



Planning Committee

Meeting Date:

Wednesday, 10 July 2019

Agenda

Meeting Time:

7:00 pm

Meeting Venue:

Clarendon Hall, York House

Paul Martin, Chief Executive

Committee Members

Councillor Jonathan Cardy (Chair) Councillor John Coombs (Joint Vice-Chair) Councillor Roger Crouch (Joint Vice-Chair) Councillor Bill Newton Dunn Councillor Piers Allen Councillor Richard Baker Councillor Peter Buckwell Councillor J-F Burford Councillor Michael Butlin Councillor Lotte Campanale Councillor Gemma Curran Councillor Martin Elengorn Councillor Pamela Fleming Councillor Andrée Frieze Councillor Penelope Frost Councillor Kate Howard Councillor Julia Neden-Watts Councillor Suzette Nicholson

Expected Attendance

Councillor Roger Crouch (Vice-Chair, in the Chair)
Councillor Richard Baker
Councillor Richard Bennett
Councillor Lotte Campanale
Councillor Gemma Curran
Councillor Martin Elengorn
Councillor Kate Howard
Councillor Julia Neden-Watts
Councillor Suzette Nicholson

Committee Administrator

Democratic Services, democratic.services@richmondandwandsworth.gov.uk

Speaking at the meeting

To find out more about Planning Committee or register to speak, please visit www.richmond.gov.uk/planning_committee or call 020 8891 1411.

The deadline to register to speak is 12 noon the working day before the meeting.

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3. Members are reminded that they are required to securely dispose of agenda packs that contain private information.

York House
Twickenham
TW1 3AA

2 July 2019

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

Albanian

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

Bengali

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

Gujarati

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

Farsi

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

Arabic

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

Urdu

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

Punjabi

Civic Centre, 44 York Street, Twickenham, TW1 3BZ
42 York Street, Twickenham, TW1 3BW
Centre House, 68 Sheen Lane, London SW14 8LP
Old Town Hall, Whittaker Avenue, Richmond, TW9 1TP
Or any library

1. Apologies

To receive any apologies for absence.

2. Declarations

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

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

3. Minutes

To consider the minutes of the Planning Committee held on Wednesday 3 July 2019 (**TO FOLLOW**)

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

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

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

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

5 - 88 18/3561/FUL Land at Hospital Bridge Road Twickenham TW2 6LH Heathfield

Proposal: Change of use of part of the open grassland and adjacent horticultural nursery for the development of a 5FE Secondary School and Sixth Form (Class D1) for 1,050 pupils (750 secondary school places and 300 sixth form places). Development is to include the formation of a new north boundary line associated to the horticultural nursery, and the erection of a main teaching block and adjoining sports block, up to three storeys in height, and associated plant and mechanical equipment, 3 court MUGA, playing pitches, on site car park, cycle parking spaces, hard and soft landscaping; amendments to existing access road to provide dual access to Nursery and Turing House School; and associated public highway works. Additional provision of an area of land to be dedicated as Public Open Space as an extension to Heathfield Recreation Ground; and the school will be subject to a Community Use Agreement.

Applicant: Ed Sutton, Bowmer and Kirkland

Agent: Bob Robinson, DPP Planning

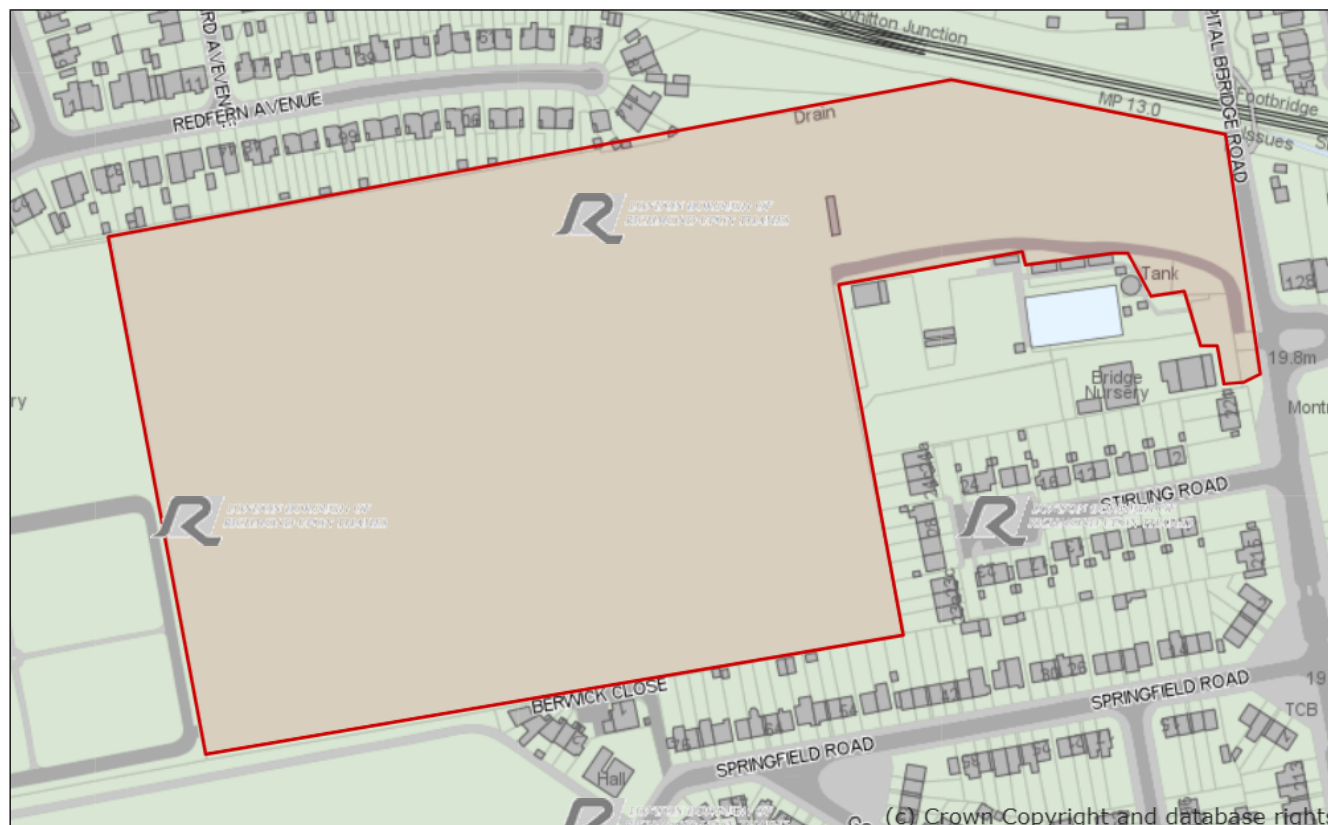
Recommendation: Approval subject to conditions, informatives and the completion of a S106 Agreement to secure the Heads of Terms, and subject to referral to the Greater London Authority to:

- Allow the recommendation to proceed unchanged
- Direct the Council under Article 6 to refuse the application
- Issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application

**18/3561/FUL
LAND AT HOSPITAL BRIDGE ROAD
TWICKENHAM
TW2 6LH**

**HEATHFIELD WARD
Contact Officer:
J Garside**

https://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/3561/FUL



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Proposal:

Change of use of part of the open grassland and adjacent horticultural nursery for the development of a 5FE Secondary School and Sixth Form (Class D1) for 1,050 pupils (750 secondary school places and 300 sixth form places). Development is to include the formation of a new north boundary line associated to the horticultural nursery, and the erection of a main teaching block and adjoining sports block, up to three storeys in height, and associated plant and mechanical equipment, 3 court MUGA, playing pitches, on site car park, cycle parking spaces, hard and soft landscaping; amendments to existing access road to provide dual access to Nursery and Turing House School; and associated public highway works. Additional provision of an area of land to be dedicated as Public Open Space as an extension to Heathfield Recreation Ground; and the school will be subject to a Community Use Agreement.

Applicant: Ed Sutton, Bowmer and Kirkland

Agent: Bob Robinson, DPP Planning

Application received date: 31.10.2018

Development Plan Policies:

National Planning Policy Framework (NPPF)

London Plan – policies:

3.18 - Education facilities
3.19 - Sports facilities
5.2 - Minimising carbon dioxide emissions
5.3 - Sustainable design and construction
5.5 - Decentralised energy networks
5.6 - Decentralised energy in development proposals
5.7 - Renewable energy
5.9 - Overheating and cooling
5.11 - Green roofs and development site environs
5.12 - Flood risk management
5.13 - Sustainable drainage
6.1 - Strategic approach
6.13 - Parking
7.6 - Architecture
7.14 - Improving air quality
7.17 - Metropolitan open land
7.21 - Trees and woodlands

Draft London Plan - Policies

S1 Developing London's social infrastructure
S3 Education and childcare facilities
S5 Sports and recreation facilities
G3 Metropolitan Open Land
G6 Biodiversity and access to nature
G7 Trees and woodlands
SI1 Improving air quality
SI2 Minimising greenhouse gas emissions
SI3 Energy infrastructure
SI4 Managing heat risk
SI5 Water infrastructure
SI12 Flood risk management
SI13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T9 Funding transport infrastructure through planning

London Plan SPDs / SPGs

- [The control of dust and emissions during construction and demolition \(July 2014\)](#)
- [Character and Context \(June 2014\)](#)
- [Sustainable Design and Construction \(April 2014\)](#)
- [Planning for Equality and Diversity in London \(October 2007\)](#)

Local Plan (2018)

LP1 - Local Character and Design Quality
LP2 - Building Heights
LP3 - Designated Heritage Assets
LP4 - Non-Designated Heritage Assets

LP5 – Views and Vistas
LP7 – Archaeology
LP8 - Amenity and Living Conditions
LP10 - Local Environmental Impacts, Pollution and Land Contamination
LP11 - Subterranean developments and basements
LP12 - Green Infrastructure
LP13 - Green Belt, Metropolitan Open Land and Local Green Space
LP15 – Biodiversity
LP16 – Trees, Woodlands and Landscape
LP17 – Green Roofs and Walls
LP20 - Climate Change Adaptation
LP21 - Flood Risk and Sustainable Development
LP22 – Sustainable Design and Construction
LP24 – Waste Management
LP28 - Social and Community Infrastructure
LP30 – Health and Wellbeing
LP31 - Public Open Space, Play Space, Sport and Recreation
LP43 - Visitor Economy
LP44 - Sustainable Travel Choices
LP45 - Parking Standards and Servicing

Supplementary Planning Documents/Guidance:

- Whitton and Heathfield Village Planning Guidance;
- Design Quality;
- Planning Obligations;
- Sustainable Construction Checklist;
- Development Control for Noise Generating and Noise Sensitive Developments;
- Refuse and Recycling Storage Requirements
- Nature Conservation and Development

SUMMARY OF APPLICATION

This application relates to an undeveloped site located off Hospital Bridge Road, in addition to a small part of the adjacent horticultural nursery. The site lies within Metropolitan Open Land (MOL) but is not within a Conservation Area or within close proximity to any designated or non-designated heritage assets. The Hounslow Railway Triangle Site of Importance to Nature Conservation (SINC) lies adjacent to the site to the north.

This is a full planning application for the change of use of part of the site for the development of a 5 form of entry (FE) Secondary School and Sixth Form (Class D1) for 1,050 pupils (750 secondary school places and 300 sixth form places), erection of a main teaching block and adjoining sports block, up to three storeys in height, 3 court MUGA, playing pitches, on-site car park for 45 spaces, cycle parking, associated hard and soft landscaping, plant and mechanical equipment. Further to this, an area of Public Open Space is proposed to the west of the site as an extension to Heathfield Recreation Ground and the applicant is also proposing community use of the site which would be subject to a Community Use Agreement. Other associated works include the formation of a new north boundary line associated with the horticultural nursery in addition to on and off-site highway works to facilitate pedestrian and highway access, including a dual access for the school and neighbouring Nursery.

The site is located in MOL and this development is considered inappropriate development and, by definition, harmful to the MOL. The introduction of permanent buildings associated hard and soft landscaping, boundary treatment and external lighting would bring about an urbanisation of the site, resulting in harm to the openness and character of the MOL, in particular in views from Hospital Bridge Road where the site is predominantly viewed, and which provides an important gap in the streetscene. The proposal also results in a significant intensification of use and would introduce a level of movement and activity that is considered significantly beyond the site's current use.

The NPPF states, *“inappropriate development...should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*.

The Council has a statutory duty to provide educational places for Borough residents and there is clear policy support through national, regional and local planning policy to finding a permanent site for the school. Paragraph 94 of the NPPF advises that *“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities”* and that *“Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”* and should *“give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications”*.

It is accepted that the applicant has established an educational need for the development and has demonstrated that there are no sequentially preferable sites to meet the need on a permanent basis. The school places currently provided by Turing House are essential in meeting educational need in the western part of the Borough. Without these places, forecast need would not be met, as confirmed by AfC who fully support this application.

It is accepted that the applicant has considered all reasonable options for the siting and layout of the development on this site, and ultimately arrived at the most appropriate option which minimises the impact on the MOL.

The proposed school building itself is deemed to strike an appropriate balance between meeting school design standards and minimising the footprint of the development to limit the impact on the MOL and, overall, the design, scale, mass, height, materials and landscaping are considered acceptable, subject to further details being secured through conditions.

Due to the siting, scale and height of the main teaching block in relation to neighbours, it is not considered that the development would result in an undue level of visual intrusion or loss of privacy through overlooking to neighbours, including those on Redfern Avenue that are considered to be the most affected. The significant increase in use of the site, in particular at morning and afternoon peak times, and use of playing fields and MUGA will bring about a change in circumstances for surrounding neighbours and will result in noise and activity beyond the existing situation. However, the impact on neighbours would not be unreasonable and it has been demonstrated through a Noise Assessment that noise levels from the MUGA would not result in internal ambient noise levels being exceeded to those properties most affected. Further details of mitigation can be secured through noise control conditions.

The proposal will result in a significant uplift in vehicle and pedestrian movement to and from the site in the morning and afternoon peak periods. Various on and off-site highway works and mitigation measures are proposed, in addition to soft measures to encourage sustainable forms of transport and, on this basis the Council's Transport Officer has advised the proposal can be accommodated on the surrounding highway and footway network without resulting a severe impact on pedestrian and highway safety subject to the proposed mitigation measures, general site access arrangements (i.e. segregated pedestrian/cycle way), an additional pedestrian access to the site which would help even demand across the highway network as well as the provision of a zebra crossing for which the applicant would be required to attain approval from the Local Highway Authority. The provision of a zebra crossing would be subject to further detailed design and satisfactorily passing further safety auditing and, through this process, consideration can be given to amended, additional or alternative safety measures necessary to ensure pedestrian and highway safety, the costs of which would be fully met by the applicant.

45 off street parking spaces are proposed for staff. TfL object to this level of parking provision albeit this aligns with Local Plan parking standards. The Council's officers accept the proposed level of parking as Local Plan compliant and that the applicant has demonstrated through a parking survey that there is sufficient capacity to accommodate the development without the overall local on-street parking stress exceeding 85%.

It is acknowledged that the site's location adjacent to a horticultural nursery raises pedestrian and highway concerns due to the significant number of pedestrians and cyclists that would be required to cross the access to the nursery during peak periods. This matter is of concern and weighs against this scheme, however, the applicant has demonstrated a thorough and robust approach to considering alternative locations for the school and proposes a new pedestrian entrance from Heathfield Recreation Ground and mitigation of safety concerns in Hospital Bridge Road.

Ultimately, the Council's Transport Officer raises no objections to the proposal subject to the measures set out below being secured through a S106 legal agreement and S278 of the Highways Act 1980.

The proposal will result in a significant loss of grassland and habitats and is sensitively located adjacent to the Railway Line Site of Importance for Nature Conservation (SINC). The applicant is offsetting this through new public open space, grassland buffers, general landscaping and planting proposed across the site in addition to species-specific mitigation. The Council's Ecologist is satisfied that the loss of biodiversity resulting from the development will be sufficiently offset through these measures and subject conditions, the transfer of land identified for public open space to the Council as well as appropriate financial contributions towards grassland restoration and ongoing site management and maintenance of this area. Whilst the loss of trees on the site is regrettable (2 x Cat B; 14 x Cat C and 1 x Cat U), the proposal will provide a substantial increase in planting across the site and, subject to further details outlined above which can be secured by conditions.

Significant public benefits form part of this proposal in the form of approximately 25,534m² of space being made available for community use and approximately 17,672m² of public open space being provided for informal recreation and habitat enhancement, secured through a Section 106 Legal Agreement.

Some concern is raised with regard to compliance with the London Plan Energy Hierarchy. The applicant is working with the GLA to ensure compliance with the final expected CO2 emissions to be confirmed as the design of the building is finalised. It is therefore considered that compliance with the London and Local Plan can be secured by conditions and a financial contribution of £105,828.21 towards the Council's Carbon Offset Fund which can be secured by a Section 106 legal agreement.

As outlined in the NPPF:

- *Decisions should apply a presumption in favour of sustainable development, and grant permission unless any adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits, when assessed against policy.*
- *Inappropriate development...should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".*

In this instance and in summary:

- a) it is deemed that very special circumstances have been demonstrated to justify the harm to the MOL.
- b) mitigation measures, conditions and Section 106 Heads of Terms and 278 Highway Works (listed below) can satisfactorily address potential harm arising from the development
- c) benefits are deemed to outweigh the harm to the MOL.

Heads of Terms

- **The transfer of land identified for public open space to the Council**
 - Financial contributions towards grassland restoration
 - Financial contribution for 5 year management and maintenance of the public open space
 - Both to a value of £153,809
- **Community Use Agreement -facilities, hours (1 year review), management, pricing, car parking, access**
- **Heathfield Recreation Ground**
 - Financial contribution of £22,500 to mitigate increased usage
 - £6,000 towards the provision of bins and benches
 - Contribution for construction of 11m x 2.5m of footway from the northern edge of the existing footway in the north-east corner of Heathfield Recreation Ground into the school site in a northerly direction
- **Traffic Management Order - Fees to secure a TMO (up to £3,000) to**
 - extend the existing Chase Bridge 20mph Zone on the B358 Hospital Bridge Road from its current location to a position north of the railway bridge,
 - to insert double yellow lines on the B358 Hospital Bridge Road and Montrose Avenue as shown in Drawing No 007 Rev. E, and on both sides of the carriageway as it goes over the railway line north of the site.
- **Buses: A financial contribution of up to £1.175m towards additional bus services / capacity subject to staged draw down payments to be related to evidenced demand for new buses over a period of 5 years unless alternative government funding for TfL bus services is confirmed during this period.**

- **Pedestrian Crossing Facilities: £120,000 towards improved pedestrian crossing facilities at the A316 / Hospital Bridge Road junction to improve the safety of pedestrians and cyclists**
- **School Travel Plans (£1,000 / year).**
- **Energy Strategy Contribution -Carbon Offset**

S278 of the Highways Act 1980:

- **Construction of a simple priority junction access with entry treatment to be agreed with the Local Highway Authority**
- **The relocation of the gateway signage to the Chase Bridge 20mph Zone to a position north of the existing railway bridge on the B358 Hospital Bridge Road with the exact location to be agreed with the Local Highway Authority.**
- **The construction of zebra pedestrian crossing (in addition to any other alternative safety measures deemed necessary to ensure pedestrian and highway safety) on the B358 Hospital Bridge Road, together with dropped kerbs and tactile paving and any associated highway works, with the details to be agreed with the Local Highway Authority prior to commencement of the development.**
- **The construction of new dropped kerbs and any associated highway works at the Montrose Avenue/B358 Hospital Bridge Road priority junction**
- **The insertion of a speed hump on the B358 Hospital Bridge Road north and south of the site access to denote entry and exit from the above-mentioned 20mph zone.**

Recommendation: Approval subject to conditions, informatives and the completion of a S106 Agreement to secure the above Heads of Terms, and subject to referral to the Greater London Authority to:

- **Allow the recommendation to proceed unchanged**
- **Direct the Council under Article 6 to refuse the application**
- **Issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application**

Site Description:

2. The site (approx. 6.5ha) is located off Hospital Bridge Road and surrounded by a landscaping firm / plant nursery and Heathfield Recreation Ground to the south, a cemetery to the west, train line to the north east and residential dwellings to the north (Redfern Avenue), south (Berwick Close, Springfield Road and Stirling Road) and east (on the opposite side of Hospital Bridge Road).
3. The site is largely undeveloped grassland with no permanent buildings but also includes an area of land currently used for the parking of vehicles associated with the adjacent horticultural nursery as well as the access to the neighbouring site itself. It is also evident that the neighbouring horticultural nursery business has expanded operations onto the western part of the site, using it for storage of plants, aggregate and earth. Vehicular access to the site is from Hospital Bridge Road, via the nursery.

4. The site is designated Metropolitan Open Land (MOL) and Area proposed for Tree Planting. Hounslow Railway Triangle Site of Nature Conservation Interest (SINC) is adjacent to the site. The adjacent Cemetery and Heathfield Recreation Ground are also both designated MOL.

Relevant Planning History

5. There has been no recent planning history, and past applications relate to structures in relation to the nursery / farm use of the site:

Ref	Proposal	Decision
97/2404	Retention of feed store and shelter for two Horses.	granted
93/0038/FUL	Erection of a poly-tunnel type greenhouse for storage of ancillary goods.	granted
92/1428/FUL	Use for growing and tending of plants, shrubs, trees etc with associated ancillary storage of materials and equipment in connection with business of supplying of plants, shrubs, trees etc to film and television production companies.	granted
92/0835/FUL	Erection of ancillary office building.	granted
92/0836/FUL	Erection of aluminium frame 4 bay glasshouse for horticultural purposes.	granted
82/0193/DD01	Demolition of existing timber framed/clad storage buildings and erection of single storey store building with ancillary office. (detailed drawings - materials). condition no. 3 of planning permission 82/0193 dated 28/4/82.	granted
82/0193	Demolition of existing timber framed/clad storage buildings and erection of single storey store building with ancillary office. (forms amended 15/4/82).	granted
81/1448	Erection of a single storey storage building to replace existing building.	granted

Environmental Impact Assessment (EIA)

6. A negative EIA Screening Opinion was published in January 2019 confirming that the Council does not consider that the development requires an Environmental Impact Assessment.

Consultation

Greater London Authority

7. London Plan and draft London Plan policies on MOL, education, urban design, inclusive design, climate change and drainage, and transport are relevant to this application. The application does not comply with the London Plan, but the resolution of the issues below could lead to the application becoming compliant with the London Plan:
- MOL:** The site is entirely within MOL. The proposed school building is positioned to minimise harm to the openness of the MOL but is on land which is entirely undeveloped and is not an appropriate MOL use. The development is therefore inappropriate and would cause harm to the MOL. The development would therefore only be acceptable if the harm is outweighed by 'very special' circumstances (VSC). At present the case put forward by the applicant does not sufficiently demonstrate VSC to outweigh harm and more evidence and information is required in respect of alternative sites; verified images; and community use.
 - Urban design:** The MUGA needs to be moved onto the area of land currently proposed or the new school buildings in order to reduce overall development footprint and impact on the MOL. The use of render is not acceptable.

- c) **Inclusive design:** a fire evacuation lift must be provided.
- d) **Climate change:** The energy strategy does not fully accord with London Plan Policies 5.2 and 5.9. Further information regarding cooling, overheating, plant, PV and full BRUKL file are required.
- e) **Transport:** The proposed level of parking is considered excessive and should be reduced; Electric Vehicle Charging Points are required; a £120k contribution to junction improvements will be sought; deliveries restricted to 9:30am-3pm; the necessary plans secured by condition/s106 obligation; and further information supplied in relation to cycle parking and bus trips.

Public and Other Representations

8. **Objections:** The initial consultation (September and October 2018) generated in excess of 1,100 letters of objection (including multiple objections):

a. Land Use / Educational Need

- Inappropriate development in MOL
- School will not serve local community
- Other suitable sites for the school in more suitable areas i.e. Teddington
- Loss of open space at Heathfield Recreation Ground
- Loss of open space has an impact on health and wellbeing
- Lack of open space in Heathfield
- Other schools are not running at capacity
- Will affect schools outside of the borough (i.e. in Hounslow)
- A report to Richmond Council's School Forum suggested need for primary school places is reducing which will subsequently reduce need for secondary school places.
- Question the need for schools in the area and whether this argument is sufficient to demonstrate very special circumstances
- No need for school in this area – a number of other schools in the vicinity which will be negatively impacted by a new school in the area in terms of intake of the best pupils and recruitment
- Various references to planning applications (some schools) being refused following call in by the Mayor on the basis of harm to the MOL and very special circumstances not being demonstrated
- Twickenham Academy sixth form closed due to lack of pupils – no need for sixth form
- Sixth form could be provided at Twickenham School
- Need for schools is in the west of the borough
- The projections and conclusions of the School Places Planning Strategy are flawed.
- Object to building on greenfield site / open space
- New school will pose competition for recovering Twickenham School
- Existing schools should be extended
- Existing Clarendon site could be extended
- Various other preferable sites
 - David Lloyd site preferable (safer access for vehicles and pedestrians; better public transport; could accommodate a larger car park; more playing fields)
 - Kneller Hall site preferable
- Options for alternative sites have been lost in recent years as other sites have been developed for housing
- Public open space does not outweigh loss of MOL
- Site has been chosen by ESFA simply as it is the best value for money site.
- The development will impact on viability of the neighbouring nursery

- Sequential Report – the assessment of various alternative sites is questioned and not considered to be robust.
- The site is a reserve burial site (Hounslow)
- The site is currently used for parking by the nursery
- A site should be found in Teddington which is near to the admission point and has more public transport and quieter roads.
- More public open space is not needed
- Safety concerns at Heath Recreation Ground due to large numbers of students
- CIL money should be used to improve Heath Recreation Ground
- MUGA should be removed from proposal – facilities could be shared with other local schools
- Who will maintain public open space?
- No need for site this size

b. Design/Siting

- Sited too close to railway - Inadequate noise screening
- Design quality is poor and not sympathetic to MOL setting
- Mass should be broken up rather than one 'superblock'
- A number of the rooms have no windows or ventilation
- The proposed building is not small scale – contrary to MOL policy
- The location of the public space is inappropriate – should run adjacent to recreation ground
- Sports pitch provision is excessive

c. Transport

General	<ul style="list-style-type: none"> • Poor PTAL rating • Too far for current pupils to travel – not a sustainable location • A site should be found in Teddington • Projections for school places are being reduced in most London boroughs • School should be consolidated on another school • Heathfield is the third most deprived area in the borough • School in this location will only benefit other areas of the Borough – local residents will experience the problems • School will close at same time as Twickenham School – approximately 2,000 pupils leaving the area at the same time • No consideration to daily deliveries and waste collection
Access	<ul style="list-style-type: none"> • Inadequate access for the disabled • there are areas where cyclists have to share a footpath with pedestrians – not safe • there should be full segregation between pedestrians and cyclists and vehicles • The need for staff to supervise is an indication the access being badly designed • Better access for pedestrians and cyclists would be from Springfield Road or Berwick Close
Public transport	<ul style="list-style-type: none"> • Public transport is not sufficient currently and will not be able to cope. • Insufficient public transport between catchment area and site – pupils will be driven to school. (against the promotion of walking and reduction of obesity). • Increased bus services will only add to traffic and air quality problems • No space for pupils to queue up for the bus at the nearest bus stop

	<ul style="list-style-type: none"> • The only bus from Teddington to the site is every 30 minutes • Why is a dedicated school bus not proposed? • No concrete proposals to improve bus or train services • No mention of TfL planned route changes (route 110) • Narrow roads (i.e. Powder Mill Lane) will not be able to cope with more buses
Parking	<ul style="list-style-type: none"> • Car park is too big and will not encourage staff to travel sustainably • Car park is too small • Insufficient parking – surrounding streets are heavily parked, and proposal will impact further • No pupil drop-off point • Car pooling or expecting staff to walk to the site is unrealistic • Teachers are unlikely to car pool or take public transport – will result in parking stress on surrounding roads • Parents will park on neighbouring nursery site
Traffic and congestion	<ul style="list-style-type: none"> • Proposal, and the site's location in relation to school catchment area, will result in additional traffic and impact on roads and junctions in the area • Two large secondary schools and four primary schools in the area which cause congestion on local roads (i.e. Hospital Bridge Road and Powder Mill Lane) • Powder Mill Lane is already gridlocked due to pickup/drop off from Heathfield School • Hospital Bridge Road is a busy road and cannot support the additional volume of traffic (including buses) and cyclists and pedestrians • Congestion on local roads (i.e. Longford Road, Nelson Road, Percy Road, HBR, Powder Mill Lane, Whitton High Street) would be exacerbated • Surrounding roads are used as rat runs and the situation would be worsened • Community use will have an adverse impact on the local road network • Area is highly congested from other schools (including Bishop Perrin School) • Queue to cross A316 will create gridlock • In reality, parents will stop on yellow lines to drop pupils off. This will worsen congestion
Safety	<ul style="list-style-type: none"> • School children crossing narrow footbridge is a hazard • School children crossing busy A316 is a safety risk • Not safe to have a school next to a railway • Narrow access via nursery is not safe. Separate access needed for school and nursery. • Traffic exiting the school will not be visible to the vehicles coming from the bridge • Traffic speed in the area is high with drivers trying to 'beat the queue' • Will impact on busy and dangerous local roads and junctions. This includes the construction phase with the number of large construction and delivery vehicles • Local roads are currently not safe for cyclists and pedestrians • HGVs regularly access nursery in addition to staff and visitors • Inappropriate and dangerous location for pedestrian crossing. Pupils accessing the site from the north will not use the crossing and will take a short cut causing highway safety concerns • Pedestrian crossing will stop traffic flow due to students crossing in dribs and drabs. Also a pedestrian safety issue

Accidents	<ul style="list-style-type: none"> • A number of accidents have occurred at the entrance point to the site in recent years • 14 serious accidents within 1500m of site according to TfL data. • A number of accidents on other local roads (including near A316 roundabout and Percy Road)
Pedestrians	<ul style="list-style-type: none"> • This part of HBR only has pedestrian footway on one side of the road • The footpath to the north of the bridge needs widening. • Pupils will have to cross narrow footbridge (and the busy Nelson Road) to access nearest shops on Nelson Road • Pedestrian crossing needed on Powder Mill Lane • Loss of possibility of walking / cycling to school
Cyclists	<ul style="list-style-type: none"> • Not safe for cyclists accessing the site from the north in particular • Cyclists will cycle on pavements, disrupting pedestrian flow • No planned cycle infrastructure (i.e. cycle lanes) or enough facilities (i.e. showers) – further measures needed
Pollution	<ul style="list-style-type: none"> • Will increase pollution
Mitigation	<ul style="list-style-type: none"> • Transport mitigation measures are not sufficient • Raised 'Copenhagen' crossing points do not give pedestrians priority or prevent parking. Qualified banksmen needed to ensure safety • Introduction of CPZ would affect local residents • Travel Plan – disagree with assertion that cycle network in the area is good. It is not safe for children. Also disagree with public transport uptake estimates • S106 to secure car borne mode share as set out in application • Review needed in the future if school catchment area changes as proposal does not include sufficient mitigation for pupils approaching from the north. • Controlled pedestrian crossing needed on Hospital Bridge Road to the south of site
Infrastructure	<ul style="list-style-type: none"> • Bridge cannot cope with expected levels of additional traffic, cyclists and pedestrians (footbridge only 1m wide in parts) • Bridge would need strengthening to accommodate additional traffic/buses • Land safeguarded for bridge widening should be secured for the future
Assessments	<ul style="list-style-type: none"> • Transport assessment is based on 20mph speed limit being implemented • Traffic Survey is inadequate, inaccurate and subjective – does not consider key Hospital Bridge Road junctions (Percy Road, Powder Mill Road, A316) and was undertaken during school holidays. • Parking Survey is inadequate and proposal would include additional yellow lines so not accurate • Transport assessment – disagree with interpretation of accident data (4.19), trip generation calculations, parking assessment (4.36) and expected cycling and public transport uptake. • Transport Assessment does not consider schools in the area • Various other objections to the findings set out in the TA also made. • Various inaccuracies in the TA • No contingencies in place if impacts turns out to be incorrectly calculated • Insufficient investigation of the impact of the proposal on local roads/junctions

Inaccuracies	<ul style="list-style-type: none"> • Plans are inaccurate – width of road is incorrect • Application forms includes incorrect details • Plans are inaccurate – width of HBR not accurate
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d. Amenity / Use

- Noise and disturbance to neighbours from proposed use (including MUGA)
- More planting needed to the northern boundary to alleviate noise/disturbance
- Noise and disturbance from increased traffic
- Overlooking from school / loss of privacy
- Loss of light and overshadowing
- Not appropriate to have a school next to a railway line due to noise
- Anti-social behaviour
- Light pollution from car park lighting
- Insufficient details of MUGA use (hours of use, management etc)

e. Trees / Biodiversity

- Loss of trees (including a rare tree species on the IUCN list - Aesculus hippocastanum)
- Loss of habitat for various species
- The site is close to Hounslow Heath and River Crane corridor
- The site has potential for bats as noted in the Ecological Appraisal
- MUGA will have an impact on dark corridor likely to be used by bats
- No invertebrate survey provided – the site is a habitat for lizards
- Site is part of a green chain linking Hounslow Heath to Kneller Gardens
- Biodiversity report does not consider bats or newts
- Loss of open space will impact on water run off rates

9. Objections from Hospital Bridge Road Residents Action Group, including pollution, transport and sequential search evidence documents:

a. Objection letter

- Inappropriate development in MOL
- Very special circumstances not been demonstrated
- Sequential Assessment Report is not a robust analysis of other potential sites
- The development will result in air pollution
- Transport Assessment and Travel Plan are not robust – assumptions for travel by public transport, cycling and car are unrealistic
- The vehicular access point is not safe
- The proposal will exacerbate parking and congestion problems
- Site has biodiversity value
- Great crested newts have been spotted in the area (within 500m) – full survey needed
- A preliminary bat survey should be undertaken as the trees on the northern boundary are proposed to be removed (as recommended in the PEA).
- Inappropriate design and layout
- Adverse impact on Heathfield Recreation Ground
- Is demand for primary school places reducing?
- Richmond Council Schools Forum (June 2018) references reduction in primary school demand in coming years.
- Stag Brewery application – local action group commissioned a review of SPPS raising concerns over educational need forecasts for borough as a whole

- THS has failed to fill places (125) with children living in primary catchment area. THS application (2016) revealed that only 43% of applications came from targeted areas (West Twickenham; Fulwell and Hampton Hill; South Twickenham and Teddington)
- Fluctuations in demand can be met through bulge classes
- Other schools have room to expand (i.e. Twickenham School, RuT and Hampton High)
- Three storey high building of block design is not appropriate in MOL
- Impact on Heathfield Recreation ground – wear and tear

b. Sequential search evidence

- The short term need for a site is used to discount sites
- Blanket dismissal of other MOL/Green Belt sites

c. Transport evidence document

- Access arrangements are unsafe and measures proposed are not sufficient (see points raised above). Primarily due to access being shared with adjacent nursery (and HGVs that access the site) and due to dangerous railway bridge and low visibility of pupils as vehicles exit the bridge).
- The risk of accidents will increase
- Not enough parking proposed
- Pupil travel – other schools to estimate pupil travel are not comparable
- Estimated travel by public transport and bicycle is exaggerated/unrealistic
- Disagree with estimated journeys by car.
- A significant number of additional bus services would be required – cost prohibitive
- Cycle provisions not sufficient
- Cycle review not done at an appropriate time (August) – distort cycle conditions
- Travel Plan's assertion that traffic flows on HBR are 'moderate' is contradicted by Council documents (2017 Air Quality Annual Status Report; 2018 Third Local Implementation Plan). HBR identified as one of five roads where average bus speeds are less than 5mph.
- Assumed increase in traffic on HBR does not align with student and staff trips estimated in travel plan for 2020
- 54% of pupils attending THS live over 2km from the school
- Traffic survey undertaken (by HBR RAG) which differs from results of survey undertaken by applicant describing HBR as 'moderate' traffic flow with no congestion observed.
- Photos of traffic, congestion, accidents and queueing in area surrounding the site presented
- Photos presented demonstrating school related traffic has a significant impact on local roads and junctions
- Proposal will make situation worse (even if only 4.8% travel by car)
- Disagree with applicant's interpretation of accident data
- Disagree with findings of cycle survey – misses out roads that pupils would use to travel to the site. Survey not undertaken during peak hours when pupils would be travelling to school
- Cycle routes will not be able to cope (nor will be safe) with additional THS pupils and some are not appropriate for various reasons including safety
- Public transport will not be able to cope with additional pupils

d. Pollution evidence document

- Proposal is contrary to draft London Plan and Mayor's Environment Strategy
- Proposal is not pollution neutral and will raise pollution levels
- Fails to make any contributions or mitigation measures to improve air quality
- The Council's monitoring data has been ignored and fails to consider local traffic conditions and travel distances
- Consultant's view that transport emissions will not be higher than existing is wrong

- Various criticisms of assumptions and findings
- Report contradicts findings of EIA screening which stated that the site fronts a road where existing levels of pollutants are likely to be at or above EU limits.

e. Further Educational Need Evidence

- Object to educational need argument for school
- Twickenham School has a large amount of vacancies for 2019 intake
- Richmond Borough schools are keen to expand to have a larger pool of pupils to sustain sixth forms
- The sequential assessment should consider sites in Kingston and Hounslow
- The applicant's argument that they will be filling a 'quality gap' in the area does not hold true and that the net effect of Turing House will be to reduce quality school places due to is planned permanent site undermining others in the locality (i.e. Heathlands School)
- School should be located near to Kingston due to future growth expected in the area
- It is unlikely that the school will fill its sixth form places
- Sixth form - if proposed, it should be a joint sixth form located at Twickenham School - reducing the size of the school building.
- Richmond Council has objected to the school's current admission point
- Hounslow site search should be based on assumption that the admission point will change to the Hospital Bridge Road site in the future.
- Questions applicant's reason for discounting sites through the sequential assessment on the basis of loss of playing fields (and thus a Sport England objection). Recently approved schemes noted by the applicant undermine this position.
- Sequential Assessment site search places too much of an emphasis on extensive playing fields
- Diseconomies and practical difficulties of a running a split-site have been over-estimated
- The Clarendon Road site is big enough to accommodate a school of the size required, or the sixth form could be located at Teddington.
- Object to assessment of various sites
- Sites have been discounted on the basis of not being available but some of these are on leases which could be terminated (Strawberry Hill Golf Club; Fulwell Golf Club etc).
- A number of sites have not been considered or fully explored.

f. Further Pollution Evidence

- Provided various newspaper articles which question the findings of the applicant's air quality assessment
- The applicant's assessment does not fully consider longer than normal car journeys to the school, increased amount of buses, significant and severe congestion on the school run journey, lack of bus routes to the HBR site, and long bus journeys
- The development will cause a modal shift to car due to the lack of bus routes to the site.
- Object to assessment of expected PM2.5 and NO2 levels due to the development adding to existing levels of congestion
- No measurements of the pollution levels (particularly PM2.5) have been taken on the Bridge Farm site considering the adjacent landscape business operations.
- Expected levels of bus transportation are not achievable.
- Much of the current catchment area is over 500m (as the crow flies) from a bus route to the HBR site

10. Objection letter received from Fulwell and Hampton Hill ward councillors Jonathan Cardy, Matthew Hull, Monica Saunders objecting on the following grounds:

- Site designated as Metropolitan Open Land (MOL)
- Site suffers from poor public transport connections

- 3.The school was started with the intention of addressing the perceived lack of secondary school places in Fulwell and North Teddington
 - Proximity to Twickenham Academy which is a recovering school and may be forced to close as a result of a new school in competition
 - Question need for 6th form
 - Proposed development of the site is contrary to the Mayor of London's strategies for Air Quality and Transport.
11. Objection letter received from Whitton ward councillor Jo Humphreys objecting on the following grounds:
- Surrounding infrastructure doesn't support a school of this size – roads too congested
 - 80% of school places located away from the site which will encourage more cars and congestion
 - Additional bus capacity not sufficient to fill the gaps
 - Richmond Cycling Campaign having stated "cycle connectivity is wholly inadequate for adolescents", pupils will find themselves having to resort to travelling by car.
 - The traffic and pollution this will generate makes this application unacceptable.
 - Object to shared entrance with a Garden Centre (and all the heavy goods vehicles, staff and customer cars that come with it)
 - Object to pedestrian crossing on one side of a blind hump back bridge
 - Object to very narrow pavements on approach which makes this a dangerous site to place a school.
12. Objection letter received from Heathfield ward councillor John Coombs objecting on the following grounds:
- Fails to meet BREEAM excellent standard
 - Public transport is important in school location
 - School building is in the noisiest corner of the site
 - The site is unsuitable for a school
13. Objection letter received from Heathfield ward councillor Lesley Pollesche objecting on the following grounds:
- Concerns that the additional traffic through flow of will have a significant negative impact on the immediate surrounding area, both for residents and road users alike.
14. Objection letter received from Heathfield ward councillor Michael Wilson objecting on the following grounds:
- The loss of local green space
 - The sequential testing report is not accurate
 - The impact on other local schools
 - Traffic and congestion during the construction phase
 - Traffic and congestion if school were to open
 - A dangerous primary entrance to the site
 - Neighbours - loss of privacy and light
15. **Support:** In excess of 670 support representations were received (including multiple letters of support):
- Education
 - Good use of unused land which is not publicly accessible.
 - High performing school which would raise educational standards and would be a benefit to the area/community
 - School needed for local community
 - Whitton and Heathfield residents already attend the school

- Permanent and single site needed for school
- Location is appropriate
- Need for more secondary schools
- School place planning strategy does not factor in the impact of good Ofsted results on school demand and that private schools in the area are not expanding at the same rate as public sector schools. The need for schools in the west of the borough could be underestimated.
- Need for sixth form since Twickenham academy sixth form closed.
- Pupils being able to continue education in sixth form is a benefit
- Approach to site selection/alternative sites has been exhaustive – no alternative
- Is the only practical and deliverable site
- School is currently oversubscribed - need new premises

b. Traffic, parking and public transports

- Current school has traffic/access constraints
- Support access from Heathfield Recreation Ground – will encourage sustainable travel and spread the footfall
- Increased bus services will accommodate the development
- Different bus services (481, H22, 110) will transport pupils from different areas to different access points to the site, spreading the impact on the network
- The school effectively encourages pupils to travel by foot or bicycle (through travel plan)
- After school activities will also disperse activity around the site
- School buses would help to minimise impact on local road network
- Many students from Whitton and Heathfield area currently attend the school
- Will bring about improvements to the road system in the area
- Disagree with traffic concerns raised by others – children will travel by public transport
- More journeys won't be generated – will just result in a change in journey patterns from a very congested area (Teddington and Hampton)
- School travel survey showed that on average pupil journey times will be reduced at the new site
- Support the scheme subject to changing the school intake area and improvements to the narrow railway bridge
- CPZ welcomed
- Many schools are built on busy roads – modifications to highways can mitigate safety

c. Design

- Design, materials and layout is appropriate and responds to visual impact
- Support the design and siting of the school in the north east corner of the site.

d. General

- The site is the only suitable site in the borough that is available at this time, as shown by the Liberal Democrats independent report, the site sequential assessment and as confirmed by Council officers
- Will support local shops and economy, providing jobs
- The proposal makes the best use of resources, financial and staffing

e. Community uses

- Area of site for public use is a community benefit
- Support the provision of new sports and community facilities for the local community

16. **General Observations:** 31 were received:

- Support the application as there is no alternative but disagree with siting a new school so close to an existing secondary school
- Admission policy should equally support the local population of Whitton

- Bridge should be widened
- Such a large school is a concern given the highway constraints of the site
- Concern over use of school for Teddington residents
- Some objections are making statements along the lines of "Heathfield is one of the lowest for green space, being 16th out of 18 wards". The scoring for the 2013 London Well Being Scores needs to be put in context. Various large areas of open spaces just fall within neighbouring wards but is accessible to Heathfield residents. The proposal will improve the public open space as land will be made accessible.

17. **Amendments:** the following was received in response to consultee comments.

- Change to red line boundary on site location plan
- Various minor amendments to plans - bin/cycle storage, car park layout, MUGA surfacing, landscaping.
- Re-location of north boundary school fence line, sports pitches and MUGA 2-3m southwards (away from neighbouring properties) to allow increased habitat corridor
- Updated Very Special Circumstances case (including response letter to GLA; revised Visual Impact Assessment; 4 storey massing comparison; MUGA re-location options; Rooftop MUGA analysis plan)
- Updated reports and information (Energy Statement and associated information relating to energy demand and cooling hierarchy; Drainage and surface water layout details; Arboricultural Impact Assessment and Tree Protection Plan; Great Crested Newt Habitat Assessment)

18. A full re-consultation was not deemed necessary due to the minor nature of the changes which are considered to improve rather than prejudice neighbour amenity. Notwithstanding, neighbours to the north of the site affected by the change to the red line boundary were contacted directly to notify of the changes.

Professional comments

Land use - Turing House School

19. Turing House School opened in temporary accommodation in 2015 at Livingston House (Queens Road Teddington), and in 2018 opened its second school site at the former Clarendon School (Hampton). The school currently accommodates a total number of 578 pupils plus 60 full time staff across the two sites. The Teddington site currently operates at capacity (325 students) and the Hanworth Road site has permission to provide 250 student places and to operate for two academic years from September 2018. The school are now seeking a permanent site, hence this application.
20. The proposal is for a 5FE secondary school and sixth form for Turing House School, accommodating 1,050 pupils and 90 full time staff at its full occupation (2026).
21. The table below shows the pupil numbers at the current sites and the expected numbers at the permanent site. It shows that at the proposed year of opening (2020), the school will provide up to 625 secondary school places across five school years and 103 sixth form students. When the school reaches full occupation (2026), the school will provide places for up to 750 secondary school places (150 per school year) plus 300 sixth form places per year. The School's initial free school application (for pupils aged 11-19) was approved with the capacity for each year group being set at 150. This aligns with the proposal.

Year		Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Total	Staff
2015	Temporary Sites	97							97	
2016		128	100						228	
2017		100	125	103					328	29
2018		125	100	125	103				453	45
2019		125	125	100	125	103			578	60
2020	Permanent Site	150	125	125	100	125	103		728	75
2021		150	150	125	125	100	125	103	878	90
2022		150	150	150	125	125	100	125	925	90
2023		150	150	150	150	125	125	100	950	90
2024		150	150	150	150	150	125	125	1000	90
2025		150	150	150	150	150	150	125	1025	90
2026		150	150	150	150	150	150	150	1050	90

Table 5.1: Student numbers

22. The current school operating hours are as follows:

Session/Group	Number of students	Start	Finish
Site opening	-	07:00	17:00
Staff arrival and departure times		07:00	17:00
Breakfast club	(current 5%, targeted 10%)	08:00	08:25
School day	All students	08:30	15:00
After-school activities	(current 14%, targeted 20%)	15:15	16:15

23. The school's admission point is located in Somerset Gardens, near the Fulwell / Teddington border. It is central to the Middlesex side of the borough and chosen as the furthest point (2237m to be precise) from any other local co-ed non-faith secondary school.

24. Various admission criteria apply, one of which relates to the geographic location of applicants:

- 20% will be allocated to those applicants whose home address is closest to the planned permanent site of the school
- 80% will be allocated to those applicants whose home address is closest to the Admissions Point for the school

Principle of Development

25. *The NPPF supports the provision of community facilities including sports venues and other local services that enhance the sustainability of communities and residential environments (para 92) and*

recognises the importance of providing sufficient choice of school places to meet the needs of existing and new communities (para 94). It states local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

26. The NPPF recognises the great importance of Green Belts:

- The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (para 133).
- LPA's should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation (para 141)
- Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (para 143)
- substantial weight should be given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (para 144)
- Exceptions to this are:
 - the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

27. The London Plan (3.18) also supports the provision of new secondary schools and further and higher education facilities to meet the demands of a growing and changing population.

- Proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations
- Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.

28. Locally, LP 13 of the Local Plan requires the protection of the borough's MOL, which should be retained in predominately open use.

- Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the MOL
- appropriate uses include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries

29. LP 12 seeks to protect, and where possible enhance, green infrastructure which includes open spaces and parks.

30. LP 28 supports new or extensions to existing social and community infrastructure where:

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

31. Paragraph 8.1.5 says that the Council will support the provision of new or extensions to existing social infrastructure where it provides for an identified need. Need is identified on an evidential basis from the Council and its partners strategies and plans, including The Council's School Place Planning Strategy.
32. Paragraph 8.1.8 (and 8.2.4) states that "where practicable, social infrastructure and community facilities should be provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses...The Council will encourage and promote the multi-use of premises, including in independent and free schools".
33. Policy LP 29 states the Council supports the provision of facilities and services for education by:
- 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;
 - 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;
 - encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.
34. Policy LP 31 states the Council's intention to protect, and where possible enhance, public open space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields. Improvements of existing facilities and spaces, including their accessibility and linkages, will be encouraged and new open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network.

Educational Need

35. Local authorities have a statutory duty to secure sufficient school places within their areas. There is clear policy support through the London Plan and Local Plan for new and enhanced educational provision which includes new schools in appropriate locations and where an identified need is being met.
36. Furthermore, at the national level, the Government's Ministerial Policy Statement 'Planning for Schools Development' (CLG: August 2011) sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system. It encourages local planning authorities to work proactively with schools and sets out a presumption in favour of the development of state-funded schools, as expressed in the NPPF. It states that the following principles (amongst others) should apply with immediate effect:
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions.
 - Local authorities should make full use of their planning powers to support state-funded school applications.
37. The Council and Afc have been working with the Educational Funding Agency (EFA) to find a permanent site for the school as it is accepted that the establishment of Turing House School, approved by the Government as a school for pupils aged 11-19, cannot be met on the two temporary sites, due to:
- a) operational and financial costs that operating from two sites
 - b) educational need forecasts
38. A Sequential Assessment has been submitted and sets out the applicant's case for educational need. The report states a permanent site for Turing House is needed as the current sites, from which the school operates, will reach capacity in 2020. Due to the Borough's rising demand for secondary school places and, without Turing House, year 7 demand will soon overtake capacity.

39. The Council's February 2018 School Places Planning Strategy (PPS), prepared by Achieving for Children (AfC), forecasts demand for additional school places across the Borough and analyses how any demand could be met. The PPS recognises that the Borough overall faces a shortfall of places up to 2023 (peaking in 2021) with a particular need in the eastern half of the Borough. A shortfall is not identified in the western half of the Borough, considering the places offered at the proposed permanent site for Turing House School.
40. Through the course of this application, AfC has provided updated forecasts which build on the PPS forecasts. This again shows a surplus in the western part of the Borough, taking into account the current (125) and future (150 pupils from 2021) intake at Turing House School, based on the presumption of a permanent site being secured. Demand is expected to be met up to 2024.
41. Turing House School currently provides 125 year 7 secondary school places for the western half of the Borough and the application must be considered on this basis. Notwithstanding, AfC has clarified that without the 125 places Turing House currently provides (i.e. in the event that a permanent site cannot be found and that the future of the temporary sites is uncertain), there would be a shortfall of 139 secondary school places in the western half of the borough by 2022. Further to this, AfC has confirmed that this potential shortfall could only be fully met through the establishment of a new school given the limited opportunities for expansion of existing schools to make up for any shortfall. On this basis, the Council would not be able to meet its statutory duty in meeting educational need.
42. Whilst at present (January 2019), there are 182 spare Year 7 places – across four schools (Hampton High, The Richmond upon Thames School, Teddington and Twickenham School) in the western half of the Borough; the existing surplus identified in the western part of the Borough is expected to shrink to a minimal level by 2022 as the number of in-borough applications for Richmond schools has been increasing significantly in recent years, as has the proportion of first preference applications for Richmond schools by in-borough residents for whom the Council has a statutory duty to allocate school places. Also large cohorts are also coming through the primary phase following significant expansion in recent years (23.5 additional FE in the western half of the Borough since 2010) and therefore spare capacity are forecast to diminish considerably from 2019 onwards. Whilst the size of the overall Reception class intakes across the Borough has reduced in the last four years, entailing a surplus of places, in-borough applications for 2019 entry show a significant increase compared with 2018 – by 5.1%, from 2,099 to 2,207 and so it is likely that this was a short term effect. Furthermore, it is also noted that forecasts do not take into account additional housing development that might come forward beyond adopted Local Plan levels.
43. School place planning is undertaken on an area basis (split between the eastern and western halves of the Borough) and as stated above, Turing House currently plays an important role in meeting educational needs in the western half. Whilst there may have been a relatively significant number of spare places at Twickenham School, this would not be sufficient to accommodate all of the 125 children who will be attending Turing House School and, as stated above, capacity is expected to diminish in the coming years.
44. In terms of the need for sixth form educational provision, the Council's statutory duty regarding post-16 provision is different as it relates to ensuring that young people are in education, employment or training, rather than education only. As such, the Council does not forecast for educational need in the same manner and it is also true that pupils tend to travel further to access post 16 education. AfC has advised that having a sixth form makes a positive contribution to the overall educational offer of the school and that there are various benefits including the attractiveness of the school, staff recruitment and enhancing the inclusivity of the school by widening the curriculum, which would not necessarily be realised should the sixth form not form part of this proposal or be provided off-site. Some representation raise the prospect of the sixth form being provided at the nearby Twickenham School which recently closed its sixth form. Whilst this may be the case, it is evident that

Twickenham School is making improvements, as demonstrated by a recent Ofsted report, and the possibility of re-opening its sixth form remains a possibility. It is also noted that the school's supplemental funding agreement, granted by the then Secretary of State for Education, established it as a school for pupils aged 11 to 19.

45. Whilst school place planning is considered on the basis of an east and west split of the Borough, school admission points are identified with consideration to more localised need. Turing House's admission point currently is identified on the basis of it being the furthest point from other co-educational schools, meeting the needs of families most in need and distributing the impact on other school admissions. Whilst the current admission point is some distance from the permanent site, it is acknowledged that it will not stabilise until a permanent site is found and the applicant has confirmed that the admission point is to be kept under review. The admission point itself is not for consideration through this application.
46. Achieving for Children fully support this application.
47. In conclusion, the educational need for a permanent site for Turing House School has been demonstrated on the basis that the school currently plays an important role in meeting educational need in the western part of the Borough, without which forecast need would not be met. There is clear policy support at the national, regional and local level for finding a permanent site and ensure that the Council can meet its statutory duty in providing educational places for Borough residents over the short-medium term.

Metropolitan Open Land

48. The site is approximately 6.5ha of undeveloped open grassland located in MOL. The site is not currently in use, albeit it appears that part of the site is being used (potentially unlawfully) for the storage of plants and materials for the adjacent horticultural nursery business. The applicant is seeking a change of use of the land to D1 use in addition to the erection of new buildings for educational use, associated hardstanding and car parking, soft landscaping, sports pitches and an area for public open space.
49. In line with national policy, the construction of new buildings is regarded as inappropriate development and the proposal (other than the playing pitches, MUGA and public open space which will be covered in more detail below) does not meet any of the exceptions set out in paragraphs 145 or 146 of the NPPF. The development is therefore inappropriate and, by definition, harmful to the MOL and should not be approved except in very special circumstances (VSC).

Impact on the MOL

50. The proposal would include the erection of a main teaching block and adjoining sports block, up to three storeys in height. This is in addition to hard and soft landscaping (notably to the front of the site adjacent to Hospital Bridge Road), sports pitches (to the west of the site) and a 3 court MUGA adjacent to the sports block.



51. The proposal can be broken down as follows:

Area	Area (sqm)	% of site area
Building Footprint	3,800 m2	5.8%
Vehicle Hard Surface	1,900 m2	2.9%
Pedestrian Hard Surface	3,100 m2	4.73%
MUGA	2,000 m2	3.05%
Grass (including sports pitches)	32,855 m2	50.15%
Planting	3,945m 2	5.95%
Public Open Space	18,000 m2	27.44%
Total	65,600 m2	

52. The proposal will result in the development of 6% of this sites MOL (14% including the associated hardstanding and MUGA). The pattern of development is such, that currently, built development predominately lines the east and west sides of Hospital Bridge Road, and arguably, this site (along with Twickenham cemetery) are anomalies, providing a gap (although its value is acknowledged). Most appropriately the built form and hard surfacing is largely kept to the far north east of the site,

following the building line of the Nursery and Stirling Road, which limits the intrusion into the MOL and the impact on its openness and character. On this basis, it is considered the most sympathetic and appropriate location for built form on the site. This also allows the wider area of MOL to remain undeveloped.

- 53. As shown through the Visual Impact Assessment (VIA), the impact on the wider area of MOL (in views from the west and south) is generally negligible given the siting of the built form being viewed in the context of an urban environment and the use of the western part of the site as public open space and school playing fields. On this basis, and in addition to the design of the built form and proposed screening, it is acknowledged that the impact on the MOL has been minimised.

View from the west (Borough Cemetery)



View from the south (Heathfield Recreation Ground)



- 54. It is not disputed the development will not be in currently open views of the MOL from the east (Hospital Bridge Road) as seen below. These viewpoints are acknowledged as being high value in

the VIA as it is where the MOL is most appreciated and provides an important gap / break in development along Hospital Bridge Road. The scale and bulk of the building is apparent in these views and the resultant impact causes considerable harm to the openness of the MOL.

Views from Hospital Bridge Road



Views from railway bridge, Hospital Bridge Road



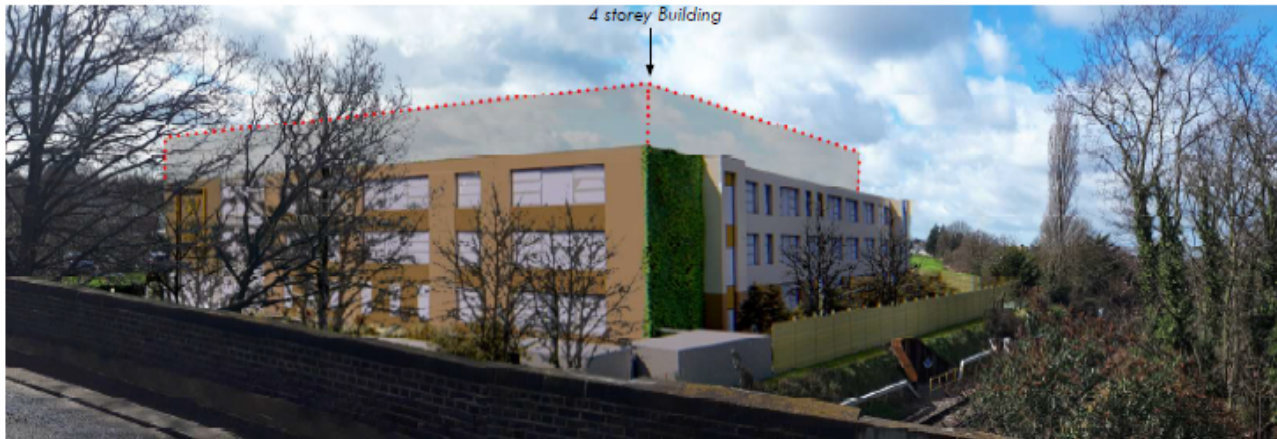
55. A number of layout options were considered through the design process. This includes 3 and 4 storey options, altering the siting, layout and form of the main building as well as the location of the sports block (including internally within the main building) and MUGA. In comparison to the proposed layout, it was deemed the alternative layouts also raised new / additional concerns in relation to amenity with surrounding neighbours, transport and access, community use arrangements (i.e. of the sports block) and the massing of the building (as the various layout options impact on the MOL in varying ways). These options provided a basis for considering whether the most appropriate layout is being proposed and whether all reasonable alternatives for this site have been considered in minimising the impact on the MOL. On this basis, it is considered that the information submitted provides a robust assessment of alternative options and that the proposed layout is the most appropriate in terms of impact on the openness of the MOL.
56. Further to this, the applicant has also submitted documents giving consideration to a 4 storey building option and alternatives for re-locating the MUGA, as advised by the Greater London Authority (GLA) through their Stage 1 Report. The 4 storey option would reduce the school building footprint, potentially allowing the MUGA to be re-located within the north east corner of the site. However, a 4 storey building is not deemed appropriate to the area (which is a predominantly low density suburban) and any benefits brought about by moving part of the development (MUGA) out of the wider MOL to the west of the site would be offset (and arguably outweighed) by the impact of

a 4 storey building in important views of the MOL from Hospital Bridge Road where the increase in scale, mass and height would be most perceptible. This is evident in the applicant's VIA which demonstrates that this option would cause significant additional harm to the MOL beyond the 3 storey option proposed.

Viewpoint 1 - Existing Summer View

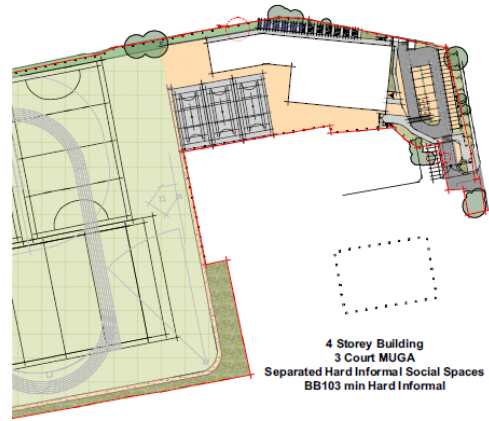
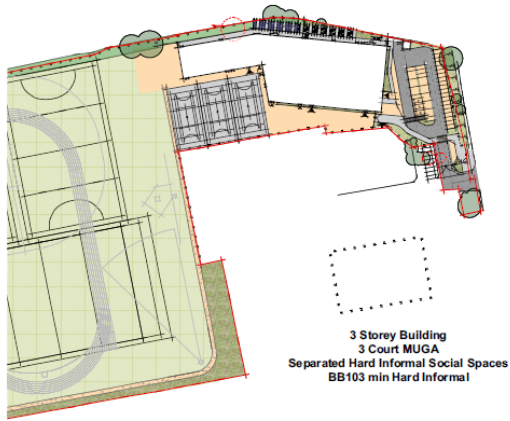
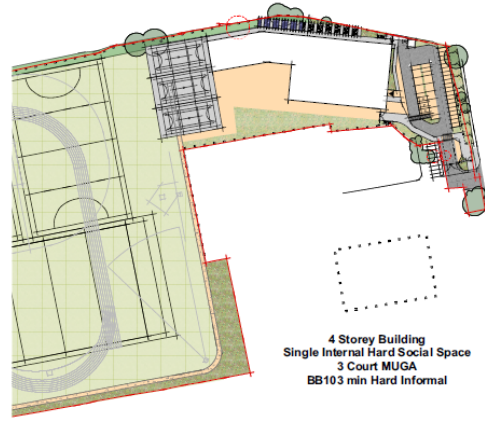
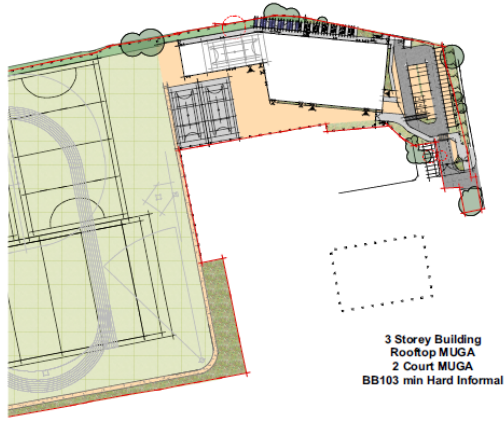


Viewpoint 1 - Proposed Summer View



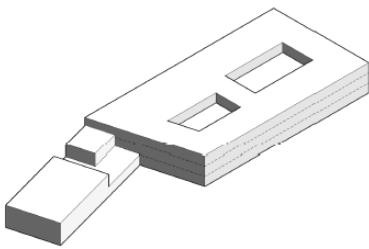
Viewpoint 1 - Proposed 4 Storey Option Summer View

57. With regard to the MUGA, whilst the development must be considered as a whole, in isolation, the MUGA is considered to represent appropriate facilities for outdoor sport and, as such, is not defined as inappropriate within MOL. This approach is consistent with similar recent decisions by the Mayor. However, consideration must still be given to the impact on openness. On the basis of the VIA, it does not appear that the MUGA would be visible, or certainly not prominent, in surrounding views.
58. Various options have been considered by the applicant, including a rooftop MUGA as well changing the layout and height of the development, to bring the MUGA out of the wider part of the MOL, as advised by the GLA in their Stage 1 Report.

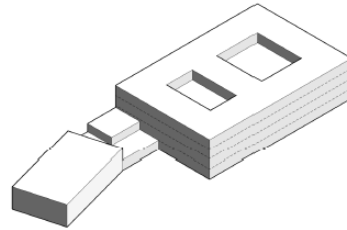


3 Storey Submitted Proposal

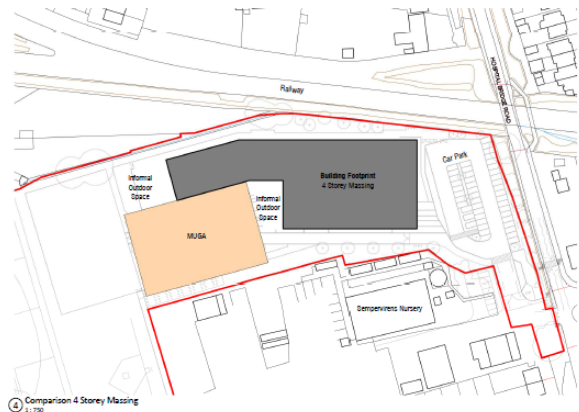
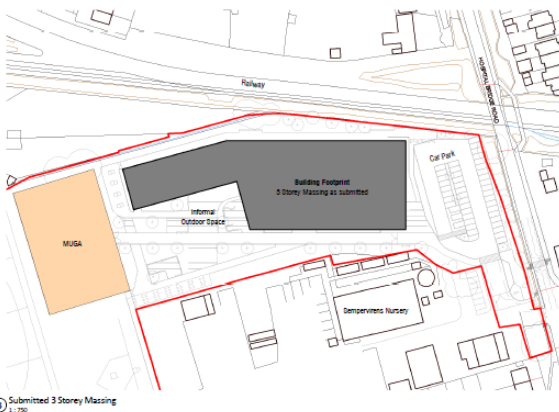
4 Storey Comparison Massing



1 3 storey block



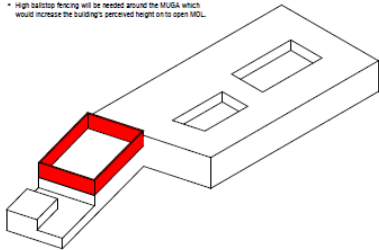
2 Comparison 4 Storey Massing



To enable access to a rooftop MUGA over the sports hall, the sports hall would need to be moved to the east to abut the main block. This would lead to:

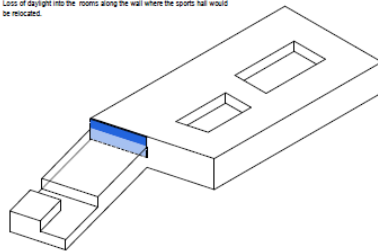
High Fencing

- High ballstop fencing will be needed around the MUGA which would increase the buildings perceived height on to open MOL.



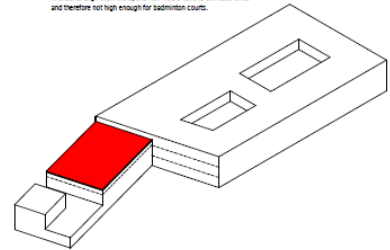
Loss of Daylight

- Loss of daylight into the rooms along the wall where the sports hall would be relocated.



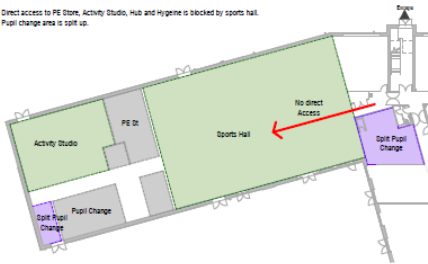
Reduced Clear Height

- The height of the sports hall for MUGA and main building floor aren't aligned.
- In order to align them the sports hall would have to be made lower and therefore not high enough for basketball courts.



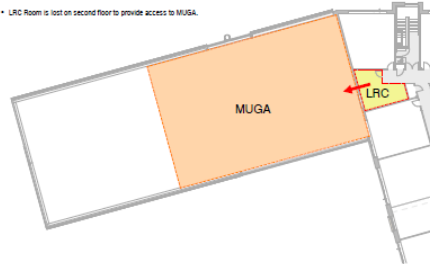
Accessibility

- Direct access to PE Store, Activity Studio, Hub and Hygiene is blocked by sports hall.
- Pupil change area is split up.



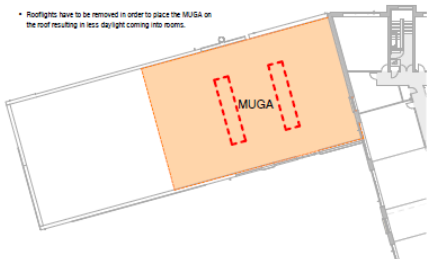
Loss of LRC

- LRC Room is lost on second floor to provide access to MUGA.



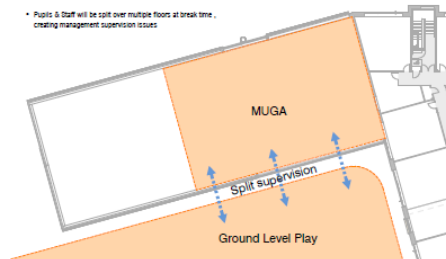
Loss of Rooflights

- Rooflights have to be removed in order to place the MUGA on the roof resulting in less daylight coming into rooms.



Split Supervision

- Pupils & Staff will be split over multiple floors at break time, creating management supervision issues.



59. It is evident from this analysis that the various options have implications for the extent of circulation and informal recreational space, the standard of school accommodation (daylight; accessibility etc), the habitat corridor (which is an essential part of the scheme and which would potentially be lost in part through the relocation of cycle storage north of the school building) or would necessitate a 4 storey building (considered above). On the basis of the applicant's analysis, the location of the proposed MUGA is accepted. The MUGA is proposed to be bounded by 3m high lightweight sports fencing with green surfacing. Further details can be secured through conditions however, on this basis, it not considered that this element alone would significantly affect the openness of the MOL or conflict with the purposes of being included within the MOL. The same is the case for the playing pitches and public open space.

60. In terms of the extent of the main school building, the design of the building has been led by current industry standards, notably the ESFA's Output Specification (OS) and Building Bulletin 103, which broadly dictate the scale of the building, setting optimum and minimum area standards. On this basis, including with consideration to the options considered above (i.e. for a 4 storey building and MUGA options), the extent of MOL taken up by the main school building is accepted.

61. Overall, it is considered that the applicant has provided a robust assessment of options for the layout of the development for this site, and the proposed layout is accepted as being least harmful to the MOL. The GLA made no further comments on the above points in their latest response and so it is considered that they accept the applicant's arguments in relation to the impact of the development on the MOL.

Boundary treatment

62. The site is currently bounded by hedgerows and lightweight fencing. Any boundary treatment can potentially result in an urbanising effect. A fencing plan and an external lighting plan have been provided. Weldmesh fencing is generally being introduced which will retain a sense of openness, however to the north, closeboard fencing is proposed to mitigate noise pollution from and to the development. Details of the fencing can be secured through conditions.
63. The need for closeboard fencing to mitigate noise impact on neighbours is acknowledged and the applicant has agreed to painting the fence a dark brown/green to soften the overall impact on the significant extent of boundary treatment which can be secured through conditions.

Lighting:

64. External lighting is proposed along the secondary pedestrian footpath, wrapping around the southern and eastern boundaries of the site. The lighting does not extend into the wider part of MOL and limiting the lighting around the southern and eastern perimeter will result in any lighting being viewed in the context of the built environment and existing street lighting along Stirling Road and Springfield Road. Further to this, the lighting plan demonstrates that expected light spillage beyond the footpath will be low. For these reasons, the proposed external lighting to the secondary footpath is not considered incongruous to this suburban location or harmful to the MOL.
65. A significant amount of external lighting is also proposed around the school building and car park which is currently an undeveloped gap along Hospital Bridge Road. Whilst similarly any external lighting in this part of the site will be viewed in the context of the built environmental and external lighting along Hospital Bridge Road, the extent of lighting and the level of spillage is likely to result in a change in environmental amenity in comparison to the existing situation and this part of the MOL, even if it is not particularly out of character for a suburban location such as this. The provision of external lighting in this area is unavoidable due to public safety and security of the site, however, it contributes to the overall harm to the MOL and will be taken into account when considering whether the public benefits of the scheme outweigh the harm to the MOL.

Sequential Assessment

66. A Sequential Assessment has been submitted in support of the very special circumstances case, to demonstrate there are no alternative suitable sites with lesser designations that could accommodate the development. The sequential assessment outlines the methodology applied, and importantly the necessary criteria, including:
- a) Search Area – The western side of the Borough (and sites within 3 miles of admission point in LB Hounslow)
 - b) Site Area – minimum of 9,400sqm (approx. 1 Ha)
 - c) Topography and physical constraints
 - d) Planning policy and suitability
 - e) Flood risk
 - f) Highways and accessibility
 - g) Availability
 - h) Affordability
 - i) Opportunities for co-location
67. No objection is raised to the methodology and criteria applied to the Sequential Assessment, which is deemed robust. The GLA also deemed the assessment to be thorough, subject to this being extended to include a search of potential sites to the south of Hounslow, which was later undertaken (through the Addendum Report), which considers sites in the London Borough of Hounslow within a 3 mile radius of the school admission point.
68. In terms of the chosen site area, this figure is far lower than DfE standard guidelines set out in Building Bulletin BB103 which determines minimum building and external area requirements for schools (55,250m²) and also less than what the DfE has advised based on their experience of delivering schools in London (16,000m²). This ensures a robust pool of sites. However, it is noted

that this minimum threshold would not allow on-site playing pitches and would require the built footprint to be minimised (potentially increasing height which has streetscene and school operational implications).

69. The Assessment included:

- 46 sites were discounted owing to their limited size (under 1 hectare).
- 23 sites were discounted as they are in active highways infrastructure use.
- 23 sites were considered in more detail, however, deemed not suitable, available or viable
- 7 sites were considered that were partially in Green Belt and MOL
- 20 co-location sites were considered.

70. All alternative sites were discounted for the following principal reasons:

- Physical constraints;
- Limited site size owing the need to retain or re-provide existing development;
- Conflicting land use priorities;
- Not available for development;
- Subject to implemented planning permissions for redevelopment;
- Affected by particularly sensitive heritage assets,
- Subject to environmental issues such as flooding, ecological or air quality/ noise;
- Highway network constraints; and
- Sites accommodating protected uses.

71. The report concludes that none of the sites considered are sequentially preferable, available or viable alternatives to the Hospital Bridge Road site. Generally, the assessment of sites is considered robust and a shows consideration has been given to the possibility of developing/co-locating at other school sites, taking into account valid planning considerations and constraints. It would be unreasonable to request anything further.

72. Representations received do question the assessment of some sites. The most commented on sites are identified below:

- Cassel Hospital – not available or suitable (constraints of listed building conversion)
Officer comments – No basis to object to conclusion
- West Twickenham Cluster (Greggs Bakery) – Unviable and unsuitable
Officer comments – constraints of the site are acknowledged. A planning application has recently been submitted for the redevelopment of the site for residential and commercial uses (19/0646/FUL). No basis to object to conclusion
- Imperial College site – not available
Officer comments – No basis to object to conclusion given the intentions of the current site owner and the pending appeal.
- Kneller Hall – Not sequentially preferable (MOL) and availability unknown
Officer comments - site is largely MOL. Site is allocated for various uses in the Local Plan which would not prohibit a secondary school on the site but constraints of heritage assets and doubts over when the site might become available are acknowledged. No basis to object to conclusion
- David Lloyd site – Not sequentially preferable (MOL) and various other planning constraints
Officer response -No basis to object to conclusion

73. A number of sites in the MOL have been ruled out on the basis of not being sequentially preferable. Principally, the intent of a sequential assessment is to consider whether there are other non-MOL sites that fundamentally would be preferable due to not being designated MOL - this is the first step in considering whether very special circumstances has been demonstrated and whether development on an MOL is acceptable. Overall, this approach is considered appropriate and it would be unreasonable to consider the hypothetical impact of development of other MOL sites or require a more detailed assessment of the potential development of a school on other MOL sites.
74. Co-location at other schools has been considered. The majority of these sites are Green Belt or MOL sites (either wholly or in part) which, in itself, places restrictions on the development of any new school buildings. The assessment concludes that there are no suitable and available school sites that could accommodate Turing Housing School through co-location. It would be unreasonable to request a more detailed assessment and officers have no basis to object to these findings. Further to this, AfC has confirmed that running a large school across multiple sites is inevitably more costly and challenging, in terms of money, time and logistics as a split-site arrangement requires, amongst other things, payment for utilities at two sets of buildings, employment of two sets of staff and/or travel between sites by senior leaders and other staff and also means that the benefits of having all pupils on the same site – mentoring, buddying, a house system, a prefect system, etc. – cannot be fully realised.
75. Sites within Hounslow Borough, within a 3 mile radius of the school admission point, have been considered. Officers raise no concerns with the assessment of sites and the LB of Hounslow have not responded to this new information. The GLA requested further information on a vacant site on Hanworth Road and the applicant has since confirmed that the site has been identified for a new SEN School for Orchard Hill College Academy Trust, as confirmed by LocatEd. The reasoning for ruling out this site is accepted.
76. Overall, the findings of the Sequential Assessment are accepted.

Public benefits

77. *As previously outlined, inappropriate development should not be approved except in very special circumstances and 'very special circumstances' will not exist unless the potential harm is clearly outweighed by other considerations. This may include public benefits deriving from a scheme.*
78. The proposal includes the following sports pitch provision:
- 1 x U15/16 football pitch (winter)
 - 1 x senior hockey pitch (winter)
 - 1 x senior rugby pitch (winter)
 - 1 x cricket field (summer)
 - 1 x 400m athletics track (summer)
 - 2 x rounders pitch (summer)
 - 1 x discus pitch (summer)
 - 1 x shot put pitch (summer)
 - 1 x 3 court MUGA - various other sports all year round
79. In principle, the provision of sports pitches is supported and in accordance with the NPPF and policies LP 28, LP 30 and LP 3. Sport England confirm their support for the application in principle subject a Community Use Agreement.
80. The site is currently private land with no public access. The applicant is proposing to make the playing pitches and MUGA, in addition to some classrooms, the sports hall and the main hall available for community use. The school building and sports hall have been designed to maximise the potential for community use and the applicant has based this proposal on an assessment of the Council's evidence base (Playing Pitch Assessment; Playing Pitch Strategy; Indoor Sports Facilities

Needs Assessment; Open Space Assessment and Infrastructure Delivery Plan) which demonstrates a need for such facilities, in particular football, rugby, hockey, netball, 3G pitches and sports halls. This is fully supported.

81. A draft Community Use Agreement has been submitted. Whilst the final details have yet to be agreed, but provides an indication of possibility arrangements:

- The school will be responsible for the sports facilities (including resources & maintenance)
- The playing pitches, MUGA and indoor sports hall, activity studio and toilets/changing rooms will be made available.
- Pricing will not be materially different than local authority and schools facilities
- Hours of access:

Term Time	School Holidays
Mon – Fri: 5.30pm – 8.30pm	Mon - Fr-: 09:00 – 17:00
Sat: 9.00am – 1.00pm	Sat: 09:00 – 13:00

82. The total area being made available for community use is:

- Playing pitches – 22,693 sqm
- MUGA – 2,007 sqm
- Indoor sports hall – 495 sqm
- Activity Studio – 113 sqm
- Associated facilities – 226 sqm
- Total – 25,534 sqm

83. Despite the initial limited hours of access (which will nonetheless be further negotiated), the co-location of community facilities is supported, is in accordance with policy, would contribute to meeting the Borough's social infrastructure needs and deemed a significant benefit to the scheme.

84. In addition to this, the westernmost section of the site is proposed as public open space. This area of land, which forms approximately 17,672m², is intended for informal recreation and habitat enhancement and would be transfer to the London Borough of Richmond, the details of which would be agreed through a S106 Legal Agreement. The area of land would be accessed via Heathfield Recreation Ground. Given the area is considered to be an appropriate use in MOL and as the site is currently not publicly accessible, this forms a significant benefit to the scheme.

MOL Summary

85. In conclusion, the proposal is inappropriate development and, by definition, harmful to the MOL.

- a) The introduction of permanent buildings associated hard landscaping, boundary treatment and external lighting would bring about an urbanisation of the site, resulting in harm to the MOLs openness and character, in particular in views from Hospital Bridge Road where the site is predominantly viewed.
- b) The proposal results in a significant intensification of use and would introduce a level of movement / activity that is significantly beyond the site's current use

86. Notwithstanding the above, in this instance and on balance it is deemed that Very Special Circumstances has been demonstrated:

- a) The Sequential Assessment robustly demonstrates there are no alternative suitable sequentially preferable sites in the Borough
- b) It has been satisfactorily demonstrated all reasonable options for the siting and layout of the development have been explored, and the final scheme is one that minimises the impact on the openness of the MOL.

- c) The school places currently provided by Turing House are essential in meeting educational need in the western part of the Borough. Without these places, forecast need would not be met, as confirmed by AfC who fully support this application.
- d) Significant additional public benefits are being provided, through
 - The Community Use Agreement for sports / school facilities
 - public open space for informal recreation and habitat enhancement,

87. On the basis that there are no sequentially preferable sites and that the educational need for the development has been established, in addition to the significant public benefits that the scheme offers, it is deemed very special circumstances have been demonstrated to justify the harm to the MOL, and such benefits outweigh the harm.

Design, Siting, Scale and Massing

88. *The NPPF recognises good design as a key aspect of sustainable development (Para 124) and that development should be sympathetic to local character (Para 127).*
89. *LP 1 sets the Council's intention for all development to be of high architectural and urban design quality, and the character and heritage of the borough to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area. To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:*
- *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;*
 - *sustainable design and construction*
 - *layout, siting and access, including making best use of land;*
 - *space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
 - *inclusive design, connectivity, permeability, natural surveillance and orientation; and*
 - *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*
90. The main teaching block fronting Hospital Bridge Road is 3 storeys high at approximately 11.2m. The sports block is approximately 8m in height and is connected to the teaching block by a single storey link building. The building has a ground floor footprint of 3,670 sqm and has 3 floors of teaching and ancillary rooms and facilities. The proposed building is primarily 'marine blend' brickwork with render to the north elevation and some of use metal cladding and composite panelling, notably to the front entrance feature.
91. The main teaching block is set back from Hospital Bridge Road with car parking in front. The building sits further back from the established building line along Hospital Bridge Road, but this is deemed acceptable given the nature of the development and site (not between two set buildings). The layout has been driven by the need to minimise the loss and impact on the MOL and it is accepted that the proposed layout is the most appropriate in this regard. On this basis, no objections are raised with regard to the layout and siting.
92. The height of the building exceeds the predominant building height in the locality, however not significantly so or to the extent that this variation in height is jarring or harmful to the streetscene given the degree of variation and the separation between neighbouring buildings.

93. Given the residential suburban character of the locality, it could be argued the form and mass of the building is out of character with the surrounding context, albeit not uncharacteristic for a school building which do not typically display domestic character and design. However, the massing has been broken up through the use of design and materials, incorporating verticality through variations in brick and cladding tones, recessed brick and fenestration, green walls, vertical curtain walling and details of the fenestration. Furthermore, the front entrance provides a distinguished focal point and identity for the school through a creative design (i.e. feature signage and full height glazing) and use of materials. These features add visual interest to the building.

Front (East) Elevation



South Elevation (facing adjacent Nursery)



North Elevation (adjacent to railway line)



94. The sports hall is set furthest into the site (and the MOL) and steps down in height from the main building. This building is more rudimentary in design but efforts have been made to soften the appearance of the building through a green wall to the southern elevation. It is noted that this building wouldn't be prominent in views from Hospital Bridge Road, as demonstrated in the VIA. Overall, the proposed design of the sports hall is considered an appropriate response to the sensitivity of this part of the site.

95. The predominant use of brick is supported. Marine Blend brick was advised by the Urban Design team on the basis of it broadly being a lighter brick with a variation in brick tone which would help to break down the buildings mass. No objections are raised with the overall palette of materials (metal cladding, panelling, lightweight glazing as well as brick) which are also considered to achieve these aims. Green walls are incorporated into the design in appropriate areas (i.e. sensitive views on the north elevation and the sports block) which is supported.
96. Overall, it is acknowledged that the design of the building is largely driven by school design standards (i.e. optimal building layout, daylight to classrooms, circulation etc) and the need to reduce the footprint of the development to limit the impact on the MOL, however, the building is not considered harmful to the character and appearance of the area. Overall, the proposal is considered acceptable by reason of its design, siting, layout, height, scale, mass and materials, subject to further details which can be secured through conditions.

Landscaping and boundary treatment

97. The landscaping surrounding the school building is largely hardstanding (permeable block paving) albeit some soft landscaping is proposed to soften the appearance. This is largely driven by the need to reduce the developed area to as smaller area as possible (to limit the impact on the MOL) and the requirement for a certain amount of hardstanding for the car park and school drop off area. This is accepted subject to further details which can be secured through conditions.
98. The site is to be fenced on all boundaries with predominantly weldmesh fencing but some close board timber fencing along the northern boundary. Whilst some concern is raised with regard to the close board fencing due to its lack of permeability, this is sited alongside boundaries that are either already developed (i.e. properties along Redfern Avenue) or where views would already be affected by the school building (i.e. views from the railway bridge along Hospital Bridge Road). The site is fenced with weldmesh to the south and east which are considered the most important boundaries in terms of allowing permeability and views through the site/MOL.

Residential Amenity

99. *Policy LP 8 requires all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:*
- *ensure the design and layout 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;*
 - *ensure that proposals are not visually intrusive or have an overbearing impact*
 - *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.*
 - *Paragraph 4.8.8 states that “the minimum distance of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances...the distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres”.*
100. The site is surrounded by a landscaping firm / plant nursery and Heathfield Recreation Ground to the south, a cemetery to the west, a train line to the north east and residential dwellings to the north (Redfern Avenue), south (Berwick Close, Springfield Road and Stirling Road) and to the east (on the opposite side of Hospital Bridge Road).

101. The site opening hours are between 07:00-17:00. It is also proposed that parts of the site will be made available for community use outside of school hours with the draft Community Use Agreement submitted giving the following hours – Monday to Friday 17:30 – 20:30 and Saturdays 09:00 – 13:00.

Visual Intrusion

102. The proposed building ranges between 2 and 3 storeys with the 3 storey main block nearer to Hospital Bridge Road, stepping down to a 2 storey sports block further to the west.
103. The proposed building is set back from Hospital Bridge Road and consequentially no undue concerns are raised with regard to the impact on No. 128 Montrose Avenue. The same is also the case for No. 223a Hospital Bridge Road and the various properties along Vincam Close to the north given they are a minimum of approximately 35m away and separated by a railway line. Given the scale and proximity to the southern boundary, the proposed building would most affect the nursery business to the south, however, this is not deemed unacceptable given its use, the height of the proposed building (a maximum of approximately 11.2m) and the separation distance (minimum of 8m from the boundary).
104. The proposed sports block is a significant distance from the nearest properties on Redfern Avenue (approximately 55m) and so it is not deemed to be overbearing for these neighbours. A 3m closeboard fence is proposed approximately 2-3m from the site's northern boundary with a the MUGA set a further 2-3m south of this fence line. These are not in themselves considered to be visually obtrusive for these neighbours. On the other boundaries, a 2.4m weldmesh fence is proposed and no objections are raised with regard to this.

Overlooking / privacy

105. Given the distance of the school building to the nearest residential neighbour on Redfern Avenue, as well as the orientation of classroom windows, no objections are raised with regard to the impact on the amenity of these neighbours in terms of loss of privacy and overlooking on to the properties themselves. However, a number of classrooms on the first and second floor would overlook the large gardens of No. 116 and No. 87 Redfern Avenue. However, given the length of the gardens, location of the building, this is not deemed unacceptable.
106. The classroom windows are more orientated towards No. 223a Hospital Bridge Road and the various properties along Vincam Close to the north, and these neighbours are a minimum of approximately 35m away and separated by a railway line and so no objections are raised either. Similarly, no objection is raised with regard to the nursery site to the south given its use.

Daylight and sunlight

107. A daylight and sunlight report has not been submitted. Rather, a statement confirming compliance with BRE standards has been provided. Notwithstanding this, officers have carried out an assessment which confirms the proposal would not result in an undue loss of daylight, sunlight or overshadowing to neighbouring properties (the relationship to surrounding residential neighbours as described above).

Noise and disturbance

108. A Baseline Noise Survey which considers the impact of noise break from nearby noise generating uses into classrooms as well the impact of noise from the use of the sports pitches and external plant on residential neighbours has been provided. The report acknowledges that the north and eastern facades are the most affected due to their proximity to the railway line and Hospital Bridge Road. It recommends mitigation measures to the building fabric including mechanical ventilation to these elevations, which can be secured through conditions.
109. Sports pitches and a MUGA is proposed adjacent to the properties on Redfern Avenue. These properties are also considered to be the most affected neighbours in relation to the sports pitches.

The report acknowledges that guideline internal ambient noise levels are likely to be exceeded without mitigation measures in the form of a 2m high close boarded fence. A 3m high close boarded fence is proposed which is likely to reduce the noise impact even further beyond what it is considered to meet the relevant guidelines in the Baseline Noise Survey. The Council's Environmental Health Officer has reviewed the Noise Report and raises no objections with its findings nor the proposal subject to noise control conditions.

110. Furthermore, a new secondary pedestrian access is proposed to the south linking the site to Heathfield Recreation Ground. This would run along the southern boundary adjacent to the rear gardens of properties on Springfield Road and Stirling Road. A 4m planting buffer is proposed separating from the footpath from the boundary with these properties. It is predicted approximately 30% of pupils would use this access in the morning and afternoon peaks and so at these times there is likely to be a significant level of activity on this footpath and a certain degree of noise and disturbance. No's 1, 5 and 6 Berwick Close are considered to be most affected by this impact given these properties are so close to the site boundary. However, given the proposed access arrangements, the limited times during the day where neighbours would be affected and the potential for soft landscaping and planting to soften any impact, it is not considered that this would unduly harm the reasonable enjoyment of their homes.
111. It is also noted that community use of the site is proposed after school hours (17:30-20:00), on Saturdays (09:00-13:00) and during school holidays (Mon-Fri - 17:30-20:00; Saturday - 09:00-13:00). These hours are not considered unreasonable. However, it is also recommended that the Community Use Agreement is subject to an assessment period of 1 year to allow further consideration of the impact on neighbours from the hours of the community use.

Light Pollution:

112. External lighting is proposed along the footpath leading from Heathfield Recreation Ground as well as around the school building and car park, essentially for pupil safety and security, especially during the winter months. An external lighting plan has been provided which provides specification details of the proposed lighting as well as light spillage levels from the proposed lighting. Lighting outside of the school boundary is minimised but further details of external lighting can be secured by condition.

Summary:

113. The proposal is not considered to result in undue loss of amenity for neighbours and so is in accordance with LP 8 of the Local Plan, subject to conditions.

Transport

114. *Paragraph 109 of the NPPF states that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*
115. *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. The Council will:*
- *Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context*
 - *Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.*

- *Public transport - Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.*
- *Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements.*

116. *LP 45 requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:*

- *Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards.*
- a) *New major development which has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents. (This is reflected in LP 46)*

117. *Policy LP 24 requires all major developments to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.*

Car Parking Standards

118. *Appendix 3 of the Local Plan requires 1 space per 2 staff. Arrangements must also be made for visitor and disabled parking spaces as per London Plan. Facilities for the setting down of coaches off street required.*

Cycle Parking

119. *The London Plan cycle parking standards are 1 space per 8 staff and 1 space per 8 students, and for storage to be safe, enclosed and weatherproof (Sheffield' bike stands would be preferable).*

120. *The main access to the site for vehicles, which would also serve pedestrians and cyclists, would be from the western side of Hospital Bridge Road with a access also proposed for cyclists and pedestrians via Heathfield Recreation Ground. On-site drop off / pick up is not proposed and access to the site in the morning and afternoon will be managed by school staff. Coach drop off is not proposed, however, it has been demonstrated the car park can safely accommodate coaches for occasional use.*

121. *There is no question the scheme would result in a significant increase in visitors and movement to the site, compared to existing. This, is in addition to the local highway and parking conditions and the relationship with the adjoining nursery, raising the following main transport considerations:*

- *Expected trip generation*
- *Vehicular Traffic Impact on the Local Road Network*
- *Impact on the Pedestrian Network and Pedestrian Access to the Site*
- *Public Transport*
- *Vehicular and Cycle Parking*
- *Delivery and Servicing*

122. A Transport Assessment (TA), a School Travel Plan (TP), a Delivery and Servicing Plan (DSP), a Car Park and Access Management Plan (CPAMP) and an Outline Construction Logistics Plan (CLP) all have been submitted.

Trip Generation

123. The TA references a 'hands up surveys' undertaken in October 2017, March 2018 and September 2018 showing pupil travel modes to the current sites and expected travel modes to the proposed site. The results vary which the applicant accredits to the time of the year the survey was undertaken and the successful implementation of a School Travel Plan. Broadly speaking, the results show that the large majority of pupils travel to the current sites, and would travel to the proposed site, by non-car modes of transport, as outlined in the table below:

Mode of travel	Mode share (October 2017)	Mode share (March 2018)	Mode share (September 2018)	Pilot survey for permanent site
	Teddington site	Teddington site	Teddington and Hampton sites	Hospital Bridge Road site
Car/ Park and Stride	14.2%	3.8%	11.4%	8.2%
Car Share	0.9%	1.0%	2.6%	0.2%
Rail	4.3%	1.3%	1.9%	1.4%
Public Bus	56.3%	60.5%	55.4%	48.8%
Cycle	9.2%	9.9%	11.2%	20.6%
Scooter	1.2%	0.6%	0.7%	1.2%
Walking	13.9%	22.9%	16.8%	19.6%
Total	100.0%*	100.0%	100.0%	100.0%

Table 5.4: Student travel behaviours (*Rounding has occurred)

124. The TA applies the baseline estimate set out above to calculate expected total vehicular trips to the site (staff and pupil):

	2020	2026
AM Peak	150 (106 of which are 2-way pupil trips arriving and departing between 07:45 – 08:30)	90 (45 of which are 2-way pupil trips arriving and departing between 07:45 – 08:30)
PM Peak	150 (106 of which are 2 way trips arriving and departing between 14:45 – 15:15)	90 (45 of which are 2-way trips arriving and departing being between 14:45 – 15:15)

125. The above vehicle trips are based on an expectation that approximately 15% (110) of the total number of pupils will travel to the school by car in the year of opening (2020) dropping to approximately 5% (50) at full occupation (2026). These assumptions are based on the school's own surveys of staff and pupils at the temporary site in Teddington which showed a similar drop in car travel following the implementation of a School Travel Plan. Comparable school data (Census 2011 and more recent STARS School Travel Plan data provided by LBRuT officers) has also been used in the assessment, to ensure this is robust
126. In terms of expected staff trip generation, recent staff surveys (September 2018) suggests approximately 70% of existing staff at the temporary sites travel by car but the applicant is seeking a reduction to 50% for the permanent site which would result in 45 car trips on the basis of 90 FTE staff.
127. Both TfL and the Council's transport officer accept the trip generation findings in the TA. Whilst the targets are ambitious, it is acknowledged that other schools within the Borough with similarly poor PTAL ratings have achieved similar reductions in private transportation for staff and pupils and it is not considered unreasonable to consider that private transportation could be reduced below baseline levels (15%) given the public transport and pedestrian/cycling links to the site and through a robust Travel Plan. It is also noted that the school currently has a Gold accreditation for its Travel Plan which it is seeking to maintain at the permanent site. The Travel Plan and associated targets can be secured through the Section 106.

Vehicular Traffic Impact of the Development on the Local Road Network

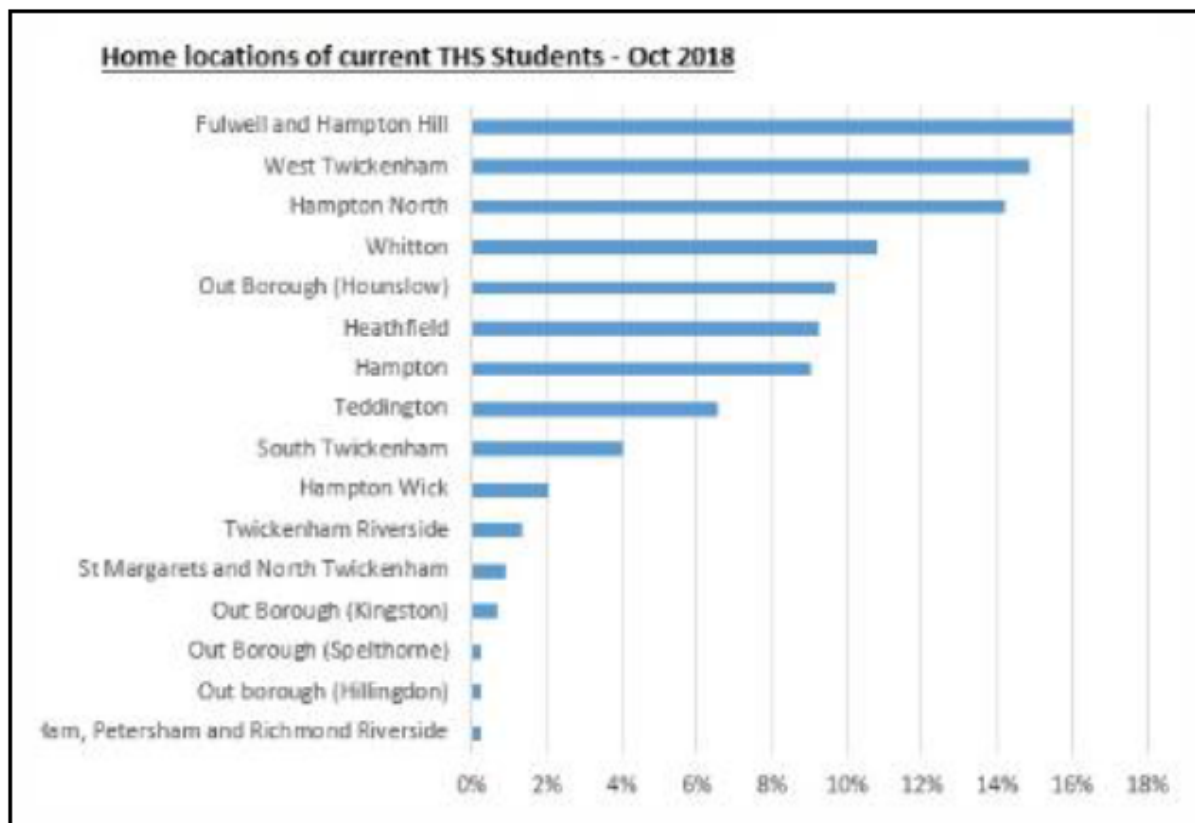
128. The submission has undertaken the following analysis to inform this application:
- Traffic Surveys of Hospital Bridge Road (and other surrounding roads) on w/c 9 July 2018 and w/c 10th September 2018
 - PICADY analysis (a model that assesses capacity of priority junctions) for the proposed vehicular access junction on to Hospital Bridge Road
 - Pedestrian surveys on footways along Hospital Bridge Road on w/c 10th September 2018
129. In terms of the impact of the proposal on the site access and the local highway network, taking into account the expected trip generation from the development, the above surveys demonstrate an expected vehicular flow of 7942 vehicles per 12 hour period and the PICADY analysis shows that, by 2026 (full occupation of the school - including development traffic), vehicular trips during the AM and PM weekday peak, inter-peak period will increase to over 1,000.
130. The Council's Transport Officer raises no objections with the assessment and is satisfied that, with this increased number of vehicular trips, the main access junction would be able to operate safely and that the amount of vehicular traffic likely to be created by the development could be accommodated on the local road network.

Wider Highway network

131. Given the school's admission point being located near to the Fulwell / Teddington border, consideration should be given to the potential impact of the development on the wider highway network. Various admission criteria apply, one of which relates to the geographic location of applicants:
- 20% will be allocated to those applicants whose home address is closest to the planned permanent site of the school
 - 80% will be allocated to those applicants whose home address is closest to the Admissions Point for the school
132. The school website identifies the following home locations of current pupils (years 7 – 10). The table below shows a relatively even spread of pupils across the wards surrounding the admission

point and, notably, approximately 39% of pupils residing in wards located between the admission point and the site (these being Whitton – 11%; Heathfield 9%; West Twickenham 15% and South Twickenham 4%). Approximately 7% reside in Teddington and 14% in Hampton North which are the two wards where the current sites are located.

133. It is therefore likely that there will be a displacement of trips (by all forms of transport) as some pupils will be required to travel further, and by potentially different means, whereas others may be required to travel shorter distances.



134. Further to this, in terms of where pupils and staff travel from, the TA includes a postcode analysis showing estimated distances that staff and students travel to the current sites and are expected to travel to the proposed sites. The analysis shows that there are variations between the two current sites (with the proportion of pupils living within 2km of the Hampton site being significantly higher than the Teddington site), however, there does not appear to be a significant overall difference between the current sites and the proposed site (with approximately 46% of pupils living within 2km of the proposed site and 99.5% within 5km).
135. The TA clarifies that the admissions policy is reviewed on an annual basis which may result in more school places being allocated to pupils near to the site which could significantly alter the findings of the Transport Assessment.
136. Overall, TfL raises no concerns with regard to the impact of the proposal on the strategic road network (A316 Chertsey Road) and the Council's Transport Officer taking account of the Transport Assessment, admissions policy and TfL's views, considers the likely increase in vehicles resulting from the development could be accommodated on the highway network subject to the mitigation proposed.

Impact of the Development on the Pedestrian Network and Pedestrian Access to the Site

- 137. The TA expects that by 2026, approximately 247 pupils (approx. 23%) will walk to the school, rising from 121 in the opening year (2020). This is based on current levels and the applicant views this target as achievable on the basis of post code data of existing pupils which estimates that approximately 35% of current students live within 1.6km of the application site (in comparison to approximately 23.5% living with 1.6km of the current site).
- 138. Further to this, a pedestrian distribution data (based on the current admissions policy) has been provided that details those that walk to the site as well as those that complete the final part of their journey by foot i.e. that also arrive by public transport. The postcode plot analysis identifies the following (further detail can be seen in the image below):

AM

- 404 pupils are expected to approach the main site access from the south on the western side of Hospital Bridge Road
- 68 pupils are expected to cross the railway footbridge approaching from the north
- 249 pupils are expected to approach on the eastern side of Hospital Bridge Road and will be required to cross the proposed zebra crossing

PM

- 505 pupils are expected to cross to the eastern side of Hospital Bridge Road via the zebra crossing dispersing north across the railway footbridge (approximately 68), south to access the route 481 bus service (approximately 350) and east along Montrose Avenue (87)
- 369 pupils are expected to travel south down the western side of HBR



- 139. In terms of the impact of additional pedestrians on local footways surrounding the site, whilst the constraints of the footways surrounding the site are acknowledged (including the particularly narrow footways across the railway bridge and the lack of footway beyond the site entrance on the western side of Hospital Bridge Road), the figures set out above relate to the entire AM (07:30 - 08:30) and PM (14:30 - 15:30) peak periods and the pedestrian comfort level assessment

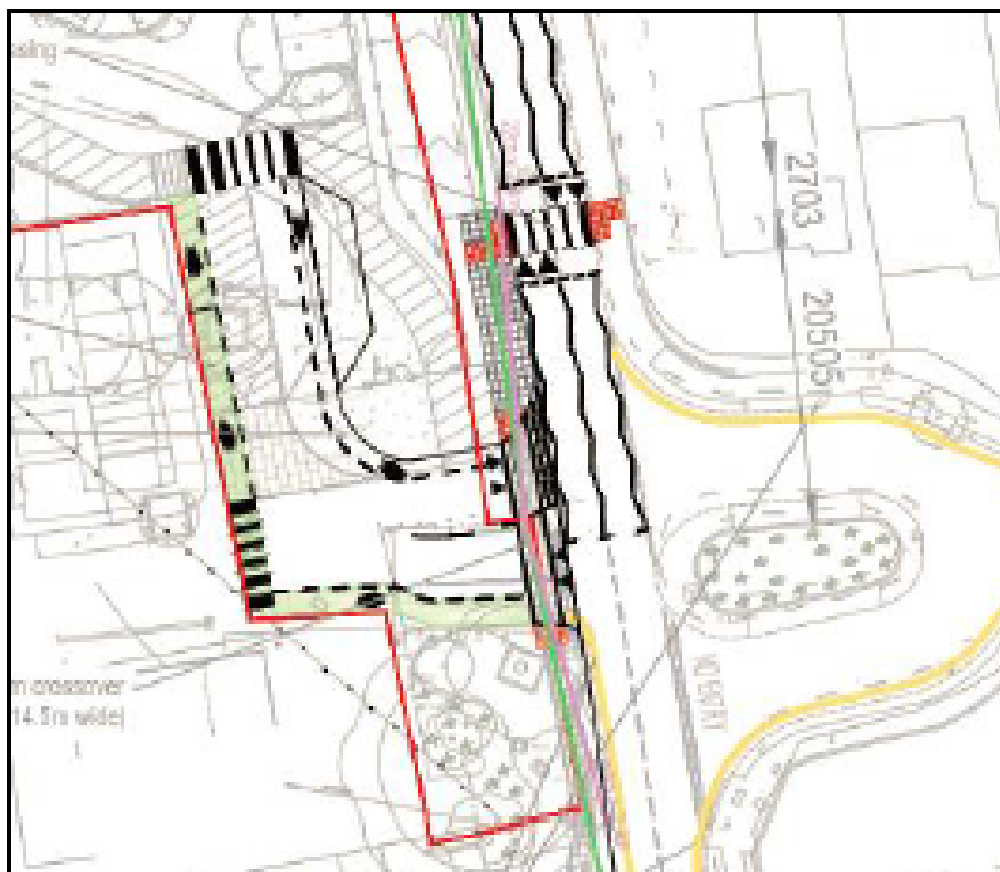
provided demonstrates that the footways surrounding the site can accommodate the expected additional pedestrian demand, notably during the morning and afternoon peaks. However, in order to help reduce the travel demand in Hospital Bridge Road, the Council's Transport Officer strongly supports the provision of a new pedestrian access via Heathfield Recreation Ground and raises no objection to the proposal subject to this new access and the mitigation measures proposed (which will be discussed in detail below).

140. With regard to the narrow railway footway, it is acknowledged that only a small number of school pupils are predicted to arrive from the north (approximately 68 in the morning and the same in the afternoon). Whilst admittedly some road users require additional space (i.e. wheelchair users) which could result in accessibility difficulties, given the limited number of additional pedestrians using this footway (approximately 68) and the limited time period over which this impact would be spread, it is not considered that this would result in undue challenges for users of the footway or likely to cause significant highway or safety issues for pedestrians or pupils, especially given the railings that line the eastern footway to the north of the bridge.
141. Hospital Bridge Road / Chertsey Roundabout is a four-arm signalised roundabout located approx. 900m to the south of the proposed school site. Approximately 66 pedestrians are expected to cross the A316 in the morning and afternoon peaks. This is a busy junction, however, does have good range of pedestrian crossing facilities. TfL has requested a contribution of £120,000 towards improved pedestrian crossing facilities at this junction which would improve the safety of pedestrians and cyclists crossing this road (heading north). The applicant has accepted this contribution. This is considered to be a benefit of the scheme.

Proposed Main Access Arrangements and Mitigation

142. The applicant is proposed to re-arrange the layout of the existing access to accommodate pedestrian, cycle and vehicular access to the school site whilst retaining suitable access for the commercial adjacent Horticultural Nursery site. This would involve widening the existing bell-mouth junction (from 7.5m to 14.5m) as well as various highway works around the main site access and leading into the site: (also illustrated in plans below)
- Zebra crossing north of the site access on Hospital Bridge Road
 - New section of footway north of the site access linking the zebra crossing with pedestrian footways within the site.
 - The existing 20mph zone being extended to a location north of the railway bridge
 - Traffic Regulation Orders restricting parking on Hospital Bridge Road and Montrose Avenue
 - Staff on duty at school arrival and leaving times to ensure appropriate use of crossing and pedestrian facilities
 - A speed table to the north of the railway bridge
 - Secondary access via Heathfield Recreation Ground





143. Various other measures are also proposed:

- Staggering start and finish times with neighbouring schools
 - Breakfast Clubs (target of 10% of pupils) – 08:00 – 08:25
 - After-school activities (target of 20% of pupils) – 15:15 – 16:15
- School Travel Plan including a range of measures to encourage sustainable forms of transport and improve road safety.

20mph Speed Limit

144. Hospital Bridge Road currently has a speed limit of 30mph except for a section of the road 100m to the south of the site which is 20mph. The Council is set to implement a Borough-wide 20mph speed limit which, when effected, will cover the site. The Council's Highways Department has confirmed that it is expected that this will be enforced in Whitton in Winter / Spring 2020.

145. Notwithstanding, the submissions AADT speed surveys gave an 85th percentile wet weather speed of 29.9mph in a northerly direction and 29.1mph in a southerly direction during the AM weekday peak hour of 07.45 to 08.45 and an 85th percentile wet weather speed in the inter-peak of 30.8mph in both directions. Notwithstanding the impending introduction of the Borough-wide 20mph speed limit, the Council's Transport Officer has recommended that the existing 20mph speed limit is extended north of the railway crossing to ensure pedestrian and highway safety and that an appropriate financial contribution for a Traffic Management Order (TMO) sought and secured through an S106 agreement.

Zebra Crossing

146. The scheme intends to provide a zebra crossing approximately 20m north of the site access, together with dropped kerbs and tactile paving, plus a 2.5m wide footway to the north of the main site access. This is deemed necessary given the number of pupils accessing the site from the

north and east and as there is currently no footway on the western side of Hospital Bridge Road north of the proposed site access.

147. Pupils arriving from the north at the 481 bus stop will be required to then cross Montrose Avenue to use the zebra crossing, with there being a potential risk that pupils will attempt to take the more direct route across Hospital Bridge Road, however, the TA estimates that only a small number of pupils are predicted to arrive from the north via the 481 bus (approximately 35 pupils in the AM) and the scheme proposes a Copenhagen Crossing across Montrose Avenue to improve the safety of this crossing.
148. The zebra crossing is proposed approximately 58m south of the brow of the railway bridge. The TA includes a Stage 1 Road Safety Audit (RSA) which assists to demonstrate how the site could be safely accessed and finds the location of the crossing acceptable in terms of stopping distances (in line with Manual for Streets guidance), subject to further consideration at a detailed design stage (Stage 2 RSA) and subject to an extension of the existing 20mph zone.
149. A crossing to the north of the main access is considered preferable in terms of pedestrian desire lines for pedestrians approaching the primary access to the school from the north and is satisfied with the proposed mitigation to those coming from the south (i.e. raised entry treatment on Montrose Avenue).
150. Whilst a Borough-wide 20mph speed limit is set to be introduced in this area next year, officers acknowledge concerns raised in relation to highway safety and traffic speed conditions along Hospital Bridge Road, including the visibility of the nursery/school entrance and proposed zebra crossing to motorists approaching from the north (travelling southbound).
151. These works would be secured through a S106 / S278 legal agreement with the precise arrangements of any crossing and associated highway works subject to detailed design and safety auditing, to be approved by the highway authority. It is noted that the Council as highway authority regularly reviews highway conditions around schools and receives comment and complaint about road safety at many schools. Whilst not necessarily being essential to make the application acceptable in planning terms, if granted approval, the highway authority would consider additional traffic calming measures and prominent signage to help reinforce safety near the school as it is prepared to for any school. Going forward, the Council's highway, traffic management, parking enforcement and school travel resources would continue to be available to support safe and sustainable travel to school as they are for any school, through even then the streets around schools in the borough can experience intense traffic, parking and pedestrian pressures at school arrival and departure times.
152. The possibility of providing a signalised crossing across Hospital Bridge Road was discounted due to limited footway width for waiting pedestrians and the pedestrians being unprepared to wait for the green man signal. This argument is accepted. However, it is noted that the highway is not a static feature and evolves, and the highway conditions would therefore be kept under ongoing review.
153. The zebra crossing and associated new section of footway in this location would potentially require the re-location of at least one street lamp and would also require the raising of the bank to allow a level footway. The Council's Transport Officers raises no in-principle concerns to these associated highway works which are considered to be achievable.
154. Overall, the Council's Transport Officer recognises the concerns regarding highway and safety conditions on Hospital Bridge Road, and the proposed zebra crossing location would be subject to detailed design and further safety auditing which would not preclude additional or alternative safety measures if considered necessary.

Nursery Access

155. The proposed access arrangements include a pedestrian and cycle way across the nursery site entrance which raises highway and pedestrian safety concerns given the significant number of pupils that will be entering the site during the AM and PM peaks and the Heavy Goods Vehicles (HGVs) that require access to the nursery site.
156. The TA includes the results of traffic surveys that were undertaken in September 2018 (as well as a further survey in July 2018) which identified the following vehicle movements to/from the nursery over the course of the day:
- Total - 179 vehicles per day (including 21 HGVs)
 - AM Peak – 16 vehicle trips per day (including 6 HGVs)
 - PM Peak – 11 vehicle trips per day (including 3 HGVs)
157. These traffic surveys are snapshots of a particular time and day and there are not known to be any conditions on the operation of the Nursery that might restrict vehicles to and from the site by time of day, size of vehicle or otherwise and it would be unreasonable for the Council to introduce a development that might put the operation of the site at risk in the future (in accordance with the agent of change principles set out in paragraph 182 of the NPPF). It is therefore essential that mitigation measures proposed not only satisfy the Council in terms of ensuring the safety of users of the site, but also avoid any conflict with the operations of the adjacent Nursery site in the future.
158. To mitigate this risk, the applicant is proposing dedicated cycle/footways into the site on either side of the main site access, including a dedicated raised crossing facility across the Nursery site access. Furthermore, the applicant's Car Park and Access Management Plan (CPAMP) includes measures to ensure the safety of these pupils, including having staff on duty during the morning and afternoon peak periods to supervise the site access, preventing unauthorised access to the car park (i.e. through parent drop off) and to ensure that designated pedestrian crossings (i.e. the zebra crossing) and footway/cycleways are used appropriately.
159. A positive working relationship will be required between the school and the neighbouring Nursery to avoid conflict between users of the school site and the Nursery and to ensure highway and pedestrian safety without unduly impacting on the operations of either site. Whilst this arrangement is far from ideal, the proposal does allow the site access to be re-designed in a way that best accommodates users of both sites. On this basis, the Council's transport officer is satisfied that the proposed measures (Car Park and Access Management Plan; School Travel Plan), represent the most appropriate way of achieving this and, subject to further details of these arrangements being secured through conditions and S106 Agreements raise no objections.
160. Objections / concerns have been raised through the consultation, including by TfL, as to large island splitting the entrance and exit of Montrose Avenue which, even with the proposed double yellow lines, could become an informal pick up and drop off area, potentially causing congestion around the junction and increasing conflict between pedestrian and cyclist. The applicant has responded to this by confirming that proposed double yellow lines and staff on duty are designed to prevent this behaviour, with this matter also being managed through the CPAMP and School Travel Plan. This position is accepted by TfL.

Secondary Access

161. A secondary access is proposed for cyclists and pedestrians via Heathfield Recreation Ground. The TA estimates approximately 30% will utilise this access in the morning and afternoon periods as it would provide a preferable route to the site for those approaching the site from the west / south west (bus routes 110, 111 and H28 departing on Hanworth Road and Powder Mill Road). In general terms, it is accepted that this will effectively spread the demand across the surrounding roads as well as reducing the impact on the main site access.

- 162. The access through the recreation ground is 3m wide, hard-surfaced, and lit. The applicant has agreed a contribution for a 11m x 2.5m of footway between the northern edge of the existing footway in Heathfield Recreation Ground and the southern boundary of the site to allow pedestrian and cycle access. A Proposed external lighting scheme has been provided for the site itself but the contribution secured will also fund the lighting of the footway. These can be secured through a S106 agreement.
- 163. The secondary access will result in increased usage and impact on Heathfield Recreation Ground, and to offset such impact the Council’s Parks Team has requested contributions towards the:
 - provision of bins and benches
 - maintenance of Heathfield Recreation Ground
- 164. The applicant has agreed to the financial contribution to mitigate the impact of the development on Heathfield Recreation Ground. These can be secured through a S106 legal agreement.

Cycle Access and Safety

- 165. The TA identifies that 104 pupils (9.9%) are expected to travel to the site by bicycle. Cycle access would be via the main and secondary access points but just over half of these pupils would arrive via the main site access. Cycle facilities and storage are provided on site in accordance with London Plan standards.
- 166. The TA includes an assessment of cycle routes connecting the site to the wider area. This includes on-road and off-road cycle routes suggested by the school which are considered to be suitable for student travel to the site. Representations raised objections in relation to the suitability and capacity of these routes to accommodate the expected additional pupils. The Council’s Transport Officer raises no objections to the methodology or findings of the Cycle Environment Review System (CERS) audit or to the safety of pupils accessing the site by bicycle subject to the measures proposed by the applicant, including:
 - Segregated cycle lane into/out of the main site access
 - Cycle access via the secondary access through Heathfield Recreation Ground
 - 20mph speed limit implemented along Hospital Bridge Road
 - Cycle storage facilities for 145 bicycles provided on site
 - The measures set out in the School Travel Plan to encourage sustainable forms of transport, including cycle training, cycle lessons and reward schemes

Public Transport

- 167. The TA estimates approximately 61% of pupils will travel to the site by public transport. An assessment of the likely impact on bus routes using current student post code data has also been undertaken. The majority of students are expected to arrive from the south and the assessment concludes that bus routes 111 and 481 are likely to receive the highest number students. Given the low frequency of the 481, this route is likely to be significantly affected.
- 168. The site access has a PTAL rating of 1b (very poor). Notwithstanding this, the site is approximately 750m from Whitton railway station and the following bus routes are within the vicinity of the site:

Bus Route	Frequency	Location
481	2 buses / hr	Hospital Bridge Road - southbound stop (approx. 50m from site); northbound (approx. 250m)
H22	4-6 buses / hr	Hospital Bridge Road – approximately 720m to the south of the main site entrance

110	3 buses / hr	Hospital Bridge Road – approximately 720m to the south of the main site entrance Powder Mill Lane – approximately 560m from the secondary access to Heathfield Recreation Ground
111	5-8 buses / hr	Hanworth Road – approximately 690m from the secondary access to Heathfield Recreation Ground (1190m from main access)
H28	3 buses / hr	Hanworth Road – approximately 690m from the secondary access to Heathfield Recreation Ground (1050m from main access)

169. Route 481 – It is expected 209 pupils to use the northbound route 481 service in the AM peak period and the east bound service in the PM period by 2026. Based on the submissions assumption that 10% of pupils will arrive for breakfast clubs, this equates to approximately 21 pupils in the 07.30 - 08.00 period and 188 pupils in the 08.00 - 08.30 period.
170. Route 111 – The route 111 serves bus stops on Hanworth Road which is approximately 800m from the proposed secondary pedestrian access. It is expected that approximately 221 pupils will use this during the AM and PM peaks. This equates to approximately 22 pupils during the period 07:30 – 08:00 and 199 pupils between 08.00 – 08:30 by 2026.
171. TfL has recently undergone consultation on proposed changes to routes H22 and 110 which both serve the vicinity of the site. TfL has confirmed that the proposed changes took into account the proposal for Turing House School.
172. Bus route 110 runs down Hospital Bridge Road as far as Powder Mill Road (where the secondary pedestrian access is proposed). The changes would result in route 110 merging with route 419, linking Richmond to Whitton (rather than Isleworth/West Middlesex Hospital) and with services increased to every 15 minutes instead of 20 minutes (an extra 4 buses/hr).
173. Service changes to the H22 route are also proposed which runs along Hospital Bridge Road as far as Percy Road (to the south of the site). The proposed route would terminate at Twickenham Station rather than running on to Richmond but would still provide services between Twickenham and Hounslow.
174. The applicant has been in discussion with TfL who has advised the need for the following to allow sufficient capacity on the bus network serving the site to accommodate the development:
- Route 111 – 2 additional northbound journeys
 - Route 481 - convert 2 service to double deck vehicles and run an additional northbound journey in the morning and southbound in the afternoon.
175. TfL has requested a financial contribution of £1.175m to mitigate against the impacts of the development. This contribution has been accepted by the applicant and can be secured by a S106 legal agreement. TfL has also confirmed that routes 111, H22 and H28 are expected to be able to accommodate the likely uplift in passengers with currently levels of capacity.

Vehicular and Cycle Parking

176. A total of 45 parking spaces are proposed in a car park fronting Hospital Bridge Road, expected to serve staff. The school is expected to have 90 full time members of staff and this level of provision is in line with the parking standards set out in the Local Plan.

177. TfL object to the level of parking provision, recommending this level be reduced. However, given the low sustainability of the site (PTAL 1a/1b) the Council's transport officer deems the level of provision, which is in line with the parking standards.
178. 9 spaces within the car park will have access to active electric charging points and a further 9 no. are passive. TfL has confirmed that this aligns with London Plan standards and conditions can be used to secure these spaces as well as further details as necessary.
179. 5% disabled bays and 5% enlarged bays that could be converted in the future are being provided within the carpark. TfL has advised this accord with London Plan requirements.
180. There will not be an on-site drop off / pick up location, however, the TA estimates that approximately 15% of pupils will be dropped off by car in the year of opening, dropping to 4.8% at full operation (2026). It is expected that most of these journeys take place between 08:00 – 08:45. These drop off/collections are expected to be accommodated through on street parking in the surrounding area.
181. A parking beat survey was submitted with the application. The survey was undertaken outside of public holidays on Tuesday 11th September between 07.30 - 10:00 and 14:00 – 18:00. The survey identified:
- a) an occupancy range of between 50% - 68% during the morning survey and 55% - 78% in the afternoon.
 - b) a significant number of residual parking spaces during the times identified as being the peak parking demand generated by the school (258 spaces during the morning peak of 08:15 – 08:30 and 320 spaces during the afternoon peak of 14:45 – 15:15).
182. Notwithstanding the survey data and the proposed level of parking being provided, 2011 Census data states that 47% of people who commute to work in the surrounding area do so by car as the main driver. Were this trend to continue in the case of people who commute to work at this school, it would mean that 42 FTE equivalent employees would be expected to travel to work by car. Therefore, with 45 spaces, the applicant is providing a surplus of 3 spaces. Therefore, no employees of the school would need to park on-street either in or out of the CPZs.
183. The streets surrounding the site are not currently within a CPZ and have unrestricted on-street parking. However, the Council has recently consulted on the introduction of CPZs in the area surrounding the site (notably, Montrose Avenue and Ryecroft Avenue) which are expected to be implemented in late 2019. Both of these CPZs will operate between 10.00 and 14.00, Monday – Friday, which should be sufficient to protect the CPZ areas from on-street parking by employees.
184. It acknowledged that some of the surrounding roads do suffer from parking stress during the times when parents are likely to be dropping off and picking up children. However, whilst the parking beat survey only commenced at 07.30, as opposed to 07.00 when employees arrive at the site, the Council's Transport Officer accepts the applicant has demonstrated that there is sufficient capacity to accommodate this across the whole area listed in their parking beat survey (20 streets) without the overall stress level being pushed above 85% stress. This assessment is based on the worst-case scenario of 15% car trips (as opposed to the 4.8% expected at full operation (2026)). For the reasons set out above, the proposed level of parking is accepted, and it is not considered reasonable to request a contribution from the applicant towards CPZ review / implementation.
185. A Car Park and Access Management Plan has been provided and can be conditioned to this application.
186. The proposed dual-access will result in the loss of approx. 8 customer parking spaces for the neighbouring nursery and it is also noted that there is an area of informal overspill parking in the

north east corner of the application site. The proposed plans show an area of parking for 7 vehicles on the nursery site immediately to the west of the existing parking area which is located on an area currently occupied by nursery stock and an area for staff parking would also be retained. The Council's Transport Officer raises no objections with this change. Furthermore, whilst it is acknowledged that customers to a horticultural nursery might reasonably seek on-site parking for convenience, it is accepted that the parking survey has demonstrated that there is a significant amount of parking capacity in the area surrounding the site also.

Cycle parking

187. 156 sheltered and secure cycle spaces are provided for staff, pupils and visitors, in line with London Plan standards. An area for further cycle storage has also been identified should demand dictate in the future. This level of provision is considered acceptable and the additional cycle storage will ensure that the scheme promotes sustainable forms of transport in the long term. Further details of the cycle parking can be secured through conditions.

Delivery and Servicing

188. A Delivery and Servicing Plan has been submitted. No concerns have been raised by TfL or the Council's Transport Officer and further details of delivery and servicing arrangements can be secured through conditions.
189. Deliveries and services to the site can be restricted between the hours of 09:30 – 15:00 to avoid conflict with users of the site, other schools in the vicinity and peak traffic hours. This can also be secured through a condition.

Summary

190. It is clear that this proposal will result in a significant uplift in vehicle and pedestrian movement to and from the site, in particular during the AM and PM peaks. The Council's transport officer is of the opinion that this can be accommodated on the surrounding highway and footway network without resulting in a severe adverse impact on pedestrian and highway safety subject to the proposed site access arrangements and the off-site highway mitigation. The secondary access will also effectively spread the public transport, vehicular and pedestrian demand across the highway network as well as having wider benefits discussed elsewhere in this report. The same is also the case for the other measures proposed including the breakfast and after school activities and clubs:
- Breakfast club and after school activities (expected uptake of 10/20% of pupils)
 - School Travel Plan – aimed at minimising the demand for car travel for students and staff and encouraging sustainable forms of transport
191. It is acknowledged that the site's location adjacent to a horticultural nursery raises pedestrian and highway concerns due to the significant number of pedestrians and cyclists. However, with mitigation measures, this is deemed acceptable.
192. With respect to the zebra crossing, which is necessary to enable safe access to the school, prior to the commencement of works, the applicant would be required to attain approval from the Local Highway Authority for this part of the scheme which will be subject to further detailed design and safety auditing. Through this process, consideration can be given to amended, additional or alternative safety measures necessary to ensure pedestrian and highway safety, the costs of which would be fully met by the applicant.
193. 45 off street parking spaces are proposed for staff, which is accepted. Further, the parking survey demonstrates there is sufficient capacity to accommodate the development without the overall stress exceeding 85%.
194. It is acknowledged that the roads and pavements around the proposed school would be busy at peak times, as is the case at many schools, and any new secondary school would likely generate

concerns about traffic and safety. In this context, the proposed school is not considered likely to result in unacceptable adverse impacts on the transport network, subject to good management and the conditions and following S106 legal agreement Heads of Terms and highway works under S278.

S106 Heads of Terms	S278 of the Highways Act 1980
<ul style="list-style-type: none"> • £1.175m towards the provision of additional bus capacity. • Contribution to enable the construction of 11m x 2.5m of footway from the northern edge of the existing footway in the north-east corner of Heathfield Recreation Ground into the school site. • Travel Plan and contribution and bonds for monitoring. (£1,000 per year) • TMO (up to £3,000) to extend the 20mph Zone on the B358 Hospital Bridge Road from its current location to a position north of the railway bridge, and to insert double yellow lines on the B358 Hospital Bridge Road and Montrose Avenue as shown in Drawing No 007 Rev. C, and on both sides of the carriageway as it goes over the railway line north of the site. • £120,000 towards improved pedestrian crossing facilities at the A316 / Hospital Bridge Road junction to improve the safety of pedestrians and cyclists 	<ul style="list-style-type: none"> • The construction of a simple priority junction access with entry treatment to be agreed with the LHA • The relocation of the gateway signage to the Chase Bridge 20mph Zone to a position north of the existing railway bridge on the B358 Hospital Bridge Road with the exact location to be agreed with the LHA. • The construction of zebra pedestrian crossing (in addition to any other alternative safety measures deemed necessary to ensure pedestrian and highway safety) on the B358 Hospital Bridge Road, together with a dropped kerbs and tactile paving, with the exact location to be agreed with the LHA prior to commencement of the development. • The construction of new dropped kerbs at the Montrose Avenue/B358 Hospital Bridge Road priority junction • The insertion of a speed hump on the B358 Hospital Bridge Road north and south of the site access to denote entry and exit from the above-mentioned 20mph zone. • The construction of a courtesy crossing on the B358 Hospital Bridge Road 75m north of the northern access to the railway footbridge

Flood Risk

- 195. *NPPF (para 158) states “the aim of the sequential test is to steer new development to areas with the lowest risk of flooding”. This is reflected in LP 21.*
- 196. *Policy 5.13 of the London Plan sets out the following Drainage Hierarchy whereby development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible:*
 - *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*
- *attenuate rainwater by storing in tanks or sealed water features for gradual release*
- *discharge rainwater direct to a watercourse*
- *discharge rainwater to a surface water sewer/drain*
- *discharge rainwater to the combined sewer.*

197. *Policy LP 21 aims:*

- *to guide development to areas of lower flood risk and sets an intention to 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.*
- *require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:*
 - *A reduction in surface water discharge to greenfield run-off rates wherever feasible.*
 - *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.*

198. Educational establishments are considered to be 'more vulnerable' uses, however, given the site lies within Flood Zone 1 (Land having a less than 1 in 1,000 annual probability of river or sea flooding), the 'Sequential Test' and 'Exception test' set out in national and local policy do not apply. Notwithstanding this, the site is thought to be at risk of groundwater and surface water flooding and therefore a Flood Risk Assessment, Surface Water Drainage Layout Plans and a Foul Water Drainage Plan have been submitted.
199. There are known areas of surface water flood risk on the site. These are primarily to the south of the site where playing pitches are proposed. However, there are areas (including areas at high risk) in the north east of the site where the car park is proposed. The site is currently undeveloped and the proposal includes approximately 1.12ha of impermeable area and so will result in considerable run-off and foul water output (as a result of the proposed use).
200. To mitigate this risk, a drainage system is proposed to alleviate the surface water flood risk on the site (and ensure flood risk is not increased off site) which includes sustainable drainage features including attenuation (attenuation tank, permeable MUGA and permeable car parking area) discharging into the public sewer network. The FRA claims that the proposed measures have been designed to provide sufficient water storage/attenuation to accommodate 1 in 100 year + climate change without increasing the runoff rate or volume off site or increase the surface water flood risk to existing properties or infrastructure adjacent to the site. Foul water drainage is also proposed to be discharged into the public sewer network.
201. Officer raise concerns with regards to the proposed drainage strategy on the basis that it is not intending to discharge at greenfield rate which is particularly pertinent given that the site is currently in greenfield condition. The applicant's response to not restricting runoff rates to greenfield rate was on the basis of advice from manufacturers that lower discharge rates (opening of the flow control) result in a higher risk of blockages, which, in an un-inspected chamber can result in a permanent overflow condition, thus negating the flow control arrangement. The applicant also considers this to be in line with Environment Agency guidance. It is recommended this matter is addressed through condition.
202. Groundwater flood risk is also acknowledged (as low risk) and, to mitigate this risk, the FRA recommends finished floor levels to be in excess of 2m above the recorded groundwater level and for external areas to be designed to ensure that flood water is directed away from the building. Flood risk from other sources is considered low (sewer and reservoir).

203. The Council's Flood Officer and the Environment Agency raised no objections to the proposal based on the information provided.
204. The site is on land designated as a principal aquifer and concerns were raised regarding the impact of the construction on the aquifer. This can be dealt with through securing further details of a Construction Method Statement through a condition.
205. Overall, the findings and mitigation measures set out in the FRA are considered to appropriately address the flood risk on the site, taking into account the need to ensure the development does not exacerbate flood risk beyond the site, subject to a condition requiring further details of the sustainable drainage strategy.

Trees and Ecology

206. *With respect to trees, under policy LP 16, the Council:*
- *Requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or the creation of new, high quality green areas, which deliver amenity and biodiversity benefits.*
 - *resists the loss of 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;*
 - *requires 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;*
 - *requires, 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);*
 - *requires 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;*
 - *requires 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). The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.*
 - *encourages planting, including new trees, shrubs and other significant vegetation where appropriate.*
207. *With regards to ecology, policy LP 15 seeks to preserve and where possible enhance the Borough's biodiversity and specifically requires new development to:*
- *protect biodiversity in, and adjacent to the Borough's designated sites for biodiversity and nature conservation importance (including buffer zones)*
 - *Support enhancements to biodiversity*
 - *incorporate and create new habitats or biodiversity features into development sites and into the design of buildings themselves where appropriate;*
 - *deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;*
 - *ensure new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;*
 - *enhance wildlife corridors for the movement of species, including river corridors, where opportunities arise; and*

- *maximise the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.*

208. *Policy LP 12 - Green Infrastructure – requires all development proposals to protect, and where opportunities arise enhance, green infrastructure.*

209. The site is primarily grassland which was previously used for the grazing of horses but comprises a variety of habitats. The site is not a designated biodiversity site but is unique within the local environment, due to several factors including its sheer size, habitat type, lack of public disturbance and position as a stepping stone and corridor contribution between the Railway Line (Site of Importance for Nature Conservation – SINC), Crane Park and Hounslow Heath which are Local Nature Reserves.

210. The following reports and surveys have been submitted, which identify the wildlife and habitats on the site and within the vicinity:

- Preliminary Ecological Appraisal
- Vegetation Survey
- Reptile Survey
- Badger Survey
- Biodiversity Enhancement and Landscape Management Plan

211. Although the built development can be considered as being restricted to the north-east corner of the site, this results in a significant loss of grassland and the change of use proposed for over 3ha of moderately species-rich albeit semi-improved grassland to sports pitches will mean more intense management and will degrade the quality of the grassland from an ecological perspective. In order to offset the loss of biodiversity, the following measures are proposed:

- Habitat corridor / grassland buffer along the northern boundary
- A new area of public open space
- Further planting along the perimeter of the site
- Green roof / wall
- Species-specific enhancements (bird, bat and invertebrate boxes, stag beetle logger)

Habitat corridor

212. A habitat corridor along the northern boundary is proposed, which ranges in width between approximately 6-14m and which comprises of the existing hedge/scrub (outside of the school site) as well as a natural grassland buffer. In achieving this, the applicant has revised the layout of the sports pitches in comparison to that initially submitted following advice from the Council's Ecologist. The corridor will provide linkages to the wider ecological/green infrastructure network (including the nearby railway line SINC as well as areas of less intensively managed grassland which will offer biodiversity value in itself.

213. The Council's Ecologist is supportive of this part of the scheme subject to further details of its maintenance and management which can be secured through conditions.

Public open space

214. A new area of semi-natural grassland public open space (approximately 1.8 ha) is proposed to the west of the site. Indicative plans of this area have been provided which would ultimately be transferred to the Council who would subsequently establish and manage the space. This species-rich grassland is the primary means of offsetting the degradation on the remainder of the site.

215. The Council's Ecologist is satisfied that the area of open space, in combination with the other measures set out elsewhere in this section of the report, sufficiently offsets the loss of habitat

from the school development subject to the following contributions requested by the Council's Parks Team:

- £153,809 towards grassland restoration and ongoing site management and maintenance over 5 years

216. The financial contribution towards these works are accepted by the applicant. Further details of the grassland restoration and site management could be secured through the S106 legal agreement.
217. It is intended that the establishment of the public open space would be simultaneous with the construction of the school and this can be secured.

Other matters

218. The existing hedgerow / scrub habitat along the northern boundary of the site has biodiversity value, in particular for breeding birds, and the scheme seeks to retain this habitat by positioning the fence southwards by approximately 2-3m. The Council's Ecologist retains some concerns over the type of fencing proposed (3m high closeboard fencing) which would reduce light and prohibit species movement between the hedge and habitat corridor. However, the does not consider this to be sufficient to object to the scheme and is satisfied that this matter can be dealt with through conditions where consideration could be given to mitigation such as gaps in the fence line to allow the movement of small mammals.

Badgers

219. A Badger Survey has been provided, which identifies some evidence of badger activity on the site in the form of a disused outlier sett (setts which are intermittently occupied). Further surveys can be secured by conditions.

Bats

220. A Preliminary Ground Level Bat Roost Assessment has been submitted, which found some habitats of 'moderate' and 'low' potential for supporting roosting bats. Some trees are to be felled (none of those identified as having bat potential as referenced above) but new planting is proposed along the perimeters of the site which will enhance this habitat. Bat boxes are also proposed across the site. Further surveys can be secured by condition.
221. A plan has been provided showing proposed external lighting which shows that lux levels have been minimised along the northern boundary in particular. The Council's Ecologist retains some concern over the impact of car park lighting intruding into the SINC corridor to the north of the site, however, accepts the scheme on the basis that Hospital Bridge Road itself is street lit and as there are no existing bat records in this particular area. Further details of external lighting (including timings of lighting and mitigation measures to further reduce spillage) can be secured by condition.

Great Crested Newts

222. Great Crested Newts (GCN) are protected species through EU and UK legislation. The Reptile Survey found no evidence of amphibians on-site or within 2km and concluded that, due to the lack of water bodies and sub-optimum habitat on site, and therefore it was not necessary to undertake further assessment. However, the Council has been made aware of recordings of GCN sightings in the vicinity. In response to this, further work has been undertaken to assess the habitat where the recording was made as well as the likelihood of dispersal to the application site. The report concludes that the habitat does not provide ideal habitat for GCNs and that dispersal to the site is likely to be limited by transport corridors. On this basis, the report concludes that the likelihood of GCNs occurring at the site is low. The Council's Ecologist accepts the conclusions made.

223. Natural England, who informed the Council that they had been notified of the presence of GCNs in proximity to the site as discussed above, raise no objections, determining that the Local Authority is responsible for the consideration of this matter.
224. The proposal would result in the significant loss of grassland, however, the Council's Ecologist is satisfied that the areas of grassland with the most important connectivity into the surrounding landscape have been retained and that the restoration and future management of the site, aimed at improving habitat quality and diversity in the new space and habitat corridor, in addition to species-specific mitigation, will offset the habitat loss. A financial contribution has been requested by the Council's Parks Team for grassland restoration and ongoing maintenance and management of the site. This has been agreed by the applicant. Subject to the completion of the S106 and the following, the Council's Ecologist raises no objections:
- Landscape Management Plan (school site)
 - Public open space management plan
 - Detailed scheme for establishing and managing the pitches and grass buffers
 - Establishment of the amenity grassland for the sports pitches
 - Ecological enhancements scheme
 - Fencing details
 - Protected species condition
 - Vegetation removal condition
 - Details of green roof and green wall
 - Details of external lighting (including design and specification of lamps, timings etc)
 - Removal of Japanese knotweed
 - Further wildlife surveys (badger, bat roost assessment)
 - Appropriate financial contribution towards grassland restoration and ongoing site management and maintenance for the public open space

Trees

225. There are numerous trees along the northern, western and southern boundaries in particular which provide important linear tree features, screening and habitat. There are also ornamental specimens at the site entrance (opposite Montrose Avenue) which provide visual amenity. There are no TPOs on the site but it is identified as an area for tree planting.
226. Trees along the Hospital Bridge Road frontage which have biodiversity value and provide an important belt of vegetation, softening the busy roadside, are to be retained which is supported.
227. The submitted Arboricultural Impact Assessment and Arboricultural Method Statement outline that a total of 14 individual trees and parts of 3 groups are to be removed (as detailed below), some of which are off-site. 4 of these trees are proposed to be removed irrespective of the development due to poor health (T009; T014; T017; T041):
- 2 x Category B
 - 14 x Category C
 - 1 x Category U
228. The Council's Tree Officer acknowledges that the majority of the trees proposed for removal are of little significance within the local and wider landscape and agrees with the categorisation of the trees in the submitted AIA and, on this basis, raises no in principle objections subject to an appropriate and sustainable planting scheme across the site. Tree T19 is a Category B Oak tree on the northern boundary which is visible from public places and will be removed to facilitate the development. The Council's Tree Officer has visited the site and noted that this tree is under physiological stress and its categorisation could be disputed and so there are no objections to its loss. It is also noted that the retention of this tree would result in a likely conflict and the presence of the building will have the effect of removing this tree from public view also. Furthermore, the

applicant has also revised the layout of the car park to avoid excavating into a bank likely containing tree roots from a nearby Oak group.

229. In terms of retained trees, the Council's Tree Officer is satisfied that the proposed layout (in terms of the school building, perimeter fencing and site access/car park etc) will not damage or affect their long-term health and further details of tree protection can be secured through conditions.
230. In terms of the proposed planting strategy, the Council's Tree Officer raises no objections to the specific location of trees/planting, however, raises concerns over some of the species being proposed. Through conditions, further details and justification of the proposed planting can be secured, including specific species, details of maintenance and of the rooting environment to ensure that new planting is sustainable and compatible with the long-term use of the site.

Summary

231. Overall, the Council's Ecologist is satisfied that the loss of biodiversity resulting from the development will be sufficiently offset through the new public open space, grassland buffers, general landscaping and planting proposed across the site and species-specific mitigation, subject to conditions (set out above), the transfer of land identified for public open space to the Council and an appropriate financial contribution towards grassland restoration and ongoing site management and maintenance of this area.
232. Whilst the loss of trees on the site is regrettable (2 x Cat B; 14 x Cat C and 1 x Cat U), the proposal will provide a substantial increase in planting across the site and, subject to further details outlined above which can be secured by conditions.

Sustainability

233. *Policies LP 20 and LP 22 set out the sustainability credentials developments should achieve:*
- *More than 1 unit or 100sqm or more of non-residential floor space: Complete the Sustainable Construction Checklist SPD.*
 - *Non-residential buildings over 100sqm: BREEAM 'Excellent' standard.*
 - *From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.*
 - *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:*
 - *All new development will be required to connect to existing DE networks where feasible.*
 - *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).*
 - *Where feasible, new non-residential development of 1000sqm or more, 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.*
234. *LP 17 requires green and/or brown roofs to 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.*

235. The application has been accompanied with reports which confirm:
- An **Energy Strategy** confirming 35% reduction in CO2 emissions through energy demand reduction (7.69%) and renewable energy measures (27.31%). This would be achieved through investing in energy efficient building fabric, fittings and fixtures (i.e. energy efficient boilers) with the remaining reduction being achieved through photovoltaic panels to the roof of the teaching block.
 - Further to the London Plan Energy Hierarchy, the Energy Strategy also demonstrates compliance with the ESFA's Output Specification (OS), which seeks exemplar design standards for education buildings, in providing a better internal environment with a focus on passive design to reduce the need for active cooling and a reduction in hot water demand. These result in further CO2 savings of 19%, giving a total reduction of 55.47%. Whilst this is not a policy requirement, it is a clear signal of a highly sustainable building which is benefit of this scheme.
 - A **Sustainable Construction Checklist**, which recognises the development will help in significantly improving the Borough's stock of sustainable developments.
 - A **BREEAM pre-assessment** giving a score of 'Very Good'. A statement has been provided to justify the development's inability to achieve an 'Excellent' rating (as required through LP 22) with the reasoning being the ESFA's funding model (which allows for environmental and sustainable features, albeit only a BREEAM 'Very Good' rating), justifying the use of public funds to meet the required 'Excellent' rating, the overall environmental credentials of the development as a whole (taking into account the preceding paragraphs as well as the Trees and Biodiversity section of this report) as well as some BREEAM credits not being achievable (in whole or in part). Given the findings of the above paragraph, this position is accepted.
236. It is noted that the Draft London Plan Be Lean energy reduction requirement of 10% is not being met with only an 8% reduction being achieved. The applicant has been working with the GLA and the applicant has confirmed that it is only possible to estimate CO2 emissions at this stage as the building design is being developed but that the final percentage of renewable technologies will be altered to meet London Plan targets. It is deemed this could be addressed through condition.
237. The GLA also raised concern with regard to cooling demand but the applicant has confirmed that there is no active cooling proposed for occupied spaces.
238. From 2019, the Local Plan requires major non-residential developments to be zero carbon. The scheme cannot achieve 100% reductions in regulated emissions, but that remainder is to be offset through a contribution to the Council's Carbon Offset fund, estimated at £105,828.21. This can be secured through a S106 legal agreement.
239. The Energy Strategy confirms that the site is not within proximity to an existing district heat network or in an area identified as having potential high heating demand. However, the proposed development does allow future connection to a network should one become available. Furthermore, the report states that the expected heat profile is significantly less than GLA guidance which confirms that establishments such as schools are not appropriate for CHP on the basis that they do not have a year-round base load for optimum operation of CHP. The GLA has raised no concerns with this argument.
240. Green Roofs have been incorporated into the scheme. This appears to total approximately 922m², which is approximately 28% of the potential roof plate area (excluding areas reserved for rooftop plant). Policy LP 17 requires major developments with roof plates over 100sqm to aim for at least 70% of any potential roof plate area as green/brown roof. The justification put forward for the shortfall is the extent of PV on the roof as well as the loading capacity of the building's structure. However, paragraph 5.6.5. of the Local Plan states that green roofs do not preclude the use of renewable energy technologies and so this justification is not fully accepted. However,

it is acknowledged that, being publicly funded, new school buildings are required to be cost-effective and driven by guidelines set by the Government. Overall, the significant shortfall in green roof provision weights against the scheme but is not considered sufficient as a reason for refusal subject to a condition requiring further justification to be provided to demonstrate that it is not possible to provide an increased provision of green roof.

241. In summary, whilst there is some concern over compliance with the London Plan Energy Hierarchy, the applicant is working with the GLA to ensure compliance with the final expected CO2 emissions to be confirmed as the design of the building is finalised. It is therefore considered that compliance with the London Plan and policies LP 20 and LP 22 of the Local Plan can be secured by conditions and a financial contribution towards the Council's Carbon Offset Fund which can be secured by a Section 106 legal agreement.

Air Quality

242. *Through Policy LP 10, the Council promotes good air quality design and new technologies. Developers should secure at least 'Emissions Neutral' development. The following will be required:*

- *an air quality impact assessment, including where necessary, modelled data;*
- *mitigation measures to reduce the development's impact upon air quality;*
- *measures to protect the occupiers of new developments from existing sources;*
- *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*

243. The site is located within an Air Quality Management Area (AQMA). LBRuT has a number of kerbside (0-1m from the edge of road) and roadside (1-5m) monitoring sites in the vicinity of the site and data collected shows that annual average EU limits for Nitrogen Dioxide (40ug/m³) are being exceeded and have been for the last 6 years. Furthermore, the Council has also collected monthly roadside/kerbside data from Hospital Bridge Road since January 2019 which presents similar findings, but annual average data is not yet available for this road. It is, however, unlikely that hourly limits are being breached (200 ug/m³).

244. An Air Quality Assessment (AQA) has been submitted, which is based on background dispersion modelling which takes into account DEFRA background air quality data and verified using the local roadside/kerbside data referred to above. Dispersion modelling gives a broader indication of the air quality conditions in the area as pollution levels drop off significantly from the roadside/kerbside and is accepted as being an appropriate methodology for the purposes of the AQA.

245. The AQA calculates the existing baseline conditions at receptors along Hospital Bridge Road as well as the conditions at the receptors taking into account the impact of the development. The assessment concludes that the percentage increase of annual mean nitrogen dioxide and particulate (PM₁₀ and PM₂₅) concentrations in the year 2020 (year of opening) on existing roadside receptors would be less than 1% (negligible), even when testing the worst-case scenario sensitivity test. The report also estimates the impact on receptors at the school façade and within the site, again, concluding that air quality would remain within EU limits. The report also concludes that emissions from energy plant will have an insignificant impact on air quality at existing nearby properties or result in air quality exceedances within the development itself. The AQA also finds the development air quality neutral (for the proposed building and transport emissions) and, overall, concludes that air quality effects will be 'not significant'.

246. The modelling and methodology of the AQA is accepted by the Council's Air Quality Officer (being in line with DEFRA guidance). The AQA is based on the findings of the Transport Assessment which concludes that the development will result in additional vehicles on surrounding roads as a

result of the development and so there will be some worsening of the existing poor roadside / kerbside air quality conditions along Hospital Bridge Road and other surrounding roads which is particularly a concern given the number of pupils travelling to and from the site at peak hours (when traffic flow is slowest and when NO₂ levels are likely to be at their highest). However, the Council's Air Quality Officer accepts that any increase is likely to be 'negligible' and, furthermore, that roadside NO₂ exceedance is generally only accepted as a concern where people are exposed to this level for an hour or more (for example town centre locations) which is unlikely to be the case in this location.

247. A local resident association (HBRAG) has provided a detailed objection to the applicant's Air Quality Assessment. The Council's Air Quality Officer has viewed this objection and similarly raised a number of concerns with the AQMA which potentially lead to predicted NO₂ levels being underestimated:
- The discrepancy between modelling and LBRuT monitoring data (Approximately +25%) which is on the limit of DEFRA guideline tolerance levels (+/- 25% before adjustments should be made to modelling results)
 - Use of 2017 local monitoring data - 2018 data has not yet been published but indicates a slight increase in NO₂ levels at nearest monitoring sites
 - Data inputs – lowest traffic speed modelled being 20kph but congestion is recognised as an issue on Hospital Bridge Road
 - The selection of worst-case scenario receptors
248. Despite these concerns, the Council's Air Quality Officer accepts that these are unlikely to significantly alter the expected NO₂ levels resulting from the development and unlikely to trigger EU limit exceedances at the receptors identified in the AQA (note – these receptors differ from the roadside / kerbside locations where NO₂ levels are significantly worse).
249. The Council's Air Quality Officer requested £20,000 to provide awareness training at 4 local schools and to encourage a modal shift away from private transportation, however, this was not accepted by the applicant. This is regrettable, however, it would not be reasonable of the Council to require further mitigation or planning obligations on air quality grounds on the basis of the findings of the report submitted which is, broadly speaking, accepted by the Council's Air Quality Officer. Ultimately, the Council's Air Quality Officer does not object to the scheme subject to the following:
- TfL financial contributions towards additional bus services / capacity (£1.175m)
 - Installation of ultra-low NO_x boilers (as confirmed in the Air Quality Assessment)
 - Travel Plan to encourage cycling and walking by staff and pupils
 - Delivery and Service plan
 - A minimum of 20% active and 20% passive EV charge points
 - Cycle parking in line with London Plan
 - Dust Management Plan condition

Conclusion

250. This application relates to an undeveloped site located off Hospital Bridge Road, in addition to a small part of the adjacent horticultural nursery. The site lies within Metropolitan Open Land (MOL) but is not within a Conservation Area or within close proximity to any designated or non-designated heritage assets. The Hounslow Railway Triangle Site of Importance to Nature Conservation (SINC) lies adjacent to the site to the north.
251. This is a full planning application for the change of use of part of the site for the development of a 5 form of entry (FE) Secondary School and Sixth Form (Class D1) for 1,050 pupils (750 secondary school places and 300 sixth form places), erection of a main teaching block and adjoining sports block, up to three storeys in height, 3 court MUGA, playing pitches, on-site car park for 45 spaces, cycle parking, associated hard and soft landscaping, plant and mechanical

equipment. Further to this, an area of Public Open Space is proposed to the west of the site as an extension to Heathfield Recreation Ground and the applicant is also proposing community use of the site which would be subject to a Community Use Agreement. Other associated works include the formation of a new north boundary line associated with the horticultural nursery in addition to on and off-site highway works to facilitate pedestrian and highway access, including a dual access for the school and neighbouring Nursery.

252. The site is located in MOL and this development is considered inappropriate development and, by definition, harmful to the MOL. The introduction of permanent buildings associated hard and soft landscaping, boundary treatment and external lighting would bring about an urbanisation of the site, resulting in harm to the openness and character of the MOL, in particular in views from Hospital Bridge Road where the site is predominantly viewed, and which provides an important gap in the streetscene. The proposal also results in a significant intensification of use and would introduce a level of movement and activity that is considered significantly beyond the site's current use.
253. The NPPF states, *"inappropriate development...should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations"*.
254. The Council has a statutory duty to provide educational places for Borough residents and there is clear policy support through national, regional and local planning policy to finding a permanent site for the school. Paragraph 94 of the NPPF advises that *"it is important that a sufficient choice of school places is available to meet the needs of existing and new communities"* and that *"Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education"* and should *"give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications"*.
255. It is accepted that the applicant has established an educational need for the development and has demonstrated that there are no sequentially preferable sites to meet the need on a permanent basis. The school places currently provided by Turing House are essential in meeting educational need in the western part of the Borough. Without these places, forecast need would not be met, as confirmed by AfC who fully support this application.
256. It is accepted that the applicant has considered all reasonable options for the siting and layout of the development on this site, and ultimately arrived at the most appropriate option which minimises the impact on the MOL.
257. The proposed school building itself is deemed to strike an appropriate balance between meeting school design standards and minimising the footprint of the development to limit the impact on the MOL and, overall, the design, scale, mass, height, materials and landscaping are considered acceptable, subject to further details being secured through conditions.
258. Due to the siting, scale and height of the main teaching block in relation to neighbours, it is not considered that the development would result in an undue level of visual intrusion or loss of privacy through overlooking to neighbours, including those on Redfern Avenue that are considered to be the most affected. The significant increase in use of the site, in particular at morning and afternoon peak times, and use of playing fields and MUGA will bring about a change in circumstances for surrounding neighbours and will result in noise and activity beyond the existing situation. However, the impact on neighbours would not be unreasonable and it has been demonstrated through a Noise Assessment that noise levels from the MUGA would not result in

internal ambient noise levels being exceeded to those properties most affected. Further details of mitigation can be secured through noise control conditions.

259. The proposal will result in a significant uplift in vehicle and pedestrian movement to and from the site in the morning and afternoon peak periods. Various on and off-site highway works and mitigation measures are proposed, in addition to soft measures to encourage sustainable forms of transport and, on this basis the Council's Transport Officer has advised the proposal can be accommodated on the surrounding highway and footway network without resulting a severe impact on pedestrian and highway safety subject to the proposed mitigation measures, general site access arrangements (i.e. segregated pedestrian/cycle way), an additional pedestrian access to the site which would help even demand across the highway network as well as the provision of a zebra crossing for which the applicant would be required to attain approval from the Local Highway Authority. The provision of a zebra crossing would be subject to further detailed design and satisfactorily passing further safety auditing and, through this process, consideration can be given to amended, additional or alternative safety measures necessary to ensure pedestrian and highway safety, the costs of which would be fully met by the applicant.
260. 45 off street parking spaces are proposed for staff. TfL object to this level of parking provision albeit this aligns with Local Plan parking standards. The Council's officers accept the proposed level of parking as Local Plan compliant and that the applicant has demonstrated through a parking survey that there is sufficient capacity to accommodate the development without the overall local on-street parking stress exceeding 85%.
261. It is acknowledged that the site's location adjacent to a horticultural nursery raises pedestrian and highway concerns due to the significant number of pedestrians and cyclists that would be required to cross the access to the nursery during peak periods. This matter is of concern and weighs against this scheme, however, the applicant has demonstrated a thorough and robust approach to considering alternative locations for the school and proposed a new pedestrian entrance from Heathfield Recreation Ground and mitigation of safety concerns in Hospital Bridge Road.
262. Ultimately, the Council's Transport Officer raises no objections to the proposal subject to the measures set out below being secured through a S106 legal agreement and S278 of the Highways Act 1980.
263. The proposal will result in a significant loss of grassland and habitats and is sensitively located adjacent to the Railway Line Site of Importance for Nature Conservation (SINC). The applicant is offsetting this through new public open space, grassland buffers, general landscaping and planting proposed across the site in addition to species-specific mitigation. The Council's Ecologist is satisfied that the loss of biodiversity resulting from the development will be sufficiently offset through these measures and subject conditions, the transfer of land identified for public open space to the Council as well as appropriate financial contributions towards grassland restoration and ongoing site management and maintenance of this area. Whilst the loss of trees on the site is regrettable (2 x Cat B; 14 x Cat C and 1 x Cat U), the proposal will provide a substantial increase in planting across the site and, subject to further details outlined above which can be secured by conditions.
264. Significant public benefits form part of this proposal in the form of approximately 25,534m² of space being made available for community use and approximately 17,672m² of public open space being provided for informal recreation and habitat enhancement, secured through a Section 106 Legal Agreement.
265. Some concern is raised with regard to compliance with the London Plan Energy Hierarchy. The applicant is working with the GLA to ensure compliance with the final expected CO₂ emissions to be confirmed as the design of the building is finalised. It is therefore considered that compliance with the London and Local Plan can be secured by conditions and a financial contribution of

£105,828.21 towards the Council's Carbon Offset Fund which can be secured by a Section 106 legal agreement.

266. *As outlined in the NPPF:*

- *Decisions should apply a presumption in favour of sustainable development, and grant permission unless any adverse impacts of doing so would 'significantly and demonstrably outweigh the benefits, when assessed against policy.*
- *Inappropriate development...should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".*

267. In this instance and in summary:

- a) it is deemed that very special circumstances have been demonstrated to justify the harm to the MOL.
- b) mitigation measures, conditions and Section 106 Heads of Terms and 278 Highway Works (listed below) can satisfactorily address potential harm arising from the development
- c) benefits are deemed to outweigh the harm to the MOL.

Heads of Terms

- The transfer of land identified for public open space to the Council
 - Financial contributions towards grassland restoration
 - Financial contribution for 5 year management and maintenance of the public open space
 - Both to a value of £153,809
- Community Use Agreement -facilities, hours (1 year review), management, pricing, car parking, access
- Heathfield Recreation Ground
 - Financial contribution of £22,500 to mitigate increased usage
 - £6,000 towards the provision of bins and benches
 - Contribution for construction of 11m x 2.5m of footway from the northern edge of the existing footway in the north-east corner of Heathfield Recreation Ground into the school site in a northerly direction
- Traffic Management Order - Fees to secure a TMO (up to £3,000) to
 - extend the existing Chase Bridge 20mph Zone on the B358 Hospital Bridge Road from its current location to a position north of the railway bridge,
 - to insert double yellow lines on the B358 Hospital Bridge Road and Montrose Avenue as shown in Drawing No 007 Rev. E, and on both sides of the carriageway as it goes over the railway line north of the site.
- Buses: A financial contribution of up to £1.175m towards additional bus services / capacity subject to staged draw down payments to be related to evidenced demand for new buses over a period of 5 years unless alternative government funding for TfL bus services is confirmed during this period.
- Pedestrian Crossing Facilities: £120,000 towards improved pedestrian crossing facilities at the A316 / Hospital Bridge Road junction to improve the safety of pedestrians and cyclists
- School Travel Plans (£1,000 / year).
- Energy Strategy Contribution -Carbon Offset

S278 of the Highways Act 1980:

- Construction of a simple priority junction access with entry treatment to be agreed with the Local Highway Authority
- The relocation of the gateway signage to the Chase Bridge 20mph Zone to a position north of the existing railway bridge on the B358 Hospital Bridge Road with the exact location to be agreed with the Local Highway Authority.

- The construction of zebra pedestrian crossing (in addition to any other alternative safety measures deemed necessary to ensure pedestrian and highway safety) on the B358 Hospital Bridge Road, together with dropped kerbs and tactile paving and any associated highway works with the exact location to be agreed with the Local Highway Authority prior to commencement of the development.
- The construction of new dropped kerbs any associated highway works at the Montrose Avenue/B358 Hospital Bridge Road priority junction
- The insertion of a speed hump on the B358 Hospital Bridge Road north and south of the site access to denote entry and exit from the above-mentioned 20mph zone

Recommendation: Approval subject to conditions, informatives and the completion of a S106 and S278 Agreement to secure the above Heads of Terms, and subject to referral to the Greater London Authority to:

- Allow the recommendation to proceed unchanged
- Direct the Council under Article 6 to refuse the application
- Issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application

Standard Conditions

AT01:	Development begun within 3 years
BD10:	Sample Panels of Brickwork
BD13A:	Materials to be approved
DV18A:	Refuse Arrangements
DV29F:	Potentially Contaminated Sites
DV30:	Refuse Storage
DV42:	Details of foundations - piling etc
DV48:	Approved Drawings
DV51:	Water Consumption
GD02A:	Restriction-Alterations/extn (schools)

NS01: BREEAM for Non-Housing

Unless otherwise agreed in writing by the Local Planning Authority, the D1 education facility hereby approved shall achieve BREEAM 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 design that replaces that scheme).

REASON: In the interests of promoting sustainable forms of developments and to meet the terms of the application.

NS02: CMS / Logistics Plan

No development shall take place, including any works of demolition, until a Construction Management Statement / Logistics Plan (to include any demolition works) has been submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved details through the demolition / construction period. The document shall demonstrate compliance with the guidance found in the Construction Logistics Plan for developers produced by Transport for London and include:

- a. The size, number, routing and manoeuvring tracking of construction vehicles to and from the site, and holding areas for these on/off site;
- b. Site layout plan showing manoeuvring tracks for vehicles accessing the site to allow these to turn and exit in forward gear;
- c. Details and location of parking for site operatives and visitor vehicles (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);

- d. Details and location where plant and materials will be loaded and unloaded;
- e. Details and location where plant and materials used in constructing the development will be stored, and the location of skips on the highway if required;
- f. Details of any necessary suspension of pavement, roadspace, bus stops and/or parking bays;
- g. Details where security hoardings (including decorative displays and facilities for public viewing) will be installed, and the maintenance of such;
- h. Details of any wheel washing facilities;
- i. Details of a scheme for recycling/disposing of waste resulting from demolition and construction works (including excavation, location and emptying of skips);
- j. Details of measures that will be applied to control the emission of noise, vibration and dust including working hours. This should follow Best Practice detailed within BS5288:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites;
- k. Details of any highway licenses and traffic orders that may be required (such as for licences for any structures / materials on the highway or pavement; or suspensions to allow the routing of construction vehicles to the site);
- l. Details of the phasing programming and timing of works;
- m. Where applicable, the Construction Management Statement should be written in conjunction with the Arboricultural Method Statement, and in accordance with British Standard BS5837:2012 'Trees in relation to design, demolition and construction - recommendations', in particular section 5.5, 6.1, 6.2, 6.3 and 7;
- n. A construction programme including a 24 hour emergency contact number;
- o. See also TfL guidance on Construction Logistics Plans;
- p. Communication strategy for residents during demolition and construction.
- q. Details to demonstrate the construction will not impact the aquifer.

REASON: In the interests of highway and pedestrian safety together with the amenity of the area.

NS03: Delivery and Servicing Plan – Education Facility

Prior to the occupation of the development hereby approved, a delivery and servicing management plan shall be submitted to and agreed in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved details unless otherwise previously agreed in writing by the Local Planning Authority. The applicants are advised the plan should restrict deliveries / serving between 09:30 and 15:00 hours.

REASON: To ensure a safe and convenient form of development with limited impact on local roads and to safeguard the amenities of nearby occupiers and the area generally.

NS04 Cycle Parking

1. Prior to occupation of the development hereby approved, a scheme showing the cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented. Such drawings to show:
 - a. the position, design, materials and finishes thereof.
 - b. 156 sheltered and secure cycle spaces
 - c. Area for further cycle storage if demand indicates in the future
2. Prior to the occupation of the development hereby approved the following cycle infrastructure (in accordance with the approved scheme) shall be provided, and thereafter retained:
 - a. Segregated cycle lane into/out of the main site access
 - b. Cycle access via the secondary access through Heathfield Recreation Ground

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

NS05: Secondary Access Point

Prior to the occupation of the school hereby approved, the secondary pedestrian access, via Heathfield Recreation Ground, shall be available for use, and thereafter maintained. The access

shall only be used within the hours of 07:00-17:00 Monday to Friday, unless otherwise agreed in writing with the Local Planning Authority,

REASON: To ensure a satisfactory form of development and pedestrian safety.

NS06: Electric Vehicle Charging Points

a. Unless otherwise agreed in writing with the Local Planning Authority, no development shall take place until a scheme for EVC infrastructure (including 9 active and 9 passive spaces), in accordance with London Plan Standards has been submitted to and approved in writing by the Local Planning Authority.

b. Prior to the any occupation of the development hereby approved, the approved scheme shall be installed, be ready for use, and be thereafter retained.

REASON: To encourage the use of ultra-low emission vehicles.

NS07: Car park and access management plan

Prior to the occupation of the development hereby approved, a car park and access management plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied other than in accordance with the approved scheme. The Plan shall include, but not be limited to, numbers of staff, hours of operation of the plan and roles and responsibilities.

REASON: To ensure a safe and convenient form of development and to safeguard the amenities of the area generally.

NS08: Parking spaces for specified uses

a. Prior to occupation of the development hereby approved, all the parking spaces, as indicated on Drawing No. EFATH-ALA-00-XX-DR-L-0004-P07, shall be clearly marked out on site at all times and shall not be used for any purposes other than for the parking of private motor vehicles by school staff, unless otherwise agreed in writing by the Local Planning Authority.

b. Prior to occupation of the development hereby approved, 5% of bays shall be marked as disabled bays, and thereafter retained.

REASON: To ensure that the proposed development does not prejudice the free flow of traffic, the conditions of general safety along the neighbouring highway or the amenities of the area.

NS09: Shower facilities

Prior to the occupation of the school, the staff and pupil change facilities, as shown on FS0316-STL-ZZ-00-DR-A-0101-P04, shall be in situ and made available to users of this building, and thereafter maintained, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To encourage sustainable transportation

NS10: Sustainable Drainage System

Unless otherwise agreed in writing with the Local Planning Authority, no works hereby permitted shall commence until a scheme to dispose of surface water (and the timing for implementation) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented and retained as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interest of sustainable construction, to avoid excessive surface water runoff and to ensure that the surface water drainage system does not pollute the ground water below the site.

NS11: PV Panels

Prior to the occupation of the development hereby approved, details of the siting, gradient and number of pv panels to be installed shall be submitted to and approved in writing by the Local Planning Authority; implemented as approved and thereafter maintained.

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

NS12: Energy Strategy

No development shall take place, including any works of demolition, until an Energy Strategy for the site has been submitted to and approved in writing by the Local Planning Authority. The strategy shall demonstrate:

- a. The building achieves zero carbon standards, with at least 35% of regulated CO2 emission reductions achieved on site (unless otherwise agreed in writing with the Local Planning Authority). Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.
- b. The necessary Carbon Offset Fund (in line with adopted standards)
- c. How the building and its associated energy requirements will be met in line with the Energy Hierarchy (in particular 10% Lean Energy Requirement)

The development shall not be constructed other than in accordance with the approved scheme.

REASON: In the interests of promoting sustainable forms of developments and to meet the terms of the application.

NS13: Uses

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that Order) the site, other than the area identified as 'Habitat Creation' on Drawing No. EFATH-ALA-00-XX-DR-L-0001-P06, shall not be used other than in D1 education use (Non-residential Institutions) and associated ancillary use.

REASON: To accord with the terms of the application, to preserve the Borough's stock of social infrastructure space, to ensure the development does not prejudice the free flow of traffic and highway safety and to protect existing residential amenities.

NS14: Pupil & Staff Numbers

The school hereby approved shall:

- a) have no more than 750 secondary school pupils and 300 sixth form pupils registered to attend at any one time unless otherwise agreed in writing by the Local Planning Authority
- b) have no more than 90 FTE staff employed at any one time unless otherwise agreed in writing by the Local Planning Authority

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

NS15 – Hours

Unless otherwise previously being agreed in writing by the Local Planning Authority, the school shall not operate otherwise between the hours of 07:00-17:00 Monday to Friday.

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

NS16: Restriction on use of roof

The roof of the building shall not be used for any purpose other than as a means of escape in emergency or for maintenance of the building.

REASON: To safeguard the amenities of the adjoining premises and the area generally.

NS17: Ecological Enhancements

Prior to the occupation of the school hereby approved, a scheme of ecological enhancements shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved scheme, and shall not be occupied until the enhancements have been implemented in full or in accordance with a timetable of implementation. Such enhancements to include:

- bat, bird and invertebrate boxes
- habitat piles and stag beetle loggeries,

- measures to allow movement of species between the site and habitat corridor

Details to be submitted include:

- specific location
- box type
- construction method.

REASON: To preserve and enhance nature conservation interest in the area.

NS18: Protected species

Unless otherwise agreed in writing by the Local Planning Authority, an ecological clerk of works must be employed on site during site clearance and construction close to areas covered within the natural landscape management plan. Persons working on site must be aware of the potential for encountering protected species. In the event that any protected species is discovered during development, including bats, badgers, reptiles or amphibians, an appropriate exclusion zone must be established, a qualified ecologist consulted, and the Local Planning Authority notified. Any subsequent actions required must be submitted to and approved in writing by the Local Planning Authority. The development shall not then be implemented other than in accordance with approved actions by the Local Planning Authority.

REASON: To ensure that ecological impacts are avoided or mitigated.

NS19: Vegetation removal

Unless otherwise agreed in writing by the Local Planning Authority, vegetation clearance shall not be carried out other than outside of the bird nesting season (March to September inclusive). If this is not feasible, any vegetation to be removed or disturbed shall be checked by an experienced ecologist no more than 5 days prior to the works and an exclusion zone set up or works delayed as necessary.

REASON: To ensure that ecological impacts are avoided or mitigated.

NS20: Japanese Knotweed

Unless otherwise agreed in writing by the Local Planning Authority, a method statement and programme for the removal and/or the chemical treatment of Japanese Knotweed on site shall be submitted to and agreed in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved scheme and programme.

REASON: To enhance the nature conservation of the site and to prevent it spreading within the site or to adjoining land.

NS21 Badger survey

Unless otherwise agreed in writing by the Local Planning Authority, prior to the commencement of development, a pre-construction survey for badgers shall be submitted to and approved by the Local Planning Authority.

REASON: To ensure that badger activity status is current.

NS22: External Illumination

No external illumination shall be installed, other than in accordance with details which shall previously be submitted to and approved in writing by the Local Planning Authority and thereafter constructed in accordance with these details. Such details to include:

- locations of external lighting
- specifications
- lux plan (vertical as well as horizontal)
- spectrum of proposed lighting prior to implementation.
- Timings
- Measures to reduce spillage

REASON: To protect/safeguard the amenities of the locality and nature conservation interests

NS23: Green Roof

a) Unless otherwise agreed in writing by the LPA, prior to the commencement of development hereby permitted, a scheme shall be submitted to the Local Planning Authority demonstrating 70% Green Roof, or justification as to why 70% is not feasible, for approval in writing. The scheme shall include the following details:

- species mix;
- depth of substrate;
- type of membrane;
- how levels of light, moisture, aeration and nutrients will be achieved;
- maintenance plan, including access.

b) The development shall not be occupied until the approved scheme has been fully implemented and is thereafter maintained in accordance with the approved scheme.

REASON: To preserve the ecological value of the site hereby approved, to promote sustainable development and ensure that the proposed development is in keeping with the existing building(s) and does not prejudice the appearance of the locality.

NS24: Green wall

Unless otherwise agreed in writing by the Local Planning Authority, prior to the commencement of development hereby approved, details of the green wall shall be submitted to and approved in writing by the Local Planning Authority such details to include:

- Location
- Specifications;
- Maintenance;
- Implementation;

The development shall not be implemented other than in accordance with the approved details and implemented in full prior to occupation of the school hereby approved.

REASON: To protect/safeguard the amenities of the locality and nature conservation interests

NS25: Landscape Management Plan:

Unless otherwise agreed in writing with the Local Planning Authority, prior to occupation of the development hereby approved, a landscape management plan for the site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

- a. covering the boundaries, habitat corridor and secondary access
- b. long-term objectives, management responsibilities and detailed prescriptions and schedules for maintenance and conservation management over a minimum period of five years from the date of occupation
- c. shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented / used other than in accordance with the approved landscape management plan.

REASON: To safeguard the ecology of the site and its connectivity into the surrounding landscape.

NS26: Amenity grassland / sports pitches

Unless otherwise agreed in writing by the Local Planning Authority, prior to commencement of the development, details for the establishment of the amenity grassland for sports pitches (and grass buffers) – including drainage, cultivation, seed, establishment method and future maintenance – shall be submitted to and agreed in writing by the Local Planning Authority and thereafter constructed in accordance with these details. No re-seeding that be carried out other than with appropriate native grasses.

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

NS27: Sports pitches 1

Unless otherwise agreed in writing by the Local Planning Authority, no development shall take place until:

- a) A detailed assessment of ground conditions of the land proposed for the new playing field land as shown on drawing number ETATH_00-XX-DR-L-0004 S2 Rev P02 shall be undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and
- b) Based on the results of this assessment to be carried out pursuant to (a) above of this condition, a detailed scheme to ensure that the playing fields will be provided to an acceptable quality (including appropriate drainage where necessary) shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.

The works shall not be implemented other than in accordance with the approved scheme within a timescale to be first approved in writing by the Local Planning Authority after consultation with Sport England.

REASON: To ensure that site surveys are undertaken for new or replacement playing fields and that any ground condition constraints can be and are mitigated to ensure provision of an adequate quality playing field and to accord with LP 31 of the Local Plan.

NS28: Sports pitches 2

The playing fields hereby approved shall not be used other than for outdoor sport (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

REASON: To protect the playing field from loss and/or damage, to maintain the quality of and secure the safe use of sports pitches and to accord with LP Policy 31 of the Local Plan

NS29: Sports pitches 3

The playing field and pitches hereby approved shall be constructed and laid out in accordance with the approved drawings and with the standards and methodologies set out in the guidance note "Natural Turf for Sport" (Sport England, 2011).

REASON: To ensure the quality of pitches is satisfactory and they are available for use before development (or agreed timescale) and to accord with LP Policy 31 of the Local Plan

NS30: Sports pitches 4

Prior to occupation of the development, a Management and Maintenance Scheme for the facility including management responsibilities, a maintenance schedule and a mechanism for review shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The measures set out in the approved scheme shall be complied with in full, with effect from commencement of use of the playing fields.

REASON: To ensure that new facilities is capable of being managed and maintained to deliver a [facility] which is fit for purpose, sustainable and to ensure sufficient benefit of the development to sport (National Planning Policy Framework (NPPF) para 97) and to accord with LP Policy 31 of the Local Plan

NS31: Fencing

Prior to occupation of the site, details of the means of enclosure/fencing/gates – including gaps or gates to allow passage of badger, hedgehog and other small mammals – shall be submitted to and agreed in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved scheme and shall thereafter be retained as approved.

REASON: To safeguard the ecology of the site, to provide appropriate security and ensure neighbouring amenity is adequately safeguarded

NS32: Arboricultural Method Statement (AMS) required

Prior to the commencement of development, an Arboricultural Method Statement (AMS), shall be submitted to and approved in writing by the Local Planning Authority. The AMS must:

- (A) Be written in accordance with and address sections 5.5, 6.1, 6.2, 6.3 and 7 of British Standard 5837:2012 Trees in relation to design, demolition and construction – recommendations
- (B) Be written in conjunction with the scheme's specific method of construction (where applicable)
- (C) Outline any tree constraints and explain any impacts for both above and below ground.
- (D) Detail all tree protection (including plans)
- (E) Detail any special engineering for construction within the Root Protection Area.
- (F) Detail any facilitation pruning that may be required. The specification for tying back and/or pruning must be measurable and prepared by a suitably qualified Arboriculturalist or Arboricultural Contractor. All tree work must be undertaken in accordance with BS3998:2010 Tree work – Recommendations unless approved by the Councils Arboricultural Officer
- (G) Provide confirmation of the appointment of an Arboricultural Consultant for the duration of the development and a schedule of inspections too achieves an auditable monitoring and supervision programme, and a timetable for submission to the Local Planning Authority.

The development shall not be implemented other than in accordance with the approved AMS.

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

NS33: Site Monitoring Procedures and recording methods required

Prior to the commencement of development, a scheme for Site Monitoring and Recording shall be submitted to and approved in writing by the Local Planning Authority. This shall detail:

- (A) Confirmation of the appointment of a retained Arboricultural consultant to conduct an auditable system of site supervision and monitoring and provide reports to the Local Authority Tree Officer.
- (B) Details of the Arboricultural consultant, site manager, other key personnel with their key responsibilities and contact details.
- (C) Details of induction procedures for all personnel in relation to Arboricultural matters.
- (D) Timetable of events concerning the approved tree protection plans, including; initial implementation of the protective measures, the final removal of the protective measures and any incursion/alterations to accommodate site specific construction/demolition procedures as approved in the Arboricultural Method Statement and the level of supervision required.
- (E) Procedures for dealing with variations or non-approved incursions into the construction exclusion zones as detailed in the approved Arboricultural Method Statement.
- (F) Details when site monitoring will take place with the local Tree Officer either by site meetings or by some other pre-arranged agreement.
- (G) Post development assessment of the retained and planted trees and any necessary remedial action.
- (H) Record sheets of supervision, must be submitted to the Local Planning Authority within 48hrs of site visits.

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

NS34: Tree Planting Scheme Required.

1. Prior to the occupation of the development hereby approved, a tree planting scheme shall be submitted to and approved in writing by the local planning authority. This scheme shall be written in accordance with the British Standard 5837:2012 Trees in relation to design, demolition and construction – Recommendations (sections 5.6) and BS 8545:2014 Trees: from nursery to independence in the landscape. Recommendations, and include:
 - i. Details of the quantity, size, species, and position,
 - ii. Rooting environment
 - iii. Planting methodology

- iv. Proposed time of planting (season)
 - v. 5 year maintenance and management programme.
2. If within a period of 5 years from the date of planting that tree or any tree planted in replacement for it, is removed, uprooted, destroyed or dies (or becomes in the opinion of the local planning authority seriously damaged) then the tree shall be replaced to reflect the specification of the approved planting scheme in the next available planting season or in accordance with a timetable agreed in writing with the local planning authority.

REASON: To safeguard the appearance of the locality.

NS35: LT09 Hard and Soft Landscaping Works

- a. Before constructing any new hard or soft landscape as described in the application the full details of both hard and soft landscaping works must be submitted to and approved in writing by the local planning authority. These details shall include proposed finished levels or contours; other vehicle and pedestrian access and circulation areas; hard surfacing materials; hard surface construction and drainage; proposed and existing utility services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc); a program or timetable of the proposed works.
 - i. Hardstanding should be permeable.
- b. Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); detailing the quantity, density, size, species, position and the proposed time or programme of planting of all shrubs, hedges, grasses etc, together with an indication of how they integrate with the proposal in the long term with regard to their mature size and anticipated routine maintenance. All tree, shrub and hedge planting included within that specification shall be carried out in accordance with BS 3936:1986 (parts 1, 1992, Nursery Stock, Specification for trees and shrubs, and 4, 1984, Specification for forest trees); BS 4043: 1989, Transplanting root-balled trees; and BS 4428:1989, Code of practice for general landscape operations (excluding hard surfaces).
 - i. The soft landscaping works shall include (and not be limited to) the habitat corridor, grassland buffer along the northern buffer, around the perimeter of the site – including a 4m buffer adjacent to the rear gardens of properties on Springfield and Stirling Road).
- c. All hard and soft landscape works shall be carried out in accordance with the approved details and in any event prior to the occupation of any part of the development.

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

NS36: Air Quality- NRMM

All Non-Road Mobile Machinery (NRMM) should meet as minimum the Stage IIIB emission criteria of Directive 97/68/EC and its subsequent amendments unless it can be demonstrated that Stage IIIB equipment is not available. An inventory of all NRMM must be registered on the NRMM register <https://nrmm.london/user-nrmm/register>. All NRMM should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment.

REASON: To ensure that the construction phase of the development will not result in a deterioration of local air quality

NS37: Thames Water Condition

Prior to the occupation of the development hereby approved, written confirmation shall be submitted to the Local Planning Authority confirming either:-

- a. all water network upgrades required to accommodate the additional flows from the development have been completed; or

- b. a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development

NS38: Natural England Condition 1

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

REASON: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

NS39: Natural England Condition 2

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

REASON: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 170 of the National Planning Policy Framework.

NS40: Natural England Condition 3

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

REASON: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

NS41 - Mechanical Services Noise Control

- a) Before any mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction plant to which the application refers is used at the premises, a scheme shall be submitted to and approved in writing by the local planning authority which demonstrates that the following noise design requirements can be complied with and shall thereafter be retained as approved
- b) The cumulative measured or calculated rating level of noise emitted from the mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction plant to which the application refers, shall be 5dB(A) below the existing background noise level, at all times that the mechanical system etc operates. The measured or calculated noise levels shall be determined at the boundary of the nearest ground floor

noise sensitive premises or 1 meter from the facade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest British Standard 4142; An alternative position for assessment /measurement may be used to allow ease of access, this must be shown on a map and noise propagation calculations detailed to show how the design criteria is achieved.

- c) The plant shall be isolated on adequate proprietary anti-vibration mounts to prevent the structural transmission of vibration and regenerated noise within adjacent or adjoining premises, and these shall be so maintained thereafter.
- d) A commissioning acoustic test and report shall be undertaken within 2 weeks of mechanical services commissioning, in order to demonstrate that condition 1(b&c) above has been achieved. The results of the test shall be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to safeguard the amenities of neighbouring residents.

NS42 - School Internal Noise Protection Scheme

- a) Prior to the occupation of the school to which the application refers a scheme providing for the specification of building envelope & facade insulation & associated ventilation of the proposed development shall be submitted to and approved in writing by the local planning authority. The scheme shall provide sound attenuation against externally generated (transportation) noise sources including road, rail aircraft, so as to achieve the internal ambient noise levels detailed in Table 1: noise activity and sensitivity levels and upper limits for indoor ambient noise level in Acoustic Design of Schools: Performance Standards Building Bulletin 93 February 2015. Any works which form part of the scheme shall be completed in accordance with the approved details before the school is occupied and shall thereafter be retained as approved. Internal noise levels should be achieved with windows open for rapid ventilation purposes. Where this cannot be achieved alternative means of ventilation and cooling will be required. Where whole building ventilation is provided then acoustically treated inlets and outlets should ideally be located away from the façade(s) most exposed to noise (and any local sources of air pollution).
- b) A commissioning acoustic test and report shall be undertaken before the occupation of the building in order to demonstrate that condition 1(a) above has been achieved. The results of the test shall be submitted to and approved in writing by the LPA.

REASON: To ensure that the amenity of the occupiers of the proposed development are not adversely affected by (road traffic) (rail traffic) (air traffic) (other) noise.

NS43: Sports Playing Facilities and MUGA Noise Control Condition

- a) Unless otherwise agreed in writing by the Local Planning Authority, a scheme to protect noise sensitive premises against noise generated from the use of the Sports Pitches and Multi Games Use Area (MUGA) shall be submitted to and approved by the LPA. The scheme shall refer to the guidance contained Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015, produced by Sports England and demonstrate compliance with the requirements of part 1b below. Any works which form part of the scheme shall be completed in accordance with the approved details and retained thereafter prior to the first use of the proposed development.
- b) The equivalent continuous sound Level LAeq,T emitted from the use of the Sports Pitches and Multi Games Use Area (MUGA) to which the application refers, as measured (1 metre from the façade) (on the boundary of) representative noise sensitive premises (residential, hospital or school) to include;
 - Redfern Avenue
 - Stirling Road
 - Springfield Road

or when measured elsewhere and calculated to said locations, shall not exceed 50dB(A) LAeq, 1hour at all times that the Sports Pitches and MUGA's are in use;

- c) A commissioning acoustic test and report shall be undertaken before the first use of the development in order to demonstrate that condition 3 has been achieved. The results of the test shall be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to safeguard the amenities of neighbouring residents.

NS44: Odour Impact from the use of the kitchen extraction system- Odour control condition

- a) Unless otherwise agreed in writing by the Local Planning Authority, prior to occupation of the development hereby approved, details of a scheme for the extraction and treatment of fumes and odours generated from cooking or any other activity undertaken on the premises shall be submitted to and approved in writing by the local planning authority. Any equipment, plant or process approved pursuant to such details shall be installed prior to the first use of the premises and shall be operated and retained in accordance with the approved details and operated in accordance with manufacturer's instructions.
- b) The scheme shall apply the risk assessment approach outlined within the councils SPG Planning Guidance for Food and Drink Establishments and the odour abatement measures corresponding to the outcome of the risk assessment shall be installed. Low level stack discharge will generally not be acceptable, the preferred termination height is 1m above roof ridge or roof eaves. Further guidance is available from EMAQ: Control of Odour and Noise from Commercial Kitchen Exhaust Systems 2018

REASON: In order to safeguard the amenities of neighbouring residents.

NS45: Noise and Vibration Construction Method Statement

- a) Unless otherwise agreed in writing by the LPA, prior to commencement of the development, a noise and vibration Construction Method Statement (CMS) for the ground works, demolition and construction phases of the development site shall be submitted to and approved in writing by the Council. Details shall include control measures for noise, vibration including working hours. Approved details shall be implemented throughout the project period.
- b) The CMS shall follow the Best Practice detailed within BS 5228:2009+A1:2014 Code of Practice for noise and Vibration Control on construction and open sites and BS 6187:2011 Code of practice for full and partial demolition. Further guidance can be obtained from the commercial environmental health department. The CMS should include an acoustic report undertaken by a suitably qualified and experienced consultant and include all the information below:
- i. Baseline noise assessment – undertaken for a least 24-hours under representative conditions to determine the pre-existing ambient noise environment.
 - ii. Noise predictions and the significance of noise effects - Predictions should be included for each phase of the demolition, and construction, vehicle movements and an assessment of the significance of noise effects must be included based on the guidance in BS 5228:2009+A1:2014 Annex E
 - iii. Piling - Where piling forms part of the construction process, a low noise and vibration method must be utilised wherever possible, and good practice guidelines should be followed e.g. BS 5228:2009+A1:2014.
 - iv. Vibration Predictions and the significance of vibration effects - Predictions should be included for each phase of demolition, and construction, and an assessment of the significance of vibration effects must be included e.g. as per BS 5228:2009+A1:2014.
 - v. Noise and vibration monitoring – Permanent real time web enabled and/or periodic noise and vibration monitoring must be undertaken for the duration of the demolition and construction phases which may result in a significant impact. The location, number of monitoring stations and the measurement data must be agreed with the LPA prior to the start of construction.
 - vi. Community engagement – The steps that will be taken to notify and update residents and businesses that may be affected by the construction of the proposed development.

REASON: In order to safeguard the amenities of neighbouring residents.

NS46: Dust Management Plan

Unless otherwise agreed in writing by the Local Planning Authority, prior to commencement of the development hereby approved, a Dust Management Plan for the ground works, demolition and construction phases shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be implemented other than in accordance with the approved scheme. The dust management plan shall include:

- a. Demonstrate compliance with the guidance found in the control of dust and emissions from construction and demolition Best Practice produced by the Greater London Authority (GLA) http://static.london.gov.uk/mayor/environment/air_quality/docs/construction-dust-pg.pdf
- b. A risk assessment of dust generation for each phase of the demolition and construction. The assessment and identified controls must include the principles of prevention, suppression and containment and follow the format detailed in the guidance above. The outcome of the assessment must be fully implemented for the duration of the construction and demolition phase of the proposed development and include dust monitoring where appropriate.
- c. where the outcome of the risk assessment indicates that monitoring is necessary, a monitoring protocol including information on monitoring locations, frequency of data collection and how the data will be reported to the Local Planning Authority;
- d. details of dust generating operations and the subsequent management and mitigation of dust demonstrating full best practicable means compliance and covering construction activities, materials storage, on and off-site haul routes, operational control, demolition, and exhaust emissions; and
- e. where a breach of the dust trigger level may occur a response procedure should be detailed including measures to prevent repeat incidence

REASON: In order to safeguard the amenities of neighbouring residents

Informatives

- COMH07 - Composite Informative
- IL25C - NPPF APPROVAL - Para. 186 and 187
- IL29 - Construction Management Statement
- IL13 - Section 106 agreement
- IH08A - Travel Plan

IL01: Details of piling-EHO consultation

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

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

Where there is a risk of disturbance being caused from piling operations then the council under section 60 Control of Pollution Act 1974 can require Best Practicable Means (BPM) to be carried out. This may entail limiting the type of piling operation that can be carried out. The types of piling operations which are more suitable for sensitive development in terms of noise and vibration impact are;

- Hydraulic Piling
- Auger Piling
- Diaphragm Walling

IL02: Advertisements

The applicant is advised of the need to obtain separate consent under the Town & Country Planning (Control of Advertisements) Regulations 1992 for any advertisements requiring express consent which it is to display on these premises.

IL03: Section 106 agreement

This planning permission has a Section 106 Agreement which must be read in conjunction with it.

IL04: CIL liable

The applicant is advised that this permission results in a chargeable scheme under the Borough's and the Mayor of London's Community Infrastructure Levy.

IL05: NPPF APPROVAL - Para 186 and 187

In accordance with paragraphs 186 and 187 of the National Planning Policy Framework, Richmond upon Thames Borough Council takes a positive and proactive approach to the delivery of sustainable development, by:

- Providing a formal pre-application and duty officer service
- Providing written policies and guidance, all of which is available to view on the Council's website
- Where appropriate, negotiating amendments to secure a positive decision
- Determining applications in a timely manner

In this instance: The application was amended following negotiations with the Council to ensure the scheme complied with adopted policy and guidance, and the application was recommended for approval and referred to the first available Planning Committee, where the agents / applicants had an opportunity to present the case

IL06: Disabled persons-Educational buildings

The applicant's attention is drawn to Section 7 (Signs) and Section 8 (Access and Facilities) of the Chronically Sick and Disabled Persons Act 1970 and to design Note No.18 - Access for the Physically Disabled to Educational Buildings: HMSO. Attention is also drawn to the provisions of part M of the Building Regulations - concerning access and facilities for disabled people.

IL07: Disabled parking

Parking for people with disabilities should be provided in spaces not less than 3.6m wide x 4.8m deep, conveniently located relative to the building entrances and clearly signed for its purpose.

IL08: Use of hardwoods

If hardwood is to be used in the development hereby approved the applicant is strongly recommended to ensure that it is from a recognised sustainable timber source. You are invited to consult the 'Good Wood Guide' produced by Friends of the Earth together with The National Association of Retail Furnishers for advice on this matter.

IL09: Street numbering

If you wish to name or number a new development, sub-divide an existing property, or change the name or number(s) of an existing property or development, you will need to apply to the London Borough of Richmond Upon Thames. Further details of this process, fees, and the

necessary information and forms that need to be submitted can be found on the Council's website http://www.richmond.gov.uk/street_numbering_and_naming. Alternately you may contact Peter Cridland, Address Management Manager (020 8891 7889 peter.cridland@richmond.gov.uk).

IL10: Trees - Protective fencing

In order to protect trees during building works the Local Planning Authority would normally expect the erection of Chestnut pale fencing to a height of not less than 1.2m around the trees in question to the extent of their existing crown spread or, where circumstances prevent this, to a minimum radius of 2m from the trunk of the tree.

IL11: Trees - Size of new stock

The Local Planning Authority would normally expect all new trees to be planted to be a minimum size of SELECTED STANDARD which shall have a sturdy reasonably straight stem with a clear height from ground level to the lowest branch of 1.8m, an overall height of between 3m and 3.5m and a stem circumference measured at 1m from ground level of 10-12cm. The tree shall, according to the species and intended use, have either a well-balanced branching head or a well defined, straight and upright central leader with the branches growing out from the stem with reasonable symmetry.

IL12: Construction Logistics Plan - TfL Guide

In relation to Condition U08012 the applicant is advised that the Construction Logistics Plan should aim for load consolidation and avoid peak rush hour to work delivery times. Further information in this regard can be found at <http://www.tfl.gov.uk/businessandpartners/freight/11422.aspx>.

IL13: Reason for granting:

The proposal has been considered in the light of the Development Plan, comments from statutory consultees and third parties (where relevant) and compliance with Supplementary Planning Guidance as appropriate. It has been concluded that there is not a demonstrable harm to interests of acknowledged importance caused by the development that justifies withholding planning permission.

IL14: Building Regulations:

The applicant is advised that the erection of new buildings or alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made. For application forms and advice please contact the Building Control Section of the Street Scene department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411). If you alter your proposals in any way, including to comply with the Building Regulations, a further planning application may be required. If you wish to deviate in any way from the proposals shown on the approved drawings you should contact the Development Control Department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411).

IL15: Damage to the public highway:

Care should be taken to ensure that no damage is caused to the public highway adjacent to the site during demolition and (or) construction. The Council will seek to recover any expenses incurred in repairing or making good such damage from the owner of the land in question or the person causing or responsible for the damage.

BEFORE ANY WORK COMMENCES you MUST contact Highways and Transport, London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ (Telephone 020 8891 7090 ask for the Streetscene inspector for your area or email highwaysandtransport@richmond.gov.uk) to arrange a pre commencement photographic survey of the public highways adjacent to and within the vicinity of the site.

The precondition survey will ensure you are not charged for any damage which existed prior to commencement of your works. If you fail to contact us to arrange a pre commencement survey then it will be assumed that any damage to the highway was caused by your activities and you will be charged the full cost of repair.

Once the site works are completed you need to contact us again to arrange for a post construction inspection to be carried out. If there is no further damage then the case will be closed. If damage or further damage is found to have occurred then you will be asked to pay for repairs to be carried out.

IL16: Noise control - Building sites:

The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department.

Under the Act the Council has certain powers to control noise from construction sites.

Typically the council will limit the times during which sites are permitted to make noise that their neighbours can hear.

For general construction works the Council usually imposes (when necessary) the following limits on noisy works:-

- Monday to Friday 8am to 6pm
- Saturdays 8am to 1pm
- Sundays and Public Holidays- No noisy activities allowed

Applicants should also be aware of the guidance contained in British Standard 5228:2009- Noise and vibration control on construction and open sites. Any enquiries for further information should be made to the Commercial Environmental Health Team, 2nd Floor Civic Centre, 44 York Street, Twickenham TW1 3AB.

IL17: Thames Water Informative:

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

IL18 Network Rail Informative 1

The Developer must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land

- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land.

IL19 Network Rail Informative 2

a. Future maintenance

The development must ensure any future maintenance can be conducted solely on the applicant's land. The applicant must ensure that any construction and any subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land and air-space, and therefore all/any building should be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. The reason for the 2m (3m for overhead lines and third rail) stand off requirement is to allow for construction and future maintenance of a building and without requirement for access to the operational railway environment which may not necessarily be granted or if granted subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works. The applicant / resident would need to receive approval for such works from Network Rail Asset Protection, the applicant / resident would need to submit the request at least 20 weeks before any works were due to commence on site and they would be liable for all costs (e.g. all possession costs, all site safety costs, all asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land. No structure/building should be built hard-against Network Rail's boundary as in this case there is an even higher probability of access to Network Rail land being required to undertake any construction / maintenance works. Equally any structure/building erected hard against the boundary with Network Rail will impact adversely upon our maintenance teams' ability to maintain our boundary fencing and boundary treatments.

b. Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to Network Rail Asset Protection. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed near/within 10 – 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

c. Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

d. Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

e. Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for approval to Network Rail Asset Protection prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

f. Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

g. Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's approval of their detailed proposals regarding lighting.

h. Noise and Vibration

The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of the National Planning Policy Framework which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.

i. Vehicle Incursion

Where a proposal calls for hard standing area / parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

j. Communication

Network Rail strongly recommends the developer contacts Network Rail Asset Protection London South East at AssetProtectionwessex@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website at www.networkrail.co.uk/asp/1538.aspx.

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