



PLANNING

SEQUENTIAL ASSESSMENT

**DEPARTMENT FOR
EDUCATION/BOWMER AND
KIRKLAND**

**LAND OFF HOSPITAL BRIDGE ROAD,
TWICKENHAM, RICHMOND-UPON-
THAMES**

SEQUENTIAL ASSESSMENT

On behalf of: Department for Education/Bowmer & Kirkland

In respect of: Land off Hospital Bridge Road, Twickenham,
Richmond-upon-Thames

Date: October 2018

Reference: 3157LO

Author: PD

DPP Planning
66 Porchester Road
London
W2 6ET

Tel: 0207 706 6290
E-mail info@dppukltd.com

www.dppukltd.com

CARDIFF

LEEDS

LONDON

MANCHESTER

NEWCASTLE UPON TYNE

Contents

1.0	INTRODUCTION	4
2.0	QUANTITATIVE NEEDS ANALYSIS.....	5
3.0	POLICY CONTEXT	11
4.0	SEQUENTIAL TEST METHODOLOGY.....	17
5.0	ASSESSMENT OF SITES.....	22
6.0	LAND OFF HOSPITAL BRIDGE ROAD	55
7.0	CONCLUSION	57

1.0 Introduction

- 1.1 This Sequential Assessment has been prepared on behalf of the Department for Education (DfE) and Bowmer & Kirkland, in support of a full planning application for a combined 5FE secondary school and sixth form, three court MUGA and associated sports facilities, together with creation of an area of Public Open Space at Land off Hospital Bridge Road, Twickenham, Richmond-upon-Thames (the 'Site').

Background

- 1.2 Turing House School is a 5FE 11-18 secondary school and sixth form, which opened in 2015 with a founding year group (Year 7) on a temporary site on Queens Road, Teddington. The school also expanded onto a further temporary site at Clarendon School in Hampton in September 2018, and plans to remain on both of these temporary sites until September 2020.
- 1.3 The DfE is seeking to secure a site to provide permanent and modern accommodation for the recently established school to facilitate a conducive learning and play environment for children, whilst addressing the clear need for Turing House to serve its full role in meeting the secondary school needs in the western part of the London Borough of Richmond upon Thames.

The Purpose of the Site Sequential Assessment

- 1.4 The site at Hospital Bridge Road is allocated as Metropolitan Open Land (MOL) under the adopted Development Plan. National, regional, and local planning policies state that all confirm that there is a presumption against inappropriate development on MOL unless 'very special circumstances' can be robustly demonstrated. Previous decisions by the Secretary of State, the GLA and various London Boroughs have confirmed that the statutory requirement to provide state funded school places and the absence of realistic alternative sites to accommodate those schools can represent 'very special circumstances'. This is examined further in the accompanying Planning Statement.
- 1.5 The purpose of this Sequential Site Assessment is, therefore, first to look at the issue of education need in the Borough and then to fully consider potential sites for the accommodation of the school. This exercise confirms that there are no other suitable non-MOL designated sites for the proposed school. Furthermore, even when compared with other potential MOL or Green Belt sites, the site at Hospital Bridge Road is shown to be the least constrained and most appropriate site for the proposed school development.

2.0 Quantitative Needs Analysis

- 2.1 This section examines the education needs of the London Borough of Richmond upon Thames and the secondary education capacity in the Borough, which underpins the decision from the DfE to support the proposals for the development of the Site for a secondary school and sixth form.
- 2.2 Section 14(1) of the Education Act 1996 requires that a local education authority secures sufficient schools for providing primary and secondary education in its area. It is therefore legally incumbent on the London Borough of Richmond upon Thames to provide a school place for every child that lives in the Borough.
- 2.3 The need to provide for enhanced educational facilities, whether this be via replacement or new educational facilities, to meet the needs of the local community is recognised in paragraph 72 of the NPPF. This calls for great importance to be placed on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. This requirement is similarly reinforced by Policy 3.18 of The London Plan, and Policy LP29 of the Richmond upon Thames Local Plan. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen choice in education.
- 2.4 The policy statement regarding planning for schools' development published by the Department for Communities and Local Government; August 2011 also advises that:

“The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools and that the following principles should apply with immediate effect:

There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework;

Local Authorities should give full and thorough consideration to the importance of enabling the development of state-funded school in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.

Local Authorities should make full use of their planning powers to support state-funded schools applications. This should include engaging in the pre-application discussions with promoters to foster a collaborative approach to applications and, where necessary, the use of planning obligations to help to mitigate adverse impacts and help deliver development that has a positive impact on the community.”

- 2.5 To provide a brief overview of current stated funded provision, there are currently 45 primary schools, 11 secondary schools, and 13 colleges (11 of which are part of secondary schools) in Richmond upon Thames that offer education facilities for the local population. In addition, there are two special educational needs (SEN) schools in Richmond upon Thames.

- 2.6 As will be explored, LB of Richmond upon Thames is experiencing increasing demand for secondary school places flowing from the previous rise in primary school demand. If this remains unaddressed, the number of secondary school places is predicted to be insufficient to meet demand in the coming years. This is acute in both the east and west of the Borough.
- 2.7 To address this growing concern, the Council adopted a School Place Planning Strategy 2015-2024, which has taken account of the pressing need to deliver schools in the Borough to meet growing need. An updated report has recently been published (June 2018) which provides an up to date picture of the demand and supply of school places in Richmond upon Thames.

School Places Planning Strategy 2018

Overview

- 2.8 First, taking a look at the general trend of school place demand within London, the London Plan estimates that as the overall population of the Capital is set to increase, this will lead to an increase in the school population by approximately 18%. Subsequently, this translates to a requirement for 110,364 new school places, broken down into 62,935 primary school places and 47,430 secondary school places.
- 2.9 Taking this to a local authority level in Richmond upon Thames, the Council's Core Strategy (2009) set a target of delivering 2,700 net homes per year until 2017. Although the target reduced slightly as a result of the London Plan (2011) to 2,450 until 2021, the draft London Plan that is due to be adopted by the end of 2019, is set to drastically increase the number of homes to be delivered to 8,110 per year and this will inevitably lead to augmented demand for both primary and secondary school places.

Provision of Secondary Education in Richmond upon Thames

- 2.10 The increase in demand for primary school places as a result of migration into the Borough over the last decade, has started to seep into demand for places at secondary schools. Whilst the provision of three new secondary schools since 2013 has somewhat appeased demand in the short term, there is still demand for new secondary schools in both the east and west of the Borough.
- 2.11 As of the 2017/18 academic year, there were 2,002 year seven secondary school places available in the Borough, with provision broken down into the following schools:

School	Published Admission Number (PAN)
Christ's (Church of England)	150
Grey Court	240
Hampton High	180

School	Published Admission Number (PAN)
Orleans Park	216
Richmond Park Academy	180
The Richmond upon Thames School	150
St Richard Reynolds Catholic High	150
Teddington	240
Turing House	100
Twickenham	180
Waldegrave School for Girls	216
Total	2,002

Table 1: Secondary school place in Richmond Upon Thames

- 2.12 As of September 2017, seven of the 11 secondary schools within the Borough were at capacity in Year seven, with the remaining schools having approximately 180 spaces available in total. There is some evidence that much of the spare capacity is related to historic issues of parental confidence rather than over-provision, and that, notwithstanding increased pupil forecasts, this historic trend may be reversed as confidence is restored. It should be noted that Turing House in its temporary home forms part of the current provision, albeit at a reduced yearly intake given the limitations of the current temporary accommodation.
- 2.13 Aside from this provision, the School Places Planning Strategy predicts that there is likely to be an increasing shortage of school places from 2019 onwards. Although such capacity difficulties could be cushioned in the short term by fewer out of Borough children being able to access places taken up by local children, the shortage of school places is set to gradually increase and further school places will inevitably be required, not least as neighbouring Boroughs have their own needs to absorb.
- 2.14 When assessing the situation in Richmond upon Thames in greater detail, there is a clear disparity between the eastern and western portions of the Borough, with distinct under provision in the east. This can be explained as traditionally this part of the Borough has seen a large number of children enter into private education. However, the need for state funded education has grown, in part due to spare capacity at Richmond Park Academy reducing sharply in recent years in line with increases in both pupil numbers and parental confidence.

Year	2017		2018		2019		2020		2021		2022		2023	
	PAN	NOR	PAN	NOR	PAN	NOR	PAN	NOR	PAN	NOR	PAN	NOR	PAN	NOR
Western half	1432	1302	1457	1392	1432	1432	1482	1482	1482	1482	1482	1482	1482	1482
Eastern half	570	550	570	540	570	570	570	570	570	570	570	570	570	570
Total	2002	1852	2027	1932	2002	2002	2052	2052	2052	2052	2052	2052	2052	2052
Year 6 Cohort	2067		2169		2343		2428		2556		2550		2542	
88% retention	N/A-		1932		2062		2137		2249		2244		2237	
Space/ Shortfall	150		70		-60		-82		-197		-192		-185	

Table 2: Secondary school pupil places forecast in Richmond Upon Thames

*PAN = Published Admission Number

** NOR = Number on Roll

***State Sector Retention rate from Year 6 assumed fixed at 88%

****Conversion rate from reception to Year 6 is averaged at 100%, so Year 6 totals from 2016 derive from the relevant year groups in October 2016 census.

2.15 As noted in the table above, as the cohort of pupils entering into secondary education increases in the coming years, the shortfall in spaces increases with almost 200 additional spaces required by 2021, tapering off slightly in the following years. It should however be noted that this, is based on a fixed average state sector retention rate of 88% notwithstanding that there are not proportional increases in local capacity in the private sector.

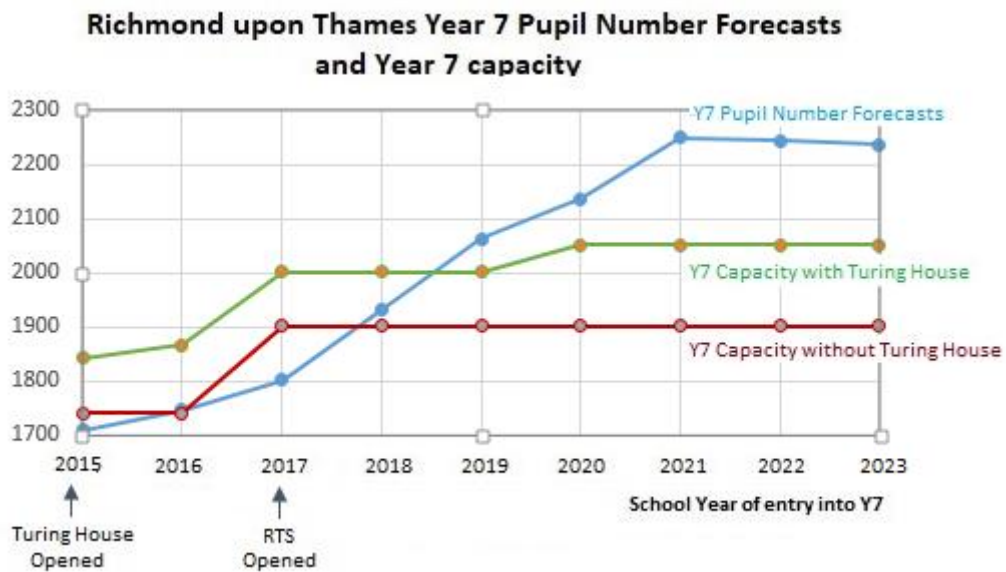
The Case for Turing House Secondary School

2.16 Turing House Secondary School was opened in September 2015 and currently operates from Turing House, 2 Queens Road in Teddington, which caters for approximately 325 pupils in total at present, with a further year group of 125 students having joined the school in September 2018 at an additional temporary site at the former Clarendon School. This brings the total number of pupils to 450 at Turing House.

2.17 As discussed previously, Richmond has seen an increase in demand for secondary school places in recent years and this is set to continue as the population of the Borough expands. Whilst the increase in demand for secondary school places could theoretically be met in the short term by the expansion of Christ's, Grey Court and Richmond Park Academy, this will only be able to meet a maximum of an additional 90 places and such expansions are currently unfeasible given various

site and financial constraints. Nevertheless, should these be developed accordingly, this still leaves a substantial shortfall. As such, in addition to Turing House, there is still a clear requirement for an additional secondary school in the Borough to meet growing in demand in the coming years. Plans are progressing for this additional new school to be provided by the Aspirations Academies Trust on the Mortlake Brewery site.

2.18 With this in mind, it is important to understand the importance that Turing House School plays in the provision of education in the Borough and the potential scenarios, with or without the school. The graph below illustrates the forecast of secondary school places in the context of Turing House School.



Graph 1: Pupil Forecast for Richmond Upon Thames

2.19 As depicted by the graph, without Turing House, Year 7 demand would overtake capacity in 2018, and even with Turing House, capacity will be overtaken in 2019. Therefore, this rising demand provides significant justification, not only for the proposals for Turing House School but also the further expansion of secondary school places as a whole in the Borough. As Turing House school has already opened in temporary accommodation, it is important that a site is found to enable the continuation of this school, as the current sites are set to reach capacity in 2020.

2.20 Despite the identified importance of a permanent site for Turing House School to the meeting of the School Place Need in the west of Richmond Borough and Policy LP29 of the Local Plan that states that sites for new schools will be identified in the Plan, neither the current site nor any other site has been identified by the Council for Turing House School. Although the Local Plan does identify some new school sites, as will be identified later in this assessment, those sites have been allocated to other schools required to address the emerging demand at primary and secondary level.

- 2.21 It is also worth noting that Richmond’s forecasts assume that the proportion of pupils entering private sector education remains static, even as overall pupil numbers rise. If the proportion of pupils entering the private sector reduces over time, e.g. due to economic factors, or ongoing school improvement programmes, then the demand for places in the maintained sector will increase beyond the forecast level.

3.0 Policy Context

3.1 The Site is located on Metropolitan Open Land (MOL), which is effectively treated as Green Belt within the context of London. The following national and local policies are therefore relevant to this sequential assessment.

National Planning Policy Framework (2018)

3.2 The revised National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's economic, environmental and social planning policies for England to support sustainable development and how these are expected to be applied and is a material consideration in the determination of planning applications. The National Planning Policy Guidance (NPPG), which acts as a guide, provides additional information and advice on how to interpret the NPPF. These documents should be read in conjunction with each other.

3.3 The NPPF provides a positive framework for decision making. At the core of the new Framework is the presumption in favour of sustainable development. The Government believes sustainable development can provide an economic benefit to the country (by contributing to a strong, responsive and competitive economy), social benefits (supporting vibrant and healthy communities) and an environmental role (by protecting and enhancing our natural, built and historic environment).

3.4 When determining planning applications, this presumption requires Local Authorities to approve development proposals that accord with the development plan without delay. The NPPF confirms that Local Planning Authorities should look for solutions rather than problems and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

Green Belt

3.5 Section 13 of the NPPF seeks to protect Green Belt land to prevent urban sprawl. Paragraph 134 states that the green belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.6 Paragraph 145 states that LPA's should regard the construction of new buildings as inappropriate in Green Belt with the exception of:

- a) Buildings for agriculture and forestry:

- b) The provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of Green Belt and does not conflict with the purposes of including land within it;
- c) The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) Limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would:
 - a. not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development; or
 - b. not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

3.7 Section 8 of the NPPF promotes healthy communities, Paragraph 97 states:

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

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

Sport England Planning Policy Statement – A Sporting Future for the Playing Fields of England

3.8 Policy P1 states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies”.

Adopted Development Plan

The London Plan (2015)

3.9 Policy 3.18 - Education facilities states that:

- The Mayor will support provision of early years, primary and secondary schools and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance.
- The Mayor strongly supports the establishment of new schools and steps to enable local people and communities to do this.
- Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes.
- In particular, proposals for new schools should be given positive consideration and should 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.
- Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.
- Development proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college's offer.

3.10 Policy 3.19 – Sports Facilities advises that development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. Temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-provision. Wherever possible, multi-use public facilities for sport and recreational activity should be encouraged.

3.11 Policy 7.17 – Green Belt states that the Mayor strongly supports the current extent of London's Green Belt. The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

Richmond Local Plan (2018)

3.12 The new Richmond Upon Thames Local Plan was formally adopted on 3rd July 2018. The most pertinent planning policies are listed below:

Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space

Green Belt and Metropolitan Open Land

A. The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.

Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate B. It will be recognised that there may be exceptional cases where inappropriate development such as small scale structures for essential utility infrastructure, may be acceptable.

C. Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.

When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account.

Local Green Space

D. Local Green Space, which has been demonstrated to be special to a local community and which holds particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

Policy LP 28

Social and Community Infrastructure

A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

New social and community infrastructure

B. Proposals for new or extensions to existing social and community infrastructure will be supported where:

1. it provides for an identified need;
2. is of a high quality and inclusive design providing access for all; and
3. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

Loss of social or community infrastructure

C. Loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:

1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and
3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5.

D. Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered.

Impacts on existing social infrastructure

E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development.

Policy LP 29

Education and Training

A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:

1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities;
2. safeguarding land and buildings in educational use;
3. identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18;
4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;

5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.

B. The Council will promote local employment opportunities and training programmes. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required.

Draft London Plan (2018)

3.13 The draft London Plan was published in August 2018 and provides revised strategic planning policy for London. It is to be the subject of an Examination in Public in January 2019 with the intention that the plan be adopted later in 2019. The following policies are most pertinent:

Policy G3: Metropolitan Land

3.14 Metropolitan Open Land (MOL) should be protected from inappropriate development:

- 1) development proposals that would harm MOL should be refused
- 2) boroughs should work with partners to enhance the quality and range of uses of MOL.

A Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

B The extension of MOL designations should be supported where appropriate.

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs; ensuring that the overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved, having regard to all of the criteria in Part B.

4.0 Sequential Test Methodology

4.1 The following section will set out the Applicant's minimum requirements and therefore, the search criteria for this Sequential Assessment.

General Search Criteria

- 4.2 Turing House School was specifically established to address educational need in the area of Richmond upon Thames located to the west and north of the River Thames which dissects the Borough. The school has identified an 'Admissions Point', which is centred on Somerset Gardens, near the Fulwell/Teddington border. It is the point in the western side of the Borough that is furthest from any other local co-ed community school. Given this location and the purpose to specifically address the needs for secondary school places in the western side of the Borough, the search for sites has been defined by this half of Richmond. This approach has been agreed with Council Officers during pre-app discussions and therefore, sites located in the east of the Borough have been duly discounted.
- 4.3 As each local authority has a duty to provide education facilities for its own populace, primarily due to the funding structure of schools from central government, it has therefore been seen as sensible to also discount sites in the neighbouring Borough of Hounslow.
- 4.4 As part of the search criteria, we have also included the potential for co-location sites, such as with other schools as encouraged by London Plan Policy 3.18.

Identifying Potential Sites

- 4.5 In order to identify specific sites to assess, the former Richmond UDP, Core Strategy and Twickenham Area Action Plan (all now superseded) were reviewed. In addition, the Richmond Site Allocations Plan (2015) was also reviewed despite this plan being cancelled and not forming part of the Council's Development Plan Documents. Finally, sites allocated within the recently adopted Richmond Local Plan (2018) were also considered.
- 4.6 In addition, several agents' websites were searched, including the following:
- Showcase/ Costar Focus;
 - Estates Gazette;
 - Rightmove;
 - Prime Location;
 - Knight Frank;
 - Nova Loca; and
 - General Google search.
- 4.7 London Borough of Richmond's Property Department were also contacted to utilise local knowledge and to identify any other potential sites, although no additional sites were identified.

4.8 Once sites were identified via the above searches, this Sequential Test applied various site suitability criteria such as:

- Size;
- Location;
- Physical constraints;
- Current site use and ownership of the building or site;
- Compatibility of a school with adjoining land uses;
- Planning policy and suitability;
- Flood risks;
- Opportunities for co-location with other uses;
- Availability and timeframes to acquire / develop to meet educational need; and

Site Size Methodology

Site Size

4.9 Turing House School will have five forms of entry (5FE), with each class sized at 30 pupils, equating to a total of 750 pupils from the ages of 11-16. The school will also include a sixth form centre for 300 students in the 16-18 years bracket. In total, the school will accommodate 1,050 students.

4.10 The Department for Education (DfE) utilises the BB103 calculations 'Notes on area guidelines for mainstream school BB103' to determine the building and external area requirements for school facilities. The DfE have advised that, based on their experience in delivering schools in the London Boroughs, the following minimum standards are typically achieved:

School Facility	Recommended Area
Primary School	0.8 ha
Secondary School	1.6 ha

Table 3: DfE Minimum Recommended School Site Size

4.11 Although the above provides a broad baseline to inform the site criteria for this assessment, the relevant DfE BB103 guidelines should be explored to ensure that the methodology is robust.

The BB103 calculations are presented in Table 1 below with the headline figures highlighted in bold. It can be deduced from the table that a secondary school of 1,050 pupils requires a minimum total site area of 55,250sq.m to be able to incorporate the necessary sports facilities.

	Minimum Area Required in Square Metres (sq.m)							
	Soft Outdoor Play	Hard Outdoor PE*	Soft Informal	Hard Informal *	Habitat	Minimum Net Area	Non-net/Float	Minimum Total Area
Area per pupil (Secondary and 16+)	39	1.8	2.5	1.2	0.5	45	6.7	51.7
Total Area for 750 Secondary and 300 16+ Pupils	41,750	1,975	2,700	1,250	525	48,200	7,050	55,250

Table 4: BB103 calculations

4.12 However, it should be noted that the above table does not include the built footprint provision for the school building itself, as this is a variant depending on scale, layout and site constraints/opportunities. What can be confirmed is that in order to accommodate 1,050 students, a minimum of 8,225sq.m is required for the school. Whilst this is unlikely to be arranged across a single storey, such buildings are generally arranged over two/three storeys to accommodate a typical secondary school of this size.

The Minimum Threshold Applied to this Site Search

4.13 Notwithstanding the above, to ensure flexibility in our approach, consideration has also been given to smaller site sizes.

4.14 The minimum site area for each singularly located school is based on the assumption that 'hard outdoor PE' and the 'hard informal' areas are the priority areas which are to be provided as a minimum for schools, with playing pitches located off-site as a worst case scenario.

4.15 As noted above, although the extent of the built footprint would be subject to specific site constraints/opportunities, there is some flexibility over the height of a secondary school building which would reduce pressure on the site size. However, it should be noted that as the building becomes taller, it typically begins to lose functionality, with staffing departments located on separate floors and additional, more stringent fire regulations coming into play. With this in mind, the maximum height of the school building would be four storeys and therefore, the smallest building footprint size has been applied in a broad superblock layout at 3,215sq.m.

4.16 The BB103 calculation does not include circulation space, car parking and servicing areas and other external spaces that are required to make a school fully functional, so an informed approach has been taken to include such features into the minimum search area.

4.17 Based on this revised methodology, the minimum site area for a 5FE and 6th Form secondary school would be as follows:

Area to be Provided	Minimum Area (sq.m)
Four Storey School Building	3,215
Hard Outdoor PE	1,975
Hard Informal	1,250
Pathway/Circulation Space	750
Float (visible non-used space such as buffer areas and vegetation)	750
Car parking (45 cars), Access and Servicing Areas	1,500
Total	9,440 (circa 1 hectare)

Table 5: Minimum site search criteria

4.18 The above demonstrates a measured approach has been taken to this site search and in light of the above, a minimum threshold of 9,440sq.m (circa 1 hectare) is therefore applied. Whilst the minimum figures summarised are lower than those anticipated by the DfE based on previous London Borough schemes, they form the basis of this sequential assessment to ensure that it is robust and assesses every potential possibility. This ensures that a wide range of sites have been fully assessed.

Clarendon School Site and Split Location Options

4.19 In initial discussions with Officers of LB of Richmond, the question was raised as to whether the school could be accommodated across a range of sites, as occurs on a temporary basis at present, or consolidated at the Clarendon School site. At the outset, we would stress that the current arrangements are very much a temporary arrangement of necessity and splitting the school across a number of sites is not a viable option for the long term future of the school for the following reasons:

Operational logistics

4.20 Splitting the school across two or more sites whether split by Key Stages or departments introduces inevitable inefficiencies and additional costs. If split by Key Stages, the need for teaching staff to commute between sites during the school day, inevitably impacts on the school day in terms of timetabling and access to teachers on the part of pupils. If split by departments, there would then be a need to transfer pupils between the sites with any costs being compounded by both scale and safeguarding issues. The current temporary arrangement has already required significant

additional funding to cover the extra costs involved and continuing such an arrangement in perpetuity is not an appropriate use of taxpayers funding.

Site Size and Redevelopment Feasibility

- 4.21 The Clarendon Site is also limited in terms of size and whilst it catered for 4-16 year olds as an SEN School, this only covered a maximum of 100 pupils. Its potential to act as part of the Turing House School extends only to accommodating two year groups for a school which is already constrained in terms of its planned year intake by the size of its current Teddington premises.
- 4.22 Any expansion of the school at Clarendon would inevitably involve an increase in height of the current predominantly single storey buildings and given the close proximity of residential properties this will result in concerns over loss of amenity and impacts on daylight/sunlight to local residents on what is essentially a backland site.

Search Criteria Summary

- 4.23 In summary, the purpose of the exercise is to identify potential sites on which the permanent home for Turing House School could be accommodated. As such, based on the aforementioned, the following criteria is applied:

Criteria	Requirements
Search Area	The western portion of the London Borough of Richmond Upon Thames (also known as Middlesex area)
Minimum site area requirement (m ²)	9,440sq.m (circa 1ha)
Topography and physical constraints - all sites	Sites are to be flat or gently sloping to facilitate schools, facilities and sports pitches.
Planning policy and suitability	Consistency with planning policy or justifiable departure from policy
Flood Risks	Site is not to be constrained by unacceptable or un-mitigatable flood risks
Highways and accessibility	Access to sites are to be safe and sites are to be accessibly and well located
Availability – all sites	To facilitate occupation by September 2020
Affordability – availability	Value for money must be assured using public funds
Opportunities for co-location with other sites	Is an allocated or windfall site coming forward which is potentially capable of accommodating the school as part of a mixed use development

Table 6: Site assessment criteria

- 4.24 The assessment of all potential sites in terms of these criteria, is contained within the following section of the report.

5.0 Assessment of Sites

Introduction

- 5.1 As stated in the previous chapter, in addition to a flexible approach to site search, flexibility has also been applied to site size and minimum site sizes have been assessed to ensure that a robust search and assessment has been completed. This approach has been applied to the sites allocated or previously allocated as part of the Development Plan, sites that are currently commercially available and other sites that have been highlighted as potential alternatives.

Initially Discounted Sites

- 5.2 Following the insitial discounting of sites in the eastern part of the Borough, attention was turned on the identification of sites in the west. Although the UDP, Core Strategy and Twickenham Area Action Plan have now been fully superseded by the Local Plan Review, a number of the proposal sites were still extant at the time of the sequential site search. A number were found to be beneath the required minimum site size and can therefore be discounted without further consideration and are listed below:

Site Reference	Size
P4 King George's Pavilion	0.1ha
H9 Beveree, Beaver Close	0.56
H10 Hampton Infants School, Ripley Road	0.79ha
H11 Hampton Junior School, Percy Road	0.58ha
H24 Former Council Depot, Oldfield Road	0.08ha
D3 Teddington Library, Waldegrave Road	0.13ha
D4 Teddington Station	0.31ha
D7 Former Playing Field at the End of School House Lane	0.09ha
D9 Sacred Heart RC Primary School, St Mark's Road	0.52ha
T2 Stable Block, Orleans House, Riverside	0.11ha
T4 Oak Lane Cemetery	0.5ha
T8 Archdeacon Cambridge C of E Primary Schools, The Green, Hampton Road	0.9ha
T9 Trafalgar Primary Schools, Elmleigh Road	0.4ha

T16 Fountain Public House, Staines Road	0.51ha
T27 St Mary's Junior C of E School, Rear of Orleans Park School	0.5ha
W5 Bishop Perrin's C of E Primary School, Hospital Bridge Road	0.2ha
TW2 Station Yard	0.2ha
TW3 Regal House	0.5ha
TW5 Telephone Exchange Garfield Road	0.17ha
TW6 Police Station London Road	0.21ha
SA3 Hampton Traffic Unit, 60-68 Station Road, Hampton	0.28ha
SA4 Hampton Delivery Office, Rosehill, Hampton	0.12ha
SA5 Telephone Exchange, Teddington	0.17ha
SA6 Teddington Delivery Office, Teddington	0.05ha
SA7 Strathmore Centre, Strathmore Road, Teddington	0.58ha
SA12 Mereway Day Centre	0.24ha
SA13 Telephone Exchange Witton	0.38ha
SA18 Ryde House, East Twickenham	0.26ha
HA4 Scout Hall, Station Road, Hampton	0.07ha
HH1 Hampton Hill Business Park, High Street, Hampton Hill	0.22ha
HH2 St Clare Business Park, Holly Road, Hampton Hill	0.74ha
TW12 159 Heath Road and Heathland Industrial Estate, Twickenham	0.9ha
TW15 Mereway Road Industrial Estate, Twickenham	0.34ha
TW16 St George's Industrial Estate, The Green, Twickenham	0.77ha
TW17 Swan Island Industrial Estate, Strawberry Vale, Twickenham	0.56ha
SM1 St Margarets Business Centre, Winchester Road, St Margarets	0.61ha
SM2 Waterside Business Centre, Railshead Road, St Margarets	0.18ha
WT1 Whitton Library, Nelson Road, Whitton	0.12ha

WT2 Iceland Store, 26-30 High Street, Whitton	0.17ha
RI3 Richmond Police Station, Red Lion Street, Richmond	0.1ha
RI5 Star and Garter Home, Richmond Hill, Richmond	0.67ha
Teddington Police Station, High Street, Teddington	0.02ha
Garrick House, High Street, Hampton Hill	0.02ha
Bermuda and Brentham House, High Street, Hampton Wick	0.02ha
Evergreen, 2-4 King Street, Twickenham	0.07ha
12-13 King Street, Twickenham	0.02ha
St Andrews House, Upper Ham Road, Ham	0.01ha

Table 7: Initially discounted sites

5.3 Several further sites were also discounted due to being in railway infrastructure or highways use:

Site Reference	Proposed Use/Allocation
B6 Beverly Brook	Pedestrian access to Richmond Park
H5 Hampton Station	Interchange improvements
H7 North End of Oak Avenue, Hampton	Provision of bridle path
H17 Church Street	Reduction in carriageway width
H18 Station Road / Ormond Avenue / Tudor Road / Oldfield Road	Junction improvement
H19 High Street / Thames Street	Junction improvement
H20 Thames Street / Church Street, Hampton	Traffic signals
H22 Fulwell Bus Garage / Rail Station	Interchange improvements
D4 Teddington Station	Station car park and environmental improvements
D6 The Causeway, Teddington	Pedestrian enhancement of junction of Par Road, Middle Lane, Park Lane and The Causeway, with restricted vehicle access to The Causeway
D13 From Kingston Bridge Via Bushy Park, Hampton Hill,	London Loop, Outer Orbital walking route, signs and waymarking

Fulwell Golf Course and Crane Park towards Hounslow Heath	
T19 Chertsey Road (A316) / London Road (A310)	Junction improvement
TW20 Whitton Road / Rugby Road	Improvements to roundabout approaches
T21 St Margarets Road / Richmond Road / Rosslyn Road	Junction improvements
T22 Chertsey Road (A316) / Hospital Bridge Road	Junction improvement
T25 St Margerets Station	Interchange improvements
T26 Strawberry Hill Station	Interchange Improvements
W6 Hospital Bridge Road (B258), North of Montrose Avenue	Widening of 380m of length of highway including bridge over railway
W7 Hanworth Road (A314)	Reconstruction of railway bridge with footways either side
W8 Powder Mill Lane	Heavy goods vehicles, vehicle construction
W11 A316 near Hospital Bridge Road	Extensions to footbridge
W12 Hanworth Road / Powder Mill Lane	Junction improvement
W14 Whitton Station	Interchange improvements

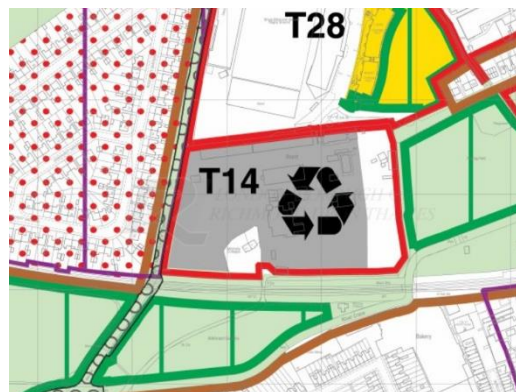
Table 8: Transport infrastructure sites

- 5.4 The remaining sites identified in the UDP, Twickenham AAP, Local Plan and Site Allocations Plan have been taken forward for more detailed consideration below as to whether they are available or suitable for the development of Turing House School. These have been assessed according to planning designations from least contentious to those which would not be considered sequentially preferable.

Sites That Are Not Suitable, Available or Viable

Craneford Way Depot, Craneford Way

- 5.5 The site is approximately 3.3ha and is a designated waste site. The site is allocated for council depot facilities and residential use, including the retention of the pump house in the event that the depot should relocate. Dual use of the site for both education and waste services would obviously raise significant health and safety concerns and this opportunity can be dismissed. Note also that the site adjoins the Richmond College site discussed later and development of a major secondary school in this location is likely to lead to infrastructure capacity issues.



- 5.6 Given the designation of the site for essential infrastructure and there being very limited if any alternatives to provide this for the Borough without significant planning issues raised, it can be appropriately discounted.

Brunel University College, Twickenham

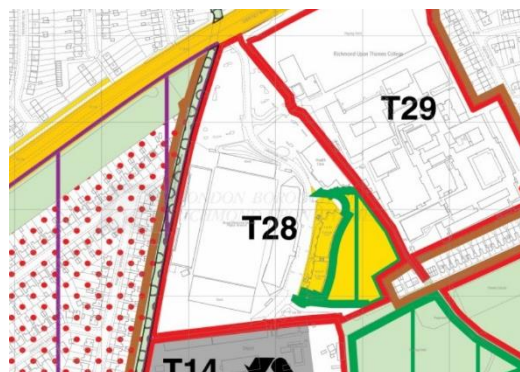
- 5.7 The site covers an area of approximately 5.7ha and comprises a GP surgery and a number of residential properties. The site is partly located in Flood Zone 3 in an area benefiting from flood defences. It is also located in a conservation area and parts of the site are designated Other Open Land of Townscape Importance and Public Open Space. There is one Grade II and one Grade II* listed building on the site.



- 5.8 Given that the redevelopment of the site for a comprehensive housing development has now been undertaken, the site is no longer considered to be available to accommodate the development and can be discounted.

Harlequins Rugby Ground

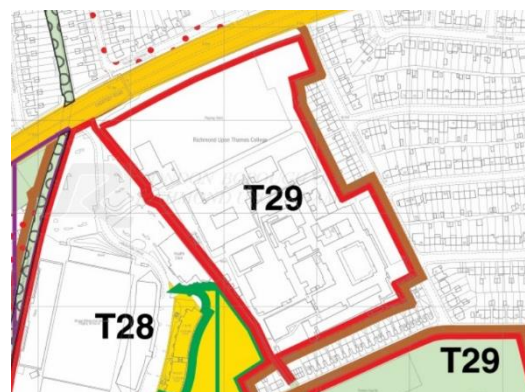
5.9 The site is approximately 5.8ha in size and comprises a rugby stadium, DHL warehouse and residential units. It is allocated for continued use as a sports ground with associated facilities, enabling development and a new access road. The site is partially designated as Other Open Land of Townscape Importance and Public Open Space.



5.10 The majority of the site is currently used as a well-known sports ground and associated parking and is currently unavailable. Whilst there is a small parcel of land to the east that is designated and would be sequentially preferable, this is constrained by residential dwellings to the west and would not be of sufficient size to meet the BB103 standards. As such, the site can be suitably discounted as a viable alternative.

Richmond Upon Thames College Site

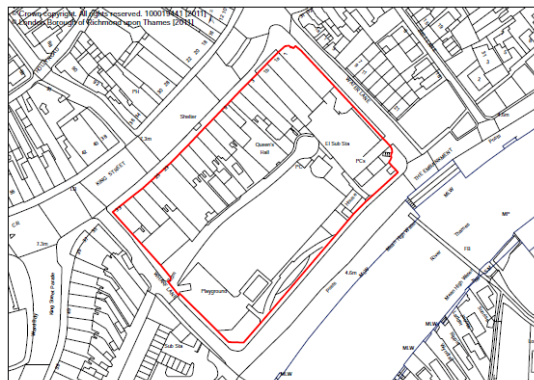
5.11 The site covers a total area of 8.6ha and is allocated for redevelopment to provide a new college, secondary school and enabling residential development on the site of the existing college and playing fields south of the A316, alongside the retention and upgrading of Craneford Way East playing field. The site is located within the River Crane Area of Opportunity.



5.12 Whilst the site is allocated for higher education development, detailed proposals have come forward to also incorporate a new secondary school and this site is now occupied by the new Richmond upon Thames School (another of the new schools required to meet the secondary educational needs of the western half of the Borough) in combination with the SEN Clarendon School's secondary centre who relocated to this site over summer 2018. Therefore, the site can be discounted as a location to accommodate the permanent home for Turing House School.

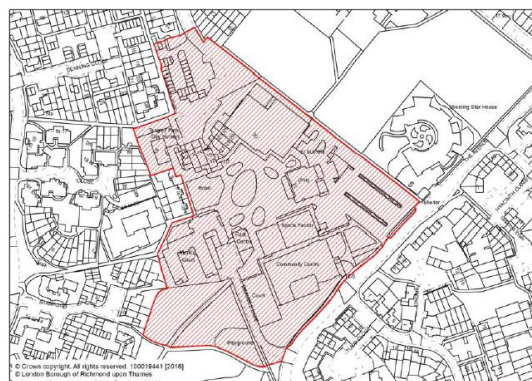
Twickenham Riverside (Former Pool Site) and South of King Street

- 5.13 The site is approximately 1.1ha in size and comprises a number of ground floor commercial units with residential units above on the north and Diamond Jubilee Gardens on the south of the site. It was allocated for open space; reuse or replacement of existing buildings to provide mixed uses with active frontages at ground floor level; potential low rise leisure and community pavilions, redevelopment or reuse of the former public toilets for residential, leisure or café use; redevelopment of 1, 1a and 1b King Street to create a public square or other civic space with an active frontage at ground level and residential above; and redevelopment of the car park with residential and/or town centre uses.
- 5.14 The site is located within the Town Centre boundary and the units on the north of the site form part of the Key Shopping Frontage. The site is also located in a conservation area.
- 5.15 Due to the complex nature of the site, being located in the Town Centre with the northern part of the site being located in a Key Shopping Frontage, the southern part of the site being allocated for open space and the site being located in a conservation area, there is no scope to accommodate a large secondary school on this site whilst accommodating/retaining all of the above important requirements. The site can therefore be discounted.



Hampton Square, Hampton

- 5.16 The site is approximately 2.8ha in size and comprises the Local Centre for Hampton Hill north. The site is allocated for partial redevelopment and improvement for community, retail and local services, employment and residential uses, including affordable units and car parking.
- 5.17 Although the built areas of the site are not constrained by planning allocations, the loss of the various land uses and their civic and social role would be counter to the Council's strategy for the area. At present, the only undeveloped area of the site would be the green open space to the south of the site, which is designated Public Open Space and Other Open Land of Townscape Importance. In any event, this area alone is insufficient to accommodate a major secondary school.
- 5.18 Given the above constraints, the site can be discounted.



Ham Close, Ham

5.19 The site is approximately 4.2ha in size and comprises of a residential estate, a youth club and an area of open space which is designated Other Open Land of Townscape Importance and Public Open Space. The site is allocated for the regeneration of Ham Close and the surrounding area, to include comprehensive redevelopment including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation.

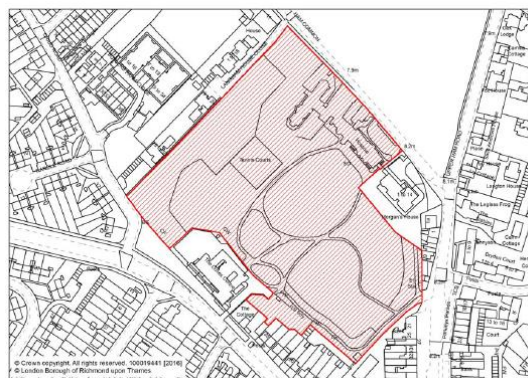


5.20 Whilst the number of units to be delivered as part of the comprehensive development of the site is yet to be determined, the Council will have an obligation to retain the current level of habitable rooms as part of the proposals in keeping with the London Plan and there could be no net loss of affordable or social housing. To offset the cost of development, additional market housing will need to be delivered.

5.21 Given the above requirements and constraints, the site is not available for development of a school.

Cassel Hospital, Ham Common, Ham

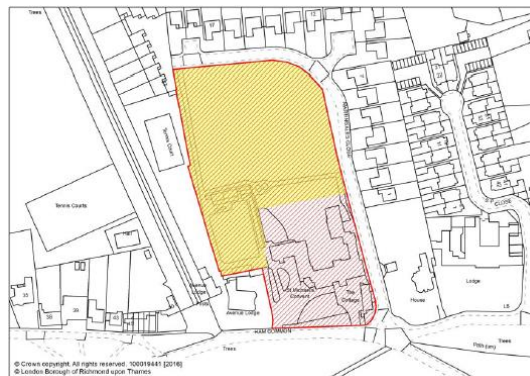
5.22 The site predominantly comprises green space with the Grade II listed Cassel Hospital located on the north-east of the site and is approximately 4.2ha in size. It is located in a conservation area and the open space associated with the hospital is designated as Other Open Land of Townscape Importance. The Local Plan Review allocates the site for social and community infrastructure uses, though conversion or potential development for residential uses could be considered if it allows for the protection and restoration of the listed buildings.



5.23 The hospital provides specialist mental health services and is an operational facility. As such, the site is not available. Moreover, the adaptation of on-site listed buildings for education purposes would likely be cost prohibitive and would not deliver the level of education facilities in line with that sought as part of the DfE's modern standards. As such, the site is neither available nor suitable.

St Michaels Convent, Ham Common

5.24 The site is approximately 1.5ha in size, comprising St Michael's Convent Gardens on the north of the site and four Grade II listed buildings: The Cottage, Orford Hall, St Michaels Convent, Avenue Lodge and Avenue Lodge Cottage. The site is located in a conservation area. It is allocated for social and community infrastructure uses through conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.



5.25 In April 2018, applications were approved for the conversion of the existing convent to 23 apartments and houses (16/3552/FUL and 16/3553/LBC). Applications to discharge conditions pursuant to the above consent are currently being progressed.

5.26 Notwithstanding the above that would indicate that the scheme is coming forward for residential development, the presence of a large number of listed buildings on the site that would require retention and reuse as part of any proposals would likely inhibit the development of the site for a school.

5.27 As such, the site can be discounted as both unavailable and unsuitable.

Sainsbury's, Lower Richmond Road, Richmond

5.28 The site is approximately 2.6ha in size and is occupied by Sainsbury's and a children's nursery. It is allocated for comprehensive redevelopment to provide retail and residential uses to also include the continued use of the food store and re-provision of existing retail floorspace.

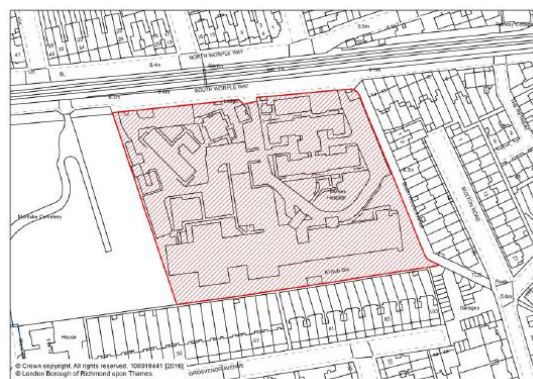
5.29 Whilst there are no discernible planning constraints on the site, the site is currently owned and operated by Sainsbury's and is highly unlikely to be available for purchase in the short to medium term. Even so, such a purchase would be cost prohibitive given the budget constraints of the public purse and ultimately this site is unviable. Any redevelopment is also likely to involve the development of units on a podium above the retail store and it is hard to see how this could be adapted to accommodate a major secondary school in an operationally effective manner.



5.30 As such, the site can be discounted as both unavailable and unsuitable.

Barnes Hospital, East Sheen

- 5.31 The site is approximately 1.45ha in size and is currently in use as a hospital. The site is allocated for social and community infrastructure with proposals required to prioritise the provision of a 2FE primary school.
- 5.32 South West London and St George's Mental Health NHS Trust have confirmed that the Hospital site is currently underused and its condition and design make it unsuitable for developing modern mental health inpatient care. The Trust are currently in the process of developing a vision for the site to deliver new homes and improved healthcare facilities, as well as providing land for a new primary school. Public Consultations were held in November and December 2017. The Trust's current plans divide the site into 0.68ha for new homes, 0.23ha for healthcare and 0.54 for community uses.
- 5.33 An application for a Certificate of Lawfulness to establish the use as C2 (residential accommodation and care to people in need of care) was submitted in June 2018 and is currently being progressed (ref. 18/1883/ES191).
- 5.34 The site's existing use would leave very limited space for a new secondary school, as would the Trust's proposals which would leave only 0.54ha available for community uses and in any case, this has been reserved for a new Primary school. The site can therefore be discounted as a suitable alternative.



Kempton Gate Business Park, Oldfield Road, Hampton

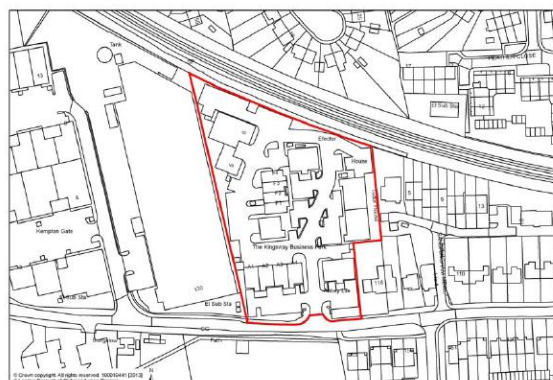
- 5.35 The site is approximately 3.19ha in size and comprises a number of light industrial and business uses. The site is allocated as a Key Employment Site.
- 5.36 Notwithstanding the protection of industrial and employment land inherent in planning policy, at present the site is occupied and the acquisition of all the relevant interests and site assembly/relocation of current occupiers would be a lengthy and costly process.
- 5.37 Given these issues, the site can be discounted as a suitable alternative on both availability and viability grounds.



Kingsway Business Park, Oldfield Road, Hampton

5.38 The site is approximately 1ha in size and comprises a number of business/office units. It is allocated as a Key Employment Site.

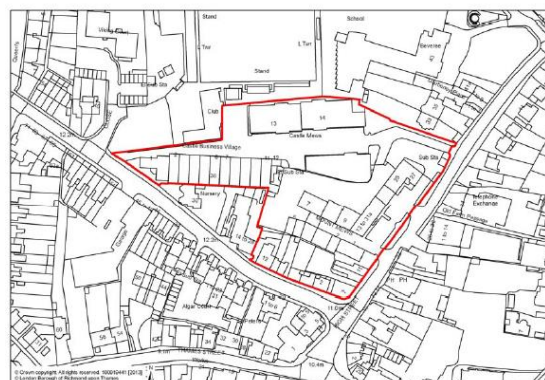
5.39 Notwithstanding the protection of employment land in Richmond planning policy, similarly to Kempton Gate, at present the site is occupied and acquisition of all the relevant interests and site assembly/relocation of current occupiers would be a lengthy and costly process.



5.40 Given these issues, the site can be discounted as a suitable alternative on both availability and viability grounds.

Castle Business Village, Castle Mews, Station Road, Hampton; 1-9 Mount Mews and 13025 High Street

5.41 The site is approximately 1.17ha in size and is allocated as a Key Employment Site. It currently comprises of office buildings, some of which have progressively been granted approval for conversion from office (B1) use to residential (C3 use) in recent years. This does signal a large degree of commercial interest in the site from private residential developers, which would have knock-on effects in the price of the land for the DfE in the first instance.



5.42 Even so, the site is very constrained by size for the school and the recent conversions from office to residential would likely raise site assembly difficulties.

5.43 Given the location in proximity to Hampton Town Centre, Hampton Court Palace and the River Thames, it may become challenging to secure off-site provision of sports facilities within a suitable distance for students. The nearest sports facilities would be located at Carlisle Park, approximately one mile away and although this does provide tennis, cricket and football pitches, given the distance and the costs incurred, it is unlikely to be a realistic option over an extended period of time.

5.44 Given the above, the site is discounted as a viable alternative.

Waldegrave Road Cluster, Teddington

5.45 The site is approximately 3.9ha of irregularly shaped land and comprises offices, a car garage, a library and a new residential development. Both Elmfield House and Teddington Library are Grade II listed. The site is mostly located within the Town Centre boundary, is partially located within a conservation area, and the southern part of the site is designated as Other Open Land of Townscape Importance and Public Open Space.



5.46 The redevelopment of the majority of the north-western portion of the site has already been completed for housing and as the south western part of the site, is too constrained in terms of size and access, this would leave the eastern portion of the site as the only potential location for a school.

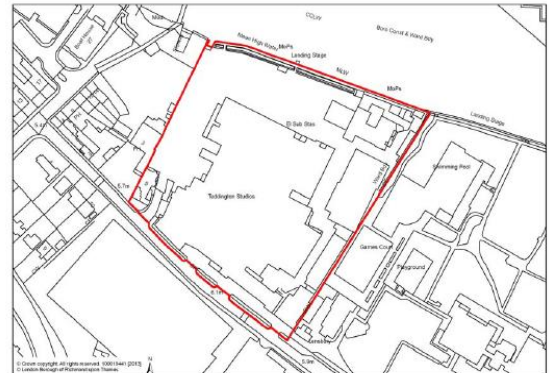
5.47 A large section of the eastern part of this site has been developed recently to accommodate Richmond Housing Partnership (RHP), the remaining area for potential development would require the assembly of several pieces of land belonging to numerous land owners. This is likely to be a costly and drawn out procedure that would elongate the construction of the school that is needed in the short-term (2020) to meet growing demand for secondary school places in the coming years.

5.48 Furthermore, the remaining area is highly constrained in terms of locating a new school building and associated outdoor recreation/social space for pupils, parking and servicing area on the site. This is made more difficult by the effective severing of the site by the RHP building and would require a significant increase in scale of the school building. There are of course, additional concerns with regards to heritage, open space and residential amenity, with the site being bounded by semi-detached dwellings on a number of sides that will likely pose significant hurdles in securing consent for a large scale modular block.

5.49 Given the above identified planning constraints, the piecemeal development of the site for office and residential over the last few years and the likely complex and protracted acquisition of the remaining land available to delivery would be a heavily compromised development, the site can be discounted as a suitable alternative.

Teddington Studios, Broom Road, Teddington

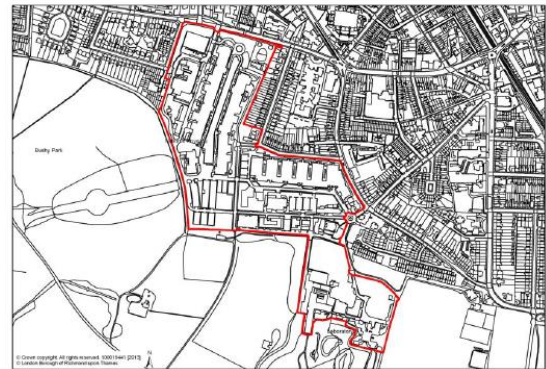
5.50 The site is approximately 1.5ha in size. The site is located in the Thames Policy Area and falls in Flood Zone 3. It is allocated for residential development, including affordable units, open space and a riverside walk.



5.51 Significantly, the site has been granted consent for residential development (ref. 14/0914/FUL), and this consent is currently being implemented. Therefore the site is no longer available to accommodate the proposed development and can be dismissed.

National Physical Laboratory, Hampton Road, Teddington

5.52 The site covers an area of approximately 17ha in size and comprises laboratory buildings, offices, a children’s nursery and the Grade II listed Teddington Hall. It is partially designated as Other Open Land of Townscape Importance.



5.53 Notwithstanding the site’s status as a nationally important research facility and ultimately its unavailability, there are several other constraints including its designation as open space and part heritage designation that would constrain future redevelopment.

5.54 As such, the site can be discounted as a suitable alternative.

West Twickenham Cluster, Twickenham

5.55 The site is approximately 2.2ha in size and comprises offices and residential units. The north-western part of the site falls in Flood Zone 2. The site was allocated for mixed residential, start up and small-scale hybrid business spaces and/or a primary school.



5.56 The north western part of the site has recently been converted from office to 6 residential dwellings, whilst the north eastern part of the site has also recently been converted to residential apartments. This leaves the central area of the site consisting of Greggs Bakery and Twickenham grid substation.

- 5.57 At the time of acquisition of the HBR site, the Twickenham Cluster site was not available for purchase. Since then, Greggs Bakery has announced that this site is to close at the end of 2018 and a Financial Viability Assessment undertaken by Colliers International, which is now in the public domain, values the site at approximately £18.7million based on a residential-led development. Therefore, any purchase of the site would need to compete with the housing market and at such an initial value, the purchase of the site for education purposes would be cost prohibitive to the public purse and would be ultimately unviable.
- 5.58 Turning now to practical planning matters, the likely complex nature of development on an irregular site in multiple ownership, which also includes the Twickenham grid sub-station and office buildings, may prove difficult to redevelop and would be highly constrained.
- 5.59 Whilst the site has been partly allocated for a primary school, the close proximity to residential dwellings and gardens on multiple sides would constrain the scale and extent of a new secondary school building and it would prove difficult to design and build a school block at the required size. This is constrained further by the requirement for associated recreation space and parking spaces, which has proved to be contentious matter for local residents. Even so, the surrounding road network of Crane Road, Gould Road and May Road is highly constrained, not only for cars but also for coaches and larger servicing vehicles. There are also likely to be matters of land contamination and remediation and its designation in Flood Zone 2 is likely to further inhibit layout and costs associated with the development of a school, especially as a school is classed as a 'more vulnerable' use class.
- 5.60 Looking further afield, it may prove difficult to secure off-site playing pitches that are easily accessible. Whilst there is Kneller Gardens and Twickenham Green in close proximity, these are public facilities and cannot be hired exclusively for school use for a defined period. Physical education classes in conjunction with public use would raise safeguarding issues. Alternatively, the nearest school facilities that could be shared would be St Catherine's Independent Girl's School (with a small sports field, with the school likely to be averse to leasing its facilities) and Waldegrave School (requiring a renegotiation of the lease) and these facilities are located some distance from the site.
- 5.61 Given the above, the acquisition and development of this site would be unviable and could only deliver a highly constrained secondary school and is therefore discounted.

Twickenham Film Studios / Arlington Works, Arlington Road, St Margarets

5.62 The site is approximately 1.4ha in size and comprises of film and sound studios. The site is located in an Area of Mixed Use.

5.63 Given the significance of the site for film and the arts and that it is currently unavailable for purchase, this would preclude the site as a viable alternative and it is therefore discounted.



HM Latchmere Prison, Church Road, Ham

5.64 The site is approximately 2.3ha in size and is located in a conservation area. It is currently under development having been allocated for a comprehensive redevelopment including a residential led scheme, including affordable units, possibly community and/or educational use and open space (14/0541/FUL).

5.65 As the above permission has been implemented, with phase one having been completed, the site can be discounted as an alternative.



Former Inland Revenue, Ruskin Avenue, Kew

5.66 The site is approximately 1ha in size and comprises a number of residential apartments. The site is located in Flood Zone 3 in an area benefitting from flood defences. The site was allocated for mixed uses to include residential, including affordable units, employment, community or health uses.

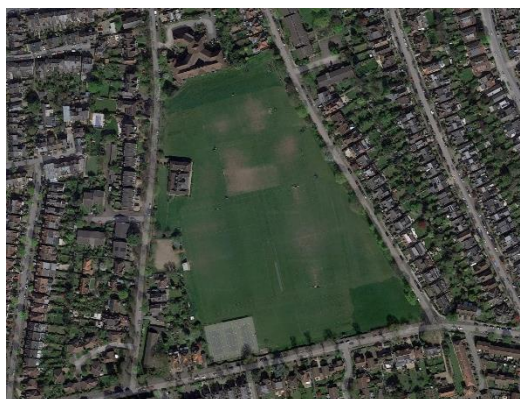
5.67 An application (ref. 14/1488/FUL) for the erection of four residential blocks comprising of 170 residential apartments was approved and has been implemented, with properties now on sale.

5.68 Given the above, the site can be dismissed as an alternative.



Former Imperial College Private Ground, Udney Park Road

- 5.69 The site is located to the north of Cromwell Road, east of Udney Park Road and west of Kingston Lane and is approximately 5.05ha in size. It comprises of playing fields, MUGAs and a clubhouse. It is designated Other Open Land of Townscape Importance.



- 5.70 An application (ref. 18/0151/FUL) for the following development has been submitted:

“Erection of a new extra-care community, with new public open space and improved sports facilities, comprising: 107 extra-care apartments (Class C2 Use), visitor suites, and associated car parking; 12 GP surgery (Class D1 use) and associated car parking; new public open space including a public park, and a community orchard; improved sports facilities (Class D2 use) comprising a 3G pitch, turf pitch, MUGA, playground, pavilion and community space, and associated parking (68 spaces); paddock for horses; and a new pedestrian crossing at Cromwell Road; and all other associated works.”

- 5.71 The above application has garnered significant level attention and objections from the public due to the perceived overdevelopment of the site and reduction in sports and recreational facilities. The owner and applicant (Quantum Group) has recently appealed against non-determination of the application and a decision will likely be made via public Inquiry in the coming months.
- 5.72 Given that Quantum Group are both the site owner and appellant, the site will clearly not be available in the short to medium term until the appeal is concluded. This may take an indefinite amount of time and any future transaction with the DfE would not meet the pressing need for a new school in the west of the Borough in the immediate term.
- 5.73 The site can therefore be dismissed on grounds that it is not currently available.

Old Latymerians Sports Ground, Wills Crescent

- 5.74 The site is approximately 3.07ha and comprises playing pitches, tennis courts and a pavilion. The site is located to the south of Wills Crescent. It is designated Other Open Land of Townscape Importance.



- 5.75 The site is not presently available and the development of the above site for a new school would incur an objection from Sport England due to the development on active sports pitches. In addition, the site has restricted access

and its use for a major school development is likely to be problematic in highways terms due to the character of the surrounding narrow residential roads.

5.76 Therefore, the site can be dismissed as a suitable alternative.

Partial Green Belt and MOL Sites

5.77 In the absence of any potential sites which are not either designated as Green Belt or MOL, it is next necessary to turn to consider sites which whilst partially subject to Green Belt or MOL constraints do offer areas of land which fall outside of these designations where accommodation of the school building could potentially be achieved.

Normansfield

5.78 The site is approximately 12.7ha in area and comprises various uses including offices, a theatre and museum and lodgings. It is allocated for institutional use, hotel, training centre, open space, nature conservation and housing.

5.79 The site is partially designated as MOL, Other Open Land of Townscape Importance and an Other Site of Nature Importance. Northern parts of the site are located in Flood Zone 2 which will pose a further constraint in respect of any application for a proposed school given its vulnerable categorisation.



5.80 Development on the site would be further constrained given that it comprises the Grade II listed Former Mortuary and Former Artisans Workshop and the Grade II* Normansfield Hospital. It is also located within a conservation area. As such, any development on the site would essentially be limited to the adaptation of the current buildings, which are not well suited to a modern educational use.

5.81 Notwithstanding its partial MOL designation, the site is discounted given its additional ecology, heritage and potential flood risk constraints.

Meadway

5.82 The site is approximately 1.2ha and is occupied by Crane Community Centre and Trafalgar Day Nursery and Pre-School. The site is partially designated MOL and an Other Site of Nature Importance and is located in the River Crane Area of Opportunity. The northern part of the site is located in Flood Zone 2.



5.83 Part of the site is located in MOL and subject to nature conservation constraints, which would limit the site's built footprint. Although in theory the Turing House School building could be located on the non-MOL area, this would involve removal of the current community uses which the current policy seeks to protect. Flood risk and ecology are likely to further constrain the site and it can therefore be discounted as a suitable alternative.

St Mary's University Strawberry Hill

The site covers a total area of 12.3ha and is occupied by St Mary's University. Buildings are located to the western side of the site whilst the middle and eastern parts comprise of open space and an athletics track to the south. There are three listed buildings on the site, including a Grade I listed chapel, a Grade II listed chapel and the Grade I listed Training College. The site is partially designated MOL and the northern part is a Grade II*

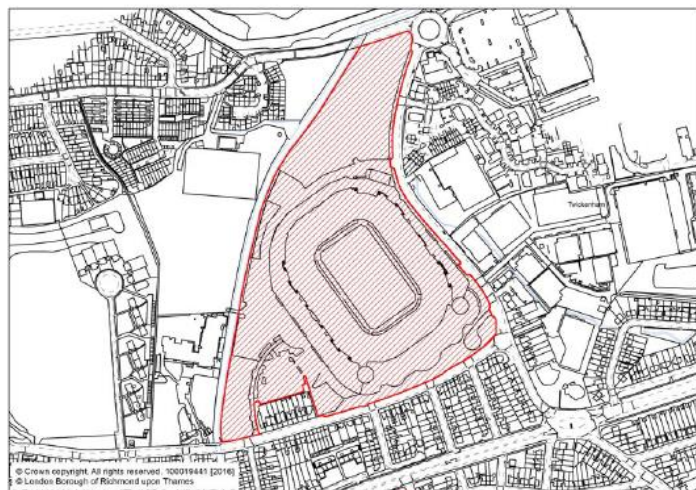


Historic Park and Garden. The site is allocated for the retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation.

5.84 Given the above partial MOL designation and heritage constraints, along with the active occupation by St Marys University, the site is not considered a suitable alternative on grounds of availability and heritage constraints.

Twickenham Stadium, Twickenham

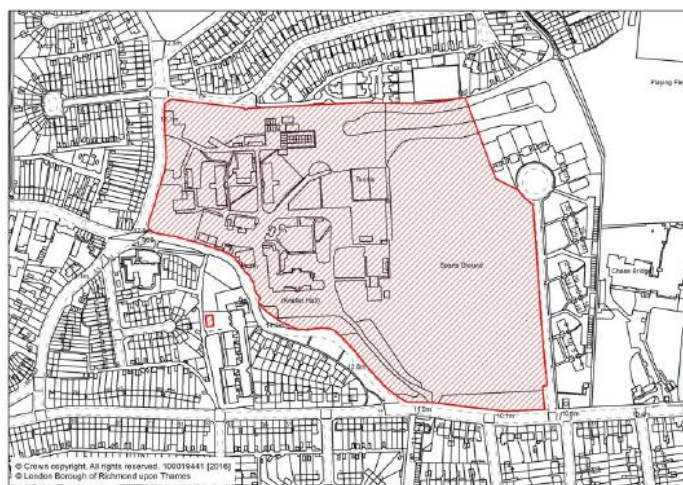
5.85 The site is approximately 12.4ha in size and comprises Twickenham Stadium and its associated parking. The western boundary of the site is designated MOL and the site is predominantly located in Flood Zone 2. The site is allocated for the continued use and improvement of the grounds for sports facilities though appropriate additional facilities include a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities.



5.86 Given that the site is used as a nationally significant sports stadium with partial designation as MOL, this site is not available and the open areas of the site are not sequentially preferable.

Kneller Hall, Whitton

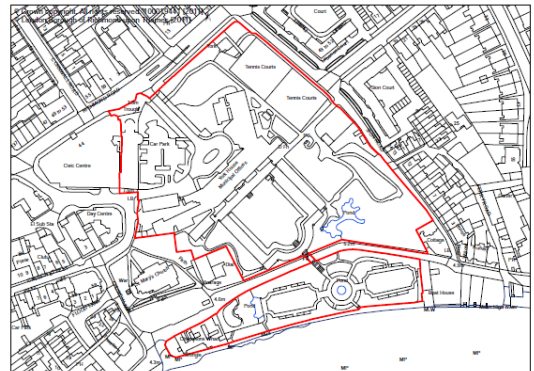
5.87 The site covers an area of approximately 9.74ha and comprises Kneller Hall and army barracks buildings on the west of the site and open fields on the east of the site. Most of the site is designated MOL. Both Kneller Hall and the gate piers are Grade II listed. The site is allocated for residential (including affordable housing), employment (B uses) and employment generating uses as well as social infrastructure uses, such as health and community facilities.



5.88 The site's MOL designation means that the site is not sequentially preferable. The presence of existing buildings on the site does create some precedent for built form, however, many of these buildings are listed heritage assets would likely be cost prohibitive for conversion and would not deliver the level of education facilities in line with that sought as part of the DfE's modern standards. The site can therefore be discounted.

York House, York House Gardens, Civic Centre and Environs

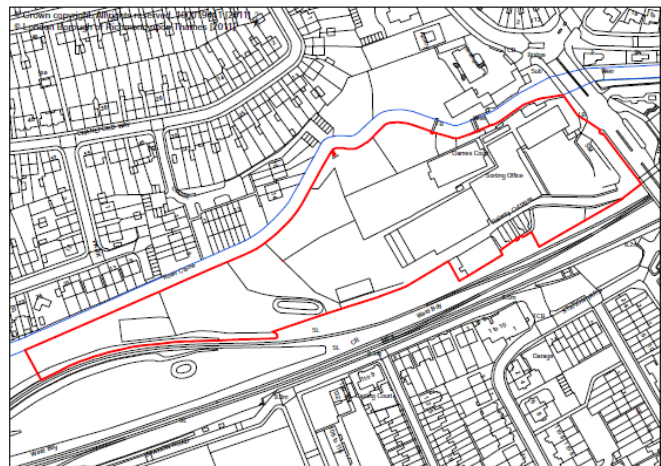
5.89 The site covers an area of approximately 3.1ha and comprises York House (Grade II listed), York House Gardens and tennis courts. The site is allocated for the retention of the civic use and additional use of the building to create a community/cultural hub with café/gallery/restaurant space, exhibition and performance space. The site is partially designated as MOL, Other Open Land of Townscape Importance and Public Open Space and is located in the Thames Policy Area. Southern parts of the site are located in Flood Zones 2 and 3.



5.90 This site is partially MOL, whilst its continued role of civic and cultural importance for the Borough, in addition to heritage constraints, would prevent a new secondary school from being developed on the balance of the site. The site can therefore be discounted on grounds of availability and planning/heritage constraints.

Former Twickenham Sorting Office and Open Land South of River Crane and Buildings to South

5.91 The site is 2.3ha and is allocated for mixed uses to include employment, residential including family housing, leisure (possibly a cinema), a substantial level of community use, retention of space for sports/outdoor activities, provision for extended open space alongside the River Crane and a riverside walk. The northern part of the site is designated MOL and the southern boundary is an Other Site of Nature Importance. The site is located within the River Crane Area of Opportunity and partially within the Town Centre boundary.



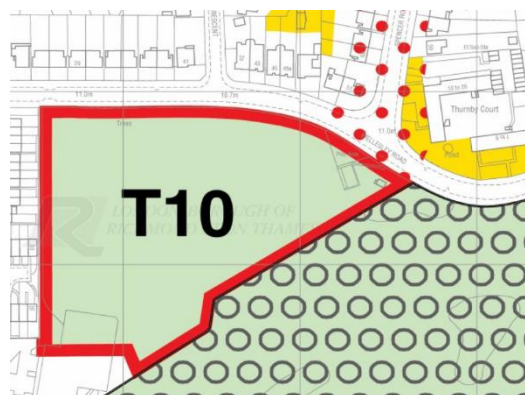
5.92 Since being allocated in the AAP, the site has been redeveloped and now comprises a number of residential properties and ground floor commercial units. Although there is a residual parcel of land to the west, this is MOL and not sufficient in size to meet the BB103 standards and the site can therefore be discounted.

Co-location Sites

- 5.93 Opportunities for co-location of the school, with other educational establishments has also been examined. Whilst the minimum site area for a secondary school as set out by the DfE is 1.6ha, the approach has been taken that sites of a minimum of 1ha should be reviewed as there may be scope for increased density in certain areas of Richmond, whilst being able to provide the minimum amount of play space and securing off-site provision of sports facilities. It must also be noted however, that the existing school sites already accommodate buildings and other facilities that reduce the amount of developable land significantly.
- 5.94 Aside from the obvious physical constraints of accommodating an additional school on an existing education site whilst ensuring that both institutions retain appropriate external space, something which clearly limits the available opportunities, many schools are now Academies and therefore, land is leased from the Department for Education on a 125 year period. The reallocation of part of a site that is occupied by an Academy for development by another educational institution, would require renegotiation of the lease, the agreement of the existing Academy and possible compensation. Loss of sports pitches would also be opposed by Sport England.
- 5.95 In light of the above, possible sites for co-location are now explored.

St James' RC Primary School

- 5.96 The site covers an area of 2.1ha The whole site is designated MOL.
- 5.97 Given this MOL allocation, development on this site would not be sequentially preferable and any increase in mass and scale to accommodate Turing House School would impact on the site's openness. It would also significantly compromise operation of the current school which utilises this area for sport and recreation. This would also be opposed by Sport England.
- 5.98 Given the above, this site can be discounted.

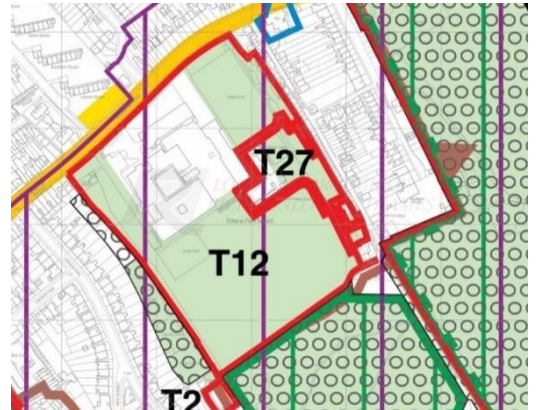


Orleans Park School, Richmond Road

5.99 The site is approximately 4.8ha in area. It is partially designed MOL and is located in a Conservation Area. The southern parts of the site are located in Flood Zones 2 and 3.

5.100 Any development on the MOL would not be sequentially preferable. Arguably, some limited development could be undertaken at the north of the site but this area would not be sufficient to accommodate a new secondary school. In addition, any development on the MUGA would be subject to Sport England objection.

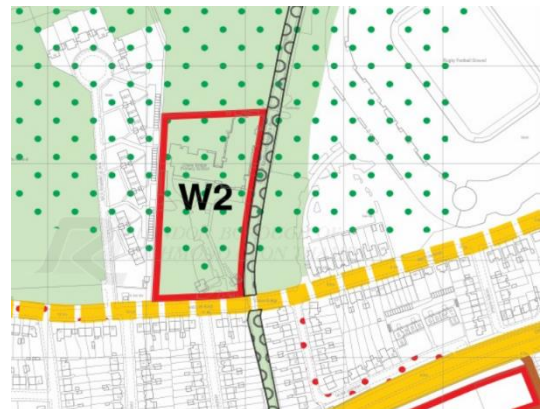
5.101 As such, the above site can be discounted.



Chase Bridge Primary Schools, Kneller Road

5.102 The site is approximately 1.9ha and occupied by Chase Bridge Primary School. The whole of the site is designated as MOL and any additional development on it would impact on its openness.

5.103 Given the site’s designation as MOL, it would not be sequentially preferable. The site is also not of sufficient size to accommodate a full secondary school alongside the Primary and is therefore discounted.

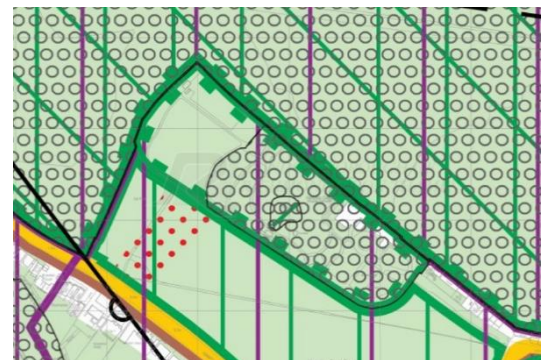


Hampton Court House

5.104 The site is occupied by an independent school, Hampton Court House, and totals approximately 2.43ha in size.

5.105 The site is designated MOL, and therefore not sequentially preferable. It is also a designated Other Site of Nature Importance and is located in a Conservation Area. Hampton Court House is Grade II listed, there are additional two Grade II* listed buildings on the site and the site is located in a Grade II* Park and Garden. Therefore, any development would be highly contentious.

5.106 The above constraints would therefore prove to be substantial risks for any proposal put forward. The site has therefore been discounted for co-location.



Christ’s Church of England Comprehensive Secondary School

- 5.107 The site is approximately 4.4ha consisting of the main school building and sports pitches to the north east and is predominantly designated as MOL.
- 5.108 The development on MOL would not be considered to be sequentially preferable and would also be subject to an objection by Sport England given its use for sports pitches.
- 5.109 Given the above, the site can be discounted as a possible co-location alternative.



Hampton School

- 5.110 Hampton School is an independent school. The total area of the site is approximately 14.46ha.
- 5.111 The majority of the school site is designated MOL and playing fields, thus the site is not sequentially preferable to the land at Hospital Bridge Road. Sport England would also object to the development of any buildings on the playing pitches.
- 5.112 The site is also in private ownership and is unlikely to be made available for the development of a state funded school.



- 5.113 In light of the above, the site is therefore discounted.

Lady Eleanor Holles School

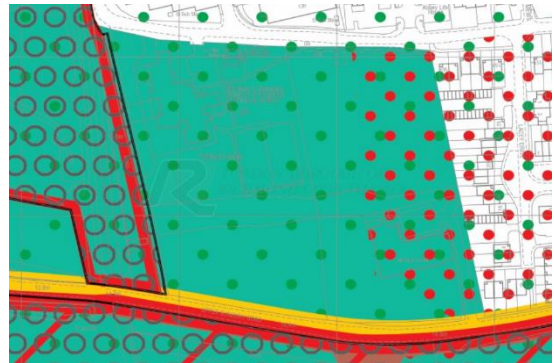
- 5.114 The total site area of the school is approximately 9.55ha in size. Most of the site is designated MOL.
- 5.115 The existing buildings are located towards the eastern side of the site, whilst playing pitches and hard courts are located to the north and west of the site. Given that the built form on the site only covers 1.4ha, it is likely that new buildings would need to be located on existing pitches in order to accommodate a new secondary school. Such proposals are likely to incur objections from Sport England.



5.116 The site is therefore discounted as a potential site for co-location given the constraints and not being sequentially preferable.

St Mary’s Hampton Church of England School

5.117 The site is approximately 2.7ha in size and is occupied by St Mary’s Hampton Church of England School. All of the site is designated Green Belt.



5.118 Any development on the site would not be sequentially preferable and the significant development that would likely entail for the provision of Turing House School would have a detrimental impact on the openness of the site.

5.119 The site is also of insufficient size to accommodate an additional full secondary school.

5.120 The site is therefore discounted for co-location due to its Green Belt designations, loss of playing fields and insufficient size.

Heathfield Schools and Heathfield Recreation Ground

5.121 The site totals approximately 3.24ha in size and comprises Heathfield Nursery and Infant School and Heathfield Junior School. The northern part of the site is designated MOL.



5.122 The school has already been redeveloped and has been expanded to become a 4FE infant and junior school (ref. 12/2792/FUL). Any development would need to be located on the existing built form to avoid encroachment into the sports pitches and there is insufficient space here to provide an additional school building.

5.123 Therefore, the site can be discounted as a viable alternative col-location site.

Twickenham School, Percy Road

5.124 The site is approximately 4.4ha in size and is occupied by Twickenham School. The southern half of the site is utilised for sports pitches and is designated MOL. There have been expansions to the school Sixth's Form centre in recent years.

5.125 Due to its MOL designation, development on the southern portion of the site would not be sequentially preferable. It would also raise objection from Sport England and would remove the existing school's sports pitches



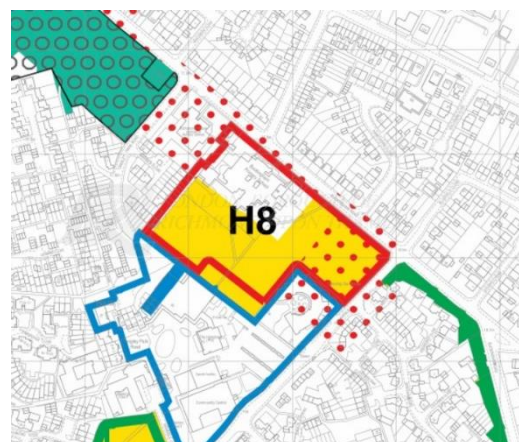
5.126 The northern part of the site already has significant built form and it would be too small to accommodate Turing House School in addition

5.127 Considering the above, the site would not be a feasible as an alternative option and can be discounted.

Buckingham Primary School

5.128 The Buckingham School site covers approximately 2.04ha. It is partially designated as Other Open Land of Townscape Importance.

5.129 Any attempt to build on playing fields would attract an objection from Sport England. This would inevitably direct development to the relatively restricted area of the existing built form, significantly increasing the scale of the predominantly one storey buildings. This is likely to be considered inappropriate given prevailing building heights. Even if this was considered acceptable, external play and leisure space would be significantly lacking and would not meet the required BB103 standards.



5.130 Offsite facilities would need to be provided to ensure adequate outdoor PE provision for both schools, with the nearest being Hampton School and requiring a Shared User Agreement.

5.131 Given the aforementioned constraints, the site is not considered to be appropriate for co-location and has been discounted.

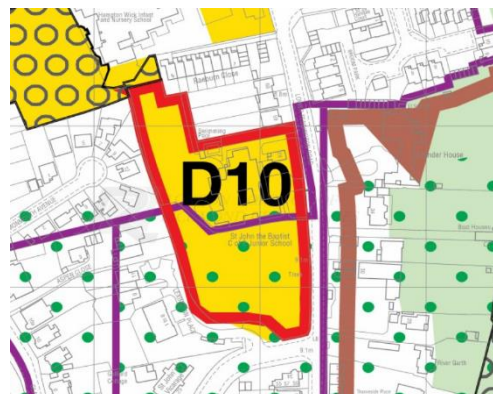
St John the Baptist C of E School, Lower Teddington Road

5.132 The site is approximately 1.4ha in size. The site is partially located in a Conservation Area and is designated entirely Other Open Land of Townscape Importance.

5.133 The development of additional buildings on sports pitches would be subject to an objection from Sport England. However, to avoid developing on this Open Land, it would be necessary to increase the size of the school buildings on the north-west of the site which would not be in keeping with the setting of the Conservation Area.

5.134 Further to this, given the size of the site, any further development is likely to result in a loss of outdoor recreational space below BB103 standards. As such the site is of insufficient size to accommodate an additional Secondary School.

5.135 As such, the site is not considered appropriate for co-location.



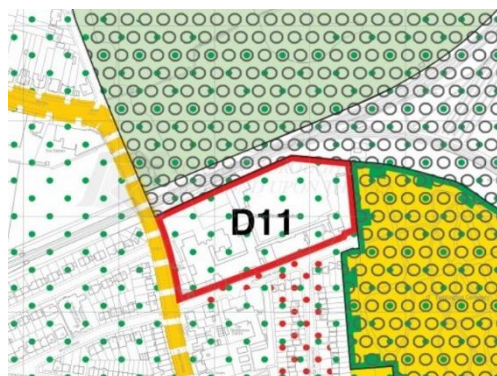
Stanley Primary School

5.136 The site is approximately 1.9ha and is occupied by Stanley Primary School. It is located within an area poorly provided by Public Open Space.

5.137 Development on the MUGA and sports pitches would be subject to an objection from Sport England, whilst an increase in massing on the existing built footprint would cause significant disruption to Stanley School, probably requiring off-site temporary accommodation in the interim period.

5.138 The resultant development would not meet the BB103 requirements for both schools and as such, the site is of insufficient size

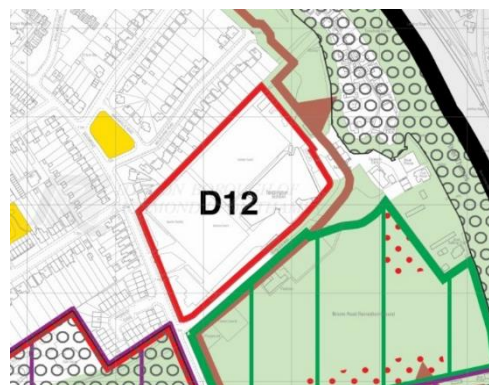
5.139 Given the above, the site is discounted as suitable for co-location.



Teddington School

5.140 The site is approximately 2.75ha in size

5.141 The school has recently been redeveloped, with the height of the current main building being four storeys in height. To accommodate Turing House, the building would likely need to double in size. Even if this was acceptable, this would still leave insufficient recreation space for pupils to meet the necessary BB103 standards. Moreover, matters of parking and the impact on Broom Road during peak hours would be core concerns for the Council and the local community.



5.142 Finally, the site is predominantly located in Flood Zone 2, with the north-eastern boundary located in Flood Zone 3, which would place further constraints on the proposed development.

5.143 Given the aforementioned reasons, the site has been discounted for co-location.

Waldegrave School

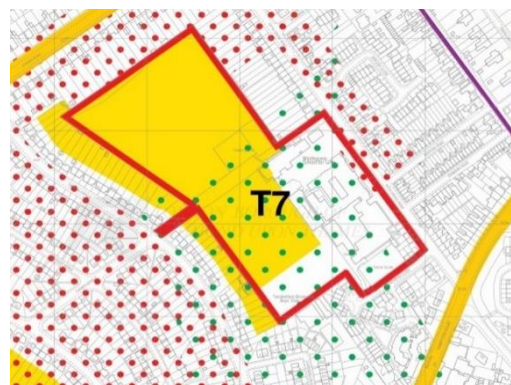
5.144 The site is approximately 5.1ha in size and comprises educational facilities for Waldegrave School.

5.145 Firstly, any development on the playing pitches would be subject to an objection from Sport England. Therefore, in order to accommodate the scale of development proposed, any additional school would need to be accommodated on the current built footprint.

5.146 The scale of the new building would be significantly larger than prevailing building heights and would likely impact on the surrounding residential context and amenity. Even so, Waldegrave School already lacks in outdoor recreation space and the inclusion of Turing School would leave a wholly inadequate school unable to meet BB103 standards.

5.147 In terms of transport, significant additional parking spaces would be required and there are likely to be significant adverse impacts on the narrow carriageway of Fifth Cross Road during peak hours, both core concerns of the Council and local community.

5.148 Given the above, the site is therefore discounted.



Nelson Primary School, Nelson Road

5.149 The site is approximately 2.6ha and is occupied by Nelson Primary School. Part of the site is designated Other Open Land of Townscape Importance.

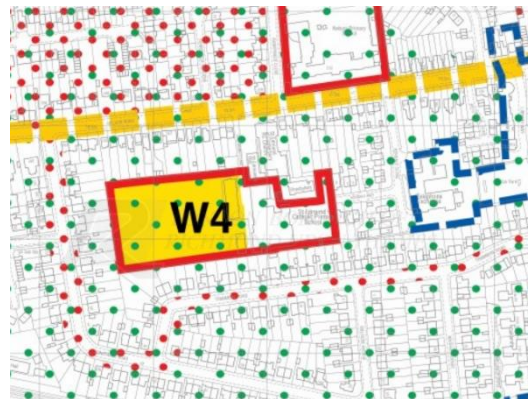


5.150 The inclusion of a new secondary school would be limited to the current built form as any development on the existing sports pitches would result in an objection from Sport England. This would lead to a significant increase in scale and built development, out of kilter with the surrounding suburban character and would require a significant increase in parking and recreational space. On this basis, it can be concluded that the site is of insufficient size to accommodate an additional secondary school

5.151 As such, the site can be dismissed for co-location with Turing House.

St Edmunds RC Primary School, Nelson Road

5.152 This site covers an area of approximately 1.3ha and comprises educational facilities for St Edmunds Catholic Primary School. Most of the site is designated Other Open Land of Townscape Importance.



5.153 Development would be limited to the built form as encroachment on to the playing pitches would be the subject of an objection from Sport England. Such development would lead to a significant increase in scale and overlooking and daylight and sunlight concerns for local residents. On this basis, it can be concluded that the site is of insufficient size to accommodate an additional secondary school

5.154 Given the above, the site can be discounted.

Collis Primary School

5.155 The site is approximately 2.9ha in size and is occupied by Collis Primary School.



5.156 The eastern half and north-west corner of the site are designated Other Open Land of Townscape Importance and sports pitches. Any development in this area would incur an objection from Sport England.

- 5.157 In order to accommodate the development, any proposed new buildings would therefore need to be provided in the place of the existing buildings, increasing scale and massing to accommodate two schools within a very small area. On this basis, it can be concluded that the site is of insufficient size to accommodate an additional secondary school. The site is therefore discounted for co-location.

St Richard's Church of England Primary School

- 5.158 The site is approximately 1.76ha and is occupied by St Richard's Church of England Primary School. All of the site is designated Other Open Land of Townscape Importance and comprises sports pitches on its eastern half.

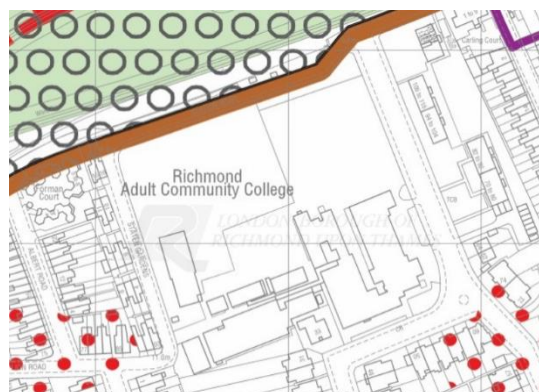


- 5.159 The loss of Other Open Land of Townscape Importance is likely to be resisted by the Council, whilst any development on sports pitches would incur an objection from Sport England. The existing built form is relatively small and constrained by surrounding streets and residential premises and the co-location of Turing on this site would require a significant increase in scale. Even so, this would leave very limited recreational and social space for students of both schools and would not meet the required BB103 standards. On this basis, it can be concluded that the site is of insufficient size to accommodate an additional secondary school.

- 5.160 Given the above, the site can be discounted for co-location.

St Richard Reynolds Catholic Primary School and Catholic High School

- 5.161 The site is approximately 1.78ha in size. It is occupied by St Richard Reynolds Catholic Primary School and St Richard Reynolds Catholic High School. The site has recently been redeveloped, having been granted permission in April 2016 (ref. 15/1359/FUL).



- 5.162 The site is already heavily constrained, providing accommodation for a primary school and secondary school, with very limited outdoor recreation space and outdoor sports facilities already secured off-site.
- 5.163 The site has therefore been discounted due to size constraints, with the site being considered to be too small to accommodate Turing House school in addition to the current facilities.

Green Belt and Metropolitan Open Land Sites

5.164 In the absence of available sites within the above categories, it is then necessary to consider sites which are identified as wholly Green Belt or MOL sites. The current application site at Hospital Bridge Road falls within this category and as such, it is not necessary to assess other sites in this category to satisfy the sequential site selection process. Nonetheless, it is also the case that all potential sites except the Hospital Bridge Road site are additionally subject to other important constraints which in practice lead to them being very much inferior potential development sites. This is illustrated by the following table:

Site	Designations
Land & Buildings at Hampton Water Treatment Works	Green Belt Other Site of Nature Importance Grade II listed Riverdale, Gate and Railings, Hampton Water Works Morelands Building, Cast Iron Railings, Ruston and Beam and Store Buildings. Located in Flood Zone 3 though the northern part of the site is in Flood Zone 2
Sunnyside Reservoir, Lower Sunbury Road, Hampton	Green Belt Other Site of Nature Importance
Hydes Field, Upper Sunbury Road, Hampton	Green Belt Other Site of Nature Importance Flood Zone 2
North End of Oak Avenue, Hampton	Green Belt District Park
Hatherop Recreation Ground	Green Belt Public Open Space
Platts Eyot, Lower Sunbury Road, Hampton	Green Belt

Site	Designations
	<p>Other Site of Nature Importance</p> <p>Flood Zone 2 and 3</p>
Hampton Water Works	<p>Green Belt</p> <p>Other Site of Nature Importance</p> <p>Thames Policy Area</p> <p>Essential water Infrastructure</p> <p>Flood Zone 2 and 3</p>
Marble Hill Park, Richmond Road	<p>MOL</p> <p>Public Open Space</p> <p>Other Site of Nature Importance</p> <p>Thames Policy Area.</p> <p>Conservation Area</p> <p>Four listed buildings ranging from Grade I to Grade II listed on the site</p> <p>Grade II* Historic Park and Garden</p> <p>Flood Zone 2 and 3</p>
Fulwell Golf Course, Wellington Road	<p>MOL</p> <p>Other Site of Nature Importance</p>
Strawberry Hill Golf Course, Wellesley Road	<p>MOL</p> <p>Other Site of Nature Importance</p>

Site	Designations
Kings Field, Hampton Court Road	MOL Public Open Space Other Site of Nature Importance
Cole Park Allotments, Cole Park Road	MOL Local Open Space Other Site of Nature Importance Flood Zone 2 and 3
Richmond Athletic Association Ground, Old Deer Park, Richmond	World Heritage Site Grade I Park and Garden (Royal Botanic Gardens, Kew) MOL Conservation Area Grade II listed pavilion
Kew Gardens Car Park	World Heritage Site Grade I Park and Garden (Royal Botanic Gardens, Kew) MOL Public Open Space Conservation Area
Land Adjacent to David Lloyd, Hampton	MOL Public Open Space Other Site of Nature Importance Public Right of Way

Table 9: Discounted Green Belt and MOL sites

Land Adjacent to David Lloyd, Hampton, Twickenham

- 5.165 Although as highlighted above, there is no requirement to assess sites which are not sequentially preferable to the current application site, we are aware that there has been significant discussion around the above site as a potential home for Turing House School. As such, we would comment on this site in more detail.
- 5.166 The site is located on the southern side of Twickenham Road and to the north-east of Uxbridge Road. It is approximately 3ha in size and comprises undeveloped scrub land and heathland. The site is mainly designated MOL but is additionally designated as, as a Site of Nature Importance and as public open space. A Public Right of Way also runs through the site.
- 5.167 Due to the above designations, the site is clearly an inferior site to Hospital Bridge Road in planning policy terms. In addition, it is understood the site is in a number of leasehold ownerships and is also the subject of a restrictive covenant, which precludes its use for anything other than recreation. The public right of way would also need to be diverted. All of the above legal constraints would take time and be costly to overcome with no guarantee of a positive outcome.
- 5.168 In light of the above, the site is not considered viable or available in addition to being a very much inferior site in planning policy terms.

6.0 Land off Hospital Bridge Road

- 6.1 After undertaking a Sequential Site Assessment, the process leaves only one site available and capable of meeting the needs of Turing House School. This is the site off Hospital Bridge Road, which is the subject of the current Planning Application.
- 6.2 The Site itself does not contain any permanent buildings and it comprises predominantly of open green space that is not open to the public, although the adjacent nursery business has informally expanded onto adjacent areas of the site. The site is bounded by trees on its southern, western and northern boundaries.
- 6.3 Although the site is MOL, it is not the subject of any additional designations (i.e. Site of Nature Conservation Importance, Site of Townscape Importance, Public Open Space)
- 6.4 Vehicular access to the site is from Hospital Bridge Road to the south-eastern corner of the site and is shared with the Nursery.
- 6.5 The EA's Flood Map identifies the site as being located in Flood Zone 1 (Low Risk). There are no listed buildings on or in proximity to the site.

Planning Assessment

- 6.6 Whilst the Site is designated as MOL, the site is currently open grassland and ecology investigations have established that the site is of no more than local importance. As such, there are no further discernible constraints on the Site that would act as additional hurdles to overcome at the planning stage such as designation as playing fields, flood risk concerns, or heritage considerations that have been intrinsic to many of the aforementioned sites that have been assessed in this report.
- 6.7 Furthermore, despite the sites MOL designation, it actually fulfils few of the roles attributable to MOL as set out in London Plan Policy 7.17, namely;
- contributes to the physical structure of London by being clearly distinguishable from the built up area;
 - includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
 - it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and
 - it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.
- 6.8 In the case of the current site, whilst it is open land distinguishable from the surrounding built up area, it is not currently in any active use and does not contain and features or landscapes of either

national or metropolitan value. Furthermore, the ecological value of the site is limited with most of the value being in the form of the trees around the edge of the site which would be largely unaffected by a school development

- 6.9 It should also be noted that the development of Turing House School on the site would actually serve to broaden the MOL objectives of the site. The school itself will provide additional sporting and leisure facilities which will be available to be used by local sports and community groups under the terms of a community use agreement. Furthermore, following discussions with officers and members of RLBRuT, it has been agreed that the western portion of the site will be made available as public open space acting as a northern extension of Heathfield Recreation Ground, albeit more for informal use and habitat enhancement rather than formal recreation.

7.0 Conclusion

- 7.1 The sequential assessment has demonstrated that, within the western area of LBRuT, the Hospital Bridge Road site is the most appropriate site for the proposed Turing House School Development.
- 7.2 The sequential assessment reveals that there are no alternative suitable sites available, either for development on a standalone basis or via the co-location of school facilities, which met one or more of the search criteria of availability, viability, size, suitability and location; when assessed against the minimum floor-space and outdoor space requirements of the school.
- 7.3 The combination of this lack of alternative sites and the clear need for a permanent home to be identified for Turing House School to allow the school to meet the acknowledged need for additional secondary school places in LBRuT, demonstrates the 'Very Special Circumstances' required to justify development on this MOL site.
- 7.4 In addition, the proposed development will facilitate additional planning benefits which weigh in favour of the development. First, the school itself will provide facilities for sport and recreation which will be made available for use by the wider community outside of school hours under the terms of a community use agreement. Secondly, following discussions with officers and members of LBRuT, it has been agreed that the western portion of the site will be made available for public access, resulting in a net gain of public open space in the area.
- 7.5 The development of the Hospital Bridge Road Site is therefore not only justified in terms of Very Special Circumstances having been demonstrated, but it also brings with it substantial wider planning benefits for the local community.