strathmore School.
2. The site is sensitively located, sited within Petersham conservation area, close to a number of listed buildings and buildings of Townscape Merit (BTM); adjacent to the Ham House Historic Park and Garden, within an archaeological priority area, and flood zone 2. The vast majority of the site is designated MOL, and the site within protected views for Ham House to Orleans House, Marble Hill House, Twickenham to Petersham and the buffer to Douglas House.

3. The Russell School is currently provided in a number of buildings displaced across the site:
  - The Russell Primary School: Operates a one form entry (1FE) system over seven academic years (reception plus Years 1-6), with a total of 239 primary places.
  - The Russell School nursery: Comprising of 52 pupils (each attending on a part-time basis, therefore 26 full-time equivalent nursery pupils).

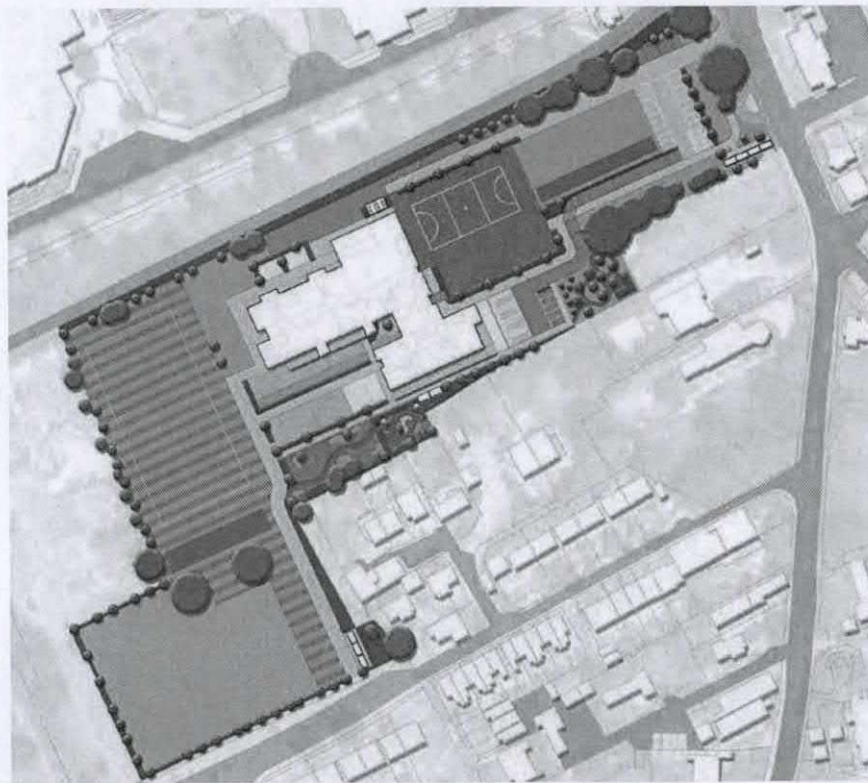
**Existing site layout:**



4. Adjoining the site to the west is the existing Strathmore School, which currently has 57 full time pupils. Its main entrance is from Meadlands Drive. There is a Council strategic proposal to relocate Strathmore School off its current site and split the provision:
  - Strathmore at The Russell Primary School: 18-24 primary places which includes 4 new classrooms for The Russell School
  - Strathmore at Grey Court School: 18-24 secondary places plus independent living provision and a hydrotherapy pool; and
  - Strathmore at St. Richard Reynolds Catholic College: 18-24 primary places and 18-24 secondary places.
5. Whilst there are lack of details of the future of the Strathmore School site, which is not ideal, as and when a scheme is submitted, this would be assessed on its own merits, and against policy and all other material considerations
6. The need for the application is in response to:
  - Strathmore school buildings not fit for purpose
  - Existing school over subscribed
  - More children can be educated within the local community rather than having to go to expensive out of borough provision
  - Parents will have more choice.
  - The Russell School is in need to redevelopments.

- The Russell has one of the largest outside playing areas of any one form entry primary schools.
  - The Russell has a variable experience of integrating children with severe learning difficulties into mainstream classrooms with their current Foundation Stage and Key Stage 1 specialist provision.
  - The inclusion of Strathmore School pupils at mainstream sites will be positive for all children and young people.
7. This proposal is for:
- Demolition of existing buildings on site.
  - The co-location of the Russell Primary School and Strathmore SEN provision in a new purpose designed complex, with a Strathmore SEN and Russell wing;
  - Expand the Russell Primary and Nursery School from a 1FE to a 1FE plus a shared form of entry (an additional 4 classrooms) as part of a shared form of entry policy in the Ham and Petersham area. The expansion of the Russell School is phased, so there will be an increase in one class per year group every other year, starting with the youngest age pupils. This would mean a total pupil capacity of 356:
  - The school growing from 236 to 330 pupil capacity,
  - 26 pre-school places
  - Associated car parking and landscaping.

**Proposed layout:**



8. **Amendments:** Amendments were submitted in March, as outlined in the updated Design and Access Statement:
- Change of site boundary – the site boundary now extends to and fully includes the existing extent of the Russell School site. This was reviewed in order to meet the educational need at the Russell Primary School and collocated Strathmore Special School (primary) and in response to some local objection.



- All of the site, layout, landscape and 3D plans as well as perspective inserts have been revised to show the boundary change, where applicable.
- The expanded area shows the existing area's buildings are to be demolished and the area landscaped.
- Confirmed number of trees to be removed, including within the groups
- To compensate for the loss of trees, additional tree planting has been proposed
- Revised external and landscape plans and planting strategy plan
- Plans showing the existing and proposed outdoor, sports pitch and playing field area
- Vehicle tracking plan.
- A plan showing the type and specification of the bin stores and cycle shelters.
- Revised ecology report
- Revised Transport Statement to include a plan showing the survey areas and actual survey output/raw data – required by Traffic and Transport.
- A technical note of the 2nd Parking and Traffic surveys (February 2015), which details its findings and references the first survey.
- The updated Russell School Travel Plan.
- Revised planning statement.
- Technical Note - Additional very special circumstances arguments.
- Plans showing the existing and proposed sports pitch and playing field areas.

**Planning history:**

9. There has been extensive planning history at the sites, as summarised in the tables below:

|             | <b>RUSSELL SCHOOL HISTORY</b>                                                                                                                                                                                                                   |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13/0581/VRC | Permission granted in March 2014 for: <ul style="list-style-type: none"> <li>• Application to vary condition U19640 (temporary use) of planning permission 08/0133/FUL to extend permission for a further 3 years.</li> </ul>                   |
| 10/2924/FUL | Permission granted in November 2010 for: <ul style="list-style-type: none"> <li>• Installation of solar photovoltaic panels onto the school roof.</li> </ul>                                                                                    |
| 08/0133/FUL | Permission granted in March 2008 for: <ul style="list-style-type: none"> <li>• To use the building as additional teaching space.</li> </ul>                                                                                                     |
| 04/3856/FUL | No further action in April 2005 for: <ul style="list-style-type: none"> <li>• Amendment to condition on 02/2299/FUL to allow timescale permitted for the erection of the portable building to be 5 years starting from January 2005.</li> </ul> |
| 02/2299     | Permission granted in January 2003 for: <ul style="list-style-type: none"> <li>• Temporary portable cabin for the provision of day-care to children aged 6 months to 5 years.</li> </ul>                                                        |
| 02/2259     | Permission granted in January 2003 for: <ul style="list-style-type: none"> <li>• Proposed extension attached to existing Infant School.</li> </ul>                                                                                              |
| 01/2157     | Permission granted in October 2001 for: <ul style="list-style-type: none"> <li>• Proposed improvements to main vehicle entrance and covered lobby to Nursery Wing.</li> </ul>                                                                   |

| <b>RUSSELL SCHOOL HISTORY</b> |                                                                                                                                                                                                                       |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 98/1455                       | Permission granted in August 1998 for: <ul style="list-style-type: none"> <li>• Move existing gate along the existing boundary fence by 6m.</li> </ul>                                                                |
| 96/1656/FUL                   | Permission granted in August 1996 for: <ul style="list-style-type: none"> <li>• Erection of costume store extension and laying out of playground.</li> </ul>                                                          |
| 95/2224/FUL                   | Permission granted in September 1995 for: <ul style="list-style-type: none"> <li>• Erection of rear conservatory.</li> </ul>                                                                                          |
| 94/2431/CAC                   | Permission granted in November 1994 for: <ul style="list-style-type: none"> <li>• Demolition of existing temporary timber building housing two classrooms, shared resource room, toilets and service room.</li> </ul> |
| 94/1740/FUL                   | Permission granted in October 1994 for: <ul style="list-style-type: none"> <li>• Erection of a single storey two classroom block to replace existing temporary structure.</li> </ul>                                  |
| 94/1683/FUL                   | Permission granted in September 1994 for: <ul style="list-style-type: none"> <li>• Erection of a conservatory style extension to existing library</li> </ul>                                                          |
| 93/0751/FUL                   | Permission granted in July 1993 for: <ul style="list-style-type: none"> <li>• Erection of a demountable single storey unit for use as staff room.</li> </ul>                                                          |
| 92/1537/FUL                   | Permission granted in May 1993 for: <ul style="list-style-type: none"> <li>• Extension to infant corridor to be used as a library and general work area.</li> </ul>                                                   |

**Material representations:**

10. The scheme has been subject to three rounds of neighbour notification.

11. The original notification generated approximately 3 support; 63 objections and 2 general observations:

Support

- Need for more school places and co-location
- Need for new, fit for purpose school

Russell School Governing Body

- Concerns over suitability of current building
- Current and increased demand for more school places
- Significant management and educational benefits
- Higher BREEAM rating
- Allows green space to be retained
- High quality educational provision
- Located further away from neighbouring houses in the conservation area.

General observations

- More consideration should be given to traffic problems
- More understanding is needed to ensure the safety of children

- Enjoyment by pupils may be compromised by scattering of buildings
- The true reason for opposition lies in the implied residential homes
- No right to an unaltered view
- Congestion comes from car ownership per home

Objections: Summarised below

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Highway</b></p>                 | <ul style="list-style-type: none"> <li>• Need for further transport survey</li> <li>• Inadequate transport statement</li> <li>• Flaws in the traffic and parking survey (and the timing)</li> <li>• Traffic and congestion</li> <li>• Surrounding roads are narrow, unsuitable and over- burdened.</li> <li>• Blind corners outside school – safety concerns.</li> <li>• Surrounding area is poorly parked – double parked, grass verge parking and on bends, and disabled bays</li> <li>• Lack of cycle parking</li> <li>• Lack of speed cameras</li> <li>• There is no marked pedestrian crossing - Need for a zebra crossing and signal</li> <li>• Need to encourage active travel and Travel Plan</li> <li>• Lack of drop-off points</li> <li>• Risk to children’s safety</li> <li>• Meadlands Drive should be one way with parking permits and double yellow lines on Sandy Lane</li> <li>• Flawed pedestrian and vehicular circulation</li> <li>• Need to redesign Sandy Land round about and Sandy Lane Clifford Road intersection</li> </ul> |
| <p><b>Landscape</b></p>               | <ul style="list-style-type: none"> <li>• Detrimental to Grade 1 listed Ham Avenue and Petersham Copse</li> <li>• Damage to public views</li> <li>• Should be reduced in scale and size</li> <li>• Loss of green amenity</li> <li>• Loss of MOL</li> <li>• 50% of trees will be felled</li> <li>• Negative impact on the conservation area</li> <li>• View from Richmond Hill lost</li> <li>• Inferior landscape</li> <li>• Insufficient replacement planting</li> <li>• Lack of detailed landscape plan</li> <li>• Lack of details of hard and soft landscaping</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Design and conservation</b></p> | <ul style="list-style-type: none"> <li>• The design is at odds with the character of the properties in the conservation area</li> <li>• Layout and density</li> <li>• 58% bigger than existing – and on MOL</li> <li>• Harming special character of Ham and Petersham</li> <li>• Piecemeal approach</li> <li>• Roof is overly dominant</li> <li>• Gable ends are peculiar</li> <li>• Covered walkways are clumsy additions</li> <li>• There should be a holistic approach to the scheme</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Educational matters</b>    | <ul style="list-style-type: none"> <li>• Lack of statistical and needs based analysis of the data that is available to provide adequate informed and strategic response to the dilemma of additional school placed</li> <li>• Lack of evidence for need</li> <li>• Better schools for expansion</li> </ul>                                                                                                                             |
| <b>Unneighbourly</b>          | <ul style="list-style-type: none"> <li>• Noise and disturbance</li> <li>• Impact on visual amenity</li> </ul>                                                                                                                                                                                                                                                                                                                          |
| <b>Ecology</b>                | <ul style="list-style-type: none"> <li>• Need for further ecology survey</li> <li>• Insufficient ecological appraisal</li> <li>• Is there an Environmental Impact of the proposal</li> <li>• Noise an disturbance</li> <li>• Impact on sensitive ecological rea</li> <li>• Effects on wildlife</li> </ul>                                                                                                                              |
| <b>Pollution</b>              | <ul style="list-style-type: none"> <li>• Traffic pollution for children</li> <li>• Increased pollution</li> </ul>                                                                                                                                                                                                                                                                                                                      |
| <b>Flooding</b>               | <ul style="list-style-type: none"> <li>• Flood impact not properly considered on the school or for surrounding properties</li> <li>• Flood risk</li> <li>• Water management</li> </ul>                                                                                                                                                                                                                                                 |
| <b>Sustainability</b>         | <ul style="list-style-type: none"> <li>• Lack of sustainability credentials</li> </ul>                                                                                                                                                                                                                                                                                                                                                 |
| <b>Education matters</b>      | <ul style="list-style-type: none"> <li>• Disruption during the construction for the children</li> <li>• Application does not consider the need of the children</li> <li>• Should be infant provision in the play areas</li> <li>• Less space for the children</li> <li>• Layout of existing school is better for children's social well being</li> <li>• Questions over the numbers of form entry's</li> </ul>                         |
| <b>Criticism with process</b> | <ul style="list-style-type: none"> <li>• Not been subject to formal consultation process</li> <li>• Lack of information on the website</li> <li>• Planning application incomplete and misleading</li> <li>• Questions over the consultation</li> <li>• Lack of consultation and democracy</li> <li>• Incomplete consultation</li> <li>• Need a full Environmental Impact Assessment</li> </ul>                                         |
| <b>Future of Strathmore</b>   | <ul style="list-style-type: none"> <li>• Lack of clarity about the size of the school, and how the adjacent land will be used.</li> <li>• Questions over what is happening to the land</li> <li>• Object to 30% of the sites being sold to property developers</li> <li>• Future of Strathmore site left blank is incomplete and misleading.</li> <li>• Failure to take into account Strathmore school and caretakers lodge</li> </ul> |

Ham and Petersham Society object

- No comment on the educational need and delighted that the Council is looking to improve the educational experience. However,

- Impact on surrounding infrastructure
- Increase in traffic and parking
- Concerns over the date of the traffic survey
- Building on MOL – 58% increase
- Questions remain unanswered regarding the Strathmore site
- Impact on surrounding area
- Loss of trees
- Supporting documents – errors and inconsistencies

Other London Wildlife Trust Ecology

- Wish to be considered as a consultee.

Richmond Bat Species Action Plan Steering Group

- Need statement to show no impact
- Lack of credible bat survey
- Surrounding areas risk of degradation
- Could breach European Law if affect roost
- Third of insects will die
- Birds will suffer as a result of loss of insects and badgers
- Light pollution

Cllr Frost

- Second traffic survey is necessary
- Residents feels that the plans put forward without sufficient attention paid to their views
- Lack of consultation
- Parking
- Need for further work.

Cllr Chappell

- Questions over the consultation

Amended consulted responses

12. In March 2015, a second round of neighbour notification was undertaken in response to the amendments. Officers were concerned that only 6 representations were received after the 14 day consultation (given the amount received originally), and had heard that some residents may have not received the letter (despite records showing these were all dispatched). Consequently, officers decided to resend the 2<sup>nd</sup> neighbour notification letter. Comments received to date are summarised below, however, if any are received between publication of this report and the Planning Committee, these will be summarised on the Addendum:

- Loss of open land
- Traffic congestion
- Parking problems
- Lack of drop off and pick up
- Pollution
- Amendments make no material difference and do not address the real concerns
- The adjacent site should be left open to compensate the loss.
- Need confirmation on the use of the parcel of land
- Fenced enclosures on Meadlands Drive is detrimental to streetscene.
- Fencing between school and Petersham Road is unacceptable to conservation area
- Limited area that children can access freely
- Does the scheme meet the criteria for playground provision

- New landscaping is manicured and over worked
- Traffic increase
- Additional form of entry
- Lack of onsite turning, drop off and pick up
- Ecology report inaccurate – not mention other badger setts
- Poor resubmission
- Inaccuracies in submission.

Cllr Frost

13. Concerned with the fragmented approach to the application and the deficiencies in the traffic plan.
14. *Sports England:* From the information provided we are satisfied that the proposal meets one of the exceptions of the above policy (E.3) in that: The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance and adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facilities on site. This being the case, Sport England does not wish to raise an objection to this application.

Greater London Authority

15. Awaiting response, and will be updated in the Addendum.

Historic England:

16. This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Transport for London

17. This application does not raise any strategic transport issues, however:
- Requests spaces are identified and reserved for blue badge parking
  - 90 cycle parking spaces are welcomed
  - Travel Plan will need to be updated, and there needs to be a commitment to update, monitor and fund the travel plan and associated measures.
  - A delivery and servicing plan (DSP) setting out measures to safely manage and minimise the impact of delivery and servicing movements to, from and within the site.
  - A Construction Logistics Plan (CLP) is required
  - Construction vehicles are recommended to be fitted with cycle specific safety equipment.

Thames Water

- Thames Water would advise that with regard to sewerage infrastructure and water infrastructure capacity, we would not have any objection to the above planning application.

Environment Agency

- Having reviewed the revised Flood Risk Assessment 9 February 2015, Version 3.0 by RAB consultants we are now in the position to remove our objection. The proposed development will only meet the requirements of the National Planning Policy Framework if the following measure(s) as detailed in the Flood Risk Assessment submitted with application 14/5076/FUL are implemented and secured by planning condition.

Ecology officer

18. No objections subject to conditions.

Arboricultural Officer

19. No principle objection to the scheme:

- The trees in the groups will generally be of low value and significance. However, with the high numbers of trees removed, we would like to see replanting which has been suggested in the AIA 5.3 as part of the landscaping of the site.
- The basis for the tree protection is acceptable, full details to be conditioned.
- The revision of the scheme has addressed the concerns of the number of trees to be removed, by increasing the replanting commitment within the site. We would therefore require that a full replanting detail is included under condition to reflect the scheme as outlined in the revised Design and Access statement.

**Professional comments:**

Land use

20. 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.
21. The above is endorsed in the London Plan (3.18) which supports education provision to meet the demands of a growing and changing population; and developments which enhance education and skills providing. Schemes that address the current and projected shortage of primary school places are particularly encouraged, as are proposals that encourage co-location of services in order to maximise land use and reduce costs. The policy advises that proposals for new schools should be given positive consideration and only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.
22. Locally, policy CP18 states the Council gives priority to providing a high standard of education and training services for all people in the Borough, through schools, and 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. Furthermore, the potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs. This is reflected in DM SI1 that states planning permission will be granted for new social infrastructure where:
- There is an identified need
  - Where practicable is provided in a multi-use, flexible building, which encourages dual use
  - Accessible
  - It is of high quality design
  - Does not have a significant adverse impact on character and amenity
  - Has provision for car parking
  - Is in accordance with other policies.
23. The dual use and co-location of facilities is endorsed in the London Plan (3.8), and CP 1 (C) and CP18.

24. The site is currently a campus, operated within various buildings. This dispersion presents a number of management issues and unavoidable inefficiencies such as doubling up of services, equipment etc. Maintenance is also a financial issue. Such separation of buildings and year groups also presents issues regarding safety, communication and connectivity. With respect to the buildings, the Strathmore School is not fit for purpose, with issues including DDA accessibility, poor natural day lighting and natural ventilation, low ceiling heights, instances of damp and condensation. The replacement building will provide a high quality, purpose built facility, designed in accordance with EFA Area Guidance, BB 103.
25. Turning to the issue of need, the Local Authority has a statutory duty to provide sufficient places. The demand for school places has increased substantially in all areas of the Borough, largely due to a 21% rise in the birth rates between 2000 and 2007. The LBRuT's reception class forecasts indicated that there would be a consistent shortfall of places per year in that area from 2011/2012 onwards. In addition the Council's School Place Planning Strategy 2015-2024, identified for 'Ham, Petersham and Richmond Riverside' the need for two or more forms of entry within this area by 2017 or 2018, due to birth-rate increases and approved, planned and probable housing developments. The Strategy made the recommendation that the expansion of two schools in the area will be required, and The Russell and Meadlands were indicated.
26. The expansion of Russell Primary School will assist in meeting high demand for school places particularly in the area. Without the additional places proposed, the Council would be wholly reliant upon a strategy of providing temporary additional places, which is less than ideal, given that the shortfall of places is predicted to continue for the next decade. With respect to the Strathmore School in particular, the scheme would also enable the Council to meet its commitments and obligations with regard to the co-location of SEN provisions both within and alongside an established main stream educational provision. There are educational benefits for SEN pupils in receiving their education within a mainstream school with access to additional facilities, social benefits from regular interaction with mainstream children, as well as recognised benefits to SEN delivery within the main stream school, sharing of good practices and working methods across both schools and the social benefits for the mainstream non SEN school children.
27. In addition to the above, the scheme will continue their existing community use programme, and have identified further opportunities for such, (as will be discussed under the Very Special Circumstances).
28. On the basis of the above, the scheme meets the aims of the above aforementioned policies, providing schools that are of a sufficient quality and quality to meet the needs to their pupils and residents.
29. Whilst the scheme provides a new high quality facility, these educational benefits need to be balanced against its impacts in terms of other material planning considerations, such as impacts on playing fields, MOL, traffic, parking, residential amenity, design, landscape, flood risk, sustainability and ecology:

Playing fields

30. Policy 3.19 of the London states that proposals that increase or enhance the provision for sports and recreation facilities will be supported, and schemes that result in a net loss of facilities, including playing fields should be resisted. This is reflected in policy DM OS8.



31. Currently, there is a marked out playing field between the Russell and Strathmore School, and various other play areas. The scheme will encroach towards this; however, the scheme maintains a summer and winter sports pitch provision in similar location, the provision of a new netball court, and an area adjacent to Meadlands Drive. In terms of the latter, the configuration has yet to be confirmed, however, there is the potential for a future non-floodlit MUGA to include some community use. On the basis of this, the aims of the policy are met, and Sport England confirm they are satisfied that the proposal meets one of their exceptions.

#### Metropolitan Open Land

32. The main existing Russell School (Junior) building, is designated MOL and as such policies CP 10, DM OS 2, the NPPF and NPPG apply. The infant school is located outside but adjacent to MOL.
33. Local policies (CP10 and DM OS2) state the Borough's MOL will be safeguarded, and retained in predominately open use. However, it recognises there may be exceptional cases where appropriate development, such as small scales structures, are accepted, but only if:
- They do not harm the character and openness of MOL; and
  - It is linked to the functional use of the MOL or supports outdoor open space uses; or
  - It is for essential utility infrastructure and facilities.
34. The above is endorsed by London Plan policy 7.17, and advises, the strongest protection should be given (the same level as Green Belts) and inappropriate development refused, except in very special circumstances.
35. As advised in the NPPF, the Government attaches great importance to Green Belts (the same as MOL). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The construction of new buildings is inappropriate in Green Belts, and by definition, this is harmful and should not be approved except in 'Very Special Circumstances'.
36. Given the sensitive land designations of the site, prior to the submission of the scheme, the applicants considered three options:
- Options 1 and 3 comprised remodelling, refurbishments and extensions to the existing Russell Junior school building, followed by the demolition of the existing Strathmore SEN School, the Russell Infants School, Annexe Building and demountable Staff Building.
  - Option 2 comprised the construction of a new purpose designed co-located school complex and ultimate demolition of all of the existing buildings on the site.
37. Following consideration, Option 2 was preferred, as this offered distinct benefits over the other options:
- A new build would comply with current building bulletin recommended area standards and building regulation standards.
  - A new build solution will enable a reduction in building footprint.
  - The floor planning, in particular the circulation is far more efficient and the gross internal floor area is relatively less, thus reducing running costs and whole-life costings.
  - The existing Stathmore School is not fit for propose – issues include accessibility, poor lighting and natural ventilation, low ceiling heights, damp etc.

38. A number of fundamental requirements informed the siting of the building, including:
- The site area to the south-west of the site was considered for the location of the new school building, however, it was considered too small an area for the collocated provision would limit access to the site and was believed a two story school building would have a greater impact on the local residents on Meadlands Drive.
  - There is insufficient land available within the land in school ownership outside the MOL for the new co-located school complex, without demolishing the existing school buildings first. For this approach to be possible, the respective school facilities within these existing buildings within the MOL would need to be re-provided within temporary buildings sited on the MOL. This approach was not considered to be viable due to financial, phasing and programme parameters and constraints. Furthermore, this ensures pupil's education is not disrupted during construction;
  - The existing sports pitch must remain fully operational for the duration of the construction of the new school complex.
  - To locate the new two storey building as far back from Petersham Road as practicable to minimise it's visual impact when viewed from the east;
  - To reduce the impact on neighbouring residents - with the main bulk of the buildings being to the north east of the site; and
  - To maintain direct access for vehicles from Petersham Road and access to community facing facilities such as halls and open space to the front of the site;
39. Further to the above, the applicants advised, that the development could not be sited on the Strathmore School site, as this school must also remain operational, until its replacement provision is provided at the three schools previously identified, which is not targeted until 2018; and other schools cannot take the SEN pupils to reduce the size of the development, as the Strathmore and The Russell Schools already operate an integrated Early Years Foundation Stage delivery.
40. The above provides the reasoning for the rebuild and its siting, and it is accepted that alternative locations outside of designated MOL have been considered. Turning to the assessment against policy, although the proposed use will be the same as existing, from a MOL perspective it is neither linked to the functional use of the MOL nor would it support outdoor open space uses; as such, the use is "inappropriate" in line with MOL policy, nor does it fall within the exceptions (i.e. buildings for agriculture and forestry). Therefore, the scheme is a departure from the adopted policy and contrary to the NPPF, and would result in a loss of and impact on the openness of the MOL.
41. The local planning authority must ensure that substantial weight is given to any harm to the Green Belt. 'Very special Circumstances' will not exist unless the potential harm to the Green Belt (and MOL) by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. It is for the applicant to demonstrate that 'Very Special Circumstances' may justify a development on MOL.
42. The applicant submitted existing and proposed footprint and floorspace calculations (see table below). This shows that the existing gross internal area within MOL is 1165m<sup>2</sup>, and gross external area within MOL is 1,288m<sup>2</sup>; and this will increase to 2576m<sup>2</sup> (gross internal) and 2041m<sup>2</sup> (gross extension) respectively. Therefore, the proposed percentage increase from existing to proposed would be 58.4% when just considering the increase in the gross external area; however, the proposed floor area would more than double compared to the existing.

|                                                                              | Whole site                                                              | In MOL only                                                                                                         | Outside designated MOL |
|------------------------------------------------------------------------------|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|------------------------|
| Existing gross internal area (includes small basement to Russell Junior)     | 2140m <sup>2</sup>                                                      | 1165 m <sup>2</sup>                                                                                                 | 975 m <sup>2</sup>     |
| Proposed gross internal area - includes ground & first floor                 | 2576.7m <sup>2</sup> (436.7 m <sup>2</sup> or 20% larger than existing) | 2576.7m <sup>2</sup>                                                                                                | 0m <sup>2</sup>        |
| Existing gross external area (to be demolished) - includes ground floor only | 2330.7m <sup>2</sup>                                                    | 1288.4m <sup>2</sup><br>(Junior – 988 m <sup>2</sup><br>Annex – 233 m <sup>2</sup><br>Modular – 67 m <sup>2</sup> ) | 1042.3m <sup>2</sup>   |
| Proposed gross external area - includes ground floor only                    | 2041m <sup>2</sup>                                                      | 2041m <sup>2</sup> (752.6 or 58.4 % increase)                                                                       | 0m <sup>2</sup>        |

43. Given the 58% increase in the gross external area in MOL, the applicants have put forward the following Very Special Circumstances (VSC):

- **Meeting educational need:** The local authority has a statutory duty to provide sufficient school places. The development would enable LBRuT to meet its commitments and obligations with regard to increased primary pupil numbers and co-locating SEN provisions both within and alongside an established main stream educational provision.
  - The demand and need for places at Strathmore has risen significantly over the last 3 years (2010 – 28 pupils, and in 2013 – 56 pupils).
  - There is a pressing need for additional primary school places within the immediate vicinity of the site. In particular, the Council's School Place Planning Strategy (approved by Cabinet in January 2015) states that there is a need for two more forms of entry within the Ham and Petersham Area by 2017 or 2018, due to birth-rate increases and approved, planned and probable medium- to large-scale housing developments, and the Strategy's preferred recommendation for this area is the expansion of the Russell School. Without the additional places that this proposal will provide, the LBRuT would be wholly reliant upon a strategy of providing temporary additional places, which is considered to be a less than ideal solution compared with permanent expansion, given that the shortfall of places is predicted to continue for the next decade, unless additional places are made available. It would also represent poor value for money compared with permanent expansion.
- **Limited alternative locations for primary school expansion in Ham and Petersham:** Expansions at St Richard's Church of England Primary and Meadlands would also be constrained by open land designations, such as Other Open Land of Townscape Importance.
- **Not suitable to provide the required educational provision in alternative locations in the Borough:** There is an identified need for primary school places in Ham and Petersham (Refer to the Council's School Place Planning Strategy, January 2015), and as such it would not be appropriate to consider sites outside of designated MOL in other parts of the borough, particularly as there is very limited available land for development and most of which is very constrained.
- **Designation of the site, and no other feasible onsite alternatives:** A significant proportion of the application site is designated MOL, with only a small portion, currently occupied by the Russell Infant and Nursery Schools, which is outside of the MOL.

Strathmore no longer  
+ plan for purpose  
Stett for Russell School  
+ Stett for St. Richard's

- These facilities need to remain operational until a new school is provided and there is insufficient land available within the land in school ownership outside the MOL for the new school complex to be constructed without demolishing the existing buildings first.
- Financial / viability constraints if the school facilities would need to be re-provided in temporary buildings whilst a new school building would be constructed.
- The area to the south-west is too small an area for the co-located provision, with limited access and with a greater impact on the local residents in Meadlands Drive.
- **Layout / Design:** Due to the reduction in the number of buildings on the site to a single purpose built building, this would improve the visual quality of the site, which is currently spread out and poorly planned. The new building would be surrounded by well-designed planting to partially screen and buffer the development from surrounding land. The removal of the infant and nursery buildings will have a positively visual impact on the MOL, and views into and out of it. Furthermore, the absence of a building on Meadlands Drive would not be incongruous to this streetscene.
- **Size:** The new school building is designed in accordance with EFA area guidance, BB103, and takes up the minimum size, such as incorporating the first floor within the roof structure and thereby minimising the height and reducing the footprint of the building.
- **Clear benefits of a new building over refurbishment:** The existing Russell Primary School buildings are located in different positions over a large site, creating management issues. Further, the majority of these buildings are in a poor state of repair. To attempt to utilise existing buildings in the expansion of the school and to co-locate Strathmore School provision was deemed inefficient
- **Harm through additional footprint, outweighed by ability to provided additional places:** The existing gross internal area of the whole site is 2140m<sup>2</sup>, and this will increase to 2576m<sup>2</sup> (20% increase). Although the scheme will result in the loss of 752m<sup>2</sup> of designated MOL, overall, the applicant has demonstrated that with an increase of 20% in the size of the building across the whole site, the school will be able to accommodate a further 4 classes for the Russell Primary (i.e. an additional 120 pupils), including accommodation for 24 Strathmore School pupils within improved facilities.
- **Community Use:**
  - The Russell school currently allows community use of the school buildings and site, including Petersham Nurseries use the car park at weekends; Perform Drama Group and Police Liaison Group use of the hall facilities; holiday bookings; and an allotment club. Furthermore, the Strathmore School has a community use programme, including evening yoga classes, signing training, holiday play schemes. These are proposed to continue.
  - Importantly, there is scope for additional community use with respect to the main hall; kitchen, and toilet / changing facilities. This new layout will allow these areas to be securely opened up without having to open the whole building. The scheme has also identified the increased external facilities will also attract more community groups to use the facilities. For example, the land on which the existing infant block and adjacent demountable building is sited, this area is to become a mix of grass and hard surfaced open space and playing area. Part of this area may be further developed in the future to be a non-floodlit Multi Use Games Area (MUGA) which could then also be used for community use when not in school use (i.e. evenings, weekends and school holiday periods). In addition, Strathmore would like to extend its expertise both within and outside of school hours to all children with SEN attending other local schools, and other types of agencies and groups, for example use of sensory room, soft play, play areas, small hall with track hoist. Conditions are recommended to ensure such.

44. In summary, whilst substantial weight has been given to the encroachment into the MOL and its consequential impact on the openness of the MOL, in this instance, officers deem it has been demonstrated that there are Very Special Circumstances that clearly outweigh the harm to MOL. Full justification has been given as to the reasons for the rebuild, the siting of the building, the lack of other suitable sites or location. Furthermore, there are clear benefits arising from the scheme, in particular, the additional education provision, the enhanced facilities, and prospect of greater community use.

Siting and design

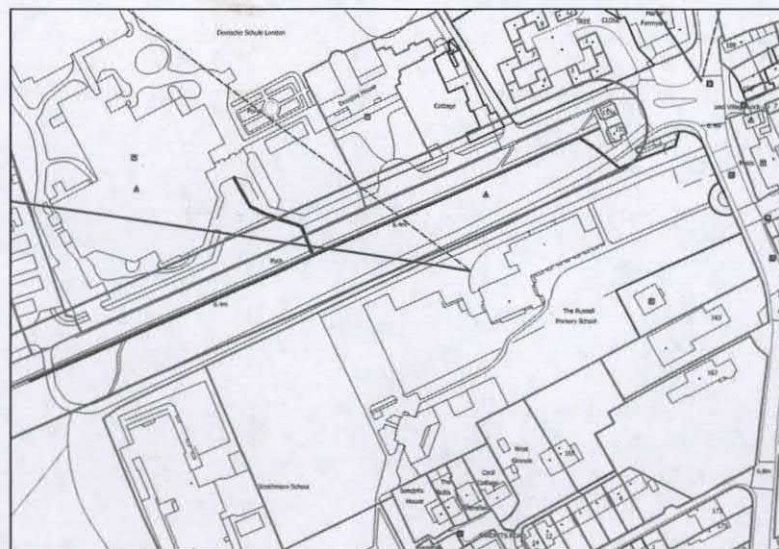
45. Strategically, policy CP7 states that opportunities should be taken to improve areas of poor environmental quality, and all new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. This is reflected in policy DM DC1. New development must be of a high architectural and urban design quality that is inclusive, respect local character, and connect with and contribute positively to its surroundings based on a thorough understanding for the site and its context. In assessing such, the Council has regard to scale, height, massing, proportions, form, layout, access, space between buildings, detailing and materials. This is reflected in the London Plan (7.4, 7.5, and 7.6).
46. The report introduction outlined the key designations of the site, and established the site is sensitively located within a conservation area, and close to a number of heritage assets and views / vistas, including the Historic Park and Garden, listed buildings and BTMs, and therefore the following policies are pertinent:
- London Plan (7.8): Developments affecting heritage assets and their setting should conserve their significant.
  - Policies CP10 and DM OS4 state land on the Register of Parks and Gardens of Special Historic Interest will be safeguarded and proposals that have an adverse effect on the settings, views and vista to and from historic parks and gardens will not be permitted.
  - Policy DM HD1 requires new development to conserve and enhance the character and appearance of a conservation area.
  - Developments should preserve the character, appearance and setting of listed buildings and BTMs (DM HD2 and HD3).
  - Policy DM HD7 seeks to protect the quality of views.
47. The conservation area appraisal provides a summary of the areas character, strengths, problems and pressures found in the area, and subsequently a management strategy.
48. The area is dominated by large detached mansions of two to three storeys buildings addressing the road and set in individual large well-planted grounds with mature trees and generous spaces between buildings. These mansions dominate the streetscene and other buildings such as those former stable blocks to Petersham House and more modest cottages or houses within the village adopt a more subordinate role and scale. There is a varied building line to the road, however, the larger buildings tend to be set back further from the road behind front gardens or driveways. The dominate facing material is red or plum brick with a use of red brick to highlight openings and frame principal facades.
49. Russell School sits behind a well planted front garden and low or more permeable boundaries to the street edge. Here the centre of the village bleeds out into the surrounding landscape to the west. Just north of Ham House Avenues lies the exceptional Douglas House and the Deutsche Schule building.

50. The key strengths of Petersham are identified as including the well-defined and distinctive village form; the semi-rural and treed landscape setting; strategic local views from Richmond Hill and Park; and predominant use of traditional brickwork for buildings and walls. However, it is acknowledged the area does have a number of problems and pressures, including, the urbanisation of the area, use of unsympathetic interventions, materials, boundary treatment, and traffic congestion. Therefore management proposals and policies have been established:
- Protect key vistas along the historic Ham House Avenues; and other views and vistas
  - Discourage the use of unsystematic modern interventions and materials.
  - Raise the design quality of all new development and ensure that it makes a positive contribution to these distinctive character and appearance of these areas.
51. On site, the Russell's single storey junior and infant buildings were constructed in the 1950s. The buildings have pitched concrete tiles and / or flat asphalt and felt. The elevations are finished in brick, and fenestrations having varying materials including aluminium, UPVC, timber and steel. The annex building to the south was constructed in 1990s and has a pitched concrete tiled roof and a felt flat roof. There are other modular and small single storey buildings accommodating staff facilities and the nursery. Whilst by no means offensive, there is no objection to the loss of the existing buildings.
52. In terms of the new build, the Strathmore SEN and Russell Primary Schools are conceived as two distinct entities, within the same building complex. Each school is accommodated within its own distinct block or zone.
53. Earlier sections of the report have outlined the factors that have informed the siting of the building. The proposed school is not as low key as the existing, however, has been designed to minimise its visual impact and be respectful to the sensitive nature of the site and area. The building has been set further back from Petersham Road (in keeping with the conservation area), and whilst the resulting east elevation is wide and occupies a significant proportion of the width of the site and has a larger footprint than all existing buildings on site, a number of measures have been applied to break up this massing so not to appear excessive, overbearing and intrusive to the character of the site and area including:
- Use of an irregular footprint with varying heights, with single storey elements and set backs of the second floor
  - The height of the roofs reduced towards the perimeters of the site
  - The first floor incorporated within the roof;
  - The use of heavily glazed dormer windows (which provide valuable teaching space whilst appearing lightweight and adding visual interest to these long elevations);
  - The fenestration arranged in simple vertical or horizontal slots within the facade, with the glazed panels extending down to floor level.
54. Given the challenges of the site, and the varied character of buildings in the immediate vicinity, and the existing design of buildings on site, the design approach is acceptable.
55. The proposed material palette used for the new building will comprise of the following:
- Clay facing brickwork
  - Zinc affect cladding panels
  - Natural slate roofing finish
  - Polyester powder coated aluminium framed windows and doors

56. The facing brickwork is deemed responsive to the area, and to ensure the roof finish is of a suitable standard a condition is recommended for samples. Whilst timber fenestration would be preferable, given the new build nature of the school, and the existing materials, the proposed is acceptable.
57. With respect to the areas of hard surfacing for the car parking and vehicle access, this includes golden amber aggregates, natural paving, Grasscrete and black macadam. Whilst the car parking will be more prominent from Petersham Road, attempts have been made to make it less noticeable, with additional planting, and the use of Grasscrete for the parking adjacent to the northern boundary and the access road to the car park adjacent to the mini bus area. Notwithstanding this, further landscaping is recommended, which will need to be addressed through the landscaping condition, including, additional planting at the Petersham Road end of the site; off Meadlands Drive; and the northern boundary with Ham House Avenues. A lighting plan has been submitted. There are concerns with the height of some installations, and therefore it is recommended this be conditions.
58. In terms of boundary treatment the character appraisal for the area identifies Russell School to have low or more permeable boundaries to the street edge. All boundary treatment around the periphery of the site will remain as existing apart from a new approx. 2m green weldmesh fence on the boundary with the existing Strathmore School and at the entrance on Meadlands Drive. However, given this is similar to existing, this is acceptable. Notwithstanding such, the scheme does propose new fencing within the site, including 1.2m timber picket around the pond area and early years play area; 1.8m high weldmesh around the front play areas, and 2m green weldmesh around the parking areas. It is acknowledged the safety of the children is paramount within the school, however, the heights are not ideal visually. Whilst this may not warrant a refusal (given locations of existing internal fencing), it is recommended this is secured via condition to see if this can be reduced, even modestly, and in lesser areas.

Views and Registered Park and Gardens

59. The image below identifies the location of views in the vicinity of the site. Whilst the development will clearly be visible on Ham House Avenues, given these do not encroach within the identified views / vistas; the set back of the building from the boundary; the existing relationship, the more sensitive finish of the surface for the access road and car parking adjacent to this boundary; and the proposed landscaping condition; this is not deemed to unduly adversely effect of such views, vistas, or the setting of the Registered Park and Garden, as sought by policies CP10, DM OS4 and HD7.



60. In summary, whilst the scheme inevitably has a greater visual impression on the site and area than existing, for the reasons outlined above, and with a number of safeguarding conditions, the proposal is not deemed to prejudice the aims of the above aforementioned policies. This is supported for colleagues the Urban Design and Conservation Team who raise no objection, subject to conditions and informatives.

Highways and parking

61. It is necessary to consider the impact of any new development on the existing wider and local transport network for all modes, how it links with the network, impacts on highway safety, and parking (policies DM TP2 and 6.3). Policy DM TP2 advises that the impact of new development on the transport network will be assessed against policy and transport standards. With respect to the latter, policy DM TP8 states that developments 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. Maximum parking standards are set for all types of developments, and these standards are expected to be met, unless it can be shown that in proposing levels of parking there would be no adverse impact on the area in terms of streetscene or on-street parking. The parking standard for education uses is 1 space per 2 staff, and arrangements must be made for adequate setting down areas.
62. The School can be accessed from its eastern side via Petersham Road, which forms the A307. Petersham Road runs north-south, and serves as the main road connection between Richmond and Kingston. The speed limit on the road in the direct vicinity of the school is 20mph. There are white 'zigzag' markings at Petersham Road, denoting no stopping on school entrance markings at any time. In addition to the Petersham Road access, there is an access off Meadlands Drive. At the junction of Clifford Road and Meadlands Drive, there is signage to signal that the area is a dedicated 'Home Zone'. These are designed primarily to meet the needs of pedestrians and cyclists before those of cars and drivers, but while also accommodating cars. There are also yellow 'zig zag' and 'School – Keep Clear' markings at the vehicle entrance on Meadlands Road. These markings denote no stopping at the school entrance during term times, Monday to Friday, 08:00 – 09:30 and 14:30 – 16:30. The Site is located within an area with a Public Transport Accessibility Level (PTAL) rating of 2 ('Poor').
63. There has been significant amount of objection to the scheme that focuses on traffic, parking and highway matters. The scheme proposes the following changes to pupil and staff numbers:

|                        |                                  | Existing               | Proposed               | Difference |
|------------------------|----------------------------------|------------------------|------------------------|------------|
| <b>Russell Primary</b> | <b>Pupils (inc. FTE nursery)</b> | 265<br>26 – pre school | 356<br>26 – pre school | +91        |
|                        | <b>Staff</b>                     | 44                     | 54                     | +10        |
| <b>Strathmore</b>      | <b>Pupils</b>                    | 57                     | 24                     | -33        |
|                        | <b>Staff</b>                     | 35                     | 20                     | -15        |

64. In summary, on the site there will be:
- 380 pupils (an additional 58)
  - 74 staff (5 less than existing)



65. A Transport Statement has been submitted, as has an amended technical and this includes the potential impact on traffic, parking, and safety.

Access and layout

66. The schemes access strategy focuses on providing safe, secure and efficient movement corridors for all users, but with an emphasis on pedestrians and cyclists.
67. Currently there are two main pedestrian routes to The Russell & Strathmore School sites. The main school entrance is located on Petersham Road, and there are further pedestrian access points located on the south side of the site on Meadlands Drive. However, it is apparent a larger proportion of children come to the school from Meadlands Drive.
68. In terms of the proposed, parents/carers dropping-off and collecting their children and visitors to the school will not be permitted to park on site. The main vehicular access will be from Petersham Road, where vehicles enter and exit the school car park from a single access/ egress point (including service vehicles). Access for emergency vehicles (fire tenders and ambulances) only can be gained via the site access from Meadlands Drive.
69. All pedestrian and cycle routes will be clearly segregated and de-marked from the vehicle movement corridors.
70. With respect to parking requirements, based on the standards, the scheme should provide 37 spaces on site. The scheme is in line with standards, including two disabled bays, and an additional 4 bays for mini bus parking and drop off.

Parking and traffic implications

71. To ascertain the potential impact of the scheme on surrounding roads, it was necessary to carry out a parking survey, and also gather information on existing travel patterns of pupils and staff. The outcomes of these have been used to forecast the potential impact on traffic and parking if the development were to proceed.
72. A parking survey was undertaken in July 2014 (2<sup>nd</sup> and 3<sup>rd</sup>), in accordance with the relevant aspects of the Richmond Parking Survey Methodology. The survey was divided into 6 periods, each of which included 15 minute intervals. The streets included were:
- Meadlands Drive;
  - Buckingham Road;
  - Buckingham Road (Cul-de-sac);
  - Clifford Road;
  - Petersham Close;
  - Sandpits Road;
  - A307 Petersham Road;
  - Sudbrook Lane;
  - Meadow Close; and
  - River Lane.
73. As part of the amended scheme, a second parking assessment was undertaken, to gauge the availability of on-street parking in the vicinity of the site several months on, and to assess any impact that the proposals will have on parking occupancy and availability in the area. This was carried out in February 2015 (4<sup>th</sup> and 5<sup>th</sup>). A comparison of the results are detailed below. Applying the worst case scenario, at peak time, there will be approx. 70 spaces available at peak time on surrounding roads.

|                            | 2014 survey - occupancy | 2015 survey - occupancy |
|----------------------------|-------------------------|-------------------------|
| <b>AM PEAK (8.30-8.45)</b> | 75%                     | 71%                     |
| <b>PM PEAK (3.15-3.30)</b> | 73%                     | 77%,                    |

74. A hands-up survey was undertaken at the existing Russell Schools in October 2014, and information regarding the journey trends of Strathmore School staff and pupils were provided by the School. The results are summarised in the tables below:

#### Russell school

|                                 | Current  | Proposed | Difference |
|---------------------------------|----------|----------|------------|
| <b>Pupils - Car</b>             | 22% (58) | 78       | +20        |
| <b>Pupils – Park and Stride</b> | 13% (34) | 46       | +12        |
| <b>Staff – Car</b>              | 33% (15) | 18       | +3         |

#### Strathmore School:

|                          | Current  | Proposed | Difference |
|--------------------------|----------|----------|------------|
| <b>Pupils - Car</b>      | 0        | 0        | 0          |
| <b>Staff – Car</b>       | 33% (12) | 7        | -5         |
| <b>Staff – Car share</b> | 3% (1)   | 1        | 0          |

75. On the basis of the results, the proposed development will result in an increase in trips made across all modes aside from School Bus Trips, with a total increase of 53 daily trips. However, with respect to car trips, the proposed development is predicted to result in an increase of 18 car trips, and an additional 12 park and stride trips. Notwithstanding such increase, the parking survey suggests that even at the daily peak for parking demand, there will be a minimum of 40 spaces available within the vicinity of the site.

76. On the basis of the parking survey and hands up surveys, officers do not consider there is an objection on the availability of spaces. However, the Highways Officer considers it is the width of the residential roads once parents have parked, which often causes congestion. Consequently, a Robust Travel Plan is recommended to be secured via condition, to assist in reducing car travel, and encouraging sustainable travel (this is supported by policy 5.G). In addition to this, there are a number of other factors to consider which also can assist to reducing trips, increasing car share trips or the concentration of car travel:

- As the number of pupils at the co-located School increases, there is a greater likelihood that an increased proportion of pupils attending the School will be siblings or will live within close proximity to the school and therefore there is more likelihood of less car borne traffic and more sustainable modes such as walking being used;
- The vast majority of trips will not be parked for any considerable length of time. Any increase in parking is likely to be limited to 5-10 minute periods, and there is sufficient on street availability should it be required;
- Adoption of a robust Travel Plan, which will encourage sustainable modes of travel and educate parents and children in the advantages of these modes of travel
- Staggered start and finish times:
  - a. Russell: 08:40-3.15pm
  - b. Nursery: 08:30-12.30; 11:30-3.30pm
  - c. Strathmore: 09:05 – 3:20pm

Highway safety

77. The Transport Statement included Up-to-date road traffic collision statistical data, obtained from the TfL Road Safety Unit, for the most recently available 60 month period to 30<sup>th</sup> April 2014. Within the vicinity, a total of 7 collisions occurred, the majority of which (5) were classified as 'slight'. Furthermore, none of the incidents recorded involved pedestrians or people of school-going age, and all but one incident occurred outside of peak morning and afternoon school pick up / drop off periods. In response to such, it is considered that there are no significant road safety issues associated with, or in the vicinity of, the school, and given the times and natures of the collisions, it is very likely that the majority of incidents cannot be attributed directly to trips made to or from the Schools.

Cycling

78. The London Plan (6.9) requires developments to provide secure, convenience and accessible cycle parking facilities. The Council's parking standards require 5 spaces per classroom. The scheme incorporates 14 classrooms, and therefore 70 cycle spaces are required. The scheme provides 90 cycle spaces in two allocated on-site bicycle shelters, in accordance with policy. These are currently sited adjacent to the pedestrian accesses to the site on Petersham Road and Meadlands Drive. A condition is recommended to ensure an appropriate finish.

79. In summary, notwithstanding the increase in pupil numbers, given the on-site parking provision, parking survey results, current transport modes and predicted levels, on balance, the scheme is not deemed to be so demonstrable to the free flow of traffic and highway and pedestrian safety to warrant a refusal, subject to a number of safeguarding conditions, including a robust travel plan with monitoring.

Residential amenity

80. The Council seeks to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance. To protect privacy, there should normally be a minimum distance of 20m between main facing windows of habitable rooms. In addition 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 properties or land are protected from overshadowing in accordance with established standards. (Policies DM DC5)

81. The scheme results in an increase in the existing number of school places at the site, and this will not doubt have an impact on the level of activity and associated noise, from coming and goings and use of the play facilities. However, given the existing relationship of the school with surrounding residential properties, the limited additional numbers in the context of the whole school, this is not deemed to cause an unreasonable level of noise and disturbance to warrant a refusal.

82. No details of the plant or any extract equipment that may be required have been provided. Conditions will be recommended to ensure these remain background levels to ensure these do not cause a nuisance.

Properties in Sandpits Road

83. These properties will adjoin the south and part of the east boundary of the site. A pedestrian access (and emergency vehicles access) is proposed adjacent to the east boundary, and access road and parking area adjacent to the schools south boundary.

Whilst there will be an increase in movement on the boundary from the additional pupils, this is not to such an extent to warrant a refusal. Furthermore, such areas are slightly located off the boundaries, whereby there is scope for some landscaping to act as a buffer. The main school building will be sited off these properties north boundary, and designed to minimise its visual impact, principally lowering the height of the school as it progresses towards this boundary to single storey. Given the distance of the single and two storey element off this boundary, and length of these gardens, the scheme is not deemed to appear visually overbearing to these properties, cause unacceptable loss of light, or undue overlooking and loss of privacy.

Properties in Meadlands Drive

84. By reason of the scheme demolishing the buildings adjacent to this boundary, and the proposed school building being significantly set into the site, this will improve the existing relationship with surrounding properties. The scheme identifies an open space that could be used as MUGA in the future, and for community use. No details of this have been provided, except this will not be floodlit. To ensure this does not raise unneighbourly concerns, a condition will be recommended for further details prior to installation, however, such activity is not so dissimilar to the existing school site, and policy encourages dual use of school sites, which this would enable. The scheme, by reason of its distance to the boundary, maintains an acceptable relationship with the Strathmore site.

Properties in Petersham Road and Tree Close

85. By reason of the distance between the new school and these properties boundaries and the natural buffer between the proposed access road and car parking and these residential gardens, the scheme will maintain an acceptable relationship that does not unduly compromise their existing level of amenities. Conditions will be imposed to ensure the landscaping is implemented and thereafter maintained.

86. Given the similar nature of some of the uses to the north side of Ham House Avenues, siting of the school off this boundary, separating distances, and enhanced natural screening being proposed, this relationship is acceptable.

Trees and landscaping

87. The abundance of trees in the borough is a great asset to its environment, softening the hardness of buildings and streets, adding life, colour and character of the urban landscape and enhancing open spaces. Policy DM DC4 thereby seeks to protect the boroughs trees and landscape, and informs there will be a presumption against schemes that result in a significant loss of trees, unless replacements are proposed.

88. There are a range of tree species on site that have been planted and self sown in places, as summarised in the table below. The applicants have sought the retention of existing mature trees across the site wherever possible, however, inevitably the scheme does result in the loss of trees, as identified in the third column.

| BS Category                       | Identification                                                                                                                               | Removal                                                                 |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| A                                 | 023 and 041                                                                                                                                  |                                                                         |
| B<br>(moderate quality and value) | 001, 003, 004, 005, H1, 006, 007, G3, 009, G4 010, G5 011, 014, G6, 016, 017, 018, 020, 021, G9 022, 030, 031, 033, 035, 037, 038, 040 & G11 | 001, 007, G3, G4, G5x5, G6x3, G11x4, 009, 014, 016, 017, 018, 020 & 021 |

|                                                                                                            |                                                                                                      |                                                                |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| <p><b>C</b><br/>(generally not hinder the development - replacement planting offers greater longevity)</p> | <p>002, G1, G2, 008, 012, 013, 015, G7, G8 019, 025, 028, 029, 032, 034, G10, 036, 039 &amp; 042</p> | <p>002, G2x5, G7x2, 008, 012, 013, 015, 025, 029 &amp; 034</p> |
| <p><b>D</b><br/>(not hinder the development)</p>                                                           | <p>024, 026 &amp; 027</p>                                                                            | <p>024, 026 &amp; 027</p>                                      |

89. It is clearly regrettable that the scheme will require the removal of a large number of trees. To compensate such loss, mitigation planting is proposed, including the provision of 55 trees around the site. The Council's Arboricultural Officer has considered the impact on the existing trees cover, tree protection, and the replacement planting. The revision has addressed the concerns over the number of trees to be removed, by increasing the replanting commitment within the site therefore, subject to full replanting condition to reflect the scheme outlined in the revised D&A Statement this is accepted
90. Notwithstanding the above, from a landscape / urban design perspective, it is recommended that any future landscaping scheme incorporates:
- Additional planting at the Petersham Road end of the site to reduce the visual impact of the proposed car park, and additional planting by the pedestrian access off Meadlands Drive area as this appears rather bland.
  - Additional planting on the northern boundary with the Avenue should be looked at to lessen visual impact of new development.
91. With respect to the layout of the landscaping, this makes use of the existing landscape setting to compose and arrange spaces for social and quiet uses throughout, and will be developed in response to the current and future requirements of the School.

Flooding

92. As advised in policies 5.12, 5.13, CP3, DM SD6 and SD7, development is guided to areas of lower risk, and it is a requirement for development applications to consider the potential risk of flooding to a proposed development over its expected lifetime and any possible impacts on flood risk elsewhere, in terms of its effects on flood flows and runoff. Furthermore, all developments are required to follow the drainage hierarchy and must utilise Sustainable Drainage Systems wherever practicable:
- Store rainwater for later use
  - Use infiltration techniques
  - Attenuate rainwater in ponds and storage tanks
  - Discharge rainwater to watercourse, surface water drain and combined sewer.
93. The proposed educational building is located in Flood Zone 1. The area of the site in Flood Zone 2 will be used for green space and an access road. These uses are considered less vulnerable in accordance with the NPPF and consequently are appropriate for the Flood Zone. There is no need for either the Sequential Test or the Exception Test to be carried out for the site. The surface water map identify that the majority of the site itself has a very low risk of surface water flooding.
94. A Flood Risk Assessment (FRA) has been submitted, and this has been reviewed by the Environment Agency. They raise no objection, subject to the recommendations outlined in the FRA are implemented and secured by way of a condition. These will include:

- Finished floor levels are set a nominal 300mm above either the 1% (1 in 100 year) fluvial flood or the 0.5% (1 in 200 year) tidal flood (including an allowance for climate change) depending which is higher.
- The school should sign up to the Environment Agency's flood warning service
- A surface water drainage strategy must be adopted to ensure that post-development surface water runoff from any additional hard-standing created as a result of the development during a 100 year return period storm event including the effects of climate change is controlled to 1.5l/s to ensure that flood risk is no greater to the surrounding area as a result of the development.
- The surface water drainage strategy should incorporate SuDS, that meets the requirements of the London Plan should be developed to limit the rate of surface water run-off to the greenfield rate of 1.5 l/s per ha and improve the quality of the run-off.
- A SuDS maintenance plan and schedule should be written to ensure efficient operation of the SuDs at all times.
- Regular maintenance of existing drainage infrastructure at the site should be carried out including de-silting and unblocking of drains.
- Whilst Falling Head Tests show that infiltration SuDs are favourable, full infiltration tests must be carried out in accordance with BRE Digest 365 to confirm the permeability of the soil if infiltration SuDS are to be considered.
- The use of good housekeeping measures such as rainwater harvesting can reduce the sites surface water runoff and put the rainwater collected to good use, such as watering plants, and flushing toilets.
- The pavement/tarmac should ideally be permeable. The conceptual drainage design also incorporates the use of infiltration trenches, green roofs, and bio-retention areas for storage and conveyance at site level. The features are interconnected with underground pipes but this could be changed to over-ground SuDS features if preferable.

95. On the basis of the above, the scheme is not deemed to increase the risk of flooding or people at risk, in line with the above policies.

#### Ecology

96. Policies CP4 and DM OS 5 advise that the Boroughs biodiversity will be safeguarded and enhanced, and therefore all new development will be expected to preserve and where possible enhance existing habitats, furthermore, all development will be required to incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments with the aim of attracting wildlife and promoting biodiversity where possible. The above is reflected in the London Plan (7.19).
97. A Preliminary Ecological Appraisal; Phase 1 Habitat and Protected Species Survey Report have been submitted. This incorporates an extended Phase 1 habitat survey and an assessment of the site's habitats that was undertaken on the 27th March 2014 within the area of the proposed works and immediately adjacent land. All buildings and trees within the survey area, covering both the Russell and Strathmore Schools, were assessed for their potential to support roosting bats. This was undertaken in accordance with the Bat Conservation Trust's Bat Surveys – Good Practice Guidelines (2012).
98. The amended scheme was subject to further notification. This raised concerns over elements of the report, and therefore the applicants have commissioned a further badger survey. The results of this will be reported in the Addendum with the appropriate assessment and any recommendations. However, for the purpose of this report an assessment has been made on the information submitted to date:

**Grassland:** The survey area comprised of small area of semi-improved grassland, a species-rich hedgerow along the northern boundary of the site, scattered trees, amenity grassland, two ponds, hard standing and buildings.

**Breeding Birds:** All trees and hedgerows within the proposed site have potential to support breeding birds, of which are protected in the UK. Therefore recommend:

- Any removal of hedges and trees should be undertaken outside the bird breeding season (March-July) if possible.
- The pear tree, which has a bird box, is to be retained as part of the development, and bird box should be left in place.

**Badgers:** There is a man-made badger sett on site, and fresh spoil piles shows that the sett is in current use. The sett has been classified as an outlier sett. Therefore recommend:

- A Natural England disturbance licence should be obtained for the works to maintain legal compliance if the sett is currently occupied by a badger.
- A preconstruction badger survey is undertaken to inform a licensing decision.
- All site workers will be informed of the known badger sett and the legal implications and offences relevant to badger and their setts.
- Any works covered by a badger licence should be completed under ecological supervision;
- Any vegetation clearance close to the badger setts should be done under ecological supervision;
- Any badger/mammal paths should be cleared of any cut vegetation that may block them;
- Trenches should be covered overnight to prevent badgers or other mammals from falling into them or trenches should include an earth ramp to allow badgers to climb out;
- Works close to badger setts should be restricted at night to reduce disturbance to any badgers which may be leaving or returning to setts. If night works are essential then they should be completed under ecological supervision;
- A final walkover of badger sett should be undertaken to ensure that no damage or harm has occurred to it or any badgers and provide updated information on

**Bats:** All buildings and trees on site were assessed for their ability to support roosting bats and all were found to have negligible value as roosting sites. The habitat on site which is predominately amenity grassland, buildings and hard standing is generally of lower value for commuting and foraging bats when compared to the surrounding higher value habitats which include Richmond Park and the River Thames.

99. The report concludes that the proposed works would not have undue impacts on Richmond Park Special Area of Conservation, SSSI and National Nature Reserve, or Ham Common or Ham Lands Local Nature Reserve. Furthermore, the proposed scheme would not have any impacts on the adjacent Site of Importance to Nature Conservation or Priority Habitats, including those immediately adjacent.

100. The scheme and report has been assessed by the Council's Ecologist. No objection is raised, and whilst the scheme is not anticipated to have any residual impacts on habitats of significant biodiversity value, a number of recommendations will be conditioned:

- All recommendations and enhancements as per the Preliminary Ecological Appraisal (pages 8 – 9) of The Mouchel report revised 27<sup>th</sup> February 2015) to be implemented:
  1. A new wildlife pond is proposed. Where possible water, plants and earth from within the pond should be retained to add to the new pond, and a method statement for pond construction, and the new pond's design, should be produced
  2. Reduce the management of amenity grassland
  3. Expanding the wildlife area
  4. Reduce the nutrient level of the wildlife area
  5. Further camera trapping of the badger sett
  6. Enhance the foraging value to badgers on site
  7. Bat and bird boxes – additional nesting/roosting spaces for these animals
- The existing hedge on the north side, which runs along the service road, needs to remain in situ, and this should be fenced off
- For all areas not involved in the demolition and construction to be fenced off to protect them during the works.
- Agreement of the DMS & CMS prior to implementation; external lighting plan; landscape planting; and method statement for the pond decommission
- Any tree/vegetation removal needs to be done outside of bird nesting season
- Provision of a vegetation buffer and wildlife corridor around the perimeter of the site.

101. Subject to the above conditions being secured, the scheme will not unduly compromise the aim of the above policies.

#### Sustainability

102. The London Plan advises that developments should make the fullest contribution to minimising carbon dioxide emissions, achieving high standards of sustainable design, and 40% improvement on 2010 Building Regulations (policies 5.2 and 5.3).

103. The above is echoed in policy CP1 that states that the Council will seek to maximise the effective use of resources including water and energy and will assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction Checklist SPG. Furthermore, policy CP2 states that the Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and that it will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from onsite renewable energy generation unless it can be demonstrated that such provision is not feasible.

104. Policy DM SD 2 sets out a hierarchy that first requires an efficient design to minimise the amount of energy uses, secondly by using low carbon technologies and finally, where feasible and viable, including a contribution from renewable sources. Notwithstanding this, developers are encouraged to achieve a 35% reduction below Part L 2013, including 20% provided via renewable energies, to improve savings beyond those generated by energy efficiency measures, as set out in Core Strategy Policy CP2. This aim is also expressed in DM SD2 in which it is a requirement to 'maximize' opportunities for the micro-generation of renewable energy. Policy DM SD1 notes that the aesthetic considerations of the renewable energy technologies must also be considered in any submission. The policy requirement is to meet BREEAM 'Excellent'.



105. A 'BREEAM Design Stage Pre-assessment (Method, August 2014) has been prepared and submitted. The pre-assessment concludes that a BREEAM rating of 'Very Good' will be achieved. It is unfortunate that excellent has not been reached, however, the development has been designed with sustainability in mind, to include the following features:
- Reduced energy requirements by 15% through efficient building and services design and the inclusion of micro CHP linked to the heating and hot water generation.
  - Reduced building energy requirements by additional 20% through addition of PV panels (total 35%);
  - Development is designed for natural and passive ventilation and cooling,
  - Intelligent automatic switching systems
  - External lighting would be photocell and time clock controlled,
106. In summary, the scheme will meet BREEAM level of 'Very Good', achieve a 35% reduction in carbon dioxide emissions beyond Building Regulations 2013 of which 20% is achieved through renewable energies. As such, the development is not deemed to compromise the aims of the above policies.

**Conclusion:**

The scheme is for the demolition and rebuild of the Russell School campus, to create a purpose built school to accommodate both The Russell and Strathmore Schools. In doing so, the scheme proposes to increase the Russell pupil roll to allow for an additional shared form entry (4 classes).

The site is sensitively located, with a number of land designations, one of which is Metropolitan Open Land (MOL). Whilst the scheme is deemed as an inappropriate development within MOL, resulting in additional floor area, and will no doubt impact upon its character, the applicants have submitted evidence to demonstrate Very Special Circumstances, including, why the rebuild is necessary, the factors that have influenced the siting of the building, and the benefits of the scheme. In this instance, it is felt the harm is outweighed by these benefits to allow an exception.

The existing school is housed in a number of buildings around the site, and this will be replaced with one building. This will have a greater visual presence, however, the design is acceptable, and measures have been made to ensure this preserves the character, appearance and setting of the area (including heritage assets) and nearby residential amenities. Such as, setting the building within the site, lowering the eave heights towards the boundary, incorporating the first floor within the roof and the use of glazing to break up the massing and provide visual interest.

A parking survey has been undertaken and an assessment carried out on the travel modes of existing pupils. Whilst the scheme results in an increase in the school roll, it is not deemed to cause unacceptable additional parking, congestion or traffic implications, subject to a condition for a robust travel plan.

**RECOMMENDATION: PERMISSION, subject to Stage 2 Referral to the Greater London Authority, and the conditions and informatives outlined in the report.**

**Standard conditions:**

- ✓ AT01 1 - Development begun within 3 years
- ✓ BD04 2 - Details (section through elevation / windows / doors / curtain walling / sheds / play equipment)
- ✓ BD10 3 - Sample panels of brickwork
- ✓ BD12 4 - Details - Materials to be approved

- ✓ DV01A 5 - Boundary fencing – Building occupation
- ✓ DV46A 6 - BREEAM for Non-Housing (Very Good)
- ✓ DV11 7 - Use of roof restricted
- ✓ DV18 8 - Refuse / recycling arrangements
- ✓ DV28 9 - External illumination
- ✓ DV30 10 - Refuse / recycling storage
- ✓ DV40 11 - Travel Plan
- ✓ DV48 12 - Decision Drawings
- ✓ DV49 13 - Construction Method Statement
- ✓ PK06 14 - Cycle parking
- ✓ LT09 15 - Hard and soft landscaping – 6months after commencement of development
- ✓ LT11 16 - Landscape Management - Large Scheme

**Non-standard conditions:**

NS01 - **Car Parking Provision:**

17

The development hereby approved shall not be occupied until the approved car parking provision and its associated demarcation (including blue badge parking) has been provided on site, and is thereafter retained. The parking spaces shall not be occupied other than by staff and visitors of the school.

REASON: To ensure the development does not result in unacceptable parking congestion or highway safety concerns.

NS02 - **Pupil numbers:**

18

The total number of pupils on the SEN school roll at the Russell School campus shall not exceed 24 pupils. The total number of pupils at the Russell Primary School pre-school shall not exceed 26 (FTE); and the total number of pupils at The Russell Primary School shall not exceed 330 pupils, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To safeguard highway and pedestrian safety and protect the amenities of neighbouring residential occupiers.

NS03 - **Service Management Plan:**

15

No servicing or deliveries shall take place other than in accordance with a Servicing Management Plan (to include a plan depicting manoeuvring layouts for the service vehicles and proposed hours) which shall have been submitted to and approved in writing by the Local Planning Authority prior to first occupation of any part of the building. The use of the site shall only operate in accordance with the agreed service management plan, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that the development is not detrimental to the free flow of traffic, the conditions of general safety along the neighbouring highways and within the site and to accord with the Council's policy and standards

NS04 - **Environment Agency Condition**

20

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) February 2015 / ref: 916B version 3 / compiled by RAB Consultants, its Appendixes (A, B and C) and the following mitigation measures detailed within the FRA:

- Limiting the surface water run-off generated by the 1 in 100 (1% Climate Change allowance) critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site. Discharge flow rates should be limited to 5l/s as proposed by the Conceptual Drainage Strategy so that potential blockages are avoided.

REASON: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site and to reduce the risk of flooding to the proposed development and future occupants.

NS05 - **Roof Structures**

21

Before first occupation of the development hereby permitted, details of any plant and extract equipment; safety railings; PV panels; lift over run shall have been submitted to and approved in writing by the Local Planning Authority (including siting, design and all technical details). The development shall be carried out in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interests of the amenity of the area and surrounding residents.

NS06 - **Community Use and management**

22

Prior to the occupation of the development hereby permitted, details of the community use, and management of such, of the site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interests of the amenity of the area and surrounding residents.

NS07 - **Arboricultural Method Statement (AMS)**

23

Prior to the commencement of development, an Arboricultural Method Statement (AMS) and Construction Method Statement specific to this scheme shall be submitted to and approved in writing by the Local Planning Authority. This AMS must outline any tree constraints and details of all tree protection, both above and below ground and special engineering for construction within the Root Protection Area. The Tree Protection Plan and Arboricultural Method Statement must be written in accordance with and address sections 5.5, 6.1, 6.2, 6.3 and 7 of British Standard 5837:2012 Trees in relation to design, demolition and construction - recommendations. The development shall not be implemented other than in accordance with the approved AMS.

REASON: To ensure that the tree (s) are not damaged or otherwise adversely affected by building operations and soil compaction.

NS08 - **Tree Planting Scheme**

24

No development shall take place until a specification of tree planting has been submitted to and approved in writing by the local planning authority. This shall include:

- The specification is to include details of the quantity, size, species, position, planting methodology, proposed time of planting and anticipated routine maintenance of all trees to be planted. All tree planting included within the approved specification shall be carried out in accordance with that specification and in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations (sections 5.6) and BS 8545:2014 Trees: from nursery to independence in the landscape. Recommendations.
- A 5 year maintenance and management programme, as outlined in BS8545.
- If within a period of 5 years from the date of planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted, destroyed or dies, (or becomes in the opinion of the local planning authority seriously damaged or defective), another tree of the same species and size originally planted shall be planted at the same place in the next planting season/within one year of the original tree's demise unless the local planning authority gives its written consent to any variations.

- All tree planting shall be carried out in accordance with the details so approved and in any event prior to occupation of any part of the development, unless otherwise agreed in writing with the local planning authority.  
REASON: To protect the landscape value of the site.

NS09 - **Ecology:**

25

✓ Prior to the commencement of development, the following schemes shall be submitted to and approved in writing by the local planning authority. The development shall thereafter only be implemented in accordance with the approved schemes unless otherwise previously agreed in writing with the local planning authority:

- Areas that shall be fenced off to protect the ecological value of the site for the duration of the development (this shall include, but not be limited to - all areas not involved in the demolition and construction; vegetation and wildlife corridor around the perimeter of the site; existing hedge on the north side, which runs along the service road. This is very valuable to existing birds, and needs to remain in situ)
- Method statement for the pond decommission and new pond build including transfer of any wildlife and water;
- External lighting plan including locations, specs, lux plan (vertical as well as horizontal) and spectrum of proposed lighting prior to implementation.
- The DMS and CMS. Due to the presence of badgers on site, the DMS and the CMS must take them into consideration with good practice implementation. Evidence will be required of this as part of the CMS condition.

REASON: To protect the ecological value of the site

NS10 - **Bird nesting:**

26

✓ No trees or vegetation shall be removed other than outside of the bird nesting season, unless previously approved in writing with the local planning authority. If the latter is to occur, mitigation measures should be put forward to ensure this does not harm habitats.

REASON: To ensure the development does not compromise the habitat value of the site.

NS11 - **Habitat Survey**

27

✓ Unless otherwise agreed in writing by the Local Planning Authority prior to the commencement of development on site, the development shall not be carried out other than in accordance with the Preliminary Ecological appraisals (pages 8-9) of The Mouchel Report revised 27<sup>th</sup> February 2015). Precautions shall be undertaken to ensure that all open holes left over night will have a form of method to allow animals who have fallen in to exit. Should bats be seen all work must halt until Natural England have been contacted for advice and have confirmed in writing that they agree work may continue.

REASON: To ensure the development would enhance the ecological value of the site.

NS12 - **Wildlife Enhancement Scheme:**

28

✓ No part of the development hereby approved shall be occupied until all the recommendations and enhancements as per the Preliminary Ecological appraisals (pages 8-9) of The Mouchel Report revised 27<sup>th</sup> February 2015) have been implemented in full. (This should be looking specifically for bat/bird/butterfly/stag beetle and hedgehog habitats. This includes pects/locations/positions/aspects)

REASON: To protect the ecological value of the site.

NS13 - **TFL – Construction Logistics Plan:**

29

Prior to the commencement of development a construction logistics plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other than in approved with the approval plan.

REASON: To ensure highway safety and minimise the impact of delivery and serving movements to, from and within the site.

NS14 - **MUGA:**

30

With respect to the perspective non-floodlit MUGA adjacent to Meadlands Drive, this shall not be carried out otherwise than in accordance with detailed drawings, including plans, design and boundary treatment. The development shall not be implemented other than in accordance with the approved detailed drawings.

REASON: To ensure the development preserve the amenities of the site, area and nearby residents.

NS15 - **Existing buildings**

31

Unless otherwise agreed in writing with the local planning authority, prior to the occupation of the school hereby approved, the existing buildings on site shall be demolished.

REASON: To ensure an acceptable form of development.

**Standard Informatives:**

COM1 - Composite informative

IL25 - NPPF APPROVAL - Para. 186 and 187

**Non-standard informatives:**

NI01 - **Applicant's advice landscaping:**

- The landscaping scheme should incorporate native, wildlife friendly species.

NI02 - **Applicants advice materials:**

Notwithstanding what is shown on the submitted plans:

- The bin store should have powder coated steelwork, not just galvanised finish.
- Cycle store colours: Royal blue would be too strident. This should be finished in a muted dark finish.

NI03 - **Applicants advice ecology:**

- With respect to condition NS09 (ecology), the Council's Ecology Officer (Tasha Hunter) should be invited to the site to confirm the areas to be fenced off.
- If development has not commenced prior to 26/03/2016 a new survey must be carried out to ensure that the wildlife activity is current, and this should be submitted to and approved in writing by the Local Planning Authority.
- If any works are undertaken during the breeding season then an ecologist should be present to check the habitat for active nests prior to removal. If breeding birds are found, work in the vicinity of a nest should be avoided until young birds have fledged (period dependent on bird species).

NI04 - **Applicants advice Thames Water and Environment Agency:**

- Surface Water Drainage – With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason – to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.
- Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- Environment Agency: We have updated our advice for developers and it is now a joint agency document with advice from Environment Agency, Natural England and Forestry Commission, it's available to view on our website: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LIT\\_2745\\_c8ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf)
- The applicants are advised to refer to the Environment Agency's letter dated 1<sup>st</sup> April 2015.

NI05 - **Applicants advice TFL:**

- TFL has developed a Standard for Consecution Logistics, to reduce risks to vulnerable road users. A commitment from the applicant and their primary contractors to demand a higher level of safety should form a key part of the CLP.TFL request that the applicant and their contractors sign up to this standard.
- TFL wishes to ensure that construction vehicles are fitted with cycle specific safety equipment.

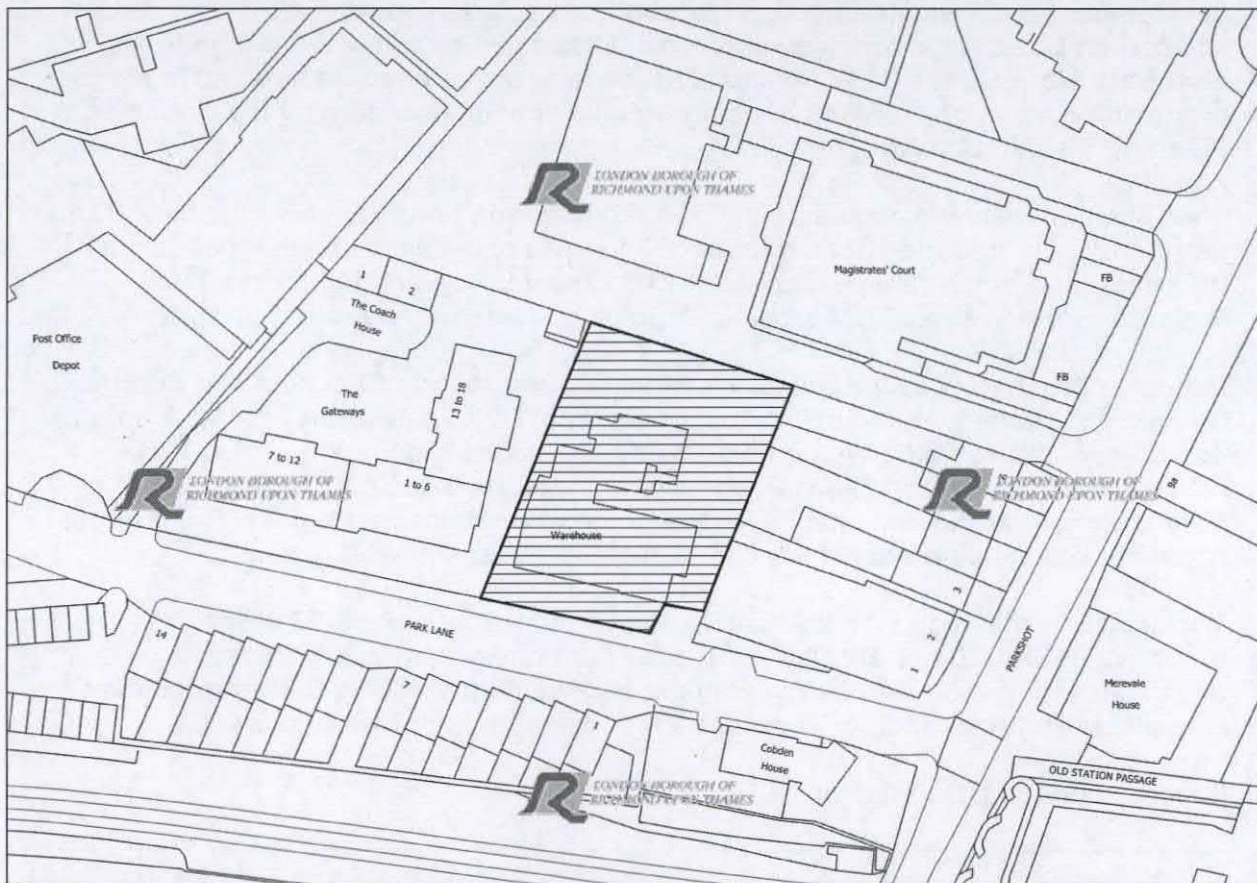
**Background papers:**

- Submitted forms and application
- Material representations
- Planning history3

14/3780/FUL  
 RICHMOND FILM SERVICES  
 PARK LANE  
 RICHMOND

SOUTH RICHMOND WARD  
 Contact Officer:  
 R Naylor

[http://www2.richmond.gov.uk/PlanData2/Planning\\_CaseNo.aspx?strCASENO=14/3780/FUL](http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=14/3780/FUL)



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**Proposal:**

The scheme subject to this application is for the conversion and restoration of the Old School building to form five residential apartments and 90m<sup>2</sup> of B1a Office space; including the erection of three terraced townhouses with basement accommodation at the rear of the site with car parking, landscaping, and use of the existing vehicular access.

**Applicant:** Mr David Evans agent on behalf of Halebourne Land and Planning Ltd

**Application received:** 8<sup>th</sup> September 2014

**Summary of application:**

The principle of development for change of use from employment to a mixed use development is considered acceptable as it has been demonstrated that the current site cannot be let for alternative employment accommodation without significant disruptive works to the BTM. A viability assessment has been undertaken in respect of providing affordable on-site housing which has been accepted by the Council's Planning Viability Advisor.

The scheme meets the maximum parking requirement, however given the high PTAL level, proximity to good public transport links, and being within walking distance to the centre and other transport nodes in this case it is considered acceptable. Nevertheless a Section 106 Agreement can be conditioned to restrict permits.

Details in the form of a completed Sustainable Construction Checklist and Energy Compliance Statement, indicating the provision of PV panels at the roof level would provide the 20% reduction in carbon dioxide emissions required by policy. The scheme should meet the "Very Good" rating under the BREEAM Domestic Refurbishment rating and Level 4 for the Code for Sustainable Homes. The proposal is therefore considered generally compliant with the sustainability aims.

The design is of a high standard and is compliant with policies CP7 of the Core Strategy and DM DC1 of the DMP. The provision of eight units is generally compliant with policy. Subject to conditions the amenity of neighbouring residents is respected with no additional overlooking, loss of light or loss of privacy.

**Recommendation: Permission**

**Development Plan Policies:**

Local Development Framework Core Strategy 2009: CP1, CP2, CP7, CP8, CP14, CP15 CP16 & CP19

Local Development Framework Development Management Plan 2011: DM SD1; DM SD2; DM SD3, DM SD6; DM HO1; DM HO3; DM HO4; DM HO6; DM SI1; DM EM2; DM TP2; DM TP6; DM TP7; DM TP8; DM HD1; DM HD3; DM DC1; DM DC5

**Supplementary Planning Guidance:**

Central Richmond Conservation Area Statement

Central Richmond Conservation Area Study

Design Quality SPD

Planning Obligation Strategy SPD

Sustainable Construction Checklist SPD

Residential Standards SPD

Small & Medium Housing Sites SPD



**Site and History:**

1. The application site consists of the one/two storey former school building which occupies the south and west areas of the site. The premises have been occupied by Richmond Film Services since consent was granted for the use of the buildings for storage and ancillary offices, workshop and showroom in connection with the equipment hire business in 1986. The building is locally listed as a Building of Townscape Merit (BTM) and is located within Central Richmond Conservation Area (CA17) and Town Centre Boundary, and is identified as an Archaeological Priority Area.
2. The application site is located on a prominent albeit set back plot along Park Lane close to the junction with Parkshot opposite the railway line. The property is effectively land locked with the Gateways apartments located to the west of the site, the Magistrates Court to the north which has also been designated a BTM whilst the properties to the east consist a residential terrace (3-6 Parkshot) which are grade II listed buildings. Whilst 1-2 Parkshot is understood has a lawful use for B1 offices.
3. The site is located in an area with a PTAL rating of 6a, which is excellent and is also located within a controlled parking zone (CPZ A1 Richmond Town) which is operational Mon-Sat 0830am-1830pm, although in some parts of the A1 zone parking controls also apply on Sundays and Bank Holidays between 1100-1700 mainly to prevent commuter parking and provide time limited parking for visitors to the shops.
4. In regard to planning history the following is considered of most relevance to the current application:
  - 7500 – Approval for an extension to the school
  - 69/1881 – Approval for the use of the building for storage purposes and use of playground as a vehicle park in conjunction with this change of use
  - 68/1882 – Withdrawn application for use of the building for office and storage purposes and use of the playground as a car park in conjunction with this change of use
  - 70/252 – Approval for a catering school, catering reception rooms, kitchen and warehousing of equipment
  - 73/1840 – Refusal for an outline application for the erection of a three storey block of offices
  - 80/53/4 – use of premises as a staff training centre – application not proceeded with
  - 80/685 – Refusal for the use of the building for storage purposes and use of former playground as a vehicle park in conjunction with the storage use
  - 85/1772 – Approval for the change of use to storage together with ancillary offices, workshop and showroom in connection with the business of equipment hire to the broadcasting and film industry.

5. More recently a planning application (Ref: 12/2968/FUL) was refused planning permission under delegated authority for the conversion (through dismantling and reconstruction of building) and extension to main 'School' building to form 5 no. 2 bedroom units and 1 no. 3 bedroom house; the demolition and removal of existing single storey extensions to main 'School' building and the erection of a terrace of 3 no. 3 and 4 bedroom townhouses. Associated landscaping works and car parking provision for 9 no. vehicles. There were eight reasons for refusal which were as follows:

1. *In the absence of appropriate evidence to demonstrate that the existing use, redevelopment for other employment uses, mixed use or maximising affordable housing would be unsuitable for the site, the scheme represents an unacceptable loss of valuable employment generating floor space in highly accessible, town centre location. The scheme would be contrary to policy, in particular policies CP19 of the Core Strategy, DM EM2 of the Development Management Plan.*
2. *The proposal, by reason of the unsatisfactory viability report; and the absence of a binding obligation to secure the necessary contribution towards affordable housing, has failed to demonstrate that the scheme has maximised affordable housing provision. The scheme is thereby contrary to policies CP15 and CP19 of the Core Strategy, DM EM2, DM HO4 and DM HO6 of the Development Management Plan, and SPD (Draft) 'Affordable Housing'.*
3. *The development, by reason of the loss of the existing building of townscape merit, the unsatisfactory justification for its demolition, and the unacceptable design elements of the replacement dwelling, would represent an unsustainable and inappropriate form of development, and that would harm the visual amenities of the surrounding area and character, appearance and setting of nearby buildings of townscape merit, listed buildings, the streetscene, and the conservation area in general. The scheme is thereby contrary to the Council's adopted policies, in particular, CP1 and CP7 of the Core Strategy, DM HO1, DM HD1, DM HD2, DM HD3, DM DC1, DM DC5 of the Development Management Plan; and SPD 'Small and medium housing sites' 'Design Quality'; and National Planning Policy Framework.*
4. *The backland development proposed by reason of its siting, proximity to the surrounding properties, unacceptable scale, width, height, design, form, massing and bulk would represent a dominant, incongruous and visually intrusive form of overdevelopment that would be detrimental to the character, appearance and setting of this part of the street scene, conservation area, surrounding Buildings of Townscape Merit (BTM) and Listed Buildings. The proposal would thereby be contrary to the Council's adopted policies, in particular, CP7 of the Core Strategy, DM DC1, HD1, HD2, HD3 of the Development Management Plan and SPD 'Small and Medium Housing Sites', 'Residential Development Standards' and 'Design Quality'.*

5. *The proposed conversion and backland site by virtue of their layout and design would result in substandard residential accommodation, whereby many of the rooms would experience unacceptable outlook and be overlooked by the surrounding development. This would provide unacceptable living conditions for the future occupants of these properties. The scheme also fails to provide satisfactory outdoor amenity space for both the backland and residential units and no information has been provided to demonstrate that the scheme meets the lifetime homes requirements. The proposal would therefore be contrary to the Council's adopted policies and guidance, in particular Core Strategy policy CP7 and CP14, Policy DM HO4, HO3, DC1 and EM2 of the Development Management Plan and Supplementary Planning Document 'Residential Development Standards'.*
6. *The proposed backland development, by reason of its siting, proximity to surrounding properties, height, width, scale, form and bulk, would represent an overbearing, visually obtrusive and unneighbourly form of development, detrimental to surrounding occupants level of amenities. The scheme is thereby contrary to policies DM DC5 and HO3 of the Development Management Plan, CP7 of the Core Strategy, SPD 'Small and Medium Housing Sites' and SPD 'Residential Development Standards'.*
7. *Without a binding obligation to preclude the issue of car parking permits to the owners of the units, loss of on street parking bays, inappropriate layout of the proposed car parking spaces, and lack of defined pedestrian access into the site, the proposal would be likely to generate increased demand for on-street car parking and result in a loss of on street parking bays to the detriment of the free flow of traffic, the conditions of general safety for pedestrians and vehicles and the residential amenities. The scheme would thereby be contrary to the Council's adopted policies, in particular TP2, TP8 and HO3 of the Development Management Plan, CP5 of the Adopted Core Strategy, and Supplementary Planning Document 'Front Garden and Other Off Street Parking Areas'.*
8. *In the absence of an appropriate legal obligation to secure contributions towards education, health, public realm, and transport within the Borough, the proposal would be contrary to the adopted Supplementary Planning Guidance 'Planning Obligations Strategy', policy SI1 of the Development Management Plan and policy CP16 of the adopted Core Strategy.*

**Proposals:**

6. The current scheme has been submitted in an attempt to overcome the previous reasons for refusal and consists the proposed conversion and restoration of the Old School building to form 5 no. residential apartments, and 90 square metres of B1a Office space, and the erection of 3no. terraced townhouses with basement accommodation at the rear, with car parking, landscaping, and use of the existing vehicular access.

**Amendments:**

7. Following negotiations with the Council's Transport and Conservation teams the plans have been amended to reflect suggested requirements and include revised drawings; report prepared by the structural engineering company setting out alternative proposal for the repair and remediation of the existing structure in connection with the change of use; and details of access and parking arrangements as requested by the Transport Team. These include:

- Amended elevations on the new units at the rear
- Revised layout includes a wider access onto Park Lane and a 1.2m wide footway and that all the parking spaces have adequate manoeuvring room;
- Separate waste storage arrangements for the two uses and a covered cycle store
- Commitment to retain both the rear, side and front walls of the original building

**Public and Other Representations:**

8. 12 letters of objection have been received and the following issues and the following material planning considerations have been raised:
- Loss of privacy
  - Safety concerns over traffic during the construction phase
  - Traffic Generation and parking issues
  - Noise and Disturbance resulting from use
  - Loss of Trees
  - Loss of light and overshadowing
  - Negative impact on visual amenity
  - Impact on listed building in a conservation area
  - Layout and density of building
  - Design appearance and materials
  - Office space out of keeping
  - Impact on nature conservation
  - Loss of employment use

**Professional comment:**

9. The main issues associated with this application are a) whether the proposal would accord with the Council's employment policies; b) does the proposal accord with housing policies; c) Community Infrastructure Levy (CIL); d) any impacts of the design on the conservation area and the host property (BTM); e) are there any negative impact in regard to neighbouring amenity; f) are there any negative impacts in regard to the additional transport and parking issues; g) are there any negative impacts on trees; h) biodiversity and archaeology impacts and i) does the proposal accord with the sustainability policies. These shall be dealt with in turn.

*a) Acceptability of change of use:*

10. Policy CP19 of the Core Strategy 2009, seeks to retain and create diverse and strong local economies, and has a general presumption against the loss of employment land. This is continued in Policy DM EM2 where the use of employment land for other purposes will only be permitted where:

*a) Adequate and realistic marketing evidence exists, and either*

*b) A sequential approach has been applied to the site as follows:*

*i) employment redevelopment*

*ii) mixed use (where employment floorspace is retained)*

*iii) maximized affordable housing provision; or*

*c) The location has access and servicing restrictions that are so poor continued employment use would be inappropriate.*

11. Policy DM EM2 indicates that given the length of economic and development cycles, a site should be marketed for normally a minimum of two years at realistic prices. This should be initially for the existing use, and if this is not practicable then for alternative employment generating uses for instance health clinic, nurseries and crèches, hotels and leisure facilities, or other uses identified of community purposes.
12. Where the Council considers that the retention of the site for employment use is no longer practicable, then exceptionally the Council may permit residential development which maximises affordable housing in accordance with policy CP15. However, given the current economic situation the Council will consider the viability of the scheme on an individual basis.
13. In relation to policy DM EM2, the Development Management Plan includes within its definition of employment sites, land lawfully used as office, storage and distribution uses. The current lawful use of the site is as a Warehouse (B8) and Office use (B1) and the building has been occupied by Richmond Film Services since the mid-1980s.
14. Policy DM EM2 states that the use of employment land for other uses will only be permitted where there is satisfactory evidence that a full and proper marketing exercise has been carried out over an extended period for the existing use and redevelopment for other employment uses (part a)
15. Richmond Film Services still occupy the application building however state that they are looking for a new premises as the existing is too small for their current needs. The age of the building, narrow corridor, and layout means that transferring items from their storage to car park is becoming increasingly difficult and unsuited to the current business as it has evolved over the years. The current owner has confirmed that no formal marketing of the building has been carried out. This decision followed advice from a local agent that it would be very unlikely that any commercial end user or operator would want to take on the building as it would be major and costly to upgrade.
16. The proposal is for the reversion of the site for the use for residential purposes however the current application seeks to retain 90m<sup>2</sup> of office space and thus the site would be considered as a mixed use type.
17. Although the proposal is for a mixed use scheme, there is a loss of employment floorspace and therefore in accordance with Policies CP19 and DM EM2, any residential use replacing employment floorspace should be in the form of affordable housing. The applicants submitted a viability statement in regard to the scheme. The Council had originally requested evidence of approaches to Registered Providers to exploring on site provision and commissioned a review of the viability assessment submitted with the application which suggested there was scope for a financial contribution.
18. However in light of the Ministerial Statement and NPPG update of 28 November 2014, advising that contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development, the Council can no longer seek affordable housing contributions which would need to be secured through a Section 106 agreement from developments of 10-units or less and which have a maximum combined gross floorspace of no more than 1000m<sup>2</sup>. The site's constraints do not allow for either threshold to be exceeded. Nevertheless, this does not overcome the need to explore on-site provision first, as on all sites that were last used for employment purposes, Policies CP19 and DM EM 2 must be addressed and on-site delivery of affordable housing will be required.

19. In the earlier site discussions, the need to explore on-site affordable housing provision has been raised. The Planning Statement with this application refers to consultations with three local housing associations in 2012 and none were willing to countenance on site provision. Viability discussions had progressed under the last application and under this application prior to the change in Government policy. However, the Council can no longer pursue a viable financial contribution in the same way.
20. A viability led argument has always formed part of the policy justification for the application. The viability assessment set out that a solely employment-based scheme or mixed use scheme where the level of employment floorspace is retained would not enable the restoration of the Old School Building which can only be achieved through a predominantly residential scheme.
21. The 2014 Viability Assessment modelled a wholly affordable housing scheme, finding that significant additional funds would need to be invested by the registered provider to deliver such a scheme. While this has not been formally interrogated and further viability discussions could reduce this gap, it appears to be a significant deficit.
22. There would also be concern as to whether on-site affordable housing could be delivered, as there are shortcomings to the standard of residential accommodation in the new build houses specifically the lack of private amenity space. Affordable units would be expected to meet the London Housing Design Guide standards, and given the tight nature of the site this is not envisaged as possible here.
23. Provision of funding has been discussed with the Council's Housing Development Manager but it is unlikely to be able to bridge the gap and demonstrate value for money in this context. The Council's Viability Advisor has suggested that even with significant levels of grant support it would not be financially viable to provide on-site affordable housing.
24. Given the current poor state of repair of the BTM, limited floor loading and the lack of suitability for modern IT of the existing building and existing structure and fabric are not ideal for use as a modern office/employment environment, it is considered unlikely that the unit could be used for an office/employment use without the need for significant modernisation. As such it is recognised that there are merits to the mixed use scheme and the restoration of a BTM, as discussed at point d) below. The proposal does not provide the supporting marketing evidence as normally required by DM EM2 however this has been justified by the aforementioned viability led argument.
25. In light of the policy context and these circumstances and given the advanced nature of discussions on this site, officers considered it was reasonable to pursue a financial contribution in this particular case, to satisfy DM EM2 (b) (ii) and (iii). The developer had indicated their willingness to offer a contribution of £90,000 towards affordable housing contribution and the Council's Viability Advisor had recommended that this was a reasonable offer in the context set out above. However, in the light of the recent changes to National Policy the Council can no longer seek affordable housing contributions from developments that do not meet with the thresholds, and the contribution reluctantly cannot be accepted.

*b) Housing mix and standards*

26. Policy CP14 of the Core Strategy indicates that density of residential proposals should be taken into account and the need to achieve maximum intensity compatible in the local context, whilst respecting quality, character and amenity of the existing neighbourhood. The policy further indicates that all new housing should be built to Lifetime Homes standards and that 10% should be to wheelchair standards.
27. DM HO3 of the DPD and SPD 'Small and Medium Housing Sites' refer specifically to backland development and states that such development must reflect the character of the surrounding area and protect neighbouring amenities. In assessing such, consideration will be given to the size and shape of the site; character of the area; access to facilities; design; effect on landscape and nature conservation; whether the scheme meets the local housing needs; and car parking and traffic implications.
28. DM HO3 states that in general, the Council will not accept proposals for developments on back garden land but proposals for development of backland sites in other uses may be acceptable if it would not have a significantly adverse impact upon the following:
- Garden land – The site does not form part of residential gardens and is a brownfield site currently consisting of hardstanding and buildings;
  - Impact on neighbours – Subject to conditions the privacy of existing homes and gardens will be maintained (see section e) below)
  - Vehicular access or car parking – Subject to conditions there is no adverse impact on neighbours (see section f) below)
  - Mass and scale of development – The scheme has been significantly reduced in mass and scale from the previous refusal and the proposed mews type development is considered more in scale with the surrounding area (see section d) below)
  - Trees, shrubs and wildlife habitats – Features important to character, appearance or wildlife must be retained subject to conditions the scheme will have no impact in regard to these (see sections g) and h) below)
29. These issues are addressed further below and demonstrate compliance with the requirements of policy DM HO3.
30. Policy DM HO4 states that development should generally provide family accommodation, except within town centres where a higher proportion of small units would be acceptable. The housing mix should be appropriate to the location. All new residential development including conversions are required to meet with the external and internal space standards. These requirements are further set out in the Residential Development Standards SPD, particularly in terms of baseline standards, amenity space, and outlook etc.
31. No small one bed units are provided as part of this application, however, the scheme would help to meet the objective Policy HO4 by providing small family dwellings. There are both larger and smaller units in the vicinity, and these flats would contribute to the overall variety of accommodation. It is recognised that creating a mix of units in a small development is not always practicable and, in the circumstances, it is not considered essential that the development should provide a proportion of small units. The scheme is therefore considered to comply with policies CP14 and DM HO4.

32. Overall, the proposed mix is considered acceptable within this area given that the proposal is located within Richmond Town centre. The Residential Development Standards SPD states that 2 bedroom units should have 60m<sup>2</sup> and 3 bedroom units should have 70m<sup>2</sup>. The details in respect to the proposed units are:

| Number<br>(NB: No 1 is the office) | Units | Tenure  | Location   | Internal floor space (m <sup>2</sup> ) |
|------------------------------------|-------|---------|------------|----------------------------------------|
| 2                                  | 2 bed | Private | Conversion | 79.0                                   |
| 3                                  | 2 bed | Private | Conversion | 60.0                                   |
| 4                                  | 2 bed | Private | Conversion | 83.0                                   |
| 5                                  | 2 bed | Private | Conversion | 93.0                                   |
| 6                                  | 2 bed | Private | Conversion | 72.0                                   |
| 7                                  | 3 bed | Private | New build  | 131.0                                  |
| 8                                  | 3 bed | Private | New build  | 137.0                                  |
| 9                                  | 3 bed | Private | New build  | 131.0                                  |

33. Therefore it is considered that the housing standards have been met in this respect. The SPD further indicates that a minimum of 5m<sup>2</sup> for outdoor amenity space should be provided for a 1-2 person flat, plus an additional 1m<sup>2</sup> for each additional occupant. Accommodation likely to be occupied by families (such as the new builds) should have direct and easy access to a good sized private garden. The aspect, useability and sense of enclosure will all be taken into account in assessing whether the private garden provided sufficiently good living conditions.
34. The application is a conversion and new build and given the current layout of the building and the town centre location there is no scope for the provision of any further private outdoor amenity space, without reducing the footprint of the building, which would in turn reduce either the number of units provided or the internal dimensions and quality of accommodation.
35. Paragraph 5.1.28 of policy DM HO4 indicates that in town centres the onus is on the applicant to show that usable roof terraces, roof gardens and balconies have been considered and the standards cannot be met. Given the location of the application site within the conservation area; its designation as a Building of Townscape Merit and the proximity to surrounding residential properties, it is considered that no additional external amenity space can be accommodated on the street facing façade in this particular location, and the incorporation of balconies/terraces in this location would be considered out of keeping and unneighbourly. As such the scheme would not meet the external amenity standards in this regard.
36. The SPD 'Residential Development Standards' states that the over intensification of a site through new residential proposals is often indicated if there are awkwardly shaped or arranged units and rooms without satisfactory light, including solely north facing single aspects or by a large number of wholly internal kitchen areas.
37. It is noted that the new build element contains dining rooms and kitchens with the basement areas which have single aspect lightwells. Whilst not an ideal situation these lightwells are on the south side of the development and have a limited outdoor amenity space providing a minimal outlook for occupants. As such the current scheme is considered an improvement on the living conditions of any future occupiers from the previous scheme.



38. Policy CP14 requires all homes to Lifetime Homes Standards and this is referred to in the Planning Statement that the 16 requirements will be met and that 10% should be to wheelchair standards, however no details are provided. Nevertheless this requirement can be secured by way of a condition.

*c) CIL*

39. Whilst the site is below the threshold for requiring an affordable housing contribution (See section a) above), the scheme is a chargeable development under both Mayoral and Borough CIL whose current rates are set at £50 and £250 per square metre respectively.

*d) Impacts on the conservation area and Building of Townscape Merit (BTM)*

40. The National Planning Policy Framework advises the Government attaches great importance to the design of the built environment stating that developments should be visually attractive as a result of good architecture. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

41. The NPPF advises that a heritage asset can include a locally listed building, and is identified as having a degree of significance. Further, councils should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. Further, significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

42. The NPPF goes on to advise that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

43. Policy DM HD1 of the DMP 2011 has a presumption to protect areas of special significance by designating Conservation Areas. Impact of proposals within and affecting the setting of Conservation Area will be taken into account. Features that contribute to character and appearance of the area will be retained, whilst new development should conserve and enhance the character and appearance of the area.

44. Policy DM HD3 seeks to preserve and enhance Building of Townscape Merit (BTM) by protecting their significance, character and setting. Alterations and extensions should be based on an accurate understanding of the structure and respect the architectural character and detailing of the original building.

45. Policy DM DC1 further states that new development must be of a high architectural and urban design quality. 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. Particular regard should be had to the compatibility with local character and detailing and materials.

46. As stated the site is located with the Central Richmond conservation area. The Central Richmond conservation area statement indicates that the character of the area is mainly a commercial shopping area and the townscape is noteworthy for its variety with a consistently high quality and many exuberant individual buildings. The area faces problems and pressures in regard the potential for the loss of traditional architectural features and materials due to unsympathetic alterations. The statement further identifies that there are areas of opportunity of enhancement in particular with regard to the improvement and protection of its setting and seeks the preservation, enhancement and reinstatement of architectural quality and unity.
47. The application site is located in a conservation area and the buildings to the east are Grade II listed and to the north are locally listed as BTMs. Therefore any scheme would need to be sensitively designed, be of a high design standard and would need to preserve and enhance the character and appearance of the conservation area and neighbouring properties. The works can be divided into two operations 1) redevelopment of the existing BTM and 2) the new build to the rear. These shall be dealt with in turn:
- 1) *Redevelopment of the existing BTM*
48. The existing building despite some unattractive "recent" additions to the side and rear, is a prominent and eye-catching development and thus any development should seek to retain and preserve the character and appearance of the existing property. Unlike the previous scheme which sought to demolish and rebuild the host property the current scheme seeks to retain the majority of the host property.
49. The frontage of the BTM facing Park Lane and side elevation adjoining the properties to the east and the west will remain relatively unaltered in order to keep any impacts on the character or the appearance of the host property as minimal as possible. The main alterations in regard to the site can be broken down into the following elements a) demolition of the modern structures to the rear and b) demolition of the internal walls. These are indicated on the following plan:

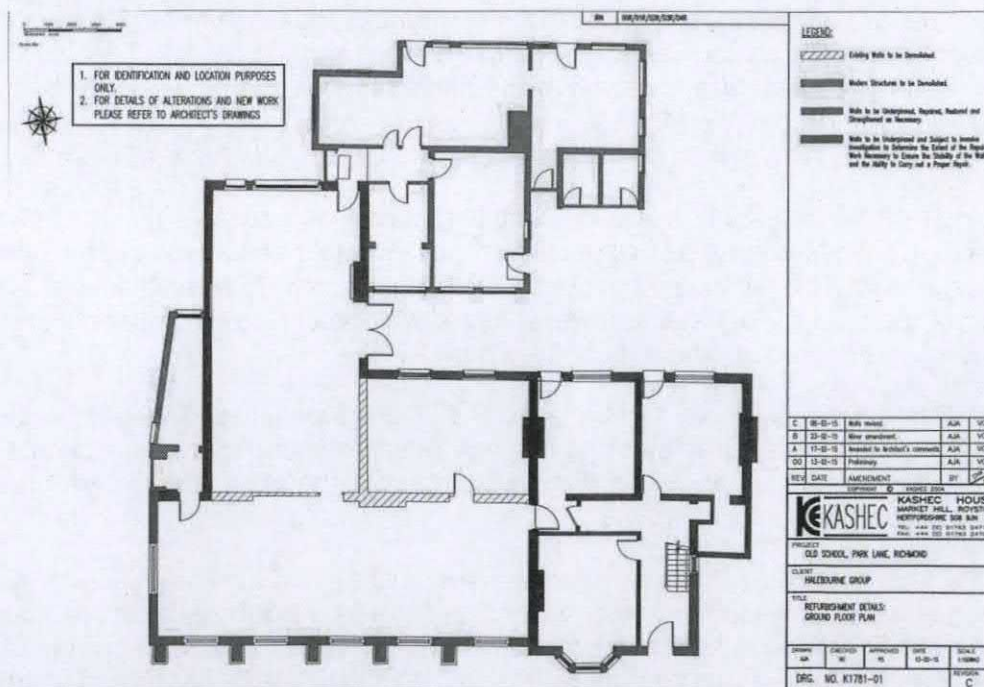


Figure A – Demolition plan (NTS)

50. As part of the application the Council's conservation team has been consulted in respect to the current proposal. They have previously noted that they consider that buildings are of historic and architectural interest and that they contribute to the character, appearance and history of the conservation area. The Conservation Team have raised concerns in respect to the level of demolition at the site and requested further amendments to the scheme.
51. The previous refused scheme was subject to structural surveys from both parties in regard to the levels of demolition proposed. No common ground could be reached and thus on the basis of the conclusions from both structural engineers, the Council did not consider that there is sufficient evidence or exceptional circumstances that would acceptably justify the demolition and rebuild of the application BTM. As such there remains an in principle objection to the proposed demolition and rebuilding of the BTM.
52. The applicant has revised the previous scheme significantly in order that the current proposal seeks to retain a significant proportion of the original structure and thus seeks to preserve the character and appearance of the conservation as far as possible whilst still providing a useful and usable redevelopment of the site. A draft 3D visual of the proposal is shown below:



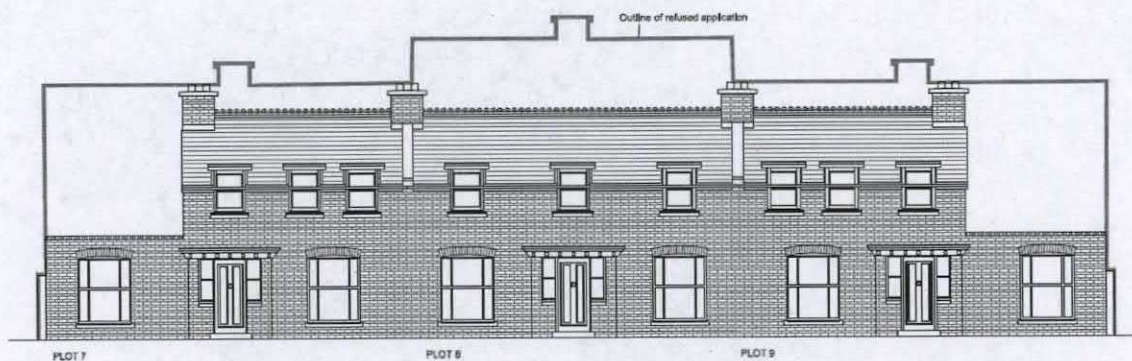
**Figure B** – Draft 3D visual of the proposed scheme (NTS).

53. In general terms the new scheme represents a vast improvement from the previous scheme given that a significant amount of existing unit would remain intact on the main elevations and is generally considered in accordance with the traditional character of the conservation area. Nevertheless a condition has been attached to provide larger scaled detail in respect to these alterations.

54. The internal alterations have been as a response to providing suitable living space into the units proposed at this part of the development. The demolition of the internal wall from their original positions is not ideal but has been demonstrated to be a necessary intervention to secure a suitable and viable internal layout, and would be considered permitted development in any event. Nevertheless the main elements of the original host property remain, and again larger scaled details are to be conditioned which would at the very least preserve the character and appearance of the host property.
55. Overall it is considered that the alterations are sympathetic to the host property and the scheme relates well to the existing BTM with regard to these alterations. Furthermore it is noted that the windows are also proposed to be replaced with traditional timber sash windows. Subsequently, and subject to conditions on further details it is considered that the scheme adequately retains the external character of this BTM whilst allowing the building to become more viable.

*2) New build to the rear of site*

56. The most significant alterations are experienced on the north elevation at the rear with the demolition of the recent additions to the BTM and the erection of three new houses. These are highlighted in Figure C below.



**Figure C** – New build section. Red line shows previous refused scheme (NTS)

57. It is acknowledged that the whole of the building is a BTM, not just the façade, and this includes the section at the rear. Generally there is no objection in design terms to the additional section to the rear of the site behind the boundary walls. In accordance with the supplementary planning guidance contained in the Small and Medium Housing Sites SPD the scheme has taken regard to the street proportion, building line and layout of the surrounding area. Whilst it is acknowledged that there is a significant addition to the host property towards the rear the context of design has sought to reference the host property and provide a sympathetic and traditional design to blend in with the host property and the surrounding area.

58. Unlike the previously refused scheme the current application has reduced the overall bulk and mass of the new build as highlighted by the red line in the above figure C. The current scheme has successfully attempted to break up the overall bulk and mass of the scheme by providing lower sections at the flanks and thus the main part of the development has been concentrated at the midpoint on the unit. The more traditional approach is also considered be more in keeping with the character of the host property and will reference the historic fabric of the BTM. The style of the scheme is a mews type development it is considered that this treatment would generally improve the street scene at the rear of the site. Given that the scheme has been designed in a more traditional treatment, which reflects the surrounding residential feel.
59. The scheme has been designed to utilise the existing boundary walls and has been set back from the streetscene to create a mews style of development which incorporates a small courtyard area to the front. Given the relatively open and prominent corner location the scheme is considered to have a relatively inconspicuous visual feel as it is significantly set back from the Park Lane frontage and contains a degree of separation with the host property, albeit that there is a visual link.
60. The Small and Medium Housing Sites SPD indicates that the visual access of the proposal needs to be considered as part of the development providing a visual not obtrusive feel, which is the case here. The amended scheme provides an open courtyard creating a "breathing space" between the proposed site and the surrounding streetscene, whilst the boundary has been delineated through the retention of the existing boundary walls, and a the lack of the boundary gate provides a less hostile feel.
61. In terms of the layout a mews development is often considered a preferred option in these types of location. The mews layout provides an urban quality to the proposal that complements the surrounding area. The materials proposed are to be a mixed stock of brick and timber fenestrations which are considered acceptable and a high standard of design however further details to ensure their compatibility will be required and again this can be secured by way of a condition.
62. There is mention of photovoltaic panels on the roof (see section i) below) however no details have been supplied in regard to the position or the impact of these units. Thus the Council will need further details of the design/manufacturers details of these in order to determine whether the impact they will have on the existing/proposed roofslopes and the effects of the BTM and the conservation area. This can be secured by condition.
63. The new build also provides basements under the three houses, and the main issues in respect to basement developments, particularly in conservation areas relates to the external manifestations of subterranean development, which include the provision of light wells and roof lights, structures for safety, access and ventilation, exposed masonry and trees and landscaping.
64. The lightwells have been specifically designed to have as minimal impact as possible on the character and appearance of the surrounding area, and have attempted to blend in with the original host property and not to appear out of keeping or incongruous additions. There are no railings proposed as the lightwells will be covered with architectural glazing. The lightwells themselves are all considered modest in size and necessary to enable light to reach the new basement rooms, and thus would not have a negative impact on the conservation area.

65. Overall it is considered that the proposal respects the historic and established character of the building and would have a neutral impact on the conservation area and BTM thus at the very least preserves the setting within the Central Richmond conservation area. Consequently it is considered that attention has been paid to the form, scale, proportions, rhythm, materials and spatial characteristics of the new development is considered consistent with policies DM DC1, DM HD1 and DM HD3 of the DMP 2011 and the National Planning Policy Framework.

*e) Impacts on neighbouring amenity*

66. Policy DM DC5 seeks to ensure that the design and layout of buildings is sufficient to ensure that adjoining land or properties are protected from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

67. Policy DM DC6 encourages purpose built, well-designed and positive balconies where new residential units are on upper floors. However, the addition of balconies to existing properties will not generally be permitted unless it can be demonstrated that they do not cause overlooking or unreasonable disturbance to neighbouring properties.

• *Visual relationship:*

68. The proposal seeks only minimal alterations to the external appearance of the existing BTM. As previously stated the site occupies a prominent and sensitive location, and the current design of the new buildings are of a suitable design that could be accommodated within this area.

69. Despite the demolition of the newer sections of the BTM at the rear of the host property the visual appearance of this part of the development remains, relatively unaltered, with the main change in the visual appearance being experienced at the rear of the site. The scheme has been redesigned from the previous scheme to move the bulk away from the neighbours either side of the scheme at The Gateways and Parkshot, with the main bulk at the first floor at approximately 13m and 25m from the respective properties. The scheme maintains the surrounding street proportions when considered in context the height is not considered unduly overbearing or visually intrusive. Thus in visual terms the scheme is not considered unduly unneighbourly and on balance is deemed acceptable.

• *Privacy:*

70. The proposal seeks only minimal alterations to the external appearance of the front and sides of the existing BTM. The existing fenestration on the western flank incorporates very large windows, it is proposed that these are to be retained. However on the upper floor at units 5 and 6 which front the Gateway apartments it is proposed that the upper portion of the windows are obscured glazed and fixed shut which can be secured by way of a condition. As such it is not considered to afford any unacceptable additional over looking that is already experienced from the existing BTM site.

71. There have been previous concerns in regard to actual and perceived overlooking experienced between the future occupiers of the new build at the rear of the site and the future occupiers of the flat within the host property at the BTM. As such the upper floor windows of flat 3 at the rear of the BTM facing the new build will be fitted with obscured glazing and fixed shut which can be secured by way of a condition.

72. The main form of overlooking or loss of privacy would be experience from the upper floor of the three new houses at the rear of the site with reference to The Gateway apartments and numbers 3-6 Parkshot to the east of the site. As previously stated these properties are approximately 13m and 25m from the upper floor of the proposal respectively.

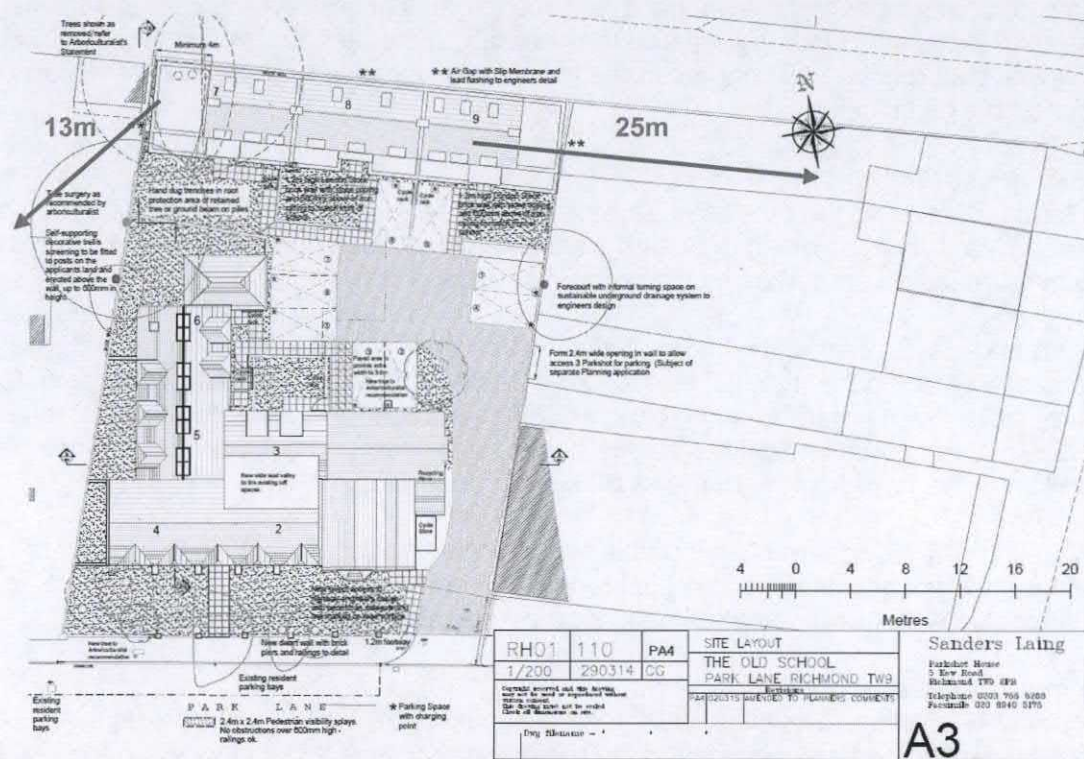


Figure D – Location Plan highlighting scheme in relation to existing properties (NTS)

73. The scheme has been specifically designed in order that no windows or openings are incorporated in either flank elevation which face the properties either side of the development. Furthermore, it would be considered prudent in this case to remove any permitted development rights for the creation of any additional openings which can be secured by way of a condition.

74. The main windows at the first floor level are positioned at the front and the rear of the site. The rear windows would only have a view of the Magistrates Court and thus not considered to afford any loss of privacy. The front windows would provide a main view of the rear elevation of the host property and only very acute angles from these windows to the properties in at the Gateway to the west and the rear of the 3-6 Parkshot to the east. Thus it is considered that on balance it is considered that the development would have little impact in terms of loss of privacy or increase in overlooking.

75. Overall it is considered that there are no issues of overlooking or creation of any additional loss of amenity, to warrant the refusal of the application.

- *Noise and disturbance:*

76. Policy DM DC5 seeks to protect residents from loss of amenity in terms of pollution which can also include noise and light pollution. It is recognised that the scheme will have a different pattern of activity and noise generation when compared to the previous use of the site as a car park associated with the current office use.

77. There will be considerably less movements than the office car park. The surrounding area is a mix of commercial and residential uses thus the residential development is considered of a use akin to the surrounding area and thus unlikely to create any significant impact in terms of noise, disturbance and light given the town centre location and this is deemed an acceptable relationship.

- *Daylight/Sunlight:*

78. In terms of massing the proposed development seeks to reinforce the character of the street. Care has been given to design a scheme which does not have any adverse impact upon surrounding properties by way of daylight/sunlight.

79. In terms of daylight amenity on The Gateway apartments and 3-6 Parkshot using the Vertical Sky Component (VSC) test the VSC value would be in excess of 27% and deemed acceptable. With regard to sunlight amenity these properties would comfortably meet the BRE's recommendations, with windows achieving at least 25% of the annual available sunlight hours including 5% of the available winter sun.

80. Overall, given the schemes acceptable siting, scale and design, and with the use of safeguarding conditions, the development is not deemed to result in an unacceptable relationship with surrounding residential properties as sought by DM DC5.

*f) Impacts of transport and parking*

81. Policy CP5 identifies that the need for travel should be reduced by the provision of employment, shops and services at the most appropriate level locally, within the network of town centres. The policy further highlights developments which would generate significant amounts of travel to be located on sites well served by public transport. The policy also requires new car free housing in Richmond and Twickenham town centres and in other areas where there is good public transport in exceptional circumstances.

82. Policy DM TP2 states that the impact of new development on the transport network will be assessed against other plan policies and transport standards. The policy indicates that it is necessary to consider the impact of any new development on the existing wider and local transport network for all modes, how it links to the network, impacts on highway safety, the impact of parking and servicing, and with larger developments what provision has been made for the movement and parking of vehicles.

83. Policy DM TP7 states that new developments should provide appropriate cycle access and sufficient and secure cycle parking facilities. The cycle parking standards indicate that the site should accommodate 9 cycle spaces at the site (one of office and one per residential unit). The proposal indicates that there will be cycle spaces provided at the ground floor level and this could be considered in accordance with the requested standards and therefore would be in accordance with policy DM TP7. However these will need to be more enclosed and separate than currently proposed to ensure that any cycles parked there are secure and this can be secured by way of a condition.



84. Policy DM TP8 seeks to ensure that developments provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. The site is located within the Richmond Town CPZ that operates Monday to Saturday 8:30am to 6:30pm (part); Monday to Saturday 8:30am to 6:30pm and Sunday, Bank Holidays 11am to 5pm (part), mainly to prevent commuter parking associated with Richmond Station, and provide time limited parking for visitors to the shops.
85. The current car parking standards for residential development it states a maximum of 1 space for 1-2 bedroom flats (5) and 1.5 for each of the 3 bed units (4) thus equating to the provision of 9 spaces for the development proposed. There are none required for the office. The applicant has indicated that there will be nine onsite parking provided.
86. The site is within a town centre location, an area of excellent (6a) PTAL and a CPZ. Given the hours of the CPZ residents would not be able to park in the surrounding roads during the day (during the week and at weekends), unless on pay and display meters that would be costly and time limited. Furthermore the Highways Team considers it prudent for a Section 106 agreement to remove access to resident permits and season tickets, all zone permits and contracts within Council car parks and also all zone parking permits for the business use. This can be secured by way of a condition.
87. It is acknowledged that representations received have raised considerable concern in respect to the development and impact on traffic and car parking spaces. These concerns have been fully considered, and given its high PTAL rating of 6a, parking provision could even be at a lower level, and given the proximity to good public transport links, and being within walking distance to the centre and other transport node, it is not considered to result in an unacceptable pressure on-street parking, however the scheme meets the standard.
88. The Highways team have raised concerns in connection with the demolition and construction phases of the proposed development particularly given its location and access. Given the relative constricted nature of the site and the existing difficulties in accessing the site it is considered prudent in this instance that the applicant submits a detailed Construction Method Statement (CMS) particularly in respect to the demolition, to mitigate disruption. As such it is not considered that this could be a ground for refusal.
89. The Highways Team have also raised concerns in respect to the office element which will require its own refuse/recycling store separate from the residential this has been shown on the plans however further details will need to be secured through a suitable condition.

g) Impact on trees

90. Policies CP4 of the Core Strategy and DM OS5 of the DPD seek to protect existing trees and in addition, discourage schemes that would result in a significant loss of wildlife habitat or landscaping that would adversely affect the character and appearance of the area.
91. The Council will continue to protect trees and make tree preservation orders (TPOs) where appropriate and the inclusion of landscape proposals will normally be required in submissions for new development. The Council will also insist on the retention of any existing trees and other important landscape features.

92. The proposal has been submitted with a Tree Survey Report undertaken by Patrick Stileman Ltd. As with the previous scheme the application seeks the removal of 6 trees, to facilitate the development. The Council's Arboricultural Officer has reviewed the information and indicated that the trees T1-T3 are within the rear of the site with limited open public view, the other trees T8, T10 and G1 are visible at the front of the site. There has been an offer to replace with 2 new trees, with the 2 larger off-site trees to be retained and protected throughout construction as outlined.

93. As such the Council's Arboricultural Officer has no principle objection to the scheme subject to suitable conditions.

h) Biodiversity and archaeology impacts

94. Policy CP4 seeks to ensure that the Borough's biodiversity will be safeguarded and enhanced and that biodiversity enhancements will be encouraged. Furthermore weighted priority in terms of their importance will be afforded to protected species and priority species.

95. The Council Ecologist considered that the site needed to be assessed for the potential for bat roosts. The applicant undertook a Bat Survey as prepared by Prime Environment Ecology Consultancy. The survey found that bats might be present and that a further survey work would be required. The Council Ecologist indicated that the applicant needs to fully comply with the recommendations for the report and conduct an emergent survey in appropriate weather as per the BCT recent guidance. If bats are found they will need to apply for a bat licence and prepare a mitigation strategy. This could be secured by condition to ensure that the proposal complies with the law.

96. Policy DM HD4 seeks to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. Safeguarding measures need to be incorporated where archaeological remains found, and there is a presumption against proposals that adversely affect archaeological remains or their setting.

97. Given that the site is located within an archaeological priority area prior to any commencement of the basement development the Council would require the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been agreed by the Local Planning Authority. This can be secured by way of a condition.

Sustainability issues

98. Policy CP1 of the Core Strategy states that developments will be required to conform to the Sustainability Construction Checklist, including meeting the BREEAM level "excellent" for conversions. Policy CP2 requires all new development to achieve a reduction in carbon dioxide emissions by 20% from on site renewable energy generation.

99. Policy DM SD1 of the DMP 2011 states that new homes must meet Code for Sustainable Homes Level 3. Furthermore and conversions should meet the BREEAM Domestic Refurbishment "excellent" rating in accordance with the requirements of policy DM SD3.

100. The application has submitted details in the form of Sustainability and Energy Statement and also a complete Sustainability Construction Checklist. The Sustainability and Energy Statement highlights that the provision of photovoltaic panels (PV) panels at the roof level to generate electricity, is considered the most appropriate technology at this site and would contribute to a 19% reduction in carbon dioxide emissions from on-site renewable energy.
101. Following the energy hierarchy has enabled carbon reductions to be calculated for the proposed redevelopment of the site, with the total overall carbon reduction is predicted to be approximately 44% through high levels of fabric efficiency, high efficiency gas boilers and PV panels. The residual carbon emissions meet the 36% target.
102. There are no roof plans highlighting the array of the panels required at the premises. The given that these units are considered utilitarian and functional care will need to be taken in regard to their location and placement although this needs to be weighed against the aims and objectives of the Development Management Plan in providing a more sustainable environment. The PV panels should be positioned on roof slopes but designed in a way to screen from views as far as possible to minimise its visual impact. Details are required in terms of position and orientation and that can be secured through a condition.
103. The Sustainable Construction Checklist indicates that the development will achieve a Code for Sustainable Homes pre-assessment for the proposed redevelopment at a rating of Level 4. Furthermore the BREEAM pre-assessment for the redevelopment demonstrates that the non-domestic part of the building can achieve a BREEAM 'Very Good' rating. The proposal is therefore considered generally compliant with the sustainability aims and objectives of the DMP.

**Conclusion:**

104. The principle of development for change of use from employment to a mixed use development is considered acceptable as it has been demonstrated that the current site cannot be let for alternative employment accommodation without significant disruptive works to the BTM. A viability assessment has been undertaken in respect of providing affordable on-site housing which has been accepted by the Council's Planning Viability Advisor.
105. The scheme meets the maximum parking requirement, however given the high PTAL level, proximity to good public transport links, and being within walking distance to the centre and other transport nodes in this case it is considered acceptable. Nevertheless a Section 106 Agreement can be conditioned to restrict permits.
106. Details in the form of a completed Sustainable Construction Checklist and Energy Compliance Statement, indicating the provision of PV panels at the roof level would provide the 20% reduction in carbon dioxide emissions required by policy. The scheme should meet the "Very Good" rating under the BREEAM Domestic Refurbishment rating and Level 4 for the Code for Sustainable Homes. The proposal is therefore considered generally compliant with the sustainability aims.
107. The design is of a high standard and is compliant with policies CP7 of the Core Strategy and DM DC1 of the DMP. The provision of eight units is generally compliant with policy. Subject to conditions the amenity of neighbouring residents is respected with no additional overlooking, loss of light or loss of privacy.

I therefore recommend **PERMISSION** subject to the following conditions:

**Conditions:**

- AT01 - Development begun within 3 years  
The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of this permission.  
REASON: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.
- BD13A - Materials to match exist'- be app'd  
The external surfaces of the building(s) (including fenestration) and all areas of hard surfacing, where applicable, shall not be constructed other than in materials to match the existing and in accordance with details/samples of which shall be submitted to and approved in writing by the Local Planning Authority.  
REASON: To ensure that the proposed development is in keeping with the existing building(s) and does not prejudice the appearance of the locality.
- LB12 - Archaeology  
No development shall take place on the application site until the applicant or their agent or successors in title has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority.  
Following approval of the written scheme of investigation any subsequent field work and assessment report required shall be submitted by the applicant and approved in writing by the Local Planning Authority. No development shall be carried out until such a report has been approved [unless otherwise agreed in writing by the Local Planning Authority].  
REASON: To safeguard any archaeological interest of the site and not to disturb any potential artefacts prior to development commencing.
- U82749 - Brickwork to match the BTM  
No new brickwork to the BTM including works of making good shall be carried out other than in materials, bonding and pointing to match the existing facing work.  
REASON: To ensure that the proposed development is in keeping with the existing building(s) and does not prejudice the appearance of the locality.
- U82750 - Large Scale Details  
The works shall not be carried out otherwise than in accordance with detailed drawings and samples including plans, elevations, and sections as applicable; such drawings to be submitted to and approved by the Local Planning Authority in writing to show:  
a) joinery details of new doors and windows to the BTM  
b) front façade detailing with regard to bricks details and pointing  
c) roof materials and detailing  
REASON: To protect the integrity of the Building of Townscape Merit.
- U82751 - Timber windows  
All windows shall be to be painted timber double hung sliding sash windows.

REASON: To ensure that the proposed development is in keeping with the existing building and does not prejudice the appearance of the locality.

- U82753 - No reduction in units  
No alterations shall be made to the units hereby approved nor shall they be occupied in any way which would result in a reduction in the number of residential units.  
REASON: To ensure that the development continues to contribute to the housing needs of the Borough by the retention of dwellings of a variety of sizes and types.
- U82754 - Lifetime Homes  
The residential units hereby approved must be specifically designed for, or be capable of easy adaptation to Lifetime Homes Standards.  
REASON: To ensure that the proposed housing contributes to the needs of people with disabilities as well as promoting high quality and thoughtful housing design for the general population.
- DV11 - Use of roof restricted  
The roof of the building shall not be used for any purpose other than as a means of escape in emergency or for maintenance of the building.  
REASON: To safeguard the amenities of the adjoining premises and the area generally.
- U82775 - Obscured glazing  
The proposed windows in the west flank elevation and the north elevation of the building hereby approved as shown on approved drawings RH01/202/PA4 and RH01/203/PA4 shall at no time be openable or glazed, otherwise than in obscured glass.  
REASON: To ensure that the proposed development does not prejudice the amenities of adjoining occupiers.
- U82774 - Restriction on PD windows  
Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking or re-enacting that Order), no window or opening other than those shown on the approved plan(s) shall be installed in the any of the wall(s) of the building hereby permitted.  
REASON: To safeguard the amenities of adjoining occupiers.
- U82755 - No loss of office use  
No alterations shall be made to the office use hereby approved nor should it be occupied in any way which would result in a reduction space provided.  
REASON: To safeguard the character and appearance of the locality and amenities of the occupiers of adjoining property.
- U82778 - Parking Permits Restriction - GRAMPIAN  
Before the development hereby permitted begins a scheme shall be agreed in writing with the local planning authority and be put in place to ensure that, with the exception of disabled persons, no resident/commercial occupier of the development shall obtain a resident/commercial parking permit within any controlled parking zone which may be in force in the area at any time.

REASON: To ensure that the development does not generate an increased demand for on-street car parking to the detriment of the free flow of traffic, the conditions of general safety along the neighbouring highways, the amenity of the area and to accord with the Council's car parking policy and standards.

U82794 - Car Parking Spaces

Prior to occupation of any of the units hereby approved the car parking spaces shown on drawing number RH01/110/PA4 shall be ready for use and be for the allocation to and the use of 8 separate flats within the building hereby approved. No more than one space shall be allocated to each flat.

REASON: To safeguard the amenities of the area and to ensure the scheme does not raise unacceptable highway or traffic impacts.

U82761 - Cycle parking

No building/dwelling/part of the development shall be occupied until cycle parking facilities have been provided in accordance with detailed drawings to be submitted to and approved in writing by the Local Planning Authority, such drawings to show the position, design, materials and finishes thereof.

REASON: To accord with this Council's policy to discourage the use of the car wherever possible.

U82763 - Dustbin enclosure required

None of the buildings hereby approved shall be occupied until separate dustbin enclosures for the residential and office elements has been provided in accordance with detailed drawings to be submitted to and approved in writing by the Local Planning Authority, such drawings to show the siting and design thereof.

REASON: To safeguard the appearance of the property and the amenities of the area.

U82764 - Refuse/Recycling arrangements

None of the buildings hereby approved shall be occupied until arrangements for the storage and disposal of refuse/waste/recycling have been made in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

REASON: To safeguard the appearance of the property and the amenities of the area.

U82765 - Construction Method Statement

No development shall take place, including any works of demolition, until a construction method statement has been submitted to, and approved in writing by the LPA. The approved statement shall be adhered to throughout the construction period. The statement shall provide for:

- i) size and routing of construction vehicles and holding areas for these on/off site;
- ii) the parking of vehicles of site operatives and visitors;
- iii) the loading and unloading of plant and materials;
- iv) the storage of plant and materials used in constructing the development;
- v) the erection and maintenance of security hoarding;
- vi) measures to control the emission of dust and dirt during construction;
- vii) a scheme for recycling and disposing of waste resulting from demolition and construction work.

REASON: To ensure that the construction process is undertaken in a safe and convenient manner that limits impact on local roads and the amenities of nearby occupiers and the area generally.

U82766 - Details of foundations - piling etc

No material start shall take place on the development hereby approved until written notice of the intention to commence work has been sent to the Development Control department of the Council. Such notice shall be sent to that department not less than 21 days prior to a material start on the development and shall give details of the intended method of constructing the foundations, including method and equipment for piling, if applicable, adjacent to the public highway to allow the formation of the lightwell, specifically on how the public highway will be shored up given the use by buses. (See informative IE06 on this notice which gives advice on foundation construction that minimises nuisance to neighbours).

REASON: To ensure that the local planning authority has sufficient notice of the commencement of work and the methods of foundation construction to enable measures to be taken, if appropriate, to protect the amenities of neighbouring occupiers

U82771 - Hard & Soft Landscaping Required

A) No development shall take place until full details of both hard and soft landscaping works have been submitted to and approved in writing by the local planning authority. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc.); proposed and existing utility services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc); retained historic landscape features and proposals for restoration, where relevant; a program or timetable of the proposed works

B) Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); detailing the quantity, density, size, species, position and the proposed time or programme of planting of all shrubs, hedges, grasses etc, together with an indication of how they integrate with the proposal in the long term with regard to their mature size and anticipated routine maintenance. All tree, shrub and hedge planting included within that specification shall be carried out in accordance with BS 3936:1986 (parts 1, 1992, Nursery Stock, Specification for trees and shrubs, and 4, 1984, Specification for forest trees); BS 4043: 1989, Transplanting root-balled trees; and BS 4428:1989, Code of practice for general landscape operations (excluding hard surfaces).

C) All hard and soft landscape works shall be carried out in accordance with the approved details and in any event prior to the occupation of any part of the development

REASON: To ensure that the proposed development does not prejudice the appearance of the locality and to preserve and enhance nature conservation interests

U82772 - Landscape maintenance

No development shall take place until a schedule of landscape maintenance for a minimum period of 5 years from the date of completion of the landscaping scheme has been submitted to and approved in writing by the local planning authority. The schedule shall include details of the arrangements for its implementation and shall be implemented as approved from the date of completion of the landscaping scheme as part of the development.

REASON: To ensure that the proposed development does not prejudice the appearance of the locality and to preserve and enhance nature conservation interests.

U82773 - Details of PV Panels

No PV panels shall not be installed other than in details/samples of which shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the proposed development is in keeping with the existing building(s) and does not prejudice the appearance of the locality.

U82748 - Decision Drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents, where applicable. Drawing numbers RH01/100; RH01/209/PA3; RH01/211/PA3 and RH01/301/PA3 all received at the LPA on 8th September 2014 and RH01/110/PA4; RH01/200/PA4; RH01/201/PA4; RH01/202/PA4; RH01/203/PA4; RH01/204/PA4; RH01/205/PA4; RH01/206/PA4; RH01/207/PA4; RH01/208/PA4; RH01/210/PA4; RH01/212/PA4; RH01/500/PA4; RH01/501/PA4 and K1781-01 Rev C all received at the LPA on 17th March 2015 and the Bat Building Assessment by Prime Environment (Ref: 0088.0001 Rev 1) received at the LPA on 2nd December 2014.

REASON: To accord with the terms of the application, for the avoidance of doubt and in the interests of proper planning.

U82781 - Lighting Strategy

Prior to the commencement of development details of external lighting including light spillage diagrams shall be submitted to and agreed in writing by the Local Planning Authority and thereafter constructed in accordance with these details.

REASON: To safeguard the ecology of the site and neighbour amenity and ensure a safe and convenient form of development.

U82782 - Bat Survey

In the event that construction works do not take place on site until after 6th November 2016, a new bat survey shall be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of any future building works.

REASON: To ensure that the bat activity status is current.

**Informatives:**

U90331 - Composite Informative

U90313 - NPPF Informative



IE06 - Details of piling-EHO consultation

The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department. Where developments include foundations works require piling operations it is important to limit the amount of noise and vibration that may affect local residents.

There are a number of different piling methods suitable for differing circumstances. Guidance is contained in British Standard BS 5228 Noise control on Construction and Open Sites - Part 4: Code of Practice for noise and vibration control applicable to piling operations.

Where there is a risk of disturbance being caused from piling operations then the council under section 60 Control of Pollution Act 1974 can require Best Practicable Means (BPM) to be carried out. This may entail limiting the type of piling operation that can be carried out.

The types of piling operations which are more suitable for sensitive development in terms of noise and vibration impact are;

- \* Hydraulic Piling
- \* Auger Piling
- \* Diaphragm Walling

U90312 - Retaining bricks

The applicant is advised that following any demolition of the BTM, any bricks of sufficient quality should be retained and sensitively reused within this development where appropriate.