

**COLLIS PRIMARY SCHOOL,
FAIRFAX ROAD, TEDDINGTON TW11 9BS**

LONDON BOROUGH OF RICHMOND UPON THAMES
APPLICATION PLANNING STATEMENT



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APPLICANT



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EXECUTIVE SUMMARY

Collis Primary School is a 3FE Community Primary School located within a residential area of Teddington, . The existing school represents a set of partnerships between the London Borough of Richmond upon Thames and other community resources, providing educational facilities for mixed-sex pupils aged 3 to 11. There are several bulge classes currently being accommodated, with a total of 793 pupils on the school roll

The Department for Education (DfE) have secured a fund for the review of existing school blocks nationally. 277 schools were approved to have at least one of their buildings (blocks) rebuilt or refurbished through Phase 2 of the Priority School Building Programme (PSBP2). Collis Primary School is one of these named schools to receive funding to upgrade their facilities. Richmond Council as the landowner and operator of Collis Primary School have also agreed to fund the redevelopment of the school nursery building. This proposal (in conjunction with Richmond Council) seeks to demolish two buildings on site and erect a new part one, part two storey replacement block for the benefit. A standalone minor administration block is also proposed.

Pupil and staff numbers will not be affected by this application, with these proposals being an upgrade in facilities rather than an expansion of the School.

The DfE have appointed a contractor and design team (Spatial Initiative Ltd) to attain planning permission and deliver this construction project. Pre-application advice was initially provided by Richmond Council in January 2017, however this was only based on basic block options and their location. Subsequent advice was sought in late 2018, with detailed advice provided in January 2019. A public consultation evening was arranged with parents, guardians, staff, pupils, local residents and community groups in July 2019. The results of these events have shaped this detailed application scheme.

The resultant scheme involves the demolition of two blocks and construction of a single replacement block consisting of, a nursery, twelve classrooms, one practical learning space, a kitchen suite, a dining area, three group rooms, a medical room, a reception suite and associated ancillary spaces. This building will be located on an existing hard surfaced play area to the north east of the school buildings. A new single storey administration block is also proposed by the school car park. Improved landscaping and play space arrangements are also proposed within the development, with the footprint of the demolished building supporting mixed surface play areas for pupils.

The newer teaching block (Junior Block – granted permission in 2005) will be unaffected by this application.

In order to prevent displacing pupils during the construction process, the existing school buildings will remain in operation while the new building is under construction in a secured building site. The large school site allows for the construction of the new building to occur and the existing school to remain in operation without having a harmful impact on residents or the school.

The appointed contractor intends to start construction of the new building as soon as they have obtained all the necessary permits (Planning, Building Regulations etc) to ensure that the school can establish at their new building as soon as possible.

1.0 INTRODUCTION

- 1.1. This statement accompanies a planning application by The Secretary of State for Education for the demolition of two existing school buildings and erection of a new part one, part two storey building at Collis Primary School. The statement has been prepared by Nicholas Taylor and Associates (NT+A) Planning Consultants on behalf of Spatial Initiative, the contractors who have been appointed by the Department for Education to deliver this construction project.
- 1.2. The new building will accommodate a nursery, classrooms, dining hall, art room, studio, offices and other ancillary facilities. A new single storey administration block is also proposed by the school car park.



VIEW OF NEW TEACHING BLOCK

- 1.3. In addition to the Planning Statement, the planning application is accompanied by full suite of planning drawings prepared by AHR Architects, and technical reports which address necessary topics related to the application and all forms and notices required by Richmond Council's Local Validations Checklist.
- 1.4. The Planning Statement adopts the following structure:
 - Section 2 describes the site and surrounding area.
 - Section 3 outlines the relevant planning history for the site.
 - Section 4 describes proposed development in detail.
 - Section 5 discusses previous pre-application consultations held with the local planning authority and other bodies.
 - Section 6 provides details of public consultation which was held with members of the public, school and local groups prior to the submission of a planning application.
 - Section 7 sets out the planning policy framework relevant to this proposal.
 - Section 8 provides a detailed appraisal of the scheme against relevant planning policies.
 - Finally, Section 9 provides a summary and conclusions.
- 1.5. In addition to this Planning Statement, this planning application is supported by the following forms, documents and reports:

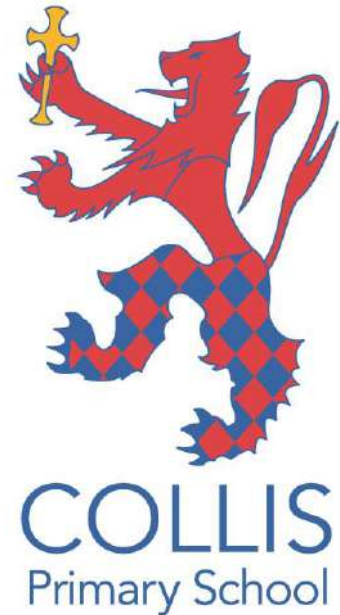
NAME	AUTHOR
Application Form, signed and dated.	Nicholas Taylor + Associates
CIL Form, signed and dated.	Nicholas Taylor + Associates
Sustainable Construction Checklist	Nicholas Taylor + Associates
Air Quality Assessment	Nicholas Taylor + Associates
Health Impact Assessment	Nicholas Taylor + Associates
Transport Assessment	Wynns

Travel Plan	Collis Primary School
Existing and Proposed Drawing Package	AHR
Landscape Plan	AHR
Design and Access Statement	AHR
Tree Survey and Method Statement	Barnes Associates
BREEAM Pre-Assessment	Method
BREEAM Note	Method
Preliminary Ecological Appraisal	Cherryfield Ecology
Preliminary Roost Assessment	Cherryfield Ecology
Flood Risk Assessment	Ambiental
Construction and Demolition Management Plan	Spatial Initiative Ltd
Low Zero Carbon Technology Feasibility Study	SI Sealy
Sustainability Assessment and Energy Statement	SI Sealy
SUDS Statement (and drawings)	Teicniuil Priory
Foul Sewage Assessment	Teicniuil Priory
Acoustic Feasibility Survey	Mott Macdonald
Acoustic Assessment	Syntegra
Activity Noise Assessment	Syntegra
Construction Noise and Vibration Assessment	Syntegra
Lighting Plan	SI Sealy
Ground Investigation Report	Socotec

2.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

COLLIS PRIMARY SCHOOL

- 2.1 Collis Primary School is a mixed gender three form of entry (3FE) community primary school located on a backland site in the residential area of Teddington. Whilst the school dates back to 1865, the school established at their current address on Fairfax Road in 1972. The school expanded in 1982 and in 2005 via new block extensions/developments.
- 2.2 The School represents a set of partnerships between the London Borough of Richmond upon Thames and other community resources, providing educational facilities for pupils aged 3 to 11. While the School is 3FE, there are several bulge classes bringing the current school roll to 793. Despite these bulge classes, there is no plan currently in place to expand the school to a 4FE school.
- 2.3 There are approximately 110 of staff at Collis which includes 47 teachers along with support, administration and maintenance staff.



AERIAL VIEW OF COLLIS PRIMARY SCHOOL SITE

- 2.4 There are currently six named school buildings on the western half of the school site. For the sake of clarity of this submission going forward, these blocks have been labelled EFA-A to EFA-F respectively.
- **EFA-A** – Original School block (1970s)
 - **EFA-B** – 2 storey extension (2000s)
 - **EFA-C** – Caretakers house (1970s)
 - **EFA-D** – Nursery block (1980s)
 - **EFA-E** – Temporary single storey classroom block (2010s)
 - **EFA-F** – Extension to original school block (1980s)



BREAKDOWN OF SCHOOL BLOCKS WITHIN THE SITE

2.5 Please note that EFA-A and EFA-E (infant block) are connected and are treated as one building for the purpose of the description of this planning application. Most of the school’s teaching blocks are single storey except for block EFA-B. EFA-B (junior block) is the two-storey teaching block granted planning permission in September 2005 and constructed immediately thereafter.



EXISTING EFA-A AND EFA-F BLOCKS LOOKING WEST FROM THE PLAYGROUND



ENTRANCE TO BLOCK EFA-A WHEN VIEWED FROM THE CAR PARK



2 STOREY BLOCK EFA-B VIEWED FROM THE CAR PARK

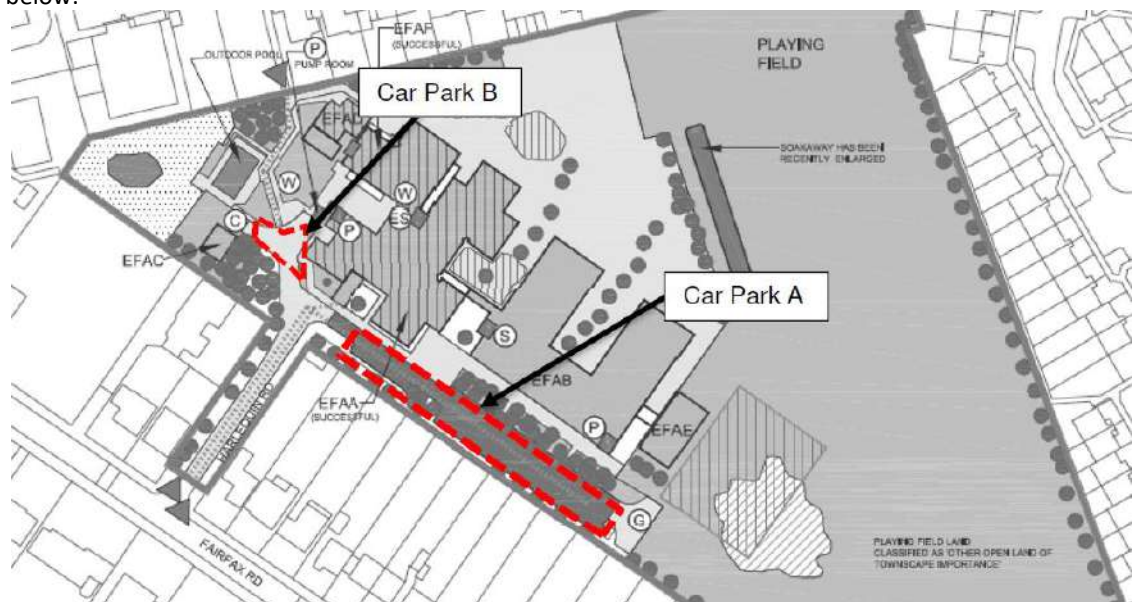
2.6 There are multiple hard surfaced playground areas and two hard surfaced courts in the north of the site, an outdoor swimming pool in the northwest of the site, a recreational sports field in the eastern half and a nature conservation area containing a pond to the west of the site

2.7 The school has one main vehicular access point from Fairfax Road, located at the southwest side. There is additional vehicular access via Harlequin Road located on the site’s southern boundary however this is used for emergency access only. There are two pedestrian access points to the site; one via Fairfax Road to the southwest and one via an alleyway footpath connected to Cromwell Road to the north.



ACCESS TO SCHOOL SITE

2.8 The school site has two on-site car parking areas to the front of the school used by staff. See plan below:

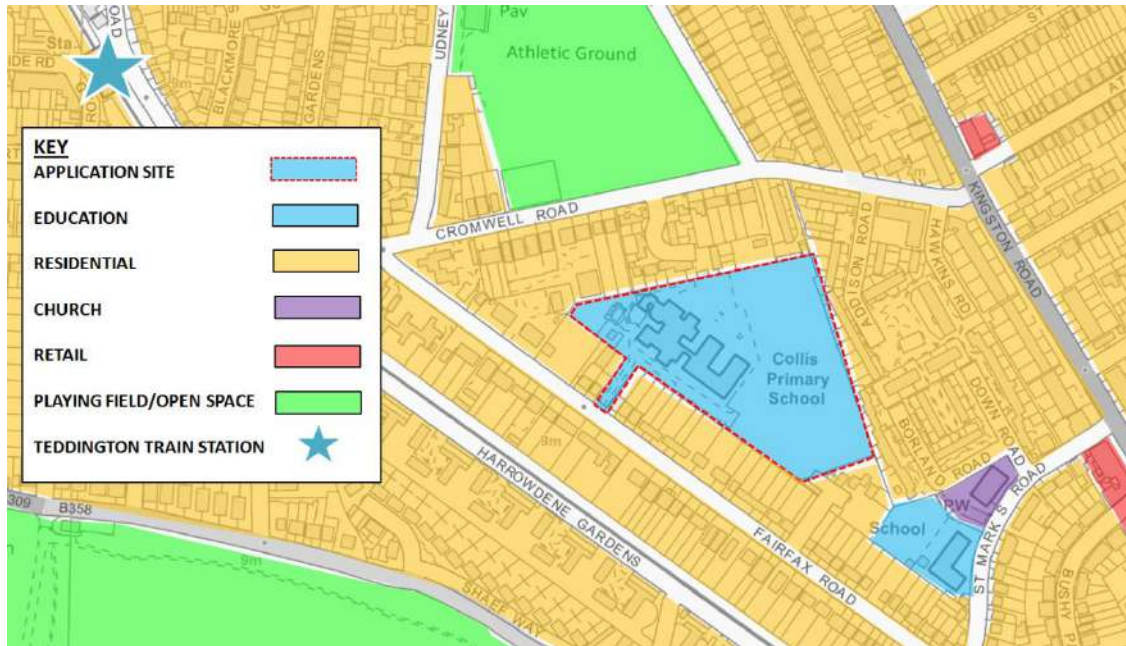


COLLIS PRIMARY SCHOOL – CAR PARK AREAS

2.9 There are also over 70 individual trees and groups of trees within the school site. These are not formally protected as there is no TPO for the site and it falls outside of a conservation area.

SURROUNDING AREA

2.10 The surrounding area is predominantly residential in character, with suburban housing surrounding the site on all sides. Most of these are detached or semi-detached dwellings however there is a block of flats immediately to the south-east of the site on Harlequin Road. There are some other facilities other than housing in the surrounding area. Please see the plan below:



EXISTING SATELLITE IMAGE OF THE SITE AND SURROUNDING AREAS

3.0 PLANNING HISTORY

3.1 The site has an extensive planning history. All applications which have been submitted at the site since the 1970s have been summarised below.

APPLICATION NUMBER	PROPOSAL	DECISION
19/1613/FUL	Re-use of an artificial grass pitch to create a multi use games area (MUGA) and side pitch for the school and accompanying fencing	In progress
18/0397/FUL	Retention of the portakabin classroom block consisting of 2 classrooms, cloakroom and toilets, overclad externally.	Granted permission 03/04/2018
14/1728/FUL	Retention of demountable classroom unit for 3 more years.	Granted permission 28/07/2014
13/0424/FUL	Replacement of bark safety surface, climbing frame and six small wooden climbing / playing structures with a wet pour safety surface (play area extended by 43 sqm into the school playground,); three larger play frames and four pieces of play equipment; and a perimeter fence installed (0.95m tall) . No change to number of users of the site and access now restricted to during school hours only.	Granted permission 16/07/2015
11/2044/FUL	New Portakabin classroom block consisting of 2 classrooms, cloakroom and toilets, overclad externally	Granted permission 17/08/2011
05/1180/DD0 1	Details pursuant to condition U06214 (hard and soft landscaping)	granted permission 22/11/2005
05/1180/FUL	Erection of two storey extension to create 12 classrooms, hall, small hall, library, ICT room, changing rooms, other teaching spaces and staff facilities, together with car parking, playground and improvements for pedestrian access outside of school building	granted permission 01/09/2005
04/1310/FUL	Dismantling Of 4 No. Existing Demountable Classrooms/buildings And Removal From Site. The Relocation At The Existing Elliotts Demountable Classrooms On The Site And The Erection Of 3 No.new Single Storey Demountable Double Classrooms.	granted permission 30/06/2004
04/T0284	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging The Nature Trail.	refused permission 08/04/2004
04/T0285	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging The Nature Trail	refused permission 08/04/2004
03/1552/FUL	Proposed Erection Of Re - Locatable Double Classroom Unit.	granted permission 19/06/2003
01/3372	Provision Of Water Tank Housing On Free-standing Steelwork Supports And Base Foundation.	granted permission 21/02/2002
01/3192	Provision Of Roof Level Water Tank Housing And Smaller Additional Housing For Heating System Feed Tank.	granted permission 11/02/2002
01/1286	Erection Of A 7.8m X 15m Demountable Classroom.	granted permission 19/07/2001
97/0776	Renewal Of Planning Consent For A Sectional Building For Use By An After School Care Scheme.	granted permission 29/08/1997
95/2468/FUL	Erection Of Galvanised Steel Storage Shed.	granted permission 28/09/1995

APPLICATION NUMBER	PROPOSAL	DECISION
95/0833/FUL	Erection Of Pre-cast Concrete Garage Structure For Use As Storage Space For School Equipment/materials	granted permission 21/04/1995
94/1314/FUL	Erection Of Classroom Extensions And Alteration Of 2 No Windows To Form Door/window Combinations.	granted permission 14/07/1994
93/0985/FUL	Erection Of A Demountable Single Classroom.	granted permission 23/08/1993
93/0921/S192	Erection Of A Single Demountable Classroom.	decided as no further action be taken 09/08/1993
92/0218/FUL	Erection Of Sectional Building To Be Used In Conjunction With The Schools After School Care Scheme	granted permission 06/04/1992
91/1974/S64	Use Of The 'pavilion' Changing Rooms As An After School Care Group For The Children Of Working Mot...	Decision Unknown 20/11/1991
91/0311/FUL	Installation Of A Single Demountable Classroom.	granted permission 07/05/1991
80/0744/DD01	Alterations including erection of single storey infant teaching and nursery extensions to the existing school and provision of 4 new parking bays. (Detailed drawings - materials).	granted permission 12/03/1981
80/0744	Alterations including erection of single storey infant teaching and nursery extensions to the existing school and provision of four new parking bay.	granted permission 24/07/1980
71/0544	Erection of a three-form entry junior school, erection of two-storey caretakers house and garage and provision of 10 parking spaces.	granted permission 27/04/1971

- 3.2 As the school have had to accommodate some bulge classes over the years, this has led to the recent applications for temporary classrooms in 2011, 2014 and 2018. The most recent application which saw the school substantially expand was application 05/1180/FUL which granted permission for the two storey Junior block (below)



TWO STOREY JUNIOR BLOCK GRANTED PERMISSION IN 2005

4.0 THE PROPOSED DEVELOPMENT

- 4.1 Full planning permission is formally sought in respect of the demolition of the building highlighted in red to the right and construction of a new part one, part two storey school block to the north-east of the Junior Block. Also proposed is a new admin block toward the front entrance to the site. Improved landscaping and play areas are proposed in place of the teaching blocks being demolished. Pupil and staff numbers will not be altered as a result of this proposal.



BUILDINGS BEING DEMOLISHED HIGHLIGHTED IN RED



PROPOSED SITE PLAN

- 4.2 This development will provide 1,987sqm of floorspace, with 1,725sqm demolished. The overall development will see a reduction in overall footprint occupation, as this scheme utilises a second storey.

NEW TEACHING BLOCK

- 4.3 The main replacement teaching block will be roughly rectangular for improved permeability within the building with classrooms and offices accessible from a central corridor. Two stair cores are provided at either end of the two-storey element, along with a lift to ensure accessibility to each level for all.
- 4.4 The building will run in a south-east to north west direction with aspects toward Block EFAB and the playing fields to the north east. As the school is largely built upon hard standing, no playing pitches are compromised because of this development.

- 4.5 The main block will contain a new dining hall, nursery, 12 classrooms, and art room, library and other ancillary classrooms and offices.



GROUND FLOOR PLAN LAYOUT

- 4.6 In order to keep the building height to a minimum, a flat roofed development is proposed, which is keeping with the height, appearance and scale of the more recent Junior School block. The overall height of the building is the minimum height permissible for DfE schemes.



VIEW OF NEW BLOCK FROM THE PLAYGROUND

- 4.7 Some tree loss is necessary to bring this scheme about. All of these trees were planted as part of a landscaping scheme for the Junior block development. A replacement tree planting scheme is proposed to mitigate for this.

- 4.8 This replacement block will meet the modern needs of Collis Primary within a consolidated, more efficient teaching block, replacing the buildings which have long surpassed their expected life cycle.

- 4.9 The proposed block will be a mix of brickwork and through-colour render in a mix of off-white, reds, and blue (the school's colour). Windows and doors will be double glazed in a grey PPC aluminium frame sitting in a deep reveal.



PROPOSED FRONT ELEVATION

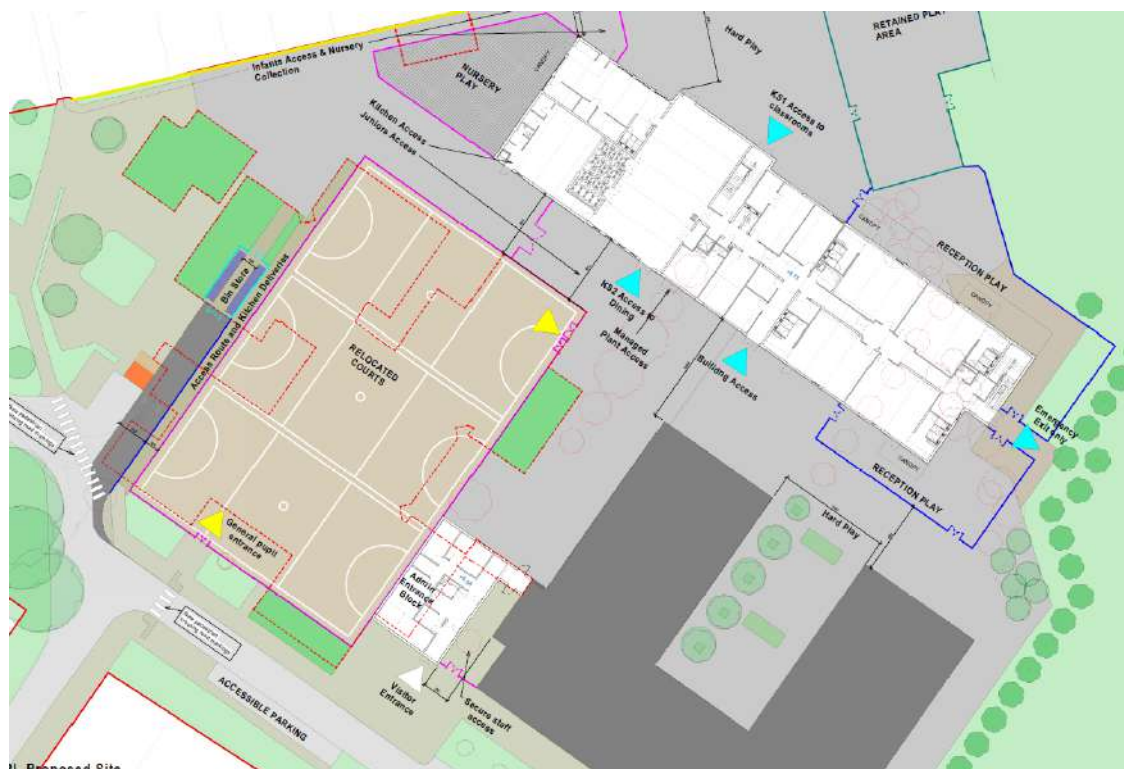
- 4.10 The roof will be of a single ply finish and form part of a fully insulated and acoustically rated. Some plant and PV panels are required on the roof in order to meet the sustainable performance requirements of the building. Collapsible railings are required for a safe access. When not in use, these will be kept in the lowered position, and we would welcome a condition requiring this.

NEW ADMIN BLOCK

- 4.11 A new administrative block is proposed to the front of the site closer to the car park and Fairfax Road. This single storey building will support the main reception for the school along with some staff offices. This building will be finished in a mix of brick and a natural green wall.

**ADMINISTRATION BLOCK**

- 4.12 New play areas are proposed throughout the school site. As can be seen from the proposed site plan, 3 new netball courts are now proposed in place of where the demolished buildings sit today. Other landscaping improvements (including tree planting) will enhance the appearance of the overall site.
- 4.13 Secure fencing is proposed throughout to ensure a safe school environment. Acoustic fencing is proposed along the northern boundary to minimise any noise impacts of the revised layout.
- 4.14 The existing car park and parking spaces will be unaffected by these proposals, however a new service vehicle access to a new dedicated waste and recycling store will be provided.
- 4.15 A new dedicated cycle parking store for 113 cycles is provided for pupils and staff within the school site. Sheffield stands for 14 cycles are retained by the staff car park.
- 4.16 Please consider the detailed Site Plan which accompanies this application (below).

**DETAILED SITE PLAN**

- 4.17 In order to prevent displacing pupils during the construction process, the existing school buildings will remain in operation while the new teaching block is first constructed in a secured building site. The large school site allows for the construction of the new school to occur and the existing school to remain in operation without having a harmful impact on the school or neighbours.

4.18 Construction will take place in two main phases; Phase 1 will be construction of the new school building in an isolated building site, while the school continues to operate from its existing buildings. After the school building has been completed, the school can relocate into their new premises. Phase 2 then involves the demolition of the relevant school buildings and creation of new hard and soft landscaping/play areas. For both phases, construction access will independently occur from the secondary vehicle access from Harlequin Road to the south.



PROPOSED CONSTRUCTION SITE LAYOUTS – PHASE 1 (LEFT) AND 2 (RIGHT)

4.19 The appointed contractor intends to start construction of the new buildings as soon as they have obtained all the necessary permits (Planning, Building Regulations etc) to ensure that the school can establish at their new building as soon as possible. The development will be constructed using modular construction methods, meaning that construction time and nuisance to pupils/staff/residents will be minimised with fewer vehicle movements and a much-reduced timescale.

PLANNING CONDITIONS

4.20 This application has been deliberately front loaded with information to allow officers to determine this application with minimum conditions. We would therefore request that planning conditions are only attached to the development in line with Section 55 of the NPPF.

4.21 This development will see a vast improvement in terms of appearance and functionality. The location and construction logistics allow the School to remain operational while concurrently delivering a brand new school building in a matter of months.



VIEW OF THE DEVELOPMENT FROM THE PLAYING FIELD

5.0 PRE-APPLICATION CONSULTATION

- 5.1 Prior to the submission of this planning application, the applicant and technical advisors have sought pre-application advice from the local planning authority and other bodies on several occasions over the last three years. These discussions are listed chronologically below.

RICHMOND COUNCIL

January 2017

- 5.2 A submission was made by the DfE to Richmond Council in November 2016 with formal advice offered by the local planning authority in January 2017. The DfE suggested two location options and welcomed officers to advise on each option. Option 1 was to the south-east of the Junior School block, while Option 2 was to the north-east of the Junior School block.



2017 OPTIONS PRESENTED TO THE LPA AND SPORT ENGLAND (NEW BLOCK INDICATED IN YELLOW)

- 5.3 Officers were supportive of the upgrading of the school's facilities, subject to compliance with other planning policies. They also indicated their preferred location for the replacement block on the existing playground, rather than on the playing fields. Officers stated that *"it is recommended that options 1's (building on playing field) are not pursued as this would be contrary to policy."* With regard to erecting a new block on the playground to the north-west of the Junior Block, officers indicated that this would be the preferred location, as it would avoid any development within land designated as OOLTI.
- 5.4 Officers proceeded to give more detailed advice in respect of other more detailed matters, which is discussed in more detail in Section 8 of this report under the relevant heading.
- 5.5 This advice is attached as Appendix 1 in this report.

SPORT ENGLAND

January 2017

- 5.6 The DfE presented the above two options to Sport England in late 2016 with advice provided by letter on 3rd January 2017. Regarding Option 1, Sport England advised that the proposal appears to prejudice the use of a playing field and because none of the exceptions to policy are considered to be applicable from the information provided, Sport England is likely to object to a subsequent planning application.
- 5.7 Regarding Option 2, Sport England advised that the proposal has the potential of meeting E3 of Sport England's Playing Fields Policy, determined as *"The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch"*, but only if the proposed development can be moved slightly to the North-West or if the development can be reduced in size so it does not encroach onto the playing field. Please see Appendix 2 for details of this feedback.

RICHMOND COUNCIL*October 2018-May 2019*

- 5.8 After the DfE appointed Spatial Initiative to secure planning permission and implement the scheme, a more detailed scheme was developed in line with the previous advice, along with taking the comments from the School, Richmond (client) and the DfE into account. Various reports were also commissioned to supplement the application submission. After a submission on October 5th 2018, a meeting was held with officers on 12th November 2018. The minutes from that meeting are attached in Appendix 3].
- 5.9 The discussion (and subsequent advice issued on 14th January 2019) was more detailed, with officers indicating that they were generally supportive of the building location and scheme overall, subject to compliance with other planning policies.
- 5.10 Written advice was provided to the applicant on 14th January 2019 (Appendix 4). After an error with the transport comments given by Richmond, amended advice was provided to the applicant on 1st May 2019. This advice is discussed in detail in section 8.

SPORT ENGLAND*November 2018*

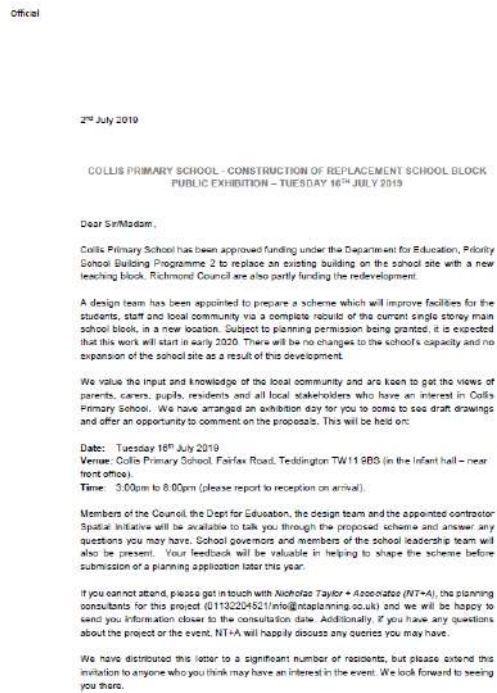
- 5.11 The scheme presented at pre-app in November 2018 was simultaneously sent to Sport England for advice. A response from Vicky Aston was received on 21st November. *“The impact on the playing field is not easy to assess from the plans as they do not show the full extent of the playing field (including, for example, the pitch layout show on the aerial photograph and any landscaping) see below. Subject to this plan demonstrating that there is no or very limited impact on the playing field then Sport England would consider that this part of the proposals met exception 3. In finalising the proposal for this site, the scheme should be adjusted to ensure there is no or minimal impact on the playing field and if necessary the proposed building should be moved closer to the site boundary to accommodate this. As they are adjacent to the playing field, Sport England also considers that the existing games courts form part of the playing field. Sport England recommends that in designing the replacement courts, the court layout should take into account current Sport England design guidance including;*
- *Artificial Surfaces for Outdoor Sport*
 - *Comparative sizes of sports pitches and courts (outdoor)*
- These documents indicate the appropriate and safe run-offs for netball and provide guidance on the height and type of nets (which will be required due to the relocation of the courts next to the deliveries area). Any new facilities should be built in accordance with Sport England’s technical guidance notes, copies of which can be found at: <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>. Subject to these courts meeting our design guidance, Sport England would consider that the replacement courts met exception 5 of our playing field policy. Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 97 of NPPF. If you require any further information please do not hesitate to contact the undersigned.”*
- 5.12 This advice (attached in Appendix 5) again was positive and provided helpful advice as to Sport England’s expectations.

SPORT ENGLAND*August 2019*

- 5.13 Finally, once the design had been further developed, pre-application advice was sought in respect of the scheme which matches the planning proposals. It was demonstrated that the building location met the requirements of Exception 3, while the relocation of courts met the requirements of Exception 4. Advice was sought from Sport England on 5th August 2019.
- 5.14 A response was received on 19th August 2019 where it was indicated that the application proposals would not be objected to by Sport England. Please see Appendix 6 for this response.

6.0 STATEMENT OF COMMUNITY INVOLVEMENT

- 6.1 Local community input is crucial for a scheme of this nature. After the appointment of the contractor in 2017, engagement was commenced seeking feedback on detailed options. Despite being funded by both the DfE and Richmond Council, it is important to ensure that the end users were happy with the proposed detailed design for which planning permission is sought. Despite the School's initial preference for the block to be located the building away from the existing playground or on the playing fields (which would result in a refused application), detailed feedback was generally positive with some small refinements suggested, which have now been incorporated into the planning application scheme.
- 6.2 Additionally, a public consultation was arranged for 16th July 2019, to allow the school and the project team to present the scheme to pupils, parents, guardians, local residents and local amenity groups and welcome any feedback and any suggestions.
- 6.3 Invitations were sent to all pupils/parents/guardians and staff by email. Letters were posted to 897 adjacent addresses within 39 nearby postcodes (map below).



INVITATION SENT TO RESIDENTS



MAP SHOWING EXTENT OF LETTER DROP

6.4 In addition, local ward councillors, local groups and officers from the local planning authority and the local MP were all invited to the event. The event ran from 3pm-8pm with members from the contractor, architects, planning consultants, Dept for Education and School all available to present and discuss this scheme with this in attendance. 4 sets of drawings on A1 boards were displayed, with a rolling presentation of the scheme playing on an overhead projector.



BOARDS ON DISPLAY AT CONSULTATION

6.5 A wide range of people came to view the proposals including local residents and groups, children, pupils, parents/grandparents of pupils, prospective parents, teachers, councillors and other interested parties.



EXTRACT FROM THE PRESENTATION BOARDS ON DISPLAY AT THE EVENT

- 6.6 Attendance was reasonable with a total of c. 80 visiting through the afternoon and evening. 51 people signed the registration sheet, and 23 people provided feedback, either by completing forms on the night, or by taking the forms home and emailing their comments to NTA in the following week.
- 6.7 Many residents provided verbal feedback or were content with the proposals, negating the need for to complete a feedback form.
- 6.8 Of those that did complete the feedback forms, the feedback was as follows:

Which of the following best describes you?	
Pupil	4%
Parent/Guardian	31%
Local Resident	61%
Staff	0%
Other	4

Do you support the demolition and construction of a new school block in general?	
I support the proposal	76%
I do not have a view	5%
I do not support the proposal	19%

What is your view on the design?	
<ul style="list-style-type: none"> I like the proposed design 	62%
<ul style="list-style-type: none"> I do not have a view 	0%
<ul style="list-style-type: none"> I do not like the proposed design 	38%

- 6.9 The principle of a new school development was strongly supported with 76% of feedback supporting the development in general. Additionally, 62% of feedback also supported the design of the scheme presented at the consultation which was encouraging. Of the 38% that did not support the scheme, constructive comments and queries were provided in the advice. These are summarised and responded to below. The comments provided are in the grey box followed by our response. They have been categorised by planning subject for clarity.

POSITIVE

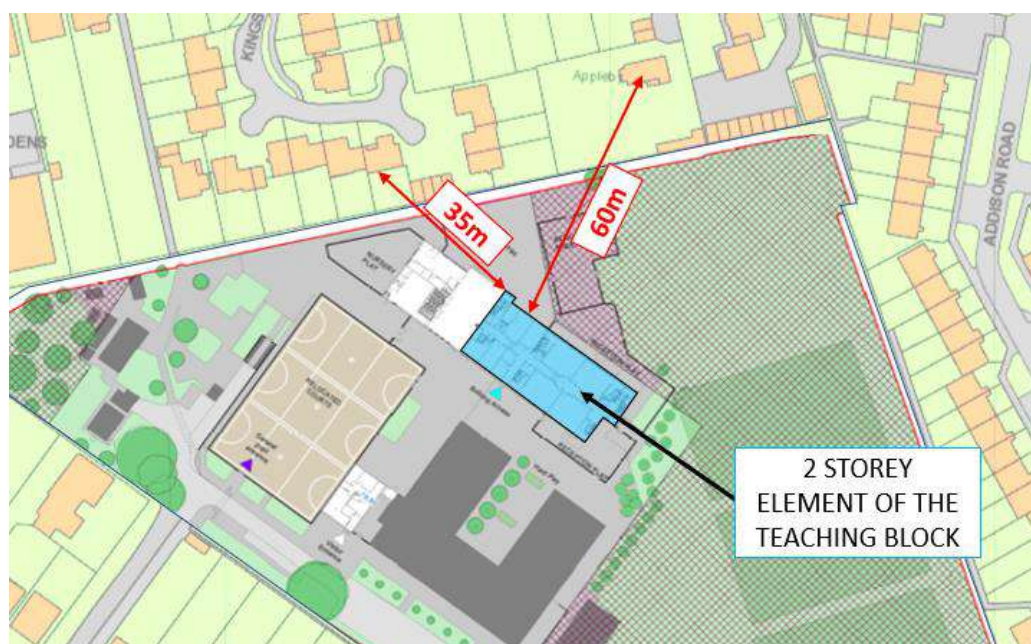
1. *Generally, the new plans are great and very much needed.*
2. *I personally think the new design offers a lot more of a peaceful environment for the children to learn and play in. 😊 And it looks nice.*
3. *Thank you for your proposals. It looks superb.*
4. *The school needs a new infant block – this scheme seems to be an appropriate way to build a new one with all the constraints.*
5. *Seems to be thinking about minimal disruption to schooling – would like to ensure enough playground space during the build – design looks good.*
6. *New facilities look great.*
7. *I would support the long overdue development of the school and the plans you presented.*
8. *Thank you for the clear, well presented display and the chance for local residents and parents to talk to your team.*

NEIGHBOURING AMENIITY

9. Whilst we support the school's ambitions to provide a high quality learning environment for its pupils, we do not support the draft plans that were shared at the meeting. Our house is located next door to the school and we share a boundary fence. Our house is built to face this boundary, which means that all of our main living areas, our kitchen/breakfast room, living room, master bedroom, dressing room, bathroom and second bedroom face towards the school. The boundary that runs between us is a brick built wall which has been raised in height with the addition of a tie fence on top, which was constructed by the school as a condition of obtaining planning permission for the adventure playground that was built a number of years ago. We also have a large glasshouse running next to the wall. Further to this, following a number of incidents, not least of which being student climbing the wall and throwing bricks at us and causing damage to property, the school fenced off an enclosure so that students could not access our boundary. We insist that this precedent is maintained. The proposed new school block will be significantly closer to our shared boundary than the existing block, it will also run almost the entire length of our boundary, albeit at an angle to that boundary. As the block will be two stories high with classroom on the second story, pupils and staff will have a clear line of sight into our property and into the living space of our home. This will suffer a significant loss of privacy which will impact on our normal daily living and enjoyment of our home and garden.

Response: The nearest property facing the windows of the new block is a detached house located on the to the north of the school site. Whilst I do appreciate that perhaps the view into the school site may be altered from upper levels of properties, we feel that their concerns may be misjudged for a number of reasons.

- a) The new part-one, part-two storey building is over 60m from the nearest property facing the windows at its closest point. Policy LP8 advises a minimum distance of 20m between windows of habitable rooms as a generally acceptable distance. Overlooking distances are also not usually calculated for between residential and non-residential uses.



DISTANCE TO NEAREST PROPERTIES

- b) The new block will be only two-storey. As the existing Junior block to the south is also two-storey, the proposed new block will mostly fall into the foreground of any longer view.
- c) Many of the new houses along the northern boundary have a strong line of trees which currently screen the view of the application site from neighbouring properties.
- d) The school (especially the classroom spaces on level 1) would only be in use during school time, with most classrooms vacated by 3pm. Therefore, for most of the afternoon and evening, the rooms which this resident is concerned with, will be empty with lights switched off.

- e) BRE Guidance to assess daylight sunlight impacts advises a 25-degree line to be taken from the centre height of the lowest window of a neighbouring property. If this line is breached by a proposed development, then daylight/sunlight concerns may be an issue. As the 2-storey block is 60m from this property's window, a 25-degree line would come nowhere close to the new block proposed.

The school do not intend to alter the habitat area (fenced off area) following the completion of this development.

10. The end of the block facing the properties on Kingsmead Close is ugly and potentially noisy. I would prefer to be looking at a building with windows.

Response: The block facing Kingsmead Close is a mix of mostly brick and some render. Colour has been added at ground floor level to add an element of playfulness as it is the nursery play area. This elevation will not be visible by residents.

The upper levels are a simple white render which matches the characteristics of the more recent Junior block.

Acoustic Consultants Syntegra undertook an assessment of the relocation of the playing courts and determined that no mitigation measures would be required. Syntegra also advised that while noise impacts along the northern receptors would be low, it was advised that it would be beneficial to erect acoustic fencing along this northern boundary. The applicant was happy to include this, and this fencing is shown on the proposed site plan.

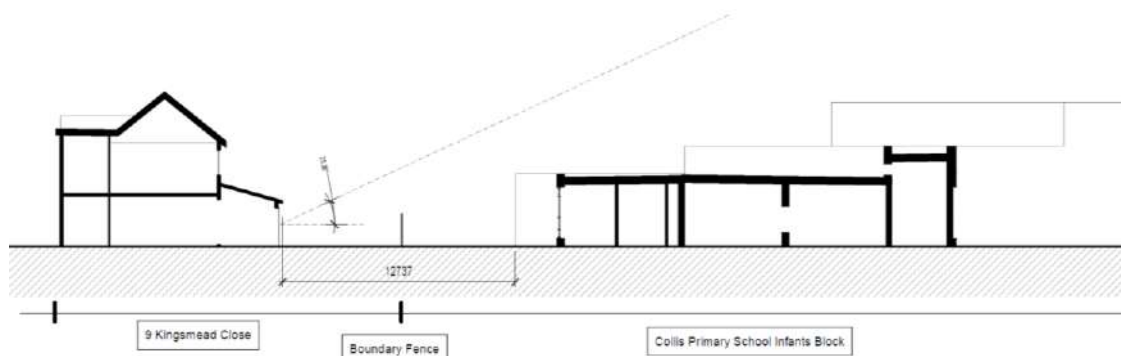
Windows have been kept to a minimum on the elevations facing Kingsmead Close to prevent any privacy concerns or perceptions of overlooking. Some clerestory windows have been added to the ground floor hall (as this has a taller floor-to-ceiling height), but windows have been omitted from the first-floor level to protect privacy of residents.

11. My property will directly be overlooked by the new proposed development. The corner of the single storey block will be only 6m from my boundary, impacting on light and privacy. I will object to any of the proposed plans.

12. This will block my light. There is a loss of privacy, being overlooked. I will object to all stages of this development.

Response: The single storey element of the new block will be 12m from the rear elevation of the closest neighbouring properties (on Kingsmead Close to the north-west). The two-storey element of the new block is 35m from their rear elevation at its closest point. No windows are proposed at first floor level to prevent privacy concerns.

With regard to daylight sunlight, BRE Guidance to assess daylight sunlight impacts advises a 25-degree line to be taken from the centre height of the lowest window of the worst affected neighbouring property. If this line is breached by a proposed development, then daylight/sunlight concerns may be an issue. See the drawing PL-CPS-AHR-ZZ-ZZ-DR-A-90-011 below for this assessment. As can be seen, the 25-degree line is not infringed by this development.



DAYLIGHT/SUNLIGHT ASSESSMENT

13. *Neighbours in Cromwell Road are understandably concerned at the close proximity to their boundary and any adjustment to the position of the buildings or tree screening that would protect their outlook should be considered. I think the staggering of the heights of the three sections of the building helps to reduce the impact of its bulk.*

Response: As suggested, the building height is staggered with the lower levels closer to the boundary to prevent any overbearing impacts on surrounding neighbours. Given the closest distances of the 2-storey element (35m), outlook and daylight/sunlight of these residents is protected.

Acoustic Consultants Syntegra undertook an assessment of the relocation of the playing courts and determined that no mitigation measures would be required. Syntegra advised that while noise impacts along the northern receptors would be low, it was advised that it would be beneficial to erect acoustic fencing along this northern boundary. The applicant was happy to include this, and this fencing is shown on the proposed site plan.

14. *The proposed building is too close to Kingsmead Close. It will cause problems with privacy, light and possibly noise. The building could, I suggest be moved further away reasonably easily by several metres, keeping everyone happy. Your design is not compromised nor are the resident's privacy and light issues.*

Response: Please see response 13 above. Unfortunately, the building cannot be moved any further away from the properties, as we are not able to build on school playing fields in accordance with national and local planning policy. The development already infringes with some of the playing field however not so much to warrant an objection. Any further infringement would be met with objecting in a planning application.

15. *The proposed development is unnecessarily close to residential properties.*

Response: The development has been specifically sited for several reasons:

- a) Set back from the boundary (12m minimum to the nearest rear elevation.)
- b) Significant set back of the 2 storey element (35m to the nearest rear elevation.)
- c) Layout which is acceptable to the school and funder.
- d) Not developing on the school playing field or land designated by the local planning authority as "Other Open Land of Townscape Importance".

In consideration of the local planning policies which protect residential amenity, we consider that this development is wholly compliant.

16. *I am a neighbour who will be most affected by the redevelopment of Collis Primary School in Teddington. Presently, my house overlooks the playground which is the proposed site for the new infant school. Unlike the current building for the infant school, the proposed one is to be a double storey building which will start 6 meters from my back fence. I am strongly opposed to this development in the proposed location due to the fact that:*

1. *My light will be totally blocked by a double storey building.*
2. *My views will be totally obstructed by a double storey building meters from my back windows*
3. *I will loose all privacy from the back of my house as the new building is so close to my back fence*
4. *I am going to be overlooked by the windows and the road access which will directly impact my property*
5. *There will be an increase in noise and disruption from the school as the building is so close to my house and the new walkway into the school is gong to mean hundreds of parents and children will be walking right past my back fence several times a day causing immense noise and disruption*
6. *Whilst have been informed that the building closest to my back fence is 6 meters away, that building is to be single storey, however, this does not take away from the fact that the building is so close to my property in the first place.*

Response: In terms of the impact a property will have on neighbouring amenity, we would use the potentially worst affected properties for our assessments. This would be the properties along Kingsmead Close to the north-west of the new block.

- a) The development will not block out natural light. BRE guidance shows that the building will not impact light at all.
- b) The two-storey element will be 35m from the rear elevation of the closest property, ensuring outlook from this property is maintained.
- c) There will be no windows at level 2 ensuring that privacy is protected with no views into the garden or rear windows.
- d) There are no windows looking into the gardens or house. The access road for bins/servicing is not located near this property.
- e) Parents/Guardians will travel along the northern boundary at drop-off/pick up time, however this will not be a substantial amount. It will also only occur for a brief period in the morning and the afternoon, after which this area will largely be silent. Acoustic fencing is also proposed to address any potential noise concerns.
- f) We do acknowledge that a 6m distance can seem alarming, however this part of the building is single storey. The 2-storey element occurs some 30m away from the boundary.

17. *We are also concerned that there will be even more noise that we currently experience from the school due to the location of the block, as well as further light pollution.*

18. *There is no internal link from the infant block to the Junior block, this is will increase noise and disruption from the staff and children as children move from one building to another. This will occur several times a day due to the dining hall and school office being located in the new building.*

Response: The school would be predominantly used during the school day, so light pollution would not be an issue, as the building will be empty for prolonged dark periods.

There will be the same number of pupils on site as there are now, so we do not anticipate substantial noise level increases. Acoustic Consultants Syntegra undertook an assessment of the relocation of the playing courts and determined that no mitigation measures would be required.

Syntegra advised that while noise impacts along the northern receptors would be low, it was advised that it would be beneficial to erect acoustic fencing along this northern boundary. The applicant was happy to include this, and this fencing is shown on the proposed site plan.

There will be some intermittent movement between the two buildings, but as the access between the two building will be in the centre of the site, we don't anticipate that the change in noise levels would be noticeable compared to what they are now.

EXTERNAL APPEARANCE

19. *Elevations are poor and lack interest. Over-reliance on render which is used too close to south elevation – Consider use of windows to provide dual aspect. Bland, boring, low quality and cheap.*

Response: Whilst comments on the design are welcomed, we do acknowledge that this is a subjective topic. These building have been designed taking a fabric first approach which meets the DfE guidance which demands high quality, robustness and longevity. The volume, layout and window locations are all dictated by the internal quality of environment of the schools and classrooms. We do however acknowledge that the replacement block needs to be reflective of its surroundings and have designed a scheme which achieves this. This is discussed further in Section 8 of this report.

20. *Just a shelter for nursery pick-up please.*

Response: Unfortunately, as part of the Priority School Building Programme, the only available funding is for the replacement of buildings. Should the funding become available at a later date for a shelter, the school can consider installing such a shelter.

21. *Where there is painted render proposed, a muted colour (rather than white) would also help the building to blend into its surroundings.*

Response: We would respectfully disagree and suggest that white render is the predominant material already used on site, so it would be in keeping with the character of the school buildings on site. As a design team, we have successfully used white render on many school buildings across the country in

the last two years. The difference with our schemes is that the render is coloured in manufacturing (through-colour render), meaning that the colour will not fade or require painting over time.

22. I would prefer a more generous area allowed for playground space with both quiet areas, room for ball games at play time and landscaping

Response: The play areas are split between the relocated courts, and some more informal play areas. There is ultimately an increased in playground size. The school will ultimately decide how they use the playground space.

23. The main school entrance should remain opposite the access road. As proposed, the arrival and main reception of the school is poorly located.

Response: The intention is to keep all built form together linking the new admin block with Junior block. This allows for more open and expansive playspace, rather than having an isolated admin block in the way. The admin block is the secure entry into the site; the entire site will be completely secure during school times forcing visitors to enter via this block.

24. The existing site should have been redeveloped in its original position, while housing the pupils in temporary classrooms. This would not impose on the houses in Kingsmead Close.

Response: This is a not-for-profit project being funded due to the poor quality of the existing school buildings which we are seeking to remedy. The rental of temporary classrooms for 12 months is an option which is resisted by the Dept for Education, as it is seen as an unnecessary expense of taxpayers money. The substantial cost of temporary accomodation cannot be justified, as there is another viable solution that is being explored that will allow the school to remain operational without the hire/use of temporay accomodation.

25. There is no plan B. Other side for the new building seem to have been ruled out – residents would prefer the building to reuse the existing building site or further south.

Response: The Dept for Education and Collis Primary School have been involved in this development since 2016 and have considered various development options since that date. 2 options were presented to Richmond Council's Planning Dept in December 2016, and advice was welcomed. Richmond Council then advised that any development options which involved building on the land designated as Other Open Land of Townscape Importance (playing field) should not be pursued as this would be contrary to policy.

A second round or pre-application advice was sought in late 2018. A primary scheme was presented to officers which avoided building on the playing fields, however at the meeting we again sought advice on potentially building on the playing field. This was again resisted. The local planning authority are supportive of the siting of this new block in principle.

Due to designations of land and the fact that the grassed areas are all playing field, the site's development potential is constrained to the application proposals.

26. We were concerned to learn that the proposed location is not the preference of the school either. The school and its neighbours would gain greater benefit and minimal disturbance if the block was replaced on the existing site, or located more centrally on the site.

Response: Although this wasn't initially the most favoured location for the block by the school, having better understood the site's constraints and planning policy restrictions, the senior leadership team and governing body, as well and the Local Authority (client/landowner) and Dept for Education have all approved and signed off the proposed block location and overall scheme.

27. The location of the new infant clock is far from ideal. Consideration should be given to rebuilding a new block in the current infant location with the use of temporary accommodation during construction.

Response: this would require the erection of a substantial number of temporary classrooms. Please see response 24 above.

28. *There has been no thought given to local residents and no consultation. In addition, I feel that not enough consideration has been given to additional areas on the school site which would be suitable alternative land for the location of the new junior building.*

Response: This informal consultation has occurred prior to any planning application even being submitted. A further consultation will be formally carried out by the local planning authority during the planning application process. There are a significant amount of designations across the site which dictate and limit the location of this proposal.

INTERNAL DESIGN

29. *Although it would be good to have base areas in the Reception, Year 1 and Year 2 areas, as this has been an excellent facility in the current school building.*

Response: The inclusion of base areas are no longer required or encouraged in Dept for Education Schemes. This scheme meets the modern requirements for schools.

30. *Consider sliding doors to early years classrooms to improve access to play areas (outside)*

Response: After reviewing and providing comments on the draft proposals over the last two years, the school's leadership team have indicated that they are happy with the current internal and external layout, so these changes have not been incorporated to the application scheme.

31. *Consider large double doors between reception classrooms, and potential to locate WCs between rooms to be more space efficient.*

Response: Again, the school have confirmed their support of the block layout and arrangement.

32. *The school kitchen should be in the same location to enable smooth operation (deliveries and waste).*

Response: The school kitchen needs to be in the new block with upgraded facilities created. The new layout ensures that the kitchen can be directly accessed without breaking the secure line of the school. Management of both deliveries and waste were taken into account when designing the building and its external areas.

33. *Shared space in the reception class area, could structural/non supporting walls be flexible/moveable?*

Response: Shared space in the reception class areas was not a requirement or suggestion which the school's leadership required as part of the development.

34. *Also, cloakrooms outside the classes is preferable.*

Response: This is not possible due to fire regulation requirements. As the corridor is a key fire escape route, this area should be kept free of potential hazards and obstructions.

35. *Consider size of dining hall relative to number of pupils and sittings. Its too small for 3FE.*

Response: The dining hall proposed is 25sqm (269sqft) more than would normally be required for a school development of this size. It is anticipated that the school would not have all pupils in the school eating at the same time.

36. *The nursery should be much larger, not a like-for like replacement. It is far too small as shown. It should have a more direct relationship with reception classrooms and play space. Single door to playground is too small.*

Response: The nursery location and size is as the school's leadership team have requested; located away from the school facilities with easy access for collections. Again, the size of the nursery is also compliant with modern DfE requirements. A single door is proportional for a nursery of this scale.

PLAYSPACE

37. *The proposals has a negative impact on early years and infant play space and hard play more generally.*

Response: The proposal involves the loss of 476m² of *informal* hard play space but *gains* 491m² *hard PE space* meaning that there is a net increase of hard play space overall. The informal hard play space

provision in the proposed scheme is 2,224sqm more than what is required by the DfE standards for modern schools (BB103).

38. *Nursery and reception play space is too small.*

Response: The provision meets the specific requirements of the DfE for modern school buildings and has been met with support by the school's leadership team.

PARKING

39. *As a local resident, the congestion caused by comings and goings of traffic associated with the school has got worse over the years. Despite having been assured in the past that all teachers park on site, from observation that is not the case. This proposed development should include adequate parking on site for all teachers. Parking offsite by teachers/staff adds to the congestion and encourages parents to park across local driveways when delivering and/or collecting their kids. If access to the school was possible from Harlequin Road, pressure could be taken off Fairfax and Cromwell Road entrances.*

Response: Staff car use is at around 40% although reliance on cars is reducing through the implementation of their Travel Plan. Secondly, as the school is not expanding, an increase in parking provision would not be supported in a planning application. TFL have insisted that a staff parking provision of max 25% is required on school developments, to discourage reliance on car use. Any increase in parking would be resisted by Richmond and the Greater London Authority.

From an operational perspective, the school will speak to staff and ensure that the car park is first used by staff as a priority and they should only park in available spaces on the street as a secondary option.

The use of Harlequin Road as a means for drop-off/pick up is not viable as pupils would have to travel through grassland to access the school. This will return to be an emergency access only upon completion of the development.

CONSTRUCTION

40. *I am concerned about the delivery route from the bottom of Fairfax Road. This road has parking on both sides and is very narrow. I understand that parking will be restricted on delivery days of units. What about the other lorries? The top of Fairfax Road is used by the parents of Sacred Heart in St. Marks road. I am concern by lorry movements.*

Response: Parking will be restricted only during the periods of construction where low loaders are required to access the site. These would be the longest vehicles that would need to enter the site by far. We have undertaken tracking studies to confirm that the low loaders and other vehicles will be able to safely access the site without having a harmful impact to residents. This access point was used for the construction of the Junior block, so it is a demonstrably a safe and secure construction access route. Utilising the school access would cause severe disruption to both the school and residents.

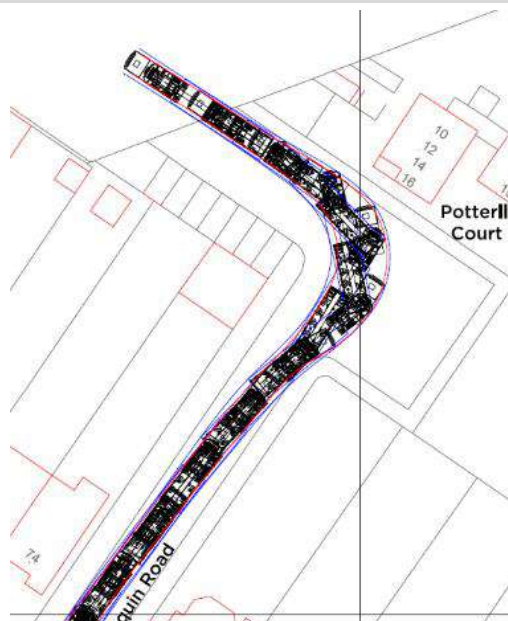
41. *Concerns around use of modular*

A: *BB101 compliance ventilation and overheating.*

B: *Robustness of floor construction.*

C: *Quality of finishes and performance – specifically fire safety.*

Response: A: M&E consultants SI Sealy have to produce various studies as part of the pre-planning stages of this project to ensure that the design of this school meets the rigorous daylighting, heating and cooling requirements which form part of the Priority Schools Building Programme 2. SI Sealy have confirmed that BB101 will be complied with in



TRACKING OF LARGEST VEHICLE
NEEDING TO ENTER THE SITE

this project. The scheme would not be signed off by the Dept for Education unless property ventilation, heating and cooling systems were proposed, to ensure that long life of this new block.

B - Full structural calculations are carried out on all structural elements of our school buildings. All school buildings erected by Spatial Initiative adhere to, and often exceed, current building regulations. In this instance, our floor design provides for a loading of 10Kn/M2 which is over and above the required Building Control standard. We hold Agreement certification for our steel-framed modular structures to a design life of a *minimum* of 60 years.

C – While the development is modular, the building will appear as any other traditional build school. The structure will be built off-site, but the external materials will be added traditionally to the external face once installed on site. This give a robust and high-quality finish to the building. In terms of fire safety, all of the products and materials specified will comply with up to date building regulations, ensuring a safe and high-quality finish. Please see some images below of a scheme recently completed by the same contractor under the same Dept for Education Framework.



HIGHCLIFFE ACADEMY, LEICESTER DELIVERED UNDER THE SAME DFE FRAMEWORK



HIGHCLIFFE ACADEMY, LEICESTER DELIVERED UNDER THE SAME DFE FRAMEWORK

42. *We were further concerned to learn that during the construction period it is proposed to build a site hut adjacent to our boundary wall. All vehicles and materials bought to the site during the period of the build will be run along a track around the outside of the playing fields and along the entire length of our boundary wall. This will cause us to experience considerable noise, pollution and disturbance and will significantly impact our normal daily living and enjoyment of our property. The wall itself has a significant lean and over the years we have had it inspected by a structural engineer to assure us of its integrity. Further to this, we both work from home and Sarah operates her business from home. Sarah's ability earn a living during the works if this proposal to go ahead will be severely compromised by the noise that will be experience from the site hut and vehicles etc travelling along the boundary. The proposal to run a track around the outside of the playing field will offer the maximum amount of disturbance to the largest number of neighbours to the school. A more sensible and sustainable option, that would minimise disruption and pollution,*

is to locate the site office nearer to the access point for materials and good and to run a track straight from the Fairfax road entrance direct to the building site.

Response: While this suggestion would certainly be the most direct route to the construction site, this would prevent the majority of the school site from being used during the construction period. The proposed route will allow the playing fields to continue to be used by the school.

In terms of disruption, the amount of staff, noise, dust, movements, etc would be significantly reduced compared to a traditional construction method. As can be seen from the submitted Construction Method Statement, we will go to significant measures to minimise any disruption to residents. We are a specialist school contractor who exclusively work on schools in residential areas, so we are used to ensuring that residents are not disrupted by the development. Please consider the detailed Construction and Demolition Management Plan which accompanies this application.

SUSTAINABILITY

43. Environmental and sustainability proposals not detailed. Renewables, SUDS, greywater recycling, etc.

Response: SUDS and renewables are proposed as part of our application. The scheme achieves a 36.5% better than building regulations in terms of CO2 reduction through the installation of 100sqm of photovoltaic panels on the flat roof. This is a vast improvement compared to the performance of the existing building.

Sustainable Urban Drainage Systems are implemented in the form of a modular crate attenuation system (231m³) and permeable paving.

Please consider the SUDS and Energy Statements which accompanies the planning application.

TREES AND LANDSCAPING

44. Significant loss of trees

Response: There is some loss of trees, all of which were recently planted as part of the Junior Block Development granted in 2005. All of these trees are relatively young and have a low value (in terms of British Standard grading). Substantial replacement planting is proposed as part of this development. Please consider the proposed landscape plan for details of proposed planting.

45. Insufficiently detailed landscaping proposals.

Response: At the consultation, we provided general proposed site plans, as the scheme was not 100% finalised. Now that the layout is frozen, we have instructed a landscape architect to prepare a landscaping scheme which accompanies the application submission.

MISCELLANEOUS

46. We recall that there was an infestation of rats when the new school was built. The rats were also in the caretaker's property my next-door neighbour.

Response: We are not aware of a rodent problem in the existing building, however if this occurs, we will employ specialists to immediately address this issue.

47. Is there a sprinkler system?

Response: The scheme will meet the stringent Fire Safety Building Regulations. A detailed Fire Strategy has been commissioned as part of the project, where it was determined that sprinklers would not be required given the layout and scale of the development, and also the relatively short travel distances required to travel to any of one of the 11 Emergency Exits proposed in the new block.

- 6.10 Copies of the consultation registration form and feedback responses can be provided directly to the Local Planning Authority in confidence should they wish to see a copy.

7.8 The relevant policies in which this scheme will be assessed against are detailed below.

7.9 *The London Plan (2016):*

- Policy 3.16 Social infrastructure
- Policy 3.18 Education facilities
- Policy 5.1 Climate change mitigation
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.1 Building London's neighbourhoods and communities
- Policy 7.2 An inclusive environment
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.8 Heritage

7.10 *The London Borough of Richmond Local Plan (July 2018)*

- Policy LP 1 - Local Character and Design Quality
- Policy LP 2 - Building Heights
- Policy LP 8 - Amenity and Living Conditions
- Policy LP 14 - Other Open Land of Townscape Importance
- Policy LP 15 - Biodiversity
- Policy LP 16 - Trees, Woodlands and Landscape
- Policy LP 17 - Green roofs and walls
- Policy LP 21 - Flood Risk and Sustainable Drainage
- Policy LP 22 - Sustainable Design and Construction
- Policy LP 24 - Waste Management
- Policy LP 28 - Social and Community Infrastructure
- Policy LP 29 - Education and Training
- Policy LP 31 - Public Open Space, Play Space, Sport and Recreation
- Policy LP 44 - Sustainable Travel Choices
- Policy LP 45 - Parking Standards and Servicing

7.11 In addition to the above policies, the *Sustainable Construction Checklist SPD (2016) Planning Obligations SPD (2014) Design Quality SPD (2006) Design for Maximum Access SPD (1991) and Refuse and Recycling Storage Requirements SPD (2015)* are also of relevance. These SPD documents were considered in the preparation of this planning application to ensure this proposal's full compliance with all tiers of policy and guidance.

8.0 PLANNING APPRAISAL

8.1 In this section, we appraise the proposal under the pertinent planning issues. These are considered to be:

- PRINCIPLE OF DEVELOPMENT
- OTHER OPEN LAND OF TOWNSCAPE IMPORTANCE
- PLAYING FIELDS
- RESIDENTIAL AMENITY
- DESIGN
- LIVING ROOF AND WALLS
- TREES AND LANDSCAPING
- SUSTAINABILITY
- TRANSPORT
- FLOODING AND DRAINAGE
- ECOLOGY
- AIR QUALITY
- HEALTH IMPACT ASSESSMENT

8.2 Where pre-application advice is being quoted, this will be provided in a grey box.

PRINCIPLE OF DEVELOPMENT

8.3 Paragraph 94 of the NPPF states that local planning authorities should “give great weight to the need to create, expand or alter schools” and attaches importance to ensuring that a sufficient choice of school places is available, requiring local planning authorities to take a proactive, positive and collaborative approach to meeting this requirement.

8.4 London Plan policy 3.18 states that “The Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance.

8.5 Local Plan Policy LP 28 states that “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. 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.”

8.6 Local Plan Policy LP 29 relates to education facilities. It states that “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.”

8.7 January 2019 pre-application advice stated that “The scheme will be in support of the above policy lines. However, it is recommended any submission identifies: • Why the existing school buildings are not of sufficient quality; • It is recommended that any temporary accommodation (14/2718/FUL) is addressed and incorporated within the rebuild; • Why the proposal is the most sustainable or only option; • How the scheme will improve the quality of the educational space; • Why it is not feasible to expand or consider expansion of the school; • Demonstrate how the scheme meets the requirements of policy

CP28– relating to new social infrastructure. If such information meets to the satisfaction of officers, the scheme would ensure the school is of sufficient size and quality to meet the needs of the school and residents of the Borough.” A response to this advice is below.

Existing Buildings/Expansion

- 8.8 The DfE led *Priority School Building Programme* is rebuilding and refurbishing school buildings in the worst condition across the country. There are two phases of the programme covering a total of 537 schools in total. Under the first phase, PSBP1, 260 schools are being rebuilt and/or refurbished: 214 through capital grant and 46 using private finance. Under the second phase, PSBP2, individual blocks at 277 schools will be rebuilt and refurbished nationally using capital grant. By focussing on individual school buildings rather than whole schools, the DfE maximises the impact of the public investment, helping funding go further to help the schools in most need.
- 8.9 Under the PSBP, Richmond Council applied for the entire school to be redeveloped. After an assessment by the Department for Education, only the Infant Block (EFAA and EFAF) was successful in securing funding from the Dept for Education.
- 8.10 The fact that the Infant Block was successful in applying for funding by the DfE under the (PSBP) demonstrates that the existing buildings to be demolished are substandard, failing and have come to the end of their functional life. The building was erected in the middle of the last century with not much work carried out since. While the teachers make every effort to create the best possible teaching environment internally, the building does not meet modern standards or expectations. The contrast in building quality has become even more noticeable since the construction of the Junior Block in 2006.
- 8.11 The funding from the DfE will only cover the replacement of buildings which were considered to fail the condition-led requirements of the PSBP. This covers the Infant Block only. Richmond Council are separately funding the demolition and rebuild of the nursery (EFAD) which was considered the priority for the Council. Funding an expansion or replacement of other school buildings was not pursued and there is no means to fund any such development.

Expansion

- 8.12 As mentioned previously, this project is seeking permission to upgrade the school’s facilities under the above named programme. An expansion would require a completely different approach. This has never been part of the project brief despite involvement with Richmond Council (Programme Management Office) for several years.
- 8.13 Every planning application needs to be assessed on its own merits, and despite not replacing temporary buildings or involving an expansion, this application is policy compliant insofar as it is upgrading social and community infrastructure to buildings which are in need.

Quality of Education space

- 8.14 This development will ensure that Collis Primary School will be able to provide a high-quality standard of education within facilities which are of a modern standard, fit-for-purpose and match the quality of teaching occurring within.
- 8.15 Detailed ventilation, heating and natural light studies have been carried out on all rooms to ensure that the building meets the Output Specifications of of the DfE. This is a significant improvement compared the existing building performance and ultimately complies with national, regional and local planning policy, all of which supports education facilities.
- 8.16 Externally, there will be an increase of playspace compared to what they have now, with the scheme exceeding BB103 requirements. This is through the utilisation of a part one part two storey development, rather than a wholly single storey building.

Temporary Classroom Block

- 8.17 The applicants note that there is temporary teaching accommodation within the school site. This has recently been granted planning permission (18/0397/FUL) for a temporary time period (up until 30th

July 2020). This is to accommodate the bulge classes currently at the school. While officers previously requested if these classrooms could be accommodated within any permanent solution coming forward, the funding under the PSBP is not available to accommodate temporary teaching accommodation within a permanent building solution. Once the bulge classes at the school complete, this temporary building will be removed from the site. The proposed new teaching block is a permanent solution which re-provides permanent teaching facilities of buildings which are in poor condition. This development does not provide for temporary accommodation.

- 8.18 In terms of the potential for school expansion, this is not part of this DfE funding programme, which is to replace the existing facilities which are failing. There may be scope for expansion in future, however this will not form part of this project.

LP 28 – New Social Infrastructure

- 8.19 As mentioned previously the LP28(B) has 3 requirements before a development will be supported. *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.*

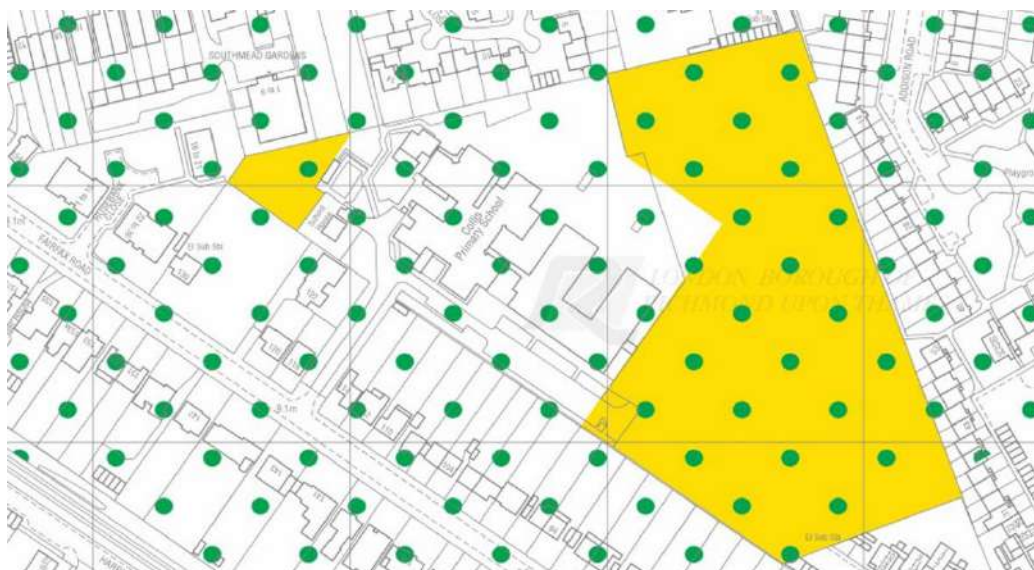
- 8.20 In response to this, 1) the re-provision of modern classrooms are obviously meeting a need, as it is an operational school and the buildings approved for demolition have already been approved funding for demolition by both the DfE and Richmond Council; 2) The proposed replacement school buildings are required to be step-free and wholly accessible for all, in compliance with the stringent DfE requirements; 3) as a school the internal spaces can be quite regimented unfortunately. The larger spaces are multi-use. The location requirement is not applicable here.

- 8.21 All in all, despite not being a new or expansion of social infrastructure, the development complies with Policy LP28.

OTHER OPEN LAND OF TOWNSCAPE IMPORTANCE

- 8.22 As identified in section 7, Collis Primary School contains two areas which are designated as Other Open Land of Townscape Importance (OOLTI). This is defined in the Local Plan as *“Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area.”*

- 8.23 There are two pieces of land designated as OOLTI at Collis Primary School; one small wooded area to the west of the site, and one larger area which mostly covers the playing fields to the east. Both are indicated in yellow on the plan below. OOLTI has special local protections through planning policy.



OOLTI DESIGNATION

- 8.24 Local Plan policy LP14 states that *“Other open areas that are of townscape importance will be protected in open use, and enhanced where possible. It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate: a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or b. it can only be a replacement of, or minor extension to, existing built facilities; and c. it does not harm the character or openness of the open land. Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged. When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.”*
- 8.25 January 2017 pre-application advice stated that Option 1 (building within OOLTI) would be resisted as *“this would result in an unacceptable loss of OOLTI”* and *“It is recommended that options 1’s are not pursued as this would be contrary to policy.”* The siting of a new block on the existing hard-surfaced playground was encouraged. This advice was followed in the pre-application advice request submitted in October 2018.
- 8.26 January 2019 pre-application advice stated that: *“It is acknowledged that the proposed replacement block, which has a roughly rectangular footprint, will not be sited in OOLTI. Policy LP14 does state that when considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated open land will be taken into account. Such an assessment should accompany any future planning application.”*
- 8.27 Firstly, it is important to acknowledge that the planning application proposals do not require development on any land designated as OOLTI and has no harmful impact on the two OOLTI locations from continuing to function as they do now. The proposed site plan shows the location of the building in relation to OOLTI designation.
- 8.28 Secondly, we wish to highlight that there are two OOLTI locations on this site. Whilst we have avoided building in the larger eastern OOLTI completely, we are also enhancing the character of the western OOLTI by demolishing the sprawling existing infants block and nursery building, relocating the play areas and including some increase in soft landscaping. In terms of overall footprint location across the site, there is an overall increase in open space.



NEW BLOCK IN REALTION TO OOLTI DESIGNATED LAND

- 8.29 It is however acknowledged that the new teaching block is located next to the eastern playing fields and designated OOLTI, therefore, we provide an assessment of the *visual impacts on the character and openness of the designated other open land will be taken into account as per the requirements of Policy LP14.*

Character of the eastern OOLTI

- 8.30 The character of the eastern OOLTI, is a playing field attached to a school use. The construction of the new teaching block will not alter this character or function.



EASTERN OOLTI PLAYING FIELD UNAFFECTED BY THE DEVELOPMENT

Openness of the eastern OOLTI

- 8.31 The openness of OOLTI land is a subjective assessment which can be identified through the presence of buildings or its visual impact. The visual impact of the proposed development from the OOLTI will be a view of a two-storey block from where the playground was once located.
- 8.32 However, this playground is already characterised by being located next to a two-storey development in the form of the recent Junior Block. From most views of the OOLTI, the new teaching block would fall into the foreground view of the two-storey junior block in any case.
- 8.33 Additionally, to soften any visual impact of the building from the eastern OOLTI, replacement planting is proposed on the boundary to soften the appearance of the new building.



PROPOSED VIEW OF NEW BUILD FROM EASTERN OOLTI WITH SOFTENED APPEARANCE THROUGH PLANTING

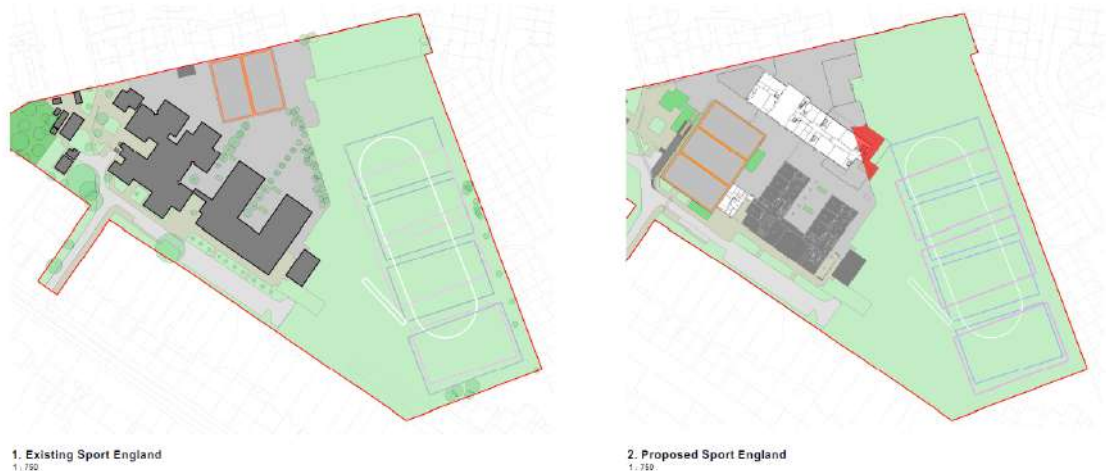
- 8.34 Given the location and siting of the building in relation to existing built development on site, views into and from the OOLTI would be unaffected by this development.
- 8.35 In summary, the development is not to be built on OOLTI land. The proposal involved an improvement to the character and openness of the western OOLTI, with the character and openness of the eastern OOLTI also unharmed through the siting and design of this development.

PLAYING FIELDS

- 8.36 The NPPF (para 97) resists development on playing fields, unless in exceptional circumstances. At a local level Policy LP31 states that *“Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.”*
- 8.37 January 2019 pre-application advice stated that *“The Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Where proposals involve the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of*

sport facilities, provision of wider public benefits, including public spaces, and therefore enabling and prompting physical activity and encouraging healthier lifestyles and habits for all ages."

- 8.38 The proposed block location is proposed mostly upon a hard-landscaped informal play area of the school in order to avoid development on the school's playing fields. This development will require building partially on two netball courts by the northern boundary, however three replacement courts will be built upon the footprint of the school building to be demolished.
- 8.39 Advice was provided by Sport England in 2017 in respect of various block locations, where it was indicated that a block located on the hard-standing area could be considered to comply with Sport England policy with some slight modifications. See section 5.6 of this report.
- 8.40 Subsequent advice in November 2018 advised that the scheme would appear meet the criteria of Exception 3, however a more detailed site plan would be required. The netball courts would also need to be considered as part of the proposals.
- 8.41 Pre-application advice has been sought from Sport England on three separate occasions in the last couple of years to ensure that the proposed development would not fall foul of Sport England's criteria. As discussed in Section 5 of this report, the application scheme is considered to meet Sport England Exception 3 in that it does not prejudice the use of any playing pitches on site. Similarly, the relocation and increased of the netball courts on site is considered to meet the requirements of Exception 5.



PITCHES IN RELATION TO NEW BLOCK

- 8.42 In August 2019, Sport England confirmed that the revised scheme has responded positively to previous advice, thereby complying with Sport England policy (see Appendix 6). It was queried how long the school would need to go without a netball court. The current planning programme has a January 2020 commencement date, with the entire development completed by December 2020. It is anticipated that the new courts would be available for use by January 2021.
- 8.43 Due to the nature of the proposals being funded under the PSBP (improvement of inadequate school buildings), there is no scope or funding available to enhance sports facilities on site. Given the context and nature of the proposal, a neutral impact on sports facilities is considered wholly appropriate. This proposed layout will ensure the protection of the existing playing fields and pitches at Collis Primary School, thus complying with the NPPF, Local Plan policy LP31 and Sport England's Playing Field policies.

RESIDENTIAL AMENITY

- 8.44 London Plan Policy 7.6 states (in part) that buildings and structures should *"not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings."* At a local level, Local Plan Policy LP8 states that *"All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:*

1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible; 2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure; 3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure; 4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.”

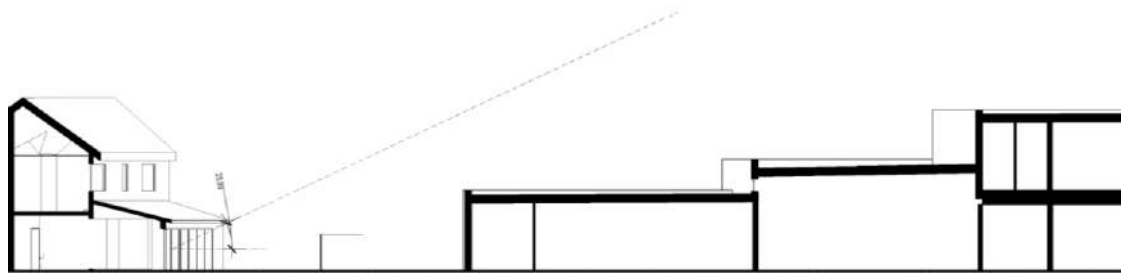
8.45 Pre-application advice stated: “-it is acknowledged that the new building will be single storey closest to Kingsmeade close/Cromwell Road boundaries which will assist in reducing the impact of the development, especially on Kingsmeade close properties which have relatively short gardens. Any new openings on upper levels facing these properties should be avoided or be obscure glazed and non-openable below 1.7m of the floor level of the room it serves. -the proposed nursery and its play area would be located close to this boundary, hence acoustic fencing should be considered. -the courts are shown to be moved towards the southern boundary which will inevitably introduce noise to residents in Fairfax Road.”

8.46 In addition to not conflicting with playing field or OOLTI policies discussed earlier in this report, the location of the proposed school block needed to be considerate of the surrounding residential uses and their amenity. Development along the boundary was considered but was discounted as it would have an overbearing impact on neighbours to the north and could cause direct overlooking concerns between the school and nearby houses. The location proposed is the most appropriate location to site a new school building when considering all of the site and project constraints.

8.47 The main properties of concern that require consideration against the above-named policies and advice are along the northern boundary.

Overbearing and Daylight/Sunlight

8.48 At its closest point (the corner) the siting of the new school block is 6m from the northern boundary and 12.7m from the rear building line of the nearest house on Kingsmead Close. The building and siting has been deliberately laid out so that the single storey elements are closest to the northern boundary, with the two storey part of the block occurring over 35m away from the nearest property



SECTION BETWEEN KINGSMEAD CLOSE AND THE PROPOSED DEVELOPMENT

8.49 At its closest point (the corner) the siting of the new school block is 6m from the northern boundary and 12.7m from the rear building line of the nearest house on Kingsmead Close. The building and siting has been deliberately laid out so that the single storey elements are closest to the northern boundary, with the two storey part of the block occurring over 35m away from the nearest property.



NEIGHBOURING CONTEXT

- 8.50 With regard daylight/sunlight, BRE Guidance to assess daylight sunlight impacts advises a 25-degree line to be taken from the centre height of the lowest window of the worst affected neighbouring property. If this line is breached by a proposed development, then daylight/sunlight concerns *may* be an issue. See the drawing PL-CPS-AHR-ZZ-ZZ-DR-A-90-011 below for this assessment. As can be seen, the 25-degree line comes nowhere close to being infringed by this development. Therefore, the development is considered to have an acceptable impact on these residents as natural light will be unaffected.

Privacy

- 8.51 The only windows on the north-west elevation facing Kingsmead Close are high level windows providing light and ventilation to the school hall. This will not cause any overlooking or privacy concerns.
- 8.52 Looking north-east, the classrooms would look out toward the playing field and habitat area, and a house beyond. This house is screened by a large boundary wall and trees. It is also 60m away from the new classroom block so overlooking concerns would not occur.



EXISTING VIEW LOOKING NORTH-EAST FROM THE NETBALL COURTS

Noise

- 8.53 Following previous pre-application advice, an acoustic consultant Syntegra was appointed to assess the overall impact of the relocation of the netball courts. After a detailed assessment (See Acoustic Assessment prepared by Syntegra), it was determined that there would be no harmful impact caused by the relocation of the netball courts, and mitigation was not required.
- 8.54 Secondly, it was queried whether the houses along Kingsmead Road would be harmfully impacted with the relocation of the nursery play area. Whilst the acoustic consultants, advised that *“As there will be a nursery play area now located close to the northern receptors, and there is an access route along the boundary – therefore parents collecting children, noise levels are likely to be generally low, with intermittent noisier periods. Accordingly, it would be beneficial to include acoustic fencing along the*

northern boundary with the residential properties as precautionary measure. In NPPF terms, this would mitigate any residual adverse impacts to a minimum.” Please see Appendix 7 for this advice.

- 8.55 This advice was factored into the detailed design with acoustic fencing along this boundary included on the proposed site plan (in yellow below)



SITE PLAN SHOWING ACOUSTIC FENCING

DESIGN

- 8.56 The NPPF para 124 gives an overview of the importance of good design nationally. It states that *“The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.*
- 8.57 Policy 7.4 of the London Plan states that *“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features.”* Policy 7.6 of the Plan states that *“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context”*
- 8.58 At a local level policy LP1 of the Local Plan states that *“To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals: 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing; 2. sustainable design and construction, including adaptability, subject to aesthetic considerations; 3. layout, siting and access, including making best use of land; 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features; 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.”*
- 8.59 Policy LP2 of the Local Plan states that the Council will *“1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area; 2. preserve and enhance the borough’s heritage assets, their significance and their setting; 3. respect the local context, and where possible enhance the character of an area, through appropriate: a. scale b. height c. mass d. urban pattern e. development grain f. materials g. streetscape h. Roofscape and i. wider townscape and landscape;”*

8.60 January 2019 pre-app advice stated: “The proposed flat roofed rendered building is considered to have little visual interest, appearing as a rendered block with a bland elevational treatment and appearance. I did suggest that the appearance of this block needs to be re-considered such that any new design complements and responds to its sensitive location, adjacent to OOLTI more positively. I would also draw your attention to policy LP17 which requires that at least 70% of any potential roof plate area should be green/brown roof. In the previous pre-application advice from Lucy Thatcher, where she was seeking design improvements, she advised any forthcoming proposal should : - be restricted to a palette of 3 materials. Consider context – If next to playing fields, soften visual appearance with choice of materials - Respond to the open space it surrounds – make it visually recessive with glazing / green walls. - Break up long elevations with shadow lines, change in materials, fenestration, step in’s. - Provide large scale details of windows – ensure they are not flat – some texture. - Keep heights to minimum (provide justification for any heights – i.e. necessary floor to ceiling heights, servicing void heights etc) - Ensure mechanical plant / PV panels / lift overruns are considered in the design so not to appear as ‘add on’s’

8.61 The replacement school block is based on first principles utilising ‘Baseline Designs’ developed by the DfE as guidance in achieving the requirements of the Department of Education’s ‘Facilities Output Specification’. The design and construction team commissioned by the DfE consists of a team of consultants to provide an accessible, efficient and inclusive new school building.



PROPOSED SITE PLAN

8.62 The DfE and design team investigated a variety of block options regarding building location, orientation and massing to reach an optimal design approach from the very start of the design process. These proposals became the subject of both client and council engagement, before this preferred option was developed in detail. The overall site layout allows for a better functioning school internally; these improvements include a more secure building for the pupils, step free access throughout the school an improved and standardised classroom layout.

8.63 In order to provide more open space around the site, a part one, part two-storey school block is proposed, replacing the existing single storey school buildings, this effectively halves the building footprint while proposing a building of a form and scale which is near identical to the Junior block on the site. The efficiency in design also ensures that only the minimum amount of development is proposed adjacent to OOLTI designated land.

8.64 In terms of scale and massing, the development is entirely in keeping with its immediate context. The proposed school site is relatively isolated, set in from the street, so there is no other context to relate to except for the established retained school buildings on site.



VIEW FROM PLAYING FIELD

8.65 Modern school buildings must be of a robust and efficient design and layout to maximise value to public funding. The design of the building and each room must meet with the Dept for Educations strict requirements regarding areas, heights, heating, cooling, acoustics, daylight, etc. The internal and external layout of the school has also followed extensive dialogue with the school to ensure that the permeability within the school site will be improved as a result of this development.



LAYOUT EFFICIENCY

8.66 After reviewing the pre-app advice previously provided this year, we have sought to break the elevation up through the choice of a limited palette of materials and elevations and colour. The external walls will be composed of durable and robust brick, with a contrasting mix of light render with some sections red and blue to further articulate the massing of the building. The material palette is in keeping with the immediate context of the other school buildings. The colour of the render matches the school’s crest and uniforms.



8.67 External windows (with integrated louvres) and doors will be double glazed thermally broken PPC aluminium with glazing specified for security, safety and to minimise heat gain to internal spaces. All room with windows will have openable windows for natural ventilation.

8.68 Due to the nature of the construction type, where the external skin is applied on site after the structure is installed in modules, all openings will have a reveal giving shadow lines and interest as one looks at the elevation (See precedent in section 5).



- 8.69 To soften the view of the new block from the playing field and OOLTI, a run of new trees are proposed which would screen the building from view, once they mature.
- 8.70 A new admin block is proposed by the existing car park and will be a mix of brick and green wall.



ADMIN BLOCK

- 8.71 This replacement school building is well designed, both internally and externally and will provide a vast improvement compared to the existing school and site. Due to its site location, the development will not have any impact on the character of the street scene or area, as it is screened from public views.
- 8.72 This development will be a vast improvement to the school and overall area, delivering a modern, fit-for-purpose school development. Given the above, it has been demonstrated that the proposals conform to the NPPF, the London Plan and local policy. From this, it can be concluded that there is a presumption in favour of sustainable development and planning permission should be granted without delay.
- 8.73 In our opinion, the proposed school therefore accords fully with design policy at all levels, including London Plan Policy 7.6 and Local Plan Policies LP1 and LP2 referred to above.

TRANSPORT

- 8.74 London Plan Policy 6.1(g) states that the Mayor will support “measures that encourage shifts to more sustainable modes and appropriate demand management.” And that “boroughs should use the standards set out in Table 6. in the Parking Addendum to set minimum cycle parking standards in DPDs” Policy 6.3 states that “Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.”
- 8.75 At a local level, Policy LP 44 states that “The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment.” while Policy LP 45 outlines the council’s parking requirements.
- 8.76 Pre-application advice stated: “- Concerns are raised regarding the implications from having to potentially reverse a refuse lorry more than 12m to exit the site onto Fairfax Road. A hammerhead turning area within the site may be acceptable, any proposal should show the tracking of this on a plan to demonstrate that the lorry can leave the site in forward gear. -The small parking area off Harlequin Road (8 garages) is a classified highway and it will need to be clarified whether these areas will need to be suspended during the course of construction. Any potential application will need to provide a plan showing tracking and details regarding the intended schedule of deliveries (days, times etc) number of deliveries that will be expected to provide the modules. - The proposal should meet Council’s current standards for cycle parking provision. Given there are no changes to the number of pupils and staff on site, the provision of the current parking spaces may be accepted. - CMS- it should be made very clear in

the CMS what the impact on Harlequin Road will be. Members of the public should be made aware that the works will be temporary with limitations on the time of day and day of the year. -The wheel washing facilities should be as close to the gate as possible so trucks do not have to drive back through muddied site to exit the site. - Main access is to be retained as existing, however location of main office will be moved further back within the site. - A statement regarding a Highway Condition Survey should be included in the CMS, Highways team will need to be contacted to undertake this survey prior to commencement of works. - Construction traffic – a temporary traffic regulation order will be needed to suspend parking along Harlequin Road to allow HGVs to enter the site. - Construction traffic – it is not clear which way vehicles will leave the site. Will they turn and then exit where they came in? If so, an HGV turning in the designated turning area needs to be tracked - Construction traffic – a highway pre-commencement condition survey needs to be carried out prior to the commencement of development. The applicant will need to liaise with the London Borough of Richmond’s Highway network Management team to organise this. - Construction traffic – please restrict deliveries and collections by HGVs to the hours of 09.30-15.00, Monday – Friday. - S278 agreement is needed to provide tactile paving wither side of the main entrance to the school from Fairfax Road and to install a courtesy crossing on Cromwell Road. I will need to do a site visit to ascertain the best position for this. - School travel plan – this needs a lot of work as parents currently drop children off in Fairfax Road, which is not part of a CPZ. The travel plan does not appear to have any targets for the reduction in car journeys among pupils and employees. Please see the link below for more details: <https://stars.tfl.gov.uk/> - Following on from the above, what target do the school have regarding increasing the percentage of total pupils who cycle to school and when do they plan to achieve this? Sufficient cycle parking needs to be provided to accommodate this targeted number. - There will be no net or gross increase in the number of pupils or employees so I am satisfied that the current levels of vehicular parking on-site are sufficient.”

Transport Impacts

- 8.77 There will be no expansion of the school as a result of this development. No negative transport impact will occur as a result of this development as the pupils and staff numbers will be retained. Increased cycle parking provision is provided to encourage more pupils to cycle to school instead of travelling by car.
- 8.78 In terms of servicing and refuse access, drawing PL-CPS-AHR-ZZ-ZZ-DR-A-90-006 shows swept path analysis to show vehicles entering and exiting the site in a forward motion.
- 8.79 Temporary parking suspensions will be required for a two-week period for the delivery of the building modules only. Outside of this time, parking suspensions will not be necessary. Please consider the CEMP for more information on this matter.
- 8.80 Cycle parking for staff and pupils is proposed on the site plan. With 113 cycles required, this seems excessive for a nursery and primary school. The cycle parking standards do not account for scooter parking which is much more common for pupils of this age. Whilst the applicant is happy to provide an uplift in cycle parking, we would be keen to discuss the quantity which would be sensible at this location.
- 8.81 Should a Highway Condition Survey be required, we welcome this to occur after permission has been granted and before works commence. The applicant has an obligation to make good any defects in any case. Given that the development is of modular construction, movements to and from the site would be decreased compared to a traditional building, meaning that potential impacts to the highway would be reduced.
- 8.82 Construction vehicles will enter and exit the site in a forward motion with wheel washing facilities at the site entrance. Please consider the CEMP for full details, and Phasing plans submitted.
- 8.83 Given the nature (not an expansion) and location (centre of the site) of the works, a S278 agreement is not considered necessary for this project. However, the applicant would be keen to discuss this matter with officers should it be deemed necessary.

- 8.84 The School already have a Gold Travel Plan which is submitted as part of this application. This has significantly reduced the percentage of car users through its implementation. Should officers seek further endeavours for improvement, we would welcome pre-occupation condition for an amended Travel Plan to be submitted to the LPA.
- 8.85 A Transport Assessment has been prepared by Wynns which demonstrates that there will be no harmful impact on transport as a result of this development.

Waste and Recycling

- 8.86 Local Plan Policy LP24 states that the Council requires *“All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements. 2. All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design. 3. Development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable. 4. All major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.”*

- 8.87 The Council's SPD on Refuse and Recycling requires *“2.6 cubic metres waste storage should be provided for every 1,000m² gross floor space with 50% of this capacity should be retained for the storage of separated waste for recycling”*.

- 8.88 With 1,987sqm of additional development (and 4,550sqm overall) a dedicated waste store is provided at the school, with 10 waste and recycling bins, providing 11,000 cubic metres, complying with Policy LP24 and the aforementioned SPD.



BIN STORE

ECOLOGY

- 8.89 Chapter 15 of the NPPF goes into significant detail about biodiversity and supporting schemes which Policy 7.19 (c) of the London Plan states that *“Development Proposals should: a wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity; b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites; c not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.”*
- 8.90 At a local level, policy LP 15 states in part that *“The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats”*.
- 8.91 A Preliminary Ecological Assessment was carried out for the site in August 2019. A further Preliminary Roost Assessment was carried out by Cherryfield Ecology in August 2018 which confirmed that the likelihood of bats being disturbed is very low, with no further survey works required. Cherryfield Ecology have confirmed in their most recent PEA that the findings of the PRA are still valid as the site circumstance have not changed,
- 8.92 Both the Preliminary Ecology and Assessment and Preliminary Roost Assessment suggest various enhancements with regard to the proposed development. These include:

- Installation of two Schwegler boxes onto the trees.
- Installation of bird boxes
- Installation of swift nest boxes
- Installation of lighting which does not have a harmful impact on protection species (the lighting scheme does not have a harmful impact on protection species).

8.93 These enhancements have been captured on the Proposed Landscape Plan which accompanies this submission. In providing these enhancements, the proposed

TREES AND LANDSCAPING

- 8.94 Local Plan policy LP 16 states that the Council will “1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland; 2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees; 3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT); 4. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate; 5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).”
- 8.95 January 2019 pre-application advice stated “There will be a presumption against schemes that result in a significant loss of trees unless replacements are proposed and there is good reason such as the health of the trees”, and “Any formal application submission would require an up-dated arboricultural report and new tree survey to include any substantial/protected trees in neighbouring gardens. There are preserved trees to the north (possibly off site), however, they may be impacted and need to be considered. Details of all tree protection measures should also be submitted. Plans should show that new landscaping will take place as part of the development proposal. There should be a targeted increased (of native species).”
- 8.96 There are 113 trees or groups of trees within the school site. Of this number, the vast majority of trees un affected by this development. None of the trees within the school site are protected via any Tree Preservation Order or by virtue of falling within a conservation area.
- 8.97 Some trees outside of the site on the northern boundary are protected by TPO however, these will be unaffected by the proposed development.
- 8.98 Some tree removal is proposed as part of this development. These are identified on the AMS map which accompanies this application submission. All of these trees were planted as part of the landscaping strategy when the Junior Block was being built a little over a decade ago. Therefore, whilst the loss of this amount of trees is regrettable, these trees can be replaced as part of the landscaping scheme quite easily.
- 8.99 Please consider the Survey and AMS which accompanies this submission. A landscape plan and Planting Plan accompany this submission which details the landscape layout and replacement tree planting scheme which accompanies this submission.

LIVING ROOF AND WALLS

8.100 Local Plan policy LP 17 states that “Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof. The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.”

8.101 January 2019 pre-application advice stated: “Any flat roof over 100m2 should provide a green roof – The aim should be to use at least 70% of any potential roof plate area as a green roof. (The onus is on the applicant / developer for proposals to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated where it has been demonstrated that a green roof is not feasible).”

Green Roof

8.102 A green roof is not incorporated for the following reasons:

- The new school block will be of modular construction, with each module manufactured off site in a standardised form. This form of construction does not readily support green or brown roofs.
- For a green roof to be supported, significant capital would need to be provided in reinforcing the structure by creating non-standardised construction modules.
- The installation of a green roof would noticeably increase the overall depth of the roof and overall height of the building. Given the sensitive location bordering OOLTI, we considered it more of a priority to minimise visual impact. To support this position, the pre-application advice also advised the applicant to “Keep heights to minimum (provide justification for any heights – i.e. necessary floor to ceiling heights, servicing void heights etc)”.
- This development is not for profit. It is to ultimately a project to improve the quality of teaching facilities of schools that have poor and failing buildings. Therefore, there is only a limited budget available to the Dept for Education with each project.
- SUDS are proposed elsewhere in the scheme, as are biodiversity enhancements.
- Much of the roof is occupied with PV panels in order to achieve the required CO2 reduction targets.

Green Wall

8.103 The applicant does still acknowledge the requirements of Policy LP17 and have instead suggested that a green wall would be a more appropriate solution given the context and nature of the proposal. The new administration block which is the first building one will see when they enter the site is proposed to have a green wall on two of its four elevations. This will have significant benefits including:

- Biodiversity enhancements.
- Visual enhancements to a more publicly visible block.
- Provides prominence for pupils to see (rather than a green roof behind a parapet).
- Improvements in air quality.
- Improved acoustic insulation.



VISIBLE GREEN WALL FOR ADMIN/ENTRANCE BLOCK

8.104 While a green roof is not proposed, given the circumstances, a green wall to two elevations of the administration block proposed would meet the requirements of Policy LP17.

SUSTAINABILITY

8.105 NPPF paragraph 153 states that “in determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable;”

8.106 January 2019 pre-app advice stated that *“all new developments should include measures capable of mitigating and adapting to climate change to meet future needs and reduce carbon dioxide emission. The relevant policies include LP17, LP20 and LP22 of the Local Plan and the SPD ‘Sustainable Construction Checklist’”*

CO2 reduction

8.107 London Plan Policy 5.2 states that *“Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy: 1. Be lean: use less energy 2. Be clean: supply energy efficiently 3. Be green: use renewable energy”*

8.108 The policy goes on to state that non-residential developments should achieve CO2 reductions in line within building regulations for the years 2016-2019. Between 2019 and 2031, developments should be zero carbon. As this development is submitted between in 2019, this scheme falls between the two requirements as an obvious transitional period.

8.109 Policy LP22 of the Local Plan has similar local requirements. It states: *“B. Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions: 3. All non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy. Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.*

C. This should be achieved by following the Energy Hierarchy:

- 1. Be lean: use less energy*
- 2. Be clean: supply energy efficiently*
- 3. Be green: use renewable energy.”*

8.110 January 2019 pre-application advice stated: *“Major non-residential schemes must achieve a 35% reduction in CO2 emissions (regulated) against a Building Regulations Part L (2013) baseline. If this is not technically feasible and therefore cannot be achieved using on-site measures, then applicants will need to demonstrate and justify this as part of a planning application.”*

8.111 The proposed development has been designed to achieve high levels of energy efficiency both in terms of the building design but also via the heating and cooling strategy. In the Sustainability Assessment and Energy Statement, SI Sealy undertake a detailed assessment application of the Energy Hierarchy and confirm that with the application design, a 36.5% improvement on Part L Building Regulations is achieved, surpassing the advised requirements outlined in the January 2019 pre-app advice.

Renewable Energy

8.112 January 2019 pre-application advice also suggested that a 20% reduction in CO2 emissions from the use of on-site renewable energy should also be achieved.

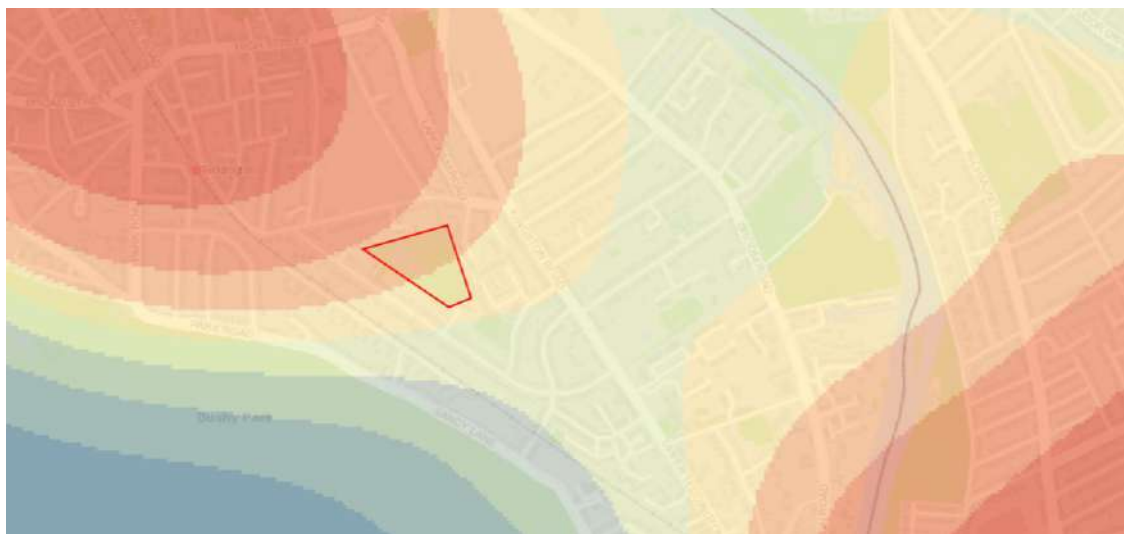
8.113 The above requirement is linked with supplementary text to Policy 5.2 of the London Plan. In relating to this application, a 25% reduction in CO2 emissions is achieved. The choice of PV panels was identified after Sealy undertook a Low Zero Carbon Technology Feasibility Study, where solar PV panels were determined to be the most suitable and effective renewable solution for the development.

Decentralised Energy and CHP

8.114 Local Plan Policy LP 22 states “The Council requires developments to contribute towards the Mayor of London target of 25% of heat and power to be generated through localised decentralised energy (DE) systems by 2025. The following will be required: **1.** All new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed. **2.** Development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). **3.** Where feasible, new development of 50 units or more, or new non-residential development of 1000sqm or more, as well as schemes for the Proposal Sites identified in this Plan, will need to provide on-site DE and CHP; this is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.”

8.115 Pre-app advice stated that “Any development of over 1000m2 will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). - Where feasible, a development of over 1000m2, will need to provide on-site DE and CHP. This is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.”

8.116 Under the Be Clean (5.3) Assessment of the applying the Energy Hierarchy in the Sealy Report, it is confirmed that “local surrounding energy demands, and heat networks have been investigated and it has been found that there are currently no local networks that would allow feasible connection at time of construction.” It is therefore proposed to design the system with a district heating connection in place to allow future connection when a local network becomes available.



GLA HEAT MAP EXTRACT WITH SITE IDENTIFIED

NOx Boilers

8.117 Local Plan LP 22 states that “Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.” Pre-app advice copied the same text verbatim.

8.118 As part of this development, we will be stripping out 2 No 14Year old REMEHA P320/7 boilers, that are circa 85% efficient and have unknown NOx (which are assumed to be significantly higher than the new proposed installation).

8.119 Under the requirements of the PSBP specification, Dept for Education schools have a requirement to install low NOx boilers with maximum NOx emissions of 40mg/kWh. Whilst the specification of the boilers has not been finalised, a typical boiler which has been installed on other PSBP schools has been

a Stratton mk2 wall hung boiler. These high efficiency condensing boiler systems are 95-96% efficient with NOx around 35-36mg/kWh.

Sustainable Construction Checklist

- 8.120 Policy LP 22 also requires Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has been submitted as part of the planning application achieving a provision score of 47%.

BREEAM

- 8.121 Policy LP 22 requires major development proposals to achieve a BREEAM score of Excellent. The proposed development is accompanied by a detailed BREEAM Pre-Assessment prepared by Method Consulting.
- 8.122 Whilst we are aware that LBRuT policy seeks BREEAM Excellent, this cannot realistically be achieved on this site given the inability to achieve certain base credits (e.g. site location in relation to public transport) but also the disproportionate cost of securing the final additional credits required to secure a score of 71. The BREEAM Pre-Assessment confirms that the scheme is forecast to achieve an overall total target credit score of 64.72% (Very Good).
- 8.123 Method have also prepared an explanatory note which explains the challenges that would be associated with seeking an Excellent rating at this site. Please consider this report along with the Pre-Assessment.
- 8.124 Should officers be content with this argument, we would welcome the below planning condition which has been applied to similar education developments in recent years:

U04534 NS18 BREEAM - *The scheme shall achieve a BREEAM school rating of 'Very Good' in accordance with the terms of the application & the requirements of the BREEAM Guide (or such national measure of sustainability for school design that replaces that scheme). REASON: In the interests of promoting sustainable forms of developments and to meet the terms of the application.*

Water

- 8.125 Policy LP22 states that “Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).” this is supported by text which states that “ 6.3.5 A minimum of 2 credits on water consumption will be required for all other types of developments in order to achieve BREEAM “excellent”. Where a BREEAM assessment is not technically feasible, applicants should incorporate best practice water saving and recycling measures as outlined in the Sustainable Construction Checklist SPD.”
- 8.126 As can be seen from the BREEAM Pre-Assessment, 3 water credits are targeted as part of this development. This is also covered in the Sustainable Construction Checklist.

AIR QUALITY

- 8.127 Policy LP 10 of the Local Plan states that “B. The Council promotes good air quality design and new technologies. Developers should secure at least 'Emissions Neutral' development. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required: 1. an air quality impact assessment, including where necessary, modelled data; 2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology; 3. measures to protect the occupiers of new developments from existing sources; 4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.” Pre-application advice did not discuss air quality.

- 8.128 There are two aspects of impacts to consider when assessing air quality: during construction and the operational development.
- 8.129 An Air Quality Assessment was carried out by NTA and accompanies this submission. It discusses the significant measures to control dust and emissions during the construction period. In terms of the operational development, this is not an expansion of a development, so the initial impact would be neutral, albeit with better performing teaching blocks. Low NO_x boilers will be specified, as per DfE requirements, which will be a substantial improvement compared to the existing situation.
- 8.130 Finally, the school already has a Gold standard Travel Plan already in place which is demonstrably reducing car use by staff and pupils. The continued implementation of this Travel Plan will continue to have improvements in Air Quality.
- 8.131 On the whole, this development will have an improvement to air quality in full compliance with Policy LP 10.

FLOODING AND DRAINAGE

Flooding

- 8.132 Local Plan policy LP21 state that. *“Applicants will have to demonstrate that their proposal complies with the following:*
1. *Retain the effectiveness, stability and integrity of flood defences, river banks and other formal and informal flood defence infrastructure.*
 2. *Ensure the proposal does not prevent essential maintenance and upgrading to be carried out in the future.*
 3. *Set back developments from river banks and existing flood defence infrastructure where possible (16 metres for the tidal Thames and 8 metres for other rivers).*
 4. *Take into account the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme, and demonstrate how the current and future requirements for flood defences have been incorporated into the development.”*
- 8.133 The site falls within Flood Zone 1. While the application site relates only to a part of the school site, the school site still is larger than 1 hectare. Accordingly, consultants Ambiental have prepared a Flood Risk Assessment to assess the probability of flooding at the site is very low and that the proposed development is suitable.

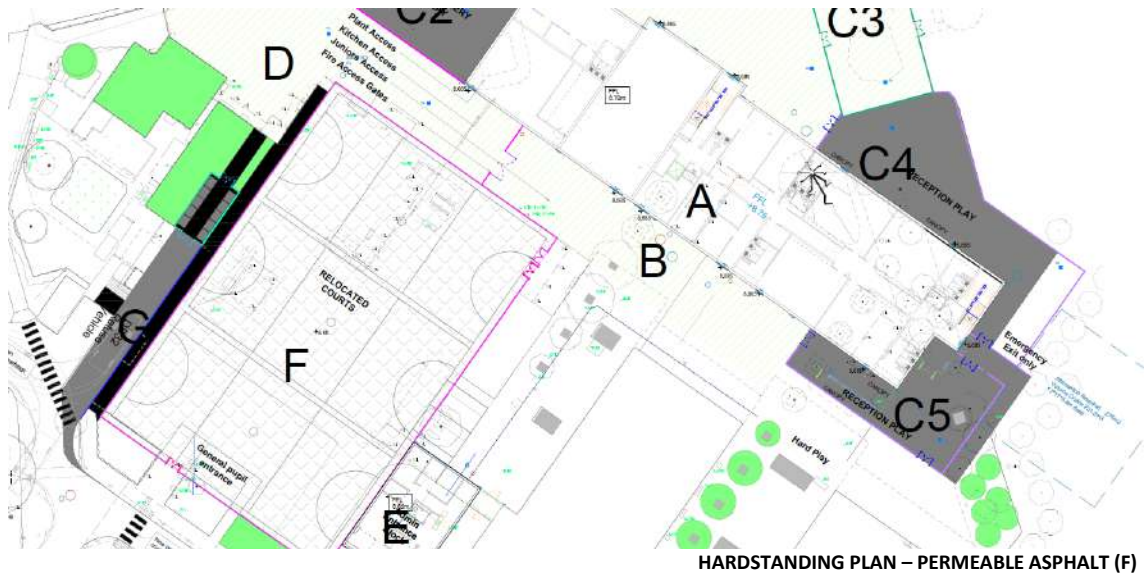
Drainage

- 8.134 Local Plan policy LP21 states that *“All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.”* It goes on to provide a table which confirms that developments in Flood Zone 1 has little restrictions, but that a Drainage Strategy will be required for development proposals. This policy also states that *“The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following: 1. A reduction in surface water discharge to greenfield run-off rates wherever feasible. 2. Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.”*
- 8.135 Two forms of SUDS are proposed in the development:
- An off-line modular crate system, constructed underground, which will attenuate surface water from the proposed modular building, road, footpaths and playground. The attenuation storage volume required for this aspect is 216m³. The crate system is considered to have a

void ratio of 95%. 231m³ of sub surface attenuation storage is proposed to the immediate south-east of the main block.

- 2. Permeable asphalt over the courts area, with the underlying sub-base as attenuation storage. The attenuation storage volume required for this aspect is 179m³. The stone sub-base system is considered to have a void ratio of 30%.

8.136 These are discussed in the SUDS Report (and associated drawings) which accompanies this application.



8.137 This will provide significant sustainable surface water drainage in compliance with policy LP21 above.

HEALTH IMPACT ASSESSMENT

8.138 Local Plan Policy LP30 states that “Planning, at all levels, can play a crucial role in creating environments that enhance people's health and wellbeing. The Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.” This will be delivered by requiring developments to submit a Health Impact Assessment (HIA) with all major development proposal.

8.139 A detailed HIA accompanies this submission. As an existing school seeking to improve facilities, it is regarded positively as a contributor to social infrastructure.

9.0 SUMMARY AND CONCLUSIONS

- 9.1 Collis Primary School is a 3FE Community Primary School located within a residential area of Teddington, a large suburban town in the southwest of London on the north bank of the River Thames. The existing school represents a set of partnerships between the London Borough of Richmond upon Thames and other community resources, providing educational facilities for mixed-sex pupils aged 3 to 11.
- 9.2 The Department for Education (DfE) is funding the upgrading of primary school facilities across the United Kingdom via the Priority School Building Programme 2. Collis Primary School is one of these named schools to receive funding to upgrade these facilities.
- 9.3 The DfE have now appointed a contractor and design team to attain planning permission and deliver this construction project. Pre-application advice was initially provided by Richmond Council in 2017 and 2019, where the scheme was supported in principle subject to detailed design suggestions.
- 9.4 This proposal (in conjunction with Richmond Council) seeks to demolish three existing buildings on site and erect a new part one, part two storey replacement block for the benefit of the school. A new single storey administration block is proposed along with upgraded hard and soft landscaping, upgrading the school's play space provision.
- 9.5 Pupil and staff numbers will not be affected by this application, with this proposal being an upgrade in facilities rather than an expansion of the School.
- 9.6 A public consultation was held with local stakeholders in July 2019. This event was well attended with the scheme supported in the feedback received.
- 9.7 The newer blocks within the school site will be unaffected by this application. In order to prevent displacing pupils during the construction process, the existing school buildings will remain in operation while the new school building is under construction in a secured building site to the north. The large school site allows for the construction of the new school to occur and the existing school to remain in operation without having a harmful impact.
- 9.8 Given the above, it has been demonstrated that the proposals conform to the NPPF, Central Government policy, the London Plan and LBRuT policy. From this, it can be concluded that there is a presumption in favour of sustainable development and planning permission should be granted without delay. The appointed contractor intends to start construction of the new buildings as soon as they have obtained all the necessary permits (Planning, Building Regulations etc) to ensure that the school can establish at in facilities which are fit for purpose as soon as possible.

APPENDICES

APPENDIX 1 – RICHMOND COUNCIL PRE-APPLICATION ADVICE

January 2017

Collis Primary School
Pre-application advice - 16/P0312/PREAPP
Date – Tuesday 3 January 2017

Introduction:

Following our meeting on Tuesday 13 December, I have summarised my comments as follows.

Proposal:

The Priority School Building Programme (PSBP) 2 was launched in 2014 to undertake major rebuilding and refurbishment projects. Collis Primary School submitted a successful application, and will be delivered through PSBP2.

Due to poor conditions of 3 school buildings, the scheme proposes to demolish blocks EFAD, EFAF and EFAA and replace with hard surfaced play / grassed play

The scheme proposes a two storey building. Two locations have been shortlisted, which this pre-application seeks advice on. Reasons for the locations are:

- o Proximity and relationship to remaining school buildings
- o Playing field – designated OOLTI
- o Distance to neighbouring properties
- o Ability to build in single phase.

It is understood the school is currently 3 form entry (630 children) with 4 bulge classes (total 740-750 pupils). The scheme does not propose to increase this.

Site:

- Collis Primary School – 3 form entry, however, currently has 4 bulge classes, in reception, and Years 1, 2 and 6, with total pupil numbers being 740.
- The school is sub-divided in 5 educational buildings – SW of the site
- One temporary building – used for After School Club
- School House – NW of site
- Multi hard surfaced playground and two hard surfaced courts north of the site
- Swimming pool in NW of site
- Recreational sport fields – eastern half
- Pond NW of site – recommend this is not described as a conservation area.
- The main vehicular access point – via Fairfax Road – SW of site
- Parking areas – SE of site
- Two pedestrian access points – one via Fairfax Road and one on Cromwell Road

Constraints:

- CIL – Low Band
- Other Open Land of Townscape Importance
- Area poorly provided with Public Open Space
- TPOs on northwest boundary – outside site



History:

Ref	Proposal	Decision	Dec Date
14/1728/FUL	Retention of demountable classroom unit for 3 more years <i>"This permission be for a limited period of three years only (unless the Local Planning Authority otherwise agrees in writing) expiring on 25 July 2017: when the buildings and works carried out under this permission shall be removed and the land re-instated to its former condition to the satisfaction of the Local Planning Authority.</i> <i>REASON: The prominent position and materials of construction are not considered suitable for a permanent building.</i>	granted permission	25/07/2014
13/0424/FUL	Replacement of bark safety surface, climbing frame and six small wooden climbing / playing structures with a wet pour safety surface (play area extended by 43 sqm into the school playground,); three larger play frames and four pieces of play equipment; and a perimeter fence installed (0.95m tall) . No change to number of users of the site and access now	granted permission	16/07/2015

	restricted to during school hours only.		
11/2044/FUL	New Portakabin classroom block consisting of 2 classrooms, cloakroom and toilets, overlaid externally to be located in the school grounds for a period of 3 years	granted permission	17/08/2011
05/1180/FUL	Erection of two storey extension to create 12 classrooms, hall, small hall, library, ICT room, changing rooms, other teaching spaces and staff facilities, together with car parking, playground and improvements for pedestrian access outside of school building	granted permission	25/08/2005
04/1310/FUL	Dismantling Of 4 No. Existing Demountable Classrooms/buildings And Removal From Site. The Relocation At The Existing Elliotts Demountable Classrooms On The Site And The Erection Of 3 No.new Single Storey Demountable Double Classrooms.	granted permission	24/06/2004
04/T0284	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging The Nature Trail.	refused permission	08/04/2004
04/T0285	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging The Nature Trail.	refused permission	08/04/2004
03/1552/FUL	Proposed Erection Of Re - Locatable Double Classroom Unit.	granted permission	19/06/2003
01/3372	Provision Of Water Tank Housing On Free-standing Steelwork Supports And Base Foundation.	granted permission	21/02/2002
01/3192	Provision Of Roof Level Water Tank Housing And Smaller Additional Housing For Heating System Feed Tank.	granted permission	31/01/2002
01/1286	Erection Of A 7.8m X 15m Demountable Classroom.	granted permission	19/07/2001
97/0776	Renewal Of Planning Consent For A Sectional Building For Use By An After School Care Scheme.	granted permission	28/08/1997

95/2468/FUL	Erection Of Galvanised Steel Storage Shed.	granted permission	28/09/1995
95/0833/FUL	Erection Of Pre-cast Concrete Garage Structure For Use As Storage Space For School Equipment/materials	granted permission	21/04/1995
94/1314/FUL	Erection Of Classroom Extensions And Alteration Of 2 No Windows To Form Door/window Combinations.	granted permission	14/07/1994
93/0985/FUL	Erection Of A Demountable Single Classroom.	granted permission	19/08/1993
93/0921/S192	Erection Of A Single Demountable Classroom.	decided as no further action be taken	09/08/1993
92/0218/FUL	Erection Of Sectional Building To Be Used In Conjunction With The Schools After School Care Scheme	granted permission	02/04/1992
91/1974/S64	Use Of The 'pavillion' Changing Rooms As An After School Care Group For The Children Of Working Mothers.		19/11/1991
91/0311/FUL	Installation Of A Single Demountable Classroom.	granted permission	02/05/1991
80/0744	Alterations including erection of single storey infant teaching and nursery extensions to the existing school and provision of four new parking bays.	granted permission	24/07/1980

Enforcement complaints: 1

Ref	Nature	Status	Closed
12/0655/EN/UBW	Childrens play equipment.	Case Closed	07/07/2014

Land uses:

The Council is currently going through the Local Plan Review; however, there is no significant change in direction between the existing and the emerging new policies that are of relevance to this application. The applicant should demonstrate compliance with both plans in any forthcoming application. The Local Plan will be published for a final 'Publication' Consultation from 4 January until 15 February 2017:

- The Council gives priority to providing a high standard of education, and this is reflected in NPPF and policy CP18, which seek to ensure that the provision of schools are sufficient in quality and quantity to meet the needs to residents. Along with the need to meet the demand for school places, the Council also has a duty to modernise schools and provide new facilities to meet changing curriculum requirements.
- Policy LP28 'Social and Community Infrastructure' states that 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 increase public access.
- Policy LP29 'Education and Training' states that the Council will support the provision of facilities to meet the needs for primary and secondary school places, will safeguard land and buildings in educational use and encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs.

The Council's School Place Planning Strategy 2015-2024 recognises that there is likely to be increasing demand for education places in the Teddington / Hampton Wick area from 2018 following the redevelopment of Teddington Studios for approximately 220 residential units. The opportunity for expansion of Collis School is specifically recognised in the Council's School Place Planning Strategy as a medium to long term option after the development of a Free School within Livingston House. (Whilst Turing House Secondary School has been operational in Livingston House since September 2015, this does not help to meet demand for primary places in the area)

The scheme will be in support of the above policy lines. However, it is recommended any submission identifies:

- Why the existing school buildings are not of sufficient quality;
- It is recommended that any temporary accommodation (14/2718/FUL) is addressed and incorporated within the rebuild;
- Why the proposal is the most sustainable or only option;
- How the scheme will improve the quality of the educational space;
- Why it is not feasible to expand or consider expansion of the school;
- Demonstrate how the scheme meets DM SI1 and Part B of emerging policy CP28 – relating to new social infrastructure.

If such information meets to the satisfaction of officers, the scheme would ensure the school is of sufficient size and quality to meet the needs of the school and residents of the Borough.

Siting and design – Other Open Land of Townscape Importance:

Core Strategy Policy CP10 states that OOLTI will be safeguarded and improved for biodiversity, sport and recreation and heritage, and for visual reasons.

Policy DM OS 3 requires areas designated as OOLTI to be protected and enhanced in open use. However, it recognises that there may be exceptional cases where appropriate development is acceptable. When assessing whether a proposal can be considered as appropriate development, the following criteria must be taken into account:

1. It must be linked to the functional use of the OOLTI; or
2. It can only be a replacement or minor extension of existing built facilities;
3. In addition to 1 or 2, it does not harm the character and openness of the open land.

There is no significant change in direction between the existing and the emerging new policies that are of relevance to this application. The applicant would be required to demonstrate compliance with both in the full application – refer to Local Plan Review policies LP12 and LP14.

- Policy LP14 'Other Open Land of Townscape Importance' seeks to protect OOLTI in open use. Development may only be appropriate if is linked to the functional use of the OOLTI or is a replacement or minor extension, and it does not harm the character or openness of the open land.
- Policy LP 31 'Public Open Space, Play Space, Sport and Recreation' seeks to protect and enhance sports grounds and playing fields. All major development proposals in the borough must meet the play space needs arising out of the development. Proposal that could affect the loss of the quality of a playing field will be assessed against the borough-wide Playing Pitch Strategy, the criteria as set out in the NPPF, as well as the Sport England Policy on planning applications for development on playing fields. Early engagement with Sport England will be required where a proposal affects playing field or sports pitch.

The Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Where proposals involve the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of sport facilities, provision of wider public benefits, including public spaces, and therefore enabling and prompting physical activity and encouraging healthier lifestyles and habits for all ages.

The scheme incorporates numerous options. However, Options 1b&C are to the southeast of the main school buildings; and option 2b&C are to the northeast of the existing school buildings.

Assessment:

Demolition	<ul style="list-style-type: none"> • The proposal involves the demolition of blocks identified as A1 (GIA 1,229.5sqm) and A3 (GIA 495.7sqm) (or EFAD, EFAF, EFAA) which are said to be in a poor condition.
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	<ul style="list-style-type: none"> No objection to the demolition of the older parts of the school building.
Option 1	<p>Option 1b & 1c:</p> <ol style="list-style-type: none"> No objection to potential future expansion to Block B – all hard standing Objection to two storey element – this would result in an unacceptable loss of OOLTI, and be intrusive within the remaining OOLTI, thereby not meeting policy exceptions. OOLTI policy DM OS 3 states that <i>'Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for social community or educational uses, it may be acceptable to re-distribute the open land within the site, providing that the new open area is equivalent or improved in terms of size, shape, location, quality and potential ecological value.'</i> The submission fails to demonstrate how the scheme re-provides open land to the equivalent value. Loss of playing field – This would be contrary to NPPF, Sport England policies, and Policy KP31. It has not been demonstrated that the scheme meets any of the exceptions of Sport England. (Any objection by Sport England would result in the application being referred to the National Planning Casework Unit) In addition to the loss of playing fields, it will be necessary to demonstrate that the scheme meets the play space needs arising out of the development. <p>It is recommended that options 1's are not pursued as this would be contrary to policy. If you however decide to take forward this option, and without prejudice, it is recommended this is robustly justified, and demonstrated how the benefits outweigh any potential harm, so officers can consider. It is recommended that the following information would assist in this assessment:</p> <ol style="list-style-type: none"> Justify the location and size of the extension Demonstrate why the building cannot be sited in the same location as the existing school buildings A1 and A3 Demonstrate why other locations on site are not feasible (including option 2) Detail what other alternatives were considered Why other options were discounted – including option 2 Demonstrate the size is the minimum – only essential school accommodation, rather than desirable. (If this option is considered essential, the new block should be sited as close to the existing school as possible to minimise any encroachment into the playing field / OOLTI. Provide the following open space details, and any potential impact. This may include: <ul style="list-style-type: none"> Amount of site within OOLTI

	<ul style="list-style-type: none"> ○ Floor area of buildings within OOLTI – existing and proposed ○ Amount of hard standing within OOLTI – existing and proposed ○ Amount of soft landscaping / grassed / playing fields within OOLT – existing and proposed ○ The overall loss of open space on the site (m2) ○ How the relocated / re-provided open space is or the equivalent quality. <p>h) With respect to impact on playing fields, provide:</p> <ul style="list-style-type: none"> ○ Calculations regarding the existing and proposed playing field space on site ○ What sports are played on the fields ○ What is the layout of the playing fields ○ What sports will be lost as a result of the development ○ What mitigation provided ○ What space does the school need to provide for the proposed school numbers? <p>i) What are the educational benefits that will be delivered as a direct result of the scheme, or what additional community benefits would / could the scheme deliver?</p>
<p>Option 2</p>	<p>Option 2b & 2c:</p> <ol style="list-style-type: none"> 1. No objection to location for potential future expansion to Block B. 2. This is the preferred option - generally avoids OOLTI. However: The scheme does not put forward an option to re-build the new school building in the same location as the existing school buildings A1 and A3? Instead it is stated that the demolition area will be replaced with hard-surfaced play or grassed play areas as necessary. It would be useful to understand the reasoning for relocating the building? Was the location of the existing buildings deemed unsuitable? Or is this only due to operational reasons and logistics of developing the site whilst continuing the school use? 3. Recommended it is re-sited more to NW so to avoid the ground floor jutting into the OOLTI 4. There is the potential to provide a courtyard character to the entrance area 5. Must demonstrate that it does not encroach into playing field / OOLTI. If loss of playing field – refer to feedback under option 1 (g and h). 6. Concerned over the location of deliveries to the kitchen – encroaching into the playing field / OOLTI – refer to feedback in option 1 (g and h).

Siting and design – Elevational treatment:

Generically policies CP7 and DM DC1 state new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road and connect with and contribute positively to its surroundings based on a thorough understanding of the site and its context. In assessing design quality this policy requires proposals to have regarded to:

- compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- detailing and materials

Schemes that are not of a high design quality, and will not result in the improvement of the area, will not be acceptable, nor will schemes which depart from the coherent and predominant character of a road or neighbourhood.

The above is reflected Local Plan Review policy LP1.

No details of elevations have been provided; therefore I recommend any forthcoming scheme:

- Complements and responds to the design of existing building
- Is restricted to a palette of 3 materials. Consider context – If next to playing fields, soften visual appearance with choice of materials
- Respond to the open space it surrounds – make it visually recessive with glazing / green walls.
- Break up long elevations with shadow lines, change in materials, fenestration, step in's.
- Provide large scale details of windows – ensure they are not flat – some texture.
- Keep heights to minimum (provide justification for any heights – i.e. necessary floor to ceiling heights, servicing void heights etc)
- Ensure mechanical plant / PV panels / lift overruns are considered in the design so not to appear as 'add on's'

To ensure a satisfactory submission, provide;

- Full site plan showing ground and first floors, and parking / layout details
- CGIs of the proposal, so the relationship between the proposal and the existing buildings can be clearly seen.
- It would be helpful if an existing and proposed site plan could be provided showing:
 - Existing playing field
 - Existing hard surfacing
 - Existing buildings
 - Proposed buildings
 - OOLTI designation

Residential amenity

Any development must protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance (DM DC5 and Local Plan Review policy LP8). To protect privacy, residential development should be sited a minimum of 20m between the main facing windows of habitable rooms. Further, with respect to sunlight

and daylight the Council is guided by the BRE Site Layout, Planning for Sunlight and Daylight, and in Sun on Ground Indicators. Any submission must demonstrate compliance with the above policy and relevant guidance.

The principle issue to arise from the scheme will be light, privacy and visual impact. The advice contained within this note is without the benefit of a site visit to adjoining properties, and therefore may alter if and when an application is submitted. However, based on the submitted plans I have the following comments:

Option 1b

1. South flank elevation of ground floor and first floor located off south boundary by approximately 4m and 25m respectively.
2. Whilst the ground floor will no doubt be visible from Fairfax properties gardens, given their garden length (approx. 20m), the setting off the boundary, and limited width of the building when viewed from these properties, this is deemed acceptable – however green walls and no clear glazed windows are recommended.

Option 1c:

1. South flank elevation of ground floor and first floor located off south boundary by approximately 3m and 18m respectively.
2. Refer to (2) of Option 1b review

Option 2b

1. The extension is proposed to the north of the existing school building.
2. Given the new building is sited approx. 22m and 33m from the northwest boundary ground and first floors respectively, and a significant distance off the northeast boundary, the amenities of residents who reside in Cromwell and Addison Road should not be unduly compromised.

Option 2b

1. The extension is proposed to the north of the existing school building.
2. Refer to (2) of Option 1b review

With respect to any forthcoming submission, please provide:

- Proposed site layout plans should show positioning of adjacent properties, so the impact on such can be clearly determined.
- Provide dimensions on the plans of distance to boundaries. (This would in particular assist neighbours)

In terms of the intensification of the site (and noise), given similar pupil numbers are proposed, the scheme is not deemed to have an unacceptable additional impact. However, for clarity:

- Provide details as to how break times will be arranged – will they all be at one time, or staggered?
- If any mechanical plant, extraction, or air conditioning units are proposed, the siting, design and technical details should be provided with the submission so officers can ascertain any potential impact arising from these. Noise impact assessments should be provided

Layout, Parking / Cycle Parking / Waste Storage

It is recommended you refer to policy CP5 of the Core Strategy and DM TP2 and DM TP8. These policies consider the impact of any new development on the existing wider and local transport network, and requires developments to demonstrate that any new scheme

provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions. A set of maximum car parking standards and minimum cycle parking standards are set. These are expected to be met, unless it can be shown that the proposed levels of parking would not cause adverse impacts on the area in terms of street scene or on-street parking. The above policies also encourage schools to develop Green Travel Plans.

There is lack of detail with the submission, and therefore my comments are only limited:

- It is understood there are currently 740 pupils at the site (as there are 4 bulge classes), and proposed pupil numbers will not exceed 750.
- For each additional classroom, 5 additional cycle parking spaces should be provided.
- Further scooter parking should be provided depending on % of children travelling by such mode – Travel Plan data should provide such information.
- Additional staff numbers are unknown; however, any scheme would be required to provide 1 space per additional 2 staff. Where will they park?
- Full details of servicing must be shown. (Provide details of existing servicing arrangements and how this will change / be intensified).

In support of any application, the following information should be provided:

- Up to date Travel Plan.
- Trip generation details of pupils and staff (there would be highway concerns with any increase in pupils on these residential roads)
- Catchment details
- Any Transport Statement concerns need to be addressed in the Travel Plan.
- Construction Method Statement – refer to the local validation checklist, which identifies all aspects that needs to be included.
- Cycle / Scooter parking for pupils (refer to standards above)
- Cycle parking for staff – covered and secure
- Service and delivery plan – this should be included in the Travel Statement (and be approved in conjunction with TFL)
- Refuse and recycling arrangement's
- After school club details should also be incorporated within the Transport Statement, including amount of clubs, number of hours – this should include existing and proposed.

Sustainability:

All new developments should include measures capable of mitigating and adapting to climate change to meet future needs, and reduce carbon dioxide emission. The relevant policies include:

- DM SD1 and DM SD2 of the Development Management Plan
- CP1 and CP2 of the Core Strategy
- SPD 'Sustainable Construction Checklist'.
- LP17 and LP22 of the Local Plan Review

The following documents and sustainability credentials are expected to be met:

- Sustainable Constructions Checklist;
- BREEAM excellent,
- 20% reduction in CO2 emissions from the use of on-site renewable energy.
- Major non-residential schemes must achieve a 35% reduction in CO2 emissions (regulated) against a Building Regulations Part L (2013) baseline. If this is not technically feasible and therefore cannot be achieved using on-site measures then applicants will need to demonstrate and justify this as part of a planning application.

Cash in lieu contribution to the Council's Carbon Offset fund will be sought in cases where it is not technically feasible. The price of carbon is £60/tonne over 30 years in line with the MALP viability evidence. (The energy reduction should be achieved following the energy hierarchy).

- Any flat roof over 100m² should provide a green roof – The aim should be to use at least 70% of any potential roof plate area as a green roof. (The onus is on the applicant / developer for proposals to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated where it has been demonstrated that a green roof is not feasible).
- Any development of over 1000m² will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).
- Where feasible, a development of over 1000m², will need to provide on-site DE and CHP. This is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.
- Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.

If the new school cannot meet the standards outlined above, full justification should be given at the time of the application for such.

Trees and ecology:

Policy CP4 and DM DC4 seek to safeguard and enhance the Boroughs biodiversity, and requires new developments to incorporate landscape proposals within any submission, which retains existing trees and other important landscape features where practical. There will be a presumption against schemes that result in a significant loss of trees unless replacements are proposed and there is good reason such as the health of the trees. (The above approach is also reflected in Local Plan Review policies LP15 and LP16)

Trees:

The submission was accompanied with an Arboricultural Report. This concluded:

- A tree survey was carried out by a qualified arboriculturalist on 13th October 2016 to assess the quality and value of the principal trees within or adjacent to the footprint of the proposed school redevelopment.
- The site does not contain any trees protected by Tree Preservation Orders (TPOs) and does not have Conservation Area status (CA).
- There were 74 individual trees and 4 groups of trees surveyed. The following tree retention categories were assigned:
 - Category A i.e. trees of high quality, 0 trees
 - Category B i.e. trees of moderate quality, 19 individual trees and 4 tree groups
 - Category C i.e. trees of low quality, 55 individual trees
 - Category U i.e. trees to be removed for arboricultural reasons, 0 trees
- The largest and most prominent trees on site are Trees 8, 9, 10 and 14 assessed as category B
- Most individual trees recorded are part of a relatively recent landscape planting scheme. Collectively these trees contribute greatly to the character of the school

however, individually most were assessed as site category C (low retention value) due to their young age and the ease with which they could be replaced with mitigation planting post-development.

The submission was reviewed by the Council's Arboricultural Officer who comments:

- There are preserved trees to the north (possibly off site), however, they may be impacted and need to be considered.
- Any application should be accompanied with an Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (in accordance with BS5827:2012 Trees in relation to design, demolition and construction) and detail all tree protection measures.
- Provision plans do show that landscaping will take place, for example, the creation of avenues along the access route. However, the existing site seems to have very little by way of trees or substantial canopy cover, and there should be a targeted increase (of native species).

Ecology:

A Preliminary Ecological Appraisal has been submitted. This concluded:

- As the works are confined to the application site, the statutory designated site for nature conservation and four non-statutory designated sites within the locality will not be impacted.
- The school site consists predominantly of buildings, hard standing and amenity grassland which make up a large school playing field in the east and north of the site. Broadleaved scattered trees and introduced shrubs are spread throughout the school grounds and there is a small area of broadleaved semi-natural woodland in the west. There is potential for badgers, breeding birds, roosting and foraging bats and hedgehogs within the school grounds.
- Despite the potential for protected and notable species, no further ecological surveys are required for the proposed redevelopment. However, recommendations are recommended:

Birds

- Vegetation clearance should be conducted outside the breeding bird season of March and August, or after nesting bird checks conducted no more than 24 hours prior to any works being undertaken.
- If an occupied nest is discovered, it must be left undisturbed until the chicks have fledged the nest and an ecologist has confirmed that the nest is no longer in use.

Mammals

- The Site has potential for hedgehogs or badgers to use the broadleaved semi-natural woodland and the possibly school field and some bare ground. The broadleaved semi-natural woodland is not expected to be impacted if the current control options are followed.
- Care should be taken to remove all brush piles within the Site in case of nesting hedgehogs and removal of the brush should not be undertaken during the hedgehog hibernation season which is generally between October and April.
- Regardless of the details for the redevelopment of the school, good practice measures should also be implemented during the construction process by covering open trenches and excavations during the night or by providing a suitable safe egress for mammals.

Amphibians

- Impacts to the broadleaved semi-natural woodland and the pool within it are not anticipated in the current control options of the redevelopment of the school.
- If the pool is anticipated to be impacted, this work should be undertaken outside of the amphibian breeding season which is generally March to June.

Invasive Species

- Caution should be taken during the works to reduce its spread through the safe removal and disposal of cotoneaster plant material.
- Caution should also be taken to avoid further spread of cherry laurel within and outside of the Site.

Amenity Grassland and Semi-Improved Grassland

- The school field has potential for commuting hedgehogs and badgers, though no direct impact to this species is anticipated from the proposed redevelopment of the school. Good practice measures should be implemented.

Bare Ground

- The piles of brash, logs and wood chippings have potential for nesting hedgehogs therefore, if removal is required, this should be removed carefully following recommendations regarding hedgehogs.

Broadleaved Scattered Trees, Hedgerows and Introduced Shrubs

- This vegetation offers suitable habitat for breeding birds and therefore, although not anticipated in the current control options, the recommendations regarding bird nesting should be following if any trees are likely to be disturbed.

Broadleaved Semi-Natural Woodland

- The broadleaved semi-natural woodland should be retained where possible due to its potential to support several protected species which is anticipated if the current control options are followed.
- If any impact is anticipated recommendations with regards to breeding birds, hedgehogs, badgers, and amphibians should be followed.

Standing water

- The standing water within the broadleaved semi-natural woodland only has potential for amphibian and invertebrate species, therefore it is recommended that this pool is retained if possible which is anticipated if the current control options are followed. Otherwise, care must be taken to avoid direct harm to amphibians.

The submission has been reviewed by the Council's Ecologists who confirmed no objection in principle. However, any forthcoming application should be accompanied with:

- Details to demonstrate the loss of amenity grass are mitigated for by habitat improvements elsewhere on the site and in particular improving the hedge line along the north eastern/western boundaries as well as wildlife enhancements. This should include specifications, species and location.
- Wildlife enhancements- specifically for bat/bird/butterfly/stag beetle and hedgehog habitats. This includes specs/locations/positions/aspects
- Details of bird boxes within the new building – for example, Sparrow terraces could also be used with cameras for education purposes
- The external lighting plan including locations, specs, lux contour plan

- Any landscape planting, spec, plan and maintenance and will be looking for native, wildlife friendly species
- The recommendations as per the Mott Macdonald Preliminary Ecological Appraisal report (pages 20 – 22) dated November 2016 to be incorporated.
- Cherry laurel spread can be contained and reduced.
- Hedges on site restored and enhanced

(Please note section 3.1 of the Preliminary Ecological Appraisal referred to recommendations in Appendix G, however, the appendices only went up to Appendix F – please provide details of recommendations)

Flooding:

The site is located within Flood Zone 1. I recommend you refer to policies DM SD6 and SD7 of the DMP, and policy LP21 of the Local Plan Review.

As required by the above policies:

- Where the site is greater than 1 ha, a Flood Risk Assessment will be necessary.
- All developments must utilise Sustainable Drainage Systems (SUDs) wherever practical and follow the drainage hierarch when disposing of surface water:
 - store rainwater for later use
 - use infiltration techniques, such as porous surfaces in non-clay areas
 - attenuate rainwater in ponds or open water features for gradual release to a watercourse
 - attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
 - discharge rainwater direct to a watercourse
 - discharge rainwater to a surface water drain
 - discharge rainwater to the combined sewer.
- If discharging surface water to a public sewer, developers are required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation.
- Applicants and developers will need to submit evidence, as part of Flood Risk Assessments and/or requirements set out in the Council's Sustainable Construction Checklist SPD, that the above drainage hierarchy has been followed and SuDS has been utilised.
- Conditions or agreements will be used where appropriate to secure implementing sustainable drainage and to ensure appropriate management, maintenance and adoption.

Summary and other matters

- The provision of new and improved accommodation at the school at the school is welcomed, subject to this addressing other policy considerations.
- Any demolition and rebuild should be robustly justified
- There is concern over the siting of options 1b and 1c, which significantly encroaches within the playing field and OOLTI. It is recommended options 2b & 2c are the most appropriate option – however, it is recommended this is sited further northwest so to avoid OOLTI

- Based on the submission details, the block plans are not deemed to raise unacceptable unneighbourly impacts.
- There is lack of detail over pupil and staff numbers, elevations, and sustainability details and therefore feedback is limited to policy requirements.
- As advised in the meeting, the applicants are encouraged to carry out a public consultation exercise with local residents prior to any submission, and this may include visiting neighbouring residential properties so relationships between sites can be established, which may also influence siting.
- It is strongly recommended you refer to the Local Validation Checklist, which clearly outlines what documents are required with any submission.

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith (without a benefit of a site visit) and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

Nevertheless, I hope that the above comments are viewed as constructive and of assistance when submitting any future application.

Yours sincerely



Lucy Thatcher
Richmond Strategic Development Lead

APPENDIX 2 – SPORT ENGLAND PRE-APPLICATION ADVICE

January 2017

From: Dale Greetham**Sent:** 03 January 2017 15:09**To:** Thomas, Rachel**Subject:** Pre-app Ref: DOVER GRAMMAR SCHOOL FOR BOYS, Astor Avenue, Dover, CT17 0DQ

Dear Rachel

Proposal: Proposed Priority School Build Programme 2 – New Build

Thank you for consulting Sport England on the above proposal.

Sport England – Statutory Role and Policy

The site is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in the light of the National Planning Policy Framework (NPPF) (in particular Para. 74), and its Playing Fields Policy: 'A Sporting Future for the Playing Fields of England', which can be accessed via the following link: www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply:

Sport England Policy	
Summary of Exceptions	
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

The proposal is for the provision of a new school building.

Option 1

This option for the proposed school building would appear to be sited on an existing area of playing field. Locating the proposed development on one of the existing playing fields would prejudice the use of the playing field.

This proposal would appear to prejudice the use of a playing field and because none of the exceptions in the above policy are considered to be applicable from the information provided, Sport England is likely to object to a subsequent planning application in the current form of option 1.

Option 2

This option for the proposed school building would appear to be sited on an existing hard standing area and a small area of playing field.

This proposal has the potential of meeting E3 of Sport England's Playing Fields Policy if the proposed development can be moved slightly to the south west or if the development can be reduced in size so it does not encroach onto the playing field.

Sport England would recommend that the detailed design of the proposed sports facility accords with Sport England's relevant design guidance in order to ensure that the facility is fit for purpose and of an appropriate quality. The guidance is available to view on Sport England's website at <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy.

If you require any further information please do not hesitate to contact the undersigned.

Yours sincerely

Dale Greetham
Planning Manager

APPENDIX 3 – RICHMOND COUNCIL PRE-APPLICATION MEETING MINUTES

November 2018

COLLIS PRIMARY SCHOOL, TEDDINGTON [755]**Meeting:**12th November 2018; 2:30pm @ London Borough of Richmond**Present:**

[BK]	Brian Kavanagh	Nicholas Taylor + Associates (SIL)
[ON]	Olivia Noonan	Spatial Initiative (SIL)
[IK]	Imran Kassim	AHR Architects (SIL)
[JB]	Jonathan Blackhurst	SI Sealy (SIL)
[GJ]	Georgie James	Method (SIL)
[PH]	Phil Houghton	Department for Education
[CO]	Cyril Okolie	Department for Education
[SO]	Sylvester Olutayo	Richmond Council (Programme Management Office)
[AV]	Anita Vedi	Richmond Council (Planning Dept)
[TM]	Will Marshall	Richmond Council (Transport)
[TG]	Teresa George	Richmond Council (Planning Dept)

Apologies:**1. INTRODUCTIONS**

1.1 BK provided an agenda to form the basis of the discussion.

PRINCIPLE OF DEVELOPMENT

1.2 BK and PH presented a background the proposals and explained how this scheme is a development of the preferred option outlined by Richmond Council in pre-application 16/P0312/PREAPP.

1.3 AV acknowledged this and stated that the principle of development was acceptable. The timescales were then queried.

1.4 PH stated that the submission would be as soon as possible after pre-application advice has been received, and a public consultation has taken place.

1.5 AV also queried if the school would be expanding to account for the existing bulge classes.

1.6 PH stated that an expansion would not be possible due to funding, however the bulge classes would be accommodated within the existing school.

BUILDING LOCATION

1.7 The location of the building outside of OOLTI was welcomed. The scale of the development was also indicated as acceptable.

TRANSPORT

1.8 Transport was then discussed. WM advised that additional car parking would not be required, if pupil/staff numbers were not changing.

- 1.9 Service access would need to be considered and a turning circle for service vehicles should be included in the final design. ON stated that this would be provided in a revised proposed site plan.
- 1.10 Cycle parking should be provided to London Plan standards. This should be provided for the entire school. Existing cycle parking provision being retained can be offset from the proposed requirement.
- 1.11 Construction access was then suggested. The proposed access route was indicated as acceptable. It was queried if parking bays would need to be suspended to provide construction access. This was confirmed, however it would only be for short periods within the construction programme, when the modules are being delivered. WM asked for this period and amount of peak movements to be indicated on the CMP submitted.
- 1.12 WM then left the meeting.

DESIGN

- 1.13 IK then presented the design approach taken for the school, providing an introduction to the scheme, both internally and externally. The mix of brick and render has been adopted on many schools previously providing distinction to the elevation.
- 1.14 AV stated that some comments have been received from colleagues in Urban Design. Avoiding the OOLTI was welcomed. The elevations proposed however seem very horizontal, with more vertical emphasis sought in a revised proposal.
- 1.15 IK stated that a more vertical emphasis could be provided through an alternative approach to materials and colour perhaps. It was explained that while the design would be a modular design process, it will appear as a traditional build. The architects and contractors have successfully worked on delivering several school projects of similar design in the last year.
- 1.16 BK to provide AV with an example of a school recently constructed by the same architects with a similar design approach. See images of said school below to appreciate the quality finish.



HIGHCLIFFE PRIMARY SCHOOL DEVELOPMENT (RECENTLY COMPLETED)



HIGHCLIFFE PRIMARY SCHOOL DEVELOPMENT (RECENTLY COMPLETED)

TREES

- 1.17 AV stated that our initial (tree) survey is out of date and will need to be updated in order to be acceptable in a planning application.
- 1.18 Any tree report accompanying an application should acknowledge the trees outside of the site, in particular, the trees subject to TPO to the north. It should be demonstrated how they will not be impacted as a result of this proposal.
- 1.19 Replacement tree planting will need to be provided at a scale of 1:1 with a better tree proposed. AV requested that we speak directly to Jane Crowther regarding this re-provision and location.
- 1.20 Update note: Email sent to Ms. Crowther on 23.11.18 seeking clarification regarding replanting scheme. Response received on 23.11. Appropriate survey and landscaping being prepared in line with this advice.

CONTAMINATION

- 1.21 BK queried if a contamination report would need to be provided as part of an application. AV indicated that she didn't think that an application would require a contamination report. AV would confirm and get back to us in her formal response.

- ENERGY**
- 1.22 JB outlined that the existing scheme could provide a CO2 saving of 20-25% above building regulations.
- 1.23 BK highlighted the fact that London Plan would require a zero-carbon development from 2019, if it is to accord with planning policy. This would make the scheme entirely unviable.
- 1.24 AV stated that they will seek a 35% reduction above building regulations to comply with local planning policy. Any shortfall on this, and we would have to pay for a consultant to independently assess our Energy Assessment and consider if CO2 reduction has been maximised. This will come at a cost to the applicant and may not result in any compromise on CO2 saving despite the additional consultant cost. It was advised that 35% reduction in is achieved, negating the need for an independent assessment.
- 1.25 This increased CO2 reduction will likely have an impact on the
- BREEAM**
- 1.26 GJ presented the intention with regard to BREEAM and highlighted the difficulties of achieving BREEAM Excellent with a scheme of this modular nature.
- 1.27 AV advised that BREEAM Excellent is what policy is required. Should this target not be achieved, it should be explicitly detailed why this could not be achieved and what efforts have been made to achieve as high a rating as possible. Relying solely on a lack of funding will not be a sufficient argument, but GJ mentioned several arguments verbally which could go some what toward justifying not meeting a BREEAM Excellent rating.
- DRAINAGE**
- 1.28 AV stated that the scheme had been sent to her colleagues in drainage, but a response has not yet been received. However, it seems as though, drainage has been considered sufficiently.
- GREEN ROOFS**
- 1.29 Urban Design and policy require a green roof to be proposed on the roof if viable. ON advised that this would have significant impacts on the module design, drainage design, foundation design, etc.
- 1.30 AV stated that she would want to see evidence of why a solution would not be viable. If a green roof is not viable, could a green wall be explored.
- CONSTRUCTION**
- 1.31 Seems acceptable. This topic was previously discussed under the topic of transport earlier in this meeting.
- NEIGHBOURING AMENITY**
- 1.32 It was advised to erect an acoustic screen on the boundary between the nursery playground and the houses to the north. These acoustic screens come in a standard design and can be fitted to prevent noise from the play area causing nuisance to neighbours. These should form part of the application proposals.
- ECOLOGY**
- 1.33 AV confirmed that a Preliminary Ecological Assessment including Bat Survey will need to accompany the planning application.
- S.106**
- 1.34 BK confirmed that there is a Memorandum of Understanding agreed between Richmond Council and the Dept for Education whereby S106/S278 contributions would not be sought. If that is the case, then the applicant will wish for a S.106 to be completely avoided (including any non-monetary obligations).

PRE-DEVELOPMENT CONDITIONS

- 1.35 The programme wishes to avoid any pre-development conditions from being attached to the development. As such, we would wish to provide this information as part of the planning application package.
- 1.36 AV suggested that she was amenable to this, but the application should accordingly be frontloaded with information. Perhaps a materials sample should be contained within the application package.
- 1.37 SO advised that the necessary tree protection should be included in the application to avoid such a condition, to which AV agreed.

PPA

- 1.38 This has been agreed in principle. Draft wording will be sent to the applicant to sign once formal advice is provided.

LOCATIONS, RESTRICTIONS AND OPPORTUNITIES

- 1.39 PH stated that he wanted to ensure that this position was the best location for the building to be sited. While the DfE are of the opinion that it is, there are alternative locations where the school would prefer the new school block to be located.
- 1.40 AV stated that they generally provide pre-app advice only on the scheme presented. She suggested any revised location should be equivalent or better than the scheme that was presented, and that development on OOLTI would be resisted. Boundary separations also needed fully considered.
- 1.41 BK added that development on OOLTI would also conflict with Sport England policy.

APPENDIX 4 – RICHMOND COUNCIL PRE-APPLICATION ADVICE*January 2019*

Official

Collis Primary School, Fairfax Road, Teddington**Pre-application advice - 18/P0319/PREAPP****Date – Monday 12 November 2018****Introduction:**

Following our meeting on Monday 12 November, I have summarised my comments as follows:-

Proposal:

The Priority School Building Programme (PSBP) 2 was launched in 2014 to undertake major rebuilding and refurbishment projects. Collis Primary School submitted a successful application and will be delivered through PSBP2.

Due to poor conditions of 3 school buildings, the scheme, in conjunction with Richmond Council proposes to demolish blocks EFAD, EFAF and EFAA and replace with hard surfaced play / grassed play

The proposal is for a two storey building which this pre-application seeks advice on. Reasons for the locations are:

- o Proximity and relationship to remaining school buildings
- o Playing field – designated OOLTI
- o Distance to neighbouring properties
- o Ability to build in single phase.

It is understood the school is currently 3 form entry (630 children) with 4 bulge classes (total 740-750 pupils with 742 pupils currently on roll). The proposal does not propose to increase this and involves an upgrade of facilities.

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Site:

- Collis Primary School – 3 form entry, however, currently has 4 bulge classes, in reception, and Years 1, 2 and 6, with total pupil numbers being 742.
- The school is sub-divided in 5 educational buildings – SW of the site
- One temporary building – used for After School Club
- School House – NW of site
- Multi hard surfaced playground and two hard surfaced courts north of the site
- Swimming pool in NW of site
- Recreational sport fields – eastern half
- Pond NW of site – recommend this is not described as a conservation area.
- The main vehicular access point – via Fairfax Road – SW of site
- Parking areas – SE of site
- Two pedestrian access points – one via Fairfax Road and one on Cromwell Road

Constraints:

- CIL – Low Band
- Other Open Land of Townscape Importance
- Area poorly provided with Public Open Space
- TPOs on northwest boundary – outside site

Official



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History:

11/2044/FUL	New Portakabin classroom block consisting of 2 classrooms, cloakroom and toilets, overlaid externally to be located in the school grounds for a period of 3 years	granted permission	17/08/2011
05/1180/FUL	Erection of two storey extension to create 12 classrooms, hall, small hall, library, ICT room, changing rooms, other teaching spaces and staff facilities, together with car parking, playground and improvements for pedestrian access outside of school building.	granted permission	25/08/2005
04/1310/FUL	Dismantling Of 4 No. Existing Demountable Classrooms/buildings And Removal From Site. The Relocation At The Existing Elliotts Demountable Classrooms On The Site And The Erection Of 3 No.new Single Storey Demountable Double Classrooms.	granted permission	24/06/2004
04/T0284	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging	refused permission	08/04/2004
04/T0285	Horse Chestnut (aesculus Hippocastanum - Neighbouring Property On The North Boundary) - Lift Overhanging Canopy By 5 Metres (may Require Whole Limb Removals) Remove Any Deadwood Overhanging	refused permission	08/04/2004
03/1552/FUL	Proposed Erection Of Re - Locatable Double Classroom Unit.	granted permission	19/06/2003
01/3372	Provision Of Water Tank Housing On Free- standing Steelwork Supports And Base Foundation.	granted permission	21/02/2002
01/3192	Provision Of Roof Level Water Tank Housing And Smaller Additional Housing For Heating System Feed Tank.	granted permission	31/01/2002
01/1286	Erection Of A 7.8m X 15m Demountable Classroom.	granted permission	19/07/2001

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95/2468/FUL	Erection Of Galvanised Steel Storage Shed.	granted permission	28/09/1995
95/0833/FUL	Erection Of Pre-cast Concrete Garage Structure For Use As Storage Space For School Equipment/materials	granted permission	21/04/1995
94/1314/FUL	Erection Of Classroom Extensions And Alteration Of 2 No Windows To Form Door/window Combinations.	granted permission	14/07/1994
93/0985/FUL	Erection Of A Demountable Single Classroom.	granted permission	19/08/1993
93/0921/S192	Erection Of A Single Demountable Classroom.	decided as no further action be taken	09/08/1993
92/0218/FUL	Erection Of Sectional Building To Be Used In Conjunction With The Schools After School Care Scheme	granted permission	02/04/1992
91/1974/S64	Use Of The 'pavillion' Changing Rooms As An After School Care Group For The Children Of Working Mothers.		19/11/1991
91/0311/FUL	Installation Of A Single Demountable Classroom.	granted permission	02/05/1991
80/0744	Alterations including erection of single storey infant teaching and nursery extensions to the existing school and provision of four new parking bays.	granted permission	24/07/1980

Enforcement complaints: 1

Ref	Nature	Status	Closed
12/0655/EN/UBW	Childrens play equipment.	Case Closed	07/07/2014

Land Use

Official

The Local Plan is now adopted (July 2018) and the new policies that are of relevance to any forthcoming application would be:-

- Policy LP28 'Social and Community Infrastructure' states that 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 increase public access.

- Policy LP29 'Education and Training' states that the Council will support the provision of facilities to meet the needs for primary and secondary school places, will safeguard land and buildings in educational use and encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs.

The Council's School Place Planning Strategy 2015-2024 recognises that there is likely to be increasing demand for education places in the Teddington / Hampton Wick area after 2018 following the redevelopment of Teddington Studios for approximately 220 residential units. The opportunity for expansion of Collis School is specifically recognised in the Council's School Place Planning Strategy as a medium to long term option after the development of a Free School within Livingston House. (Whilst Turing House Secondary School has been operational in Livingston House since September 2015, this does not help to meet demand for primary places in the area)

The scheme will be in support of the above policy lines. However, it is recommended any submission identifies:

- Why the existing school buildings are not of sufficient quality;
- It is recommended that any temporary accommodation (14/2718/FUL) is addressed and incorporated within the rebuild;
- Why the proposal is the most sustainable or only option;
- How the scheme will improve the quality of the educational space;
- Why it is not feasible to expand or consider expansion of the school;
- Demonstrate how the scheme meets the requirements of policy CP28 – relating to new social infrastructure.

If such information meets to the satisfaction of officers, the scheme would ensure the school is of sufficient size and quality to meet the needs of the school and residents of the Borough.

– Siting and design -Other Open Land of Townscape Importance

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Of relevance are policies LP12 and LP14.

Policy LP12 'Green Infrastructure' seeks to ensure that all development proposals protect, and where opportunities arise enhance, green infrastructure which is a network of multi-functional green spaces and natural elements which provide multiple benefits for people, nature and the economy.

Policy LP14 'Other Open Land of Townscape Importance' seeks to protect OOLTI in open use. Development may only be appropriate if is linked to the functional use of the OOLTI or is a replacement or minor extension, and it does not harm the character or openness of the open land.

Policy LP 31 'Public Open Space, Play Space, Sport and Recreation' seeks to protect and enhance sports grounds and playing fields. All major development proposals in the borough must meet the play space needs arising out of the development. Proposal that could affect the loss of the quality of a playing field will be assessed against the borough-wide Playing Pitch Strategy, the criteria as set out in the NPPF, as well as the Sport England Policy on planning applications for development on playing fields. Early engagement with Sport England will be required where a proposal affects playing field or sports pitch.

It is acknowledged that the proposed replacement block, which has a roughly rectangular footprint, will not be sited in OOLTI. Policy LP14 does state that when considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated open land will be taken into account. Such an assessment should accompany any future planning application.

The Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Where proposals involve the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of sport facilities, provision of wider public benefits, including public spaces, and therefore enabling and prompting physical activity and encouraging healthier lifestyles and habits for all ages.

You have already forwarded me the response from Sport England to your consultation and your response to them stating that you will be providing a specific proposed Landscape Plan that captures the entire school site, with outlines of the existing pitches and run off areas included. This will demonstrate that the development will meet Exception 3. You also stated that the dimensions of the courts

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will be included (and run off areas) along with the material finish for the replaced netball courts in any future submission.

Siting and design – Elevational treatment:

Policy LP1 'Local character and Design Quality'

states that new development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road and connect with and contribute positively to its surroundings based on a thorough understanding of the site and its context. In assessing design quality this policy requires proposals to have regarded to:

- compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- inclusive design, connectivity, permeability
- suitability and compatibility of uses

Schemes that are not of a high design quality, and will not result in the improvement of the area, will not be acceptable, nor will schemes which depart from the coherent and predominant character of a road or neighbourhood.

The proposed flat roofed rendered building is considered to have little visual interest, appearing as a rendered block with a bland elevational treatment and appearance. I did suggest that the appearance of this block needs to be re-considered such that any new design complements and responds to its sensitive location, adjacent to OOLTI more positively. I would also draw your attention to policy LP17 which requires that at least 70% of any potential roof plate area should be green/brown roof.

In the previous pre-application advice from Lucy Thatcher, where she was seeking design improvements, she advised any forthcoming proposal should :-

- be restricted to a palette of 3 materials. Consider context – If next to playing fields, soften visual appearance with choice of materials
- Respond to the open space it surrounds – make it visually recessive with glazing / green walls.
- Break up long elevations with shadow lines, change in materials, fenestration, step in's.
- Provide large scale details of windows – ensure they are not flat – some texture.
- Keep heights to minimum (provide justification for any heights – i.e. necessary floor to ceiling heights, servicing void heights etc)
- Ensure mechanical plant / PV panels / lift overruns are considered in the

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design so not to appear as 'add on's'

To ensure a satisfactory submission, provide;

- Full site plan showing ground and first floors, and parking / layout details
- CGIs of the proposal, so the relationship between the proposal and the existing buildings can be clearly seen.
- It would be helpful if an existing and proposed site plan could be provided showing:
 - Existing playing field
 - Existing hard surfacing
 - Existing buildings
 - Proposed buildings
 - OOLTI designation

Residential amenity

Any development must protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance (DM DC5 and Local Plan Review policy LP8). To protect privacy, residential development should be sited a minimum of 20m between the main facing windows of habitable rooms. Further, with respect to sunlight and daylight the Council is guided by the BRE Site Layout, Planning for Sunlight and Daylight, and in Sun on Ground Indicators. Any submission must demonstrate compliance with the above policy and relevant guidance.

The principle issue to arise from the scheme will be light, privacy and visual impact. The advice contained within this note is without the benefit of a site visit to adjoining properties, and therefore may alter if and when an application is submitted. However, based on the submitted plans I have the following comments:

-it is acknowledged that the new building will be single storey closest to Kingsmeade close/Cromwell road boundaries which will assist in reducing the impact of the development, especially on Kingsmeade close properties which have relatively short gardens. Any new openings on upper levels facing these properties should be avoided or be obscure glazed and non-openable below 1.7m of the floor level of the room it serves.

-the proposed nurseery and its play area would be located close to this boundary, hence acoustic fencing should be considered.

Official

Although the Council's Environmental Health Officer has specified the relevant guidance for floodlighting, given the sensitive nature of the site, abutting neighbouring gardens, floodlighting is not encouraged in this location.

With respect to any forthcoming submission, please provide:

- Proposed site layout plans should show positioning of adjacent properties, so the impact on such can be clearly determined.
- Provide dimensions on the plans of distance to boundaries. (This would, in particular, assist neighbours)

In terms of the intensification of the site (and noise), given similar pupil numbers are proposed, the scheme is not deemed to have an unacceptable additional impact. Will there be more intensification on use of the outdoor area?

However, for clarity:

- Provide details as to how break times will be arranged – will they all be at one time, or staggered?
- If any mechanical plant, extraction, or air conditioning units are proposed, the siting, design and technical details should be provided with the submission so officers can ascertain any potential impact arising from these. Noise impact assessments should be provided

Layout/ Parking / Cycle Parking / Waste Storage

It is recommended you refer to policies LP 44 and LP45 of the adopted Local Plan. These policies consider the impact of any new development on the existing wider and local transport network, and requires developments to demonstrate that any new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on- street parking conditions and local traffic conditions. A set of maximum car parking standards and minimum cycle parking standards are set. These are expected to be met, unless it can be shown that the proposed levels of parking would not cause adverse impacts on the area in terms of street scene or on-street parking. The above policies also encourage schools to develop Green Travel Plans.

In terms of the current submission, I would make you aware of the following matters:

- The proposal would be expected to meet the Council's car parking and cycle parking standards for the 742 pupils at the site. These state that 1 space should be provided per 2 staff. Arrangements must also be made for visitor and disabled parking spaces as per the London Plan. Facilities for the setting down of coaches off street would be required.
- Further scooter parking should be provided depending on % of children travelling by such mode – Travel Plan data should provide such information.
- Additional staff numbers are unknown; however, any scheme would be required to provide 1 space per additional 2 staff as above. Where will they park?
- Full details of servicing must be shown. (Provide details of existing servicing arrangements and how this will change / be intensified).
- Highway condition report prior to commencement and a review of the

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-the courts are shown to be moved towards the southern boundary which will inevitably introduce noise to residents in Fairfax Road.

I would refer you to comments from the Councils Environmental Health Officer which state:-

1. The new development should follow the acoustic guidance in Building Bulletin 93 Acoustic Design of Schools
2. Construction noise impacts guidance is available in the councils SPD https://www.richmond.gov.uk/media/16280/development_control_noise_generation_noise_sensitive_development_spd_adopted_september_2018.pdf
3. Relocation of tennis courts- an acoustic report must be provided- guidance on sports noise assessment is also contained in the above SPD.
4. If there is any flood lighting we would expect a lighting report which references the guidance in Sport England Design Guidance Note- Artificial Sports Lighting Updated guidance for 2012. The report must include the following areas.
 - a. A statement setting out why a lighting scheme is required, and the frequency and length of use in terms of hours of illumination during the summer and winter.
 - b. Demonstration that recommended illuminance (the quantity of light falling on the court surface) and uniformity (minimum lighting level/average lighting level) and environmental lighting impact complies with the Sport England Design Guidance Note- Artificial Sports Lighting Updated guidance for 2012
 - c. A site survey showing the area to be lit relative to the surrounding area, the existing landscape features together with proposed landscaping features to mitigate the impacts of the proposed lighting.
 - d. Details of the make and catalogue number of any luminaires/floodlights.
 - e. Size, type and number of lamps fitted within any luminaire or floodlight.
 - f. The mounting height of the luminaires/floodlights specified.
 - g. The location and orientation of the luminaires/floodlights.
 - h. A technical report prepared by a qualified Lighting Engineer or the lighting company setting out the type of lights, performance, height and spacing of lighting columns. The light levels to be achieved over the intended area, at the site boundary and for 25 metres outside it

Details of companies who may be able to assist with supplying this information may be obtained from:

Institution of Lighting Engineers
Regent House
Regent Place
Rugby
CV21 2PN
TELEPHONE :- 01788 576492
Web :- www.ile.org.uk

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With respect to any forthcoming submission, please provide:

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However, for clarity:

- Provide details as to how break times will be arranged – will they all be at one time, or staggered?
- If any mechanical plant, extraction, or air conditioning units are proposed, the siting, design and technical details should be provided with the submission so officers can ascertain any potential impact arising from these. Noise impact assessments should be provided

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- Further scooter parking should be provided depending on % of children travelling by such mode – Travel Plan data should provide such information.
- Additional staff numbers are unknown; however, any scheme would be required to provide 1 space per additional 2 staff as above. Where will they park?
- Full details of servicing must be shown. (Provide details of existing servicing arrangements and how this will change / be intensified).
- Highway condition report prior to commencement and a review of the

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- same, post-completion.
- Confirmation of whether any changes are proposed to the proposed access road and the manner in which it operates.
- EV charging points required?
- The new temporary access for construction traffic is acknowledged as well as the large compound, wheel washing facility etc all on land designated as OOLTI

In support of any application, the following information should be provided:

- Up to date Travel Plan.
- Trip generation details of pupils and staff (there would be highway concerns with any increase in pupils on these residential roads)
- Catchment details
- Any Transport Statement concerns need to be addressed in the Travel Plan.
- Construction Method Statement – refer to the local validation checklist, which identifies all aspects that needs to be included.
- Cycle / Scooter parking for pupils (refer to standards above)
- Cycle parking for staff – covered and secure
- Service and delivery plan – this should be included in the Travel Statement (and be approved in conjunction with TFL)
- Refuse and recycling arrangement's if they are changing
- After school club details should also be incorporated within the Transport Statement, including amount of clubs, number of hours – this should include existing and proposed.
- Any community use being proposed?

Sustainability

All new developments should include measures capable of mitigating and adapting to climate change to meet future needs, and reduce carbon dioxide emission. The relevant policies include LP17, LP20 and LP22 of the Local Plan and the SPD 'Sustainable Construction Checklist.

The following documents and sustainability credentials are expected to be met:

- Sustainable Constructions Checklist;
- BREEAM excellent,
- 20% reduction in CO2 emissions from the use of on-site renewable energy.

Major non-residential schemes must achieve a 35% reduction in CO2 emissions (regulated) against a Building Regulations Part L (2013) baseline. If this is not technically feasible and therefore cannot be achieved using on-site measures then applicants will need to demonstrate and justify this as part of a planning application. Cash in lieu contribution to the Council's Carbon Offset fund will be sought in cases where it is not technically feasible. The price of carbon is £60/tonne over 30 years in line with the MALP viability evidence. (The energy reduction should be achieved following the energy hierarchy).

- Any flat roof over 100m2 should provide a green roof – The aim should be to use

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at least 70% of any potential roof plate area as a green roof. (The onus is on the applicant / developer for proposals to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated where it has been demonstrated that a green roof is not feasible).

- Any development of over 1000m² will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).
- Where feasible, a development of over 1000m², will need to provide on-site DE and CHP. This is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.
- Applicants are required to consider the installation of low, or preferably ultra-low, NO_x boilers to reduce the amount of NO_x emitted in the borough.

If the new school cannot meet the standards outlined above, full justification should be given at the time of the application for such.

Trees and ecology

Policies LP15 and LP16 seek to safeguard and enhance the Boroughs biodiversity, and requires new developments to incorporate landscape proposals within any submission, which retains existing trees and other important landscape features where practical.

There will be a presumption against schemes that result in a significant loss of trees unless replacements are proposed and there is good reason such as the health of the trees.

Trees:

The submission was accompanied with an Arboricultural Report and a tree survey was carried out by a qualified arboriculturalist on 13th October 2016 to assess the quality and value of the principal trees within or adjacent to the footprint of the proposed school redevelopment. This report is however no longer valid as it is over 2 years old. It is noted that the report omitted neighbouring trees from the tree constraints plan (eg the Fir in the garden of 144 Fairfax Rd and trees in Kingsmead Close gardens which overhang the northern boundary.

- Any formal application submission would require an up-dated arboricultural report and new tree survey to include any substantial /protected trees in neighbouring gardens. There are preserved trees to the north (possibly off site), however, they may be impacted and need to be considered. Details of all tree protection measures should also be submitted
- Plans should show that new landscaping will take place as part of the development proposal. There should be a targeted increased (of native

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species).

Contamination

I have already forwarded comments from the Council's Scientific Officer regarding contamination. These are attached below:-

I can confirm I have reviewed the application. A Ground Investigation Report BY Mott MacDonald (Ref. 364584;GI09A; April 2017) and a Phase 2 Report by Socotec were submitted in support of the application.

The submitted report by Mott Macdonald states that the site was undeveloped until c. 1934 when a football ground is present within the site boundary. The site remained as fields until 1965 when the school was constructed. Further development has occurred since then. Potentially contaminative offsite uses include Gravel Pit, Electricity Sub-Station and Gas Works. The submitted report refers to a Geo-Environmental Desk Study previously completed for the site, however, it should be noted that this was not submitted to us for review.

Intrusive investigation was undertaken by Mott MacDonald in November 2016 and comprised 4no. Cable Percussion Boreholes to 20 mbgl (BH01, BH03, BH04, BH06), 2no. Cable Percussion Boreholes to 15 mbgl (BH02, BH05), 1no. Windowless Sample Borehole to 5 mbgl (WS01) and 4no. Hand Dug Inspection Pit to 1.2 mbgl (IP1 – IP4). 6no. rounds of ground gas and groundwater monitoring were undertaken over 6 weeks (between 10th January 2017 and 15th February 2017) in BH1, BH3 and BH6. 17no. soil samples were sent for chemical analysis.

Made Ground was encountered to max. depth of 1.2 mbgl. No groundwater was observed during the site investigation, however, it was encountered in BH3 at a max. depth of 3.9 mbgl. Several elevated concentrations of PAHs were identified. The results of the ground gas monitoring indicate that a Site Characteristic Situation of CS1 representing a very low hazard potential in accordance with current guidance is applicable for the site. Several elevated concentrations were identified in groundwater samples.

The submitted report recommends that remediation comprising importing clean topsoil be undertaken at the site. Furthermore, additional ground investigation is recommended for detailed design. The submitted report states that no protection measures will be required at the site based on the ground gas monitoring results.

Additional intrusive investigation was undertaken by Socotec in May and June 2018 and comprised 2no. Cable Percussion Boreholes (CP101 and CP102) to 15 mbgl, 8no. Dynamic Windowless Sampling Boreholes (WS101 to WS108) to 3.45 mbgl and 2no. Hand Excavated Trial Pits (HDP101 and HDP102) to 1.2 mbgl. 30no. soil samples were sent for chemical analysis. 3no. rounds of ground gas and groundwater monitoring were undertaken between 29th May and 6th July 2018.

The submitted report identified onsite potentially contaminative sources including Boiler house / Plant Rooms and Made Ground, while offsite potentially contaminative sources included Railway Line, Historical Gas Works and Electricity substation. The

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adopted GAC for the site was Residential without the consumption of homegrown produce.

Made Ground was identified to a max. depth of 1.4 m bgl. Several elevated concentrations of PAHs (Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenzo(ah)anthracene, Indeno(123-cd)pyrene and Naphthalene) as well as 2no. exceedances for Lead (max. 789.6 mg/kg) were identified. Several elevated concentrations were also identified in the groundwater samples analysed. The results of the ground gas monitoring indicated a maximum Carbon Dioxide value of 5.4%, and adopting a gas flow value of 0.1 l/h (i.e. the highest flow recorded), the gas screening value would be 0.0054 l/h which is within the range of Characteristic Situation 1 and is regarded as 'Very Low Risk'.

The submitted report concludes that there is a potential risk to current and future site users given the levels of contamination encountered. Furthermore, if areas of soft landscaping are proposed, a cover system could be developed to mitigate against the risk to the future site users.

Given the elevated levels of Carbon Dioxide, I would consider the site to be classified as a CS2, therefore, ground gas protections measures are considered to be required.

I recommend that Condition DV29F is attached to any planning permission granted. However, I consider the reports to be satisfactory, therefore, I can recommend the discharge of parts 1a, 1b and 1c(i). I do not recommend the discharge of the remaining part of part 1c until a detailed remediation strategy has been submitted for review.

Ecology:

It is noted that the bat survey has not found any roosting bats however it will be necessary to evaluate the developments impact on all biodiversity including green landscaping and wildlife movement around the site. Local records include hedgehogs, stag beetles, amphibians, song thrush, house sparrow and bats. The Council will therefore need to ensure that these are protected and enhanced through the development.

Any formal application will therefore require:-

- o A preliminary Ecological Appraisal - there is a possibility that there are badgers in the area
- o A comparison between current and proposed sqm of soft landscaping - there should be no net loss.
- o Ecological enhancements in the form of a plan, enhancement spec, location, height, aspect and maintenance programme will need to be agreed
- o A soft landscape plan will need to be agreed, including specs, species, and a maintenance programme
- o An external lighting plan will need to be agreed and this should include locations of

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lamps, heights, specs

- o If there are badgers, the CMS would need to be agreed to ensure good practice

As such, any forthcoming application should be accompanied with:

- Details to demonstrate the loss of amenity grass are mitigated for by habitat improvements elsewhere on the site and in particular improving the hedge line along the north eastern/western boundaries as well as wildlife enhancements. This should include specifications, species and location.
- Wildlife enhancements- specifically for bat/bird/butterfly/stag beetle and hedgehog habitats. This includes specs/locations/positions/aspects
- Details of bird boxes within the new building – for example, Sparrow terraces could also be used with cameras for education purposes
- The external lighting plan including locations, specs, lux contour plan (as above)
- Any landscape planting, spec, plan and maintenance and will be looking for native, wildlife friendly species
- Hedges on site restored and enhanced

Flooding:

The site is located within Flood Zone 1. I recommend you refer to policy LP21 of the Local Plan. This states that a Drainage Statement is required for sites of all major developments

Summary and other matters

- The provision of new and improved accommodation at the school, outside OOLTI is welcomed, subject to this addressing other policy considerations.
- Any demolition and rebuild should be robustly justified
- Since our meeting, you have forwarded Sport England's comments to me which, you will be aware, will need addressing in any formal submission.
- As advised in the meeting, the applicants are encouraged to carry out a public consultation exercise with local residents prior to any submission, and this may include visiting neighbouring residential properties so relationships between sites can be established, which may also influence siting.
- It is strongly recommended you refer to the Local Validation Checklist, which clearly outlines what documents are required with any submission.

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- At our meeting you advised that you would wish to enter into a Planning Performance Agreement (PPA) for the development. For further information relating to a PPA please view the [PPA template](#) (pdf, 360 KB). This can be found on the Council's website.

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith (without a benefit of a site visit) and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

Nevertheless, I hope that the above comments are viewed as constructive and of assistance when submitting any future application.

Yours sincerely

Wendy Wong Chang

Area Team Manager, South Team (Development Management)

APPENDIX 5 – SPORT ENGLAND PRE-APPLICATION ADVICE*November 2018*

From: Vicky Aston <[REDACTED]>
Sent: 21 November 2018 16:01
To: Brian Kavanagh <[REDACTED]>
Subject: RE: Collis Primary School | Pre-application advice

Dear Brian

Thank you for consulting Sport England on the above proposal.

Sport England –Statutory Role and Policy

The site is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) and against its own playing fields policy, which states:

‘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 which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’

Sport England Policy Exceptions	
E1	A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.
E2	The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
E3	The proposed development affects only land incapable of forming part of a playing pitch and does not: <ul style="list-style-type: none"> ▪ reduce the size of any playing pitch; ▪ result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); ▪ reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality; ▪ result in the loss of other sporting provision or ancillary facilities on the site; or ▪ prejudice the use of any remaining areas of playing field on the site.
E4	The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field: <ul style="list-style-type: none"> ▪ of equivalent or better quality, and ▪ of equivalent or greater quantity, and ▪ in a suitable location, and ▪ subject to equivalent or better accessibility and management arrangements.
E5	The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:

www.sportengland.org/playingfieldspolicy

Assessment against Sport England Policy

It is proposed to demolish existing buildings at this Primary School and provide a new classroom block on the School's existing playground and a small section of the playing field. The impact on the playing field is not easy to assess from the plans as they do not show the full extent of the playing field (including, for example, the pitch layout shown on the aerial photograph and any landscaping) see below. Subject to this plan demonstrating that there is no or very limited impact on the playing field then Sport England would consider that this part of the proposals met exception 3. In finalising the proposal for this site, the scheme should be adjusted to ensure there is no or minimal impact on the playing field and if necessary the proposed building should be moved closer to the site boundary to accommodate this.

As they are adjacent to the playing field, Sport England also considers that the existing games courts form part of the playing field. Sport England recommends that in designing the replacement courts, the court layout should take into account current Sport England design guidance including;

- Artificial Surfaces for Outdoor Sport
- Comparative sizes of sports pitches and courts (outdoor)

These documents indicate the appropriate and safe run-offs for netball and provide guidance on the height and type of nets (which will be required due to the relocation of the courts next to the deliveries area).

Any new facilities should be built in accordance with Sport England's technical guidance notes, copies of which can be found at:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Subject to these courts meeting our design guidance, Sport England would consider that the replacement courts met exception 5 of our playing field policy.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 97 of NPPF.

If you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

Vicky

Vicky Aston

Planning Manager



APPENDIX 6 – SPORT ENGLAND PRE-APPLICATION ADVICE*August 2019*

From: Vicky Aston <[REDACTED]>
Sent: 19 August 2019 14:15
To: Brian Kavanagh <[REDACTED]>
Subject: Collis Primary School - pre-application advice PA/18/L/RT/50652

Dear Brian,

Thank you for your telephone call and the additional information provided. The plan provided shows that the proposed development will result in a small of grass playing field and the relocation of the School's existing hard play area which provides for 2 courts (dimensions do not meet SE design guidance) and is unfenced. It is proposed to relocate these courts onto the site of the existing school buildings. The new area of hard play will be fenced and will be larger than the existing area that will be lost.

I confirm that provided that the replacement courts are larger than existing and should be at least as good quality as the existing. If this is the case, Sport England is unlikely to object to these proposals. They should also have appropriate fencing (please see Sport England design guidance for further information).

Sport England may request that use of the relocated courts is subject to a community use agreement. As the proposed courts will be located on the site of existing school buildings, further information should be provided to identify the timescales for reprovision of these courts.

I note that there is a further impact on the grass playing field from the corner of the new building which will affect the run-off of a grass pitch. This impact does not fit easily with any of the exceptions in Sport England's Playing Fields Policy. However, I note from your comments that any new buildings also have to consider the location of existing residents and as the incursion onto the playing field does not significantly impact the overall sporting capability of the site I consider that this is unlikely to result in an objection, provided that the building does not come any further onto the playing field.

I note that you are aware of the current application with the Council for an artificial pitch but that this does not form part of these proposals, which is being promoted by the School as a separate application.

Regards

Vicky

APPENDIX 7 – ACOUSTIC CONSULTANT ADVICE

August 2019

From: David Yates <[REDACTED]>
Sent: 07 August 2019 16:40
To: Brian Kavanagh <[REDACTED]>
Cc: Olivia Noonan <[REDACTED]>; Gavin Swanson <[REDACTED]>; Gareth Edwards <[REDACTED]>; Karen Reilly <[REDACTED]>; Shane McGill <[REDACTED]>
Subject: RE: Collis | Acoustic Requirements

Brian,

As discussed, my activity noise assessment focussed solely on the relocated netball courts – hence a reduced impact on the northern receptors.

As there will be a nursery play area now located close to the northern receptors, and there is an access route along the boundary – therefore parents collecting children, noise levels are likely to be generally low, with intermittent noisier periods. Accordingly, it would be beneficial to include acoustic fencing along the northern boundary with the residential properties as precautionary measure. In NPPF terms, this would mitigate any residual adverse impacts to a minimum.

Kind regards,



David Yates | Associate Acoustic Consultant

T: [REDACTED]

E: [REDACTED]

W: www.syntegragroup.com

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