



Quod

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# Planning Statement

## Hampton Pre-Prep Improvements

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November 2020



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# 1. Introduction

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## Purpose of this document

- 1.1 This Planning Statement has been prepared by Quod, on behalf of the Trustees of Hampton School Trust (“**the Applicant**” or “**the School**”) in support of a Full Planning Application (“**the Application**”) at **Hampton Pre-Prep School, 41-43 Wensleydale Road, Hampton** (“**the Site**”).

## Background

- 1.2 Hampton Pre-Prep is located on Wensleydale Road. It principally comprises two previously detached houses, with a prefabricated Kindergarten building and playground to the rear.
- 1.3 The Application seeks to enable the School to undertake important improvements. This will enable the existing Site to better cater to the existing pupils’ needs, and to better accord with up-to-date Department for Education (“**DfE**”) guidance.
- 1.4 Hampton Pre-Prep School, owned by the Applicant, was founded and has been at the Site since 1924 (formerly known as Denmead School). It provides co-education for girls and boys aged three to seven, in four Year Groups, from Kindergarten through to Year 2. The Pre-Prep School forms one part of the wider Hampton School Trust, with the Prep School and Secondary School in close proximity.
- 1.5 Hampton School dates its foundation to 1556/57 when, thanks to a bequest by Robert Hammond, a prominent local businessman, provision was made for the elementary instruction of local children by the Vicar of St. Mary’s, Hampton.

## The Proposed Development

- 1.6 The Description of Development for the Proposed Development is set out below:

*“Minor Application for improvement works at Hampton Pre-Prep, to include demolition of existing modular buildings, provision of a new School Hall, replacement Kindergarten accommodation, a redesigned visitor reception and waiting area, a replacement outside WC block and Reception Class wet area extension, improvements to the sick bay, and improved internal and external connectivity. No increase in pupil numbers, staff numbers, or car parking is proposed”*

## The Application Documents

- 1.7 This Planning Statement describes the Site and the Proposed Development, assessing it against relevant policy and guidance. In doing so, this Statement also summarises the findings of various supporting technical documents, listed below.
  - Design and Access Statement; *prepared by Mackenzie Wheeler*
  - Transport Statement; *prepared by Quod*
  - Statement of Community Involvement; *prepared by Quod*

- Construction Management Statement; *prepared by Quod*
- Sustainable Construction Checklist; *prepared by Create*
- BREEAM Pre-Assessment; *prepared by Create*
- Energy Statement; *prepared by Create*
- Tree Impact Assessment; *prepared by Keen Consultants*

1.8 This Planning Statement should be read alongside the above documentation. The scope of this application was shared with Officers for comment on 23 September 2020, with no response received.

## 2. Site, Surrounding Area and Existing School

### Site and Surrounding Area

- 2.1 The Site, provided at **Figure 1** below, is located on Wensleydale Road in Hampton, and lies within the jurisdiction of the London Borough of Richmond-upon-Thames (“LBRuT”). It is located in a predominantly residential area, bound by residential properties to the north, south and west, with Wensleydale Road forming the eastern boundary. The Site comprises 0.14 hectares of land.

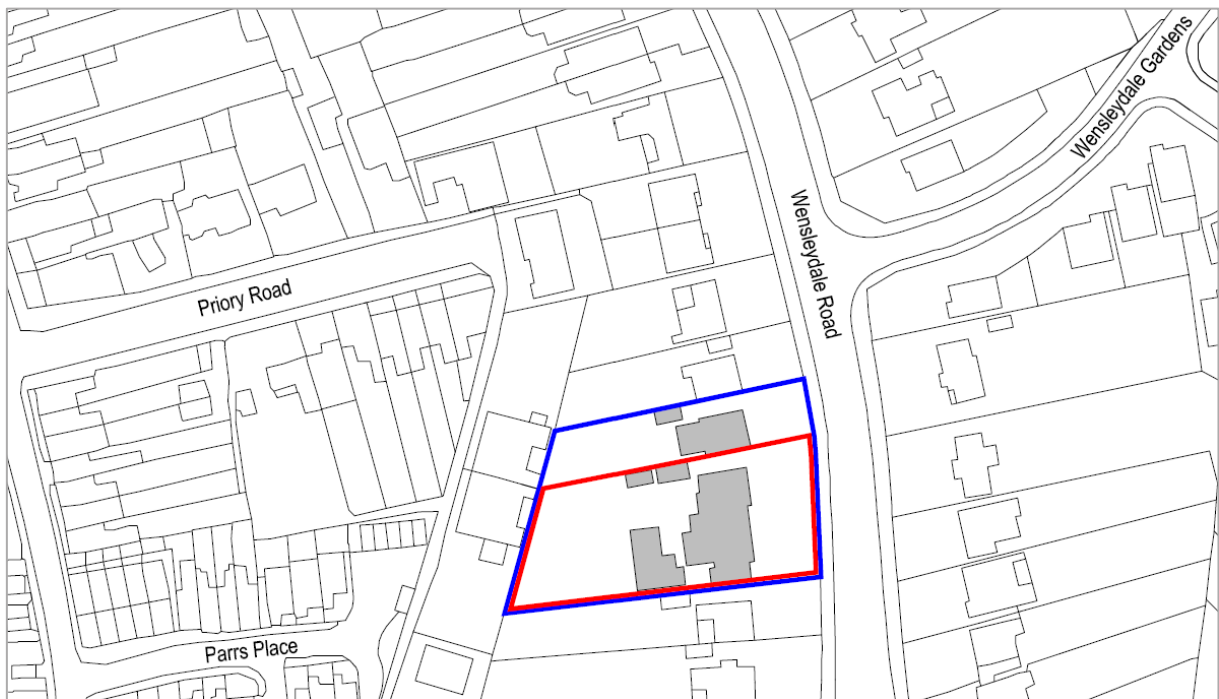


Figure 1: Site Location Plan

- 2.2 The Site benefits from close proximity to the A308 and a number of public transport options, including Hampton Railway Station (450 metres away). There are bus stops for the 111 and 216 bus routes at the Railway Station, offering travel to Heathrow, Kingston, Staines and Hampton Court.
- 2.3 The Site is located in Flood Zone 1, with a low probability of flooding. The Site is at medium risk of surface water flooding. The Site is not located within a Conservation Area, and there are no known Tree Preservation Orders on, or near the Site.
- 2.4 The School owns the neighbouring house to the north which is currently let to a private tenant (indicated by the blue line above).

### Existing School

- 2.5 Hampton Pre-Prep School comprises four year groups, each of 22 pupils from Kindergarten to Year 2, accommodated within a pair of detached houses, connected and converted for education use. The School dates back to 1924, when it opened in no. 41 Wensleydale Road as Denmead School. The conglomeration with no. 43 took place in the early 1930s.

- 2.6 The ground floor of one of the houses has been reconfigured to accommodate a visitor reception, the school dining hall, kitchen and staff areas. The visitor reception is cramped, being domestic in scale, and lacks a waiting area. The dining hall is undersized and awkward in shape and is unsatisfactory for assembly and for school performances.
- 2.7 There is no connection between the visitor reception and the school office, with access being via the staff room. To the rear are two projecting external stairs for fire escape from the first floor. The route onwards to assembly point is via an external, covered access way between the school and neighbouring house. One of the stairs projects some way from the building and presents an awkward obstacle within the playground.
- 2.8 The covered access way is used for kitchen deliveries, refuse storage and refuse collection. It also constitutes an important fire-fighting route to the rear of the building and to the kindergarten. Outside WC facilities, the Reception age group cloakroom, water-based teaching and play area are located in poor quality rear extensions.
- 2.9 The former conjoined gardens accommodate the playground, and the Kindergarten, which is accommodated in a tired prefabricated outbuilding constructed in 1974, which has now exceeded its design life.



Figure 2: Existing Dining Hall



Figure 3: Existing Ground Floor Plan



Figure 4: Side Access and External Staircase and WC



Figure 5: Existing Kindergarten Building

## Pre-Prep Planning History

2.10 The recent, relevant planning history for the site is not extensive. There are however some historic applications from different policy eras which principally demonstrate the struggles the School has encountered in seeking to improve the School.

Application Reference	Description	Decision	Notes
12/0386/FUL	Retrospective planning application for the replacement of a climbing frame as installed	<b>Refused</b> 17/04/2012  <b>Allowed at appeal</b> 05/11/2012	Refused on neighbouring amenity grounds but allowed at appeal with Inspector disagreeing with the reasons for refusal.
73/1602	Erection of school assembly hall/gymnasium at rear of premises	<b>Refused</b> 21/09/1973	Refused due to size, neighbouring amenity and intensification of a use not confirming with the local area.



73/0804	Erection of school assembly hall at rear of premises	<b>Refused</b> 07/07/1973	Refused due to size, neighbouring amenity and intensification of a use not confirming with the local area.
66/0381	Change of use of existing house to school, comprising 2 classrooms with ancillary office and store	<b>Approved</b> 22/06/1966	n/a

## Selected Local Primary Schools Planning History

2.11 A high-level review of recent applications for similar proposals at nearby primary schools in LBRuT has been undertaken and is provided in the table below. Aside from the Hampton Prep School application in 2012 (which was initially refused, but later approved), all recent redevelopment/extension applications for local junior schools have been approved.

Application Reference	Address	Description	Decision
02/584	Hampton Junior School	Erection Of Extension Of Dining Hall To Provide 3no. WCs And A Glazed Canopy	<b>Approved</b> 22/07/2002
03/3725/FUL	Hampton Junior School	Erection Of Detached Single Storey Timber Building To Be Used For An Arts And Crafts Classroom.	<b>Approved</b> 02/02/2004
09/0599/FUL	Hampton Junior School	Erection of small, detached timber building to provide additional school accommodation	<b>Approved</b> 24/04/2009
11/4125/FUL	Hampton Prep School	Redevelopment of school site comprising demolition of 3no. existing single storey teaching blocks and construction of new two story building, retaining and incorporating existing hall, with associate external works and landscaping. Provision of additional 32 pupils phased over a 3 year period.	<b>Refused</b> 24/12/2012
13/2102/FUL	Hampton Prep School	Redevelopment of school site comprising demolition of 3no. existing single storey teaching blocks and construction of new two story building, retaining and incorporating existing hall, with associate external works and landscaping.	<b>Approved</b> 09/01/2014

15/0073/FUL	The Queens Church of England Primary School	To demolish and rebuild the existing school building under the Priority Schools Building Programme, providing a new replacement 2-form entry primary school for 4-11 year olds with associated landscaping and infrastructure works.	<b>Approved</b> 19/06/2015
14/1103/FUL	The Old Court House	Demolition of existing PRU building and single storey out building, installation of ramp to front elevation of 27 Sheen Lane and erection of a new, two storey modular classroom building to be used in connection with site as a primary school.	<b>Approved</b> 16/05/2014
10/3667/FUL	Heathfield Junior School	Construction of a new 79m2 single storey classroom at Heathfield primary school in an existing long courtyard space. The vehicular and pedestrian access to the site will be unaffected by the development.	<b>Approved</b> 14/02/2011
16/1228/FUL	Hampton Junior	The scheme comprises: -the removal of existing dining hall; -the removal of an existing tree; -the relocation/ remarking of existing games court; -the removal of existing play canopy and covered walkway; -the relocation of existing cycle / scooter shelters; -the relocation of existing play canopy to studio building; -the construction of a new two-storey classroom extension to the north of main building, adjoining the studio; -interior refurbishment/ remodel of the existing kitchen to accommodate new WCs; -a new single-storey dining hall building to the northeast of the main building, along the east boundary; - a new covered walkway linking existing and proposed buildings; -new planting; and - extension to school car park. Increase in number of pupils 390 pupils to 480 pupils	<b>Approved</b> 26/07/2016

## 3. Consultation

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### Pre-Application Engagement with Richmond Planning Officers

- 3.1 The Applicant has sought to maintain an open dialogue with Planning Officers at LBRuT since the inception of the project. Planning Guidance is clear the pre-application stage is a “*2-way process*”<sup>1</sup>, and a prospective applicant should expect the following<sup>2</sup> for a local planning authority:

*“A prospective applicant should expect a clear, timely, and authoritative, view on the merits of a proposed development – as well as clear advice on consultation requirements and the information to be submitted with a formal planning application.”*

#### Timeline

- 3.2 The Applicant submitted and paid for a LBRuT pre-application advice request on **07 July 2020**. The Applicant’s request was acknowledged by LBRuT on **17 July 2020**. The appointed Officer did not make contact until **19 August 2020**, despite a number of requests by the Applicant to make contact via phone and email. Consequently, a Pre-Application Meeting was not held until **16 September 2020** (41 working days after the request was lodged), due to lack of Officer availability.
- 3.3 The Pre-Application Meeting offered some limited verbal advice, with it agreed that the formal advice would follow in due course (with the Richmond website<sup>3</sup> clear “*Within 10 working days of your meeting with a case officer, the case officer will prepare the written advice to be cleared by a Principal Planner, Team Manager or Section Manager*”).
- 3.4 Weekly emails, and phone calls have been made since the meeting to request the formal written advice, and to seek to agree a Document List (sent to Officers on **23 September 2020**, 5 working days after the meeting, with no response received). The latest correspondence with the Case Officer, received on **22 November 2020**, confirmed the written advice was not yet complete and had not been submitted to the Team Manager for clearance.
- 3.5 The School has made LBRuT Officers aware that the Application is time critical, and a submission required to be made by the end of November to allow construction to commence during Summer 2021.
- 3.6 At the time of submission, **30 November 2020** (43 works days after the meeting), no formal written advice has been received from LBRuT.

#### Assessment

- 3.7 In direct conflict of all levels of planning policy and planning guidance, the Applicant considers LBRuT have not taken a proactive, positive or collaborative approach<sup>4</sup> to working with the School, through their lack of engagement in the pre-application process.

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<sup>1</sup> Paragraph 005 ID:20-005-20150326 [National Planning Guidance, 2015]

<sup>2</sup> Paragraph 010 ID:20-005-20150326 [National Planning Guidance, 2015]

<sup>3</sup> [https://www.richmond.gov.uk/services/planning/pre-applications/pre-application\\_for\\_developers](https://www.richmond.gov.uk/services/planning/pre-applications/pre-application_for_developers)

<sup>4</sup> See Paragraph 94 [National Planning Policy Framework, 2019] and Policy LP29 [Richmond Local Plan, 2018]

## Webinar Consultation

- 3.8 Planning Guidance is clear<sup>5</sup> “*pre-application engagement with the community is encouraged where it will add value to the process and the outcome*”. As such, the Applicant has sought to follow best practice, with Hampton considering early engagement with the local community key to a successful development proposal.
- 3.9 Due to Covid-19 restrictions, a traditional public consultation could not be held. Instead, a virtual Webinar was hosted on 11<sup>th</sup> November to explain the proposals to those surrounding the Site. Feedback on the hosting of a webinar was generally very positive, with locals grateful of a chance to view and comment on proposals ahead of submission.
- 3.10 Full details of the webinar are available in the **Statement of Community Involvement**.

## Meetings with Neighbours

- 3.11 Following the Webinar, a meeting was held with the immediate neighbours of the School to discuss improvements to the fencing. These changes have been incorporated into the Proposed Development.

## Secure by Design

- 3.12 The Applicant has discussed the Proposed Development in detail with the Secure by Design Officer ahead of submission.

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<sup>5</sup> Paragraph 010 ID:20-005-20150326 [National Planning Guidance, 2015]

# 4. The Proposed Development

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## Proposed Development

4.1 Hampton Pre-Prep School is seeking consent for:

*“Minor Application for improvement works at Hampton Pre-Prep, to include demolition of existing modular buildings, provision of a new School Hall, replacement Kindergarten accommodation, a redesigned visitor reception and waiting area, a replacement outside WC block and Reception Class wet area extension, improvements to the sick bay, and improved internal and external connectivity. No increase in pupil numbers, staff numbers, or car parking is proposed”*

4.2 Specifically, the below works are proposed:

- Demolition of the existing modular buildings;
- The provision of a new hall, sized to accommodate dining, assembly, and performance;
- The provision of improved accommodation for the kindergarten;
- An increase in the size of the visitor reception, to include a waiting area;
- Improvements to the connection between the visitor reception area and the school office;
- Replacement of the outside WC block and Reception Class wet area extension;
- Improvements to the location of the sick bay; and
- Improvements to fencing.

4.3 In total, the proposals represent an increase in the GIA of the school of 105.7 sqm.

4.4 The Proposed Development is split into two principal elements:

**Part One:** A new modular building to be erected in the playground, following the demolition of the existing pre-fabricated building and two external storage buildings.

**Part Two:** A two-storey extension to the main school building to allow for an enlarged visitor reception area, a visitor WC and a new sick bay.

4.5 The Proposed Development **does not include any proposals to increase pupil numbers, staffing numbers or car parking provision.**

4.6 A full description of the design and layout of the Proposed Development is set out in the accompanying **Design and Access Statement** and should be read alongside this Planning Statement.

# 5. Planning Policy

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## Introduction

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is clear planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The statutory development plan for LBRuT comprises the following:
- **The London Plan** ('consolidated with Alterations since 2011' published in March 2016); and
  - Policies contained within the **Richmond Local Plan** (Adopted July 2018 and 3 March 2020 in relation to two legal challenges).
- 5.3 Other material considerations include:
- **The National Planning Policy Framework ("NPPF")** (February 2019);
  - **Draft London Plan** (July 2019);
  - **National Planning Practice Guidance ("PPG")**; and
  - **New Local Plan for Richmond.**
- 5.4 While in draft, the Intend to Publish ("ItP") London Plan (December 2019) is currently being applied in the determination of planning applications by the Mayor of London – however, for completeness, this Planning Statement assesses the Proposed Development against both the adopted and emerging London Plan.

## National Planning Policy

### National Planning Policy Framework (NPPF) 2019

- 5.5 The NPPF is a material consideration in the appraisal of planning applications. Adopted in February 2019, it sets out the Government's planning policies for England and how these are expected to be applied. It is underpinned by a presumption in favour of sustainable development, which is embodied within **Paragraph 11**. For decision taking this means "*approving development proposals that accord with an up-to-date development plan without delay*".
- 5.6 **Paragraph 7** of the NPPF states that the "*purpose of the planning system is to contribute to the achievement of sustainable development*", with the three dimensions to sustainable development: **economic, social and environmental**.
- 5.7 **Paragraph 94** sets out:
- "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

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". (emphasis added)

5.8 **Paragraph 109** is very clear that:

*"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

5.9 While **Paragraph 111** is also clear that:

*"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."* (emphasis added)

5.10 **Paragraph 117** seeks for decisions to *"promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environmental and ensuring safe and healthy living conditions"*.

5.11 **Paragraph 121** sets out local planning authorities should support proposals which *"make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space"*.

5.12 **Paragraph 122** sets out decisions should support development that makes efficient use of land, taking into account:

a) *"the identified need for [...] other forms of development and the availability of land suitable for accommodating it;"*

d) *"the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and"*

e) *"the importance of securing well-designed, attractive and healthy places."*

5.13 **Paragraph 124** states *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*.

5.14 **Paragraph 127** is clear planning decision should ensure developments:

a) *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;"*

b) *"are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; "*

- c) *“are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”*
- d) *“establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;”*
- e) *“optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and”*
- f) *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

## Regional Planning Policy

### London Plan (2016)

- 5.15 The latest version of the London Plan was published in March 2016, consolidating all changes to the Plan since 2011. The key policies relevant to the determination of this Application are set out below.
- 5.16 **Policy 2.6 (Outer London: Vision and Strategy)** makes clear Boroughs should *“enhance the quality of life in outer London for present and future residents”*.
- 5.17 **Policy 3.6 (Children and Young People’s Play and Informal Recreation Facilities)** seeks to ensure that all children and young people have safe access *“to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible”*.
- 5.18 **Policy 3.16 (Protection and Enhancement of Social Infrastructure)** supports development proposals that provide high quality social infrastructure.
- 5.19 **Policy 3.18 (Education Facilities)** supports the provision of primary school education facilities, clearly stating *“development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes”*. The policy further states that *“proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged”*. Additionally, *“proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college’s offer. On-site or off-site sharing of services between schools and colleges should be supported”*.
- 5.20 **Policy 3.19 (Sports Facilities)** supports proposals that enhance recreation facilities.
- 5.21 **Policy 5.3 (Sustainable Design and Construction)** requires proposals to achieve the *“highest standards of sustainable design and construction”* – proposals should demonstrate that sustainable design standards have been considered at the beginning of the design process.
- 5.22 **Policy 5.10 (Urban Greening)** seeks for proposals to integrate green infrastructure, including *“tree planting, green roofs and walls, and soft landscaping”*.



- 5.23 **Policy 5.13 (Sustainable Drainage)** sets out development should “*utilise sustainable urban drainage systems (SUDS)*”.
- 5.24 **Policy 7.1 (Lifetime Neighbourhoods)** sets out “*The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood*”.
- 5.25 **Policy 7.3 (Designing Out Crime)** seeks to create safe, secure and appropriately accessible environments.
- 5.26 **Policy 7.4 (Local Character)** requires buildings to provide a high quality design response that “*has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass*” and “*contributes to a positive relationship between the urban structure and natural landscape features*”.
- 5.27 **Policy 7.6 (Architecture)** seeks for architecture to make a positive contribution through being of “*the highest architectural quality*” and should:
- a. “*be of the highest architectural quality*”
  - b. “*be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm*”
  - c. “*comprise details and materials that complement, not necessarily replicate, the local architectural character*”
  - d. “*not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings*”
  - e. “*incorporate best practice in resource management and climate change mitigation and adaptation*”
  - f. “*provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces*”
  - g. “*be adaptable to different activities and land uses, particularly at ground level*”
  - h. “*meet the principles of inclusive design*”
  - i. “*optimise the potential of sites*”
- 5.28 **Policy 7.15 (Reducing and Managing Noise)** seeks to manage the noise impacts of new development.

#### Intend to Publish London Plan (2019)

- 5.29 The Examination in Public (“**EiP**”) on the ItP London Plan was held between 15 January and 22 May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the mayor on 8 October 2019. The Mayor has considered the Inspector’s recommendations and, on the 9 December 2019 issued to the SoS his intention to publish the London Plan. However, on the 13 March 2020, the SoS issued a letter to the Mayor of London on the need for

an improved London Plan that meets London's housing needs. The key policies relevant to the determination of this Application are set out below.

- 5.30 **Policy GG1 (Building strong and inclusive communities)** seeks to encourage early engagement with stakeholders, and ensure new buildings and spaces are “*designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements*”.
- 5.31 **Policy GG2 (Making the best use of land)** is clear that to make the best use of land, developers must apply “*a design-led approach to determine the optimum development capacity of sites*”.
- 5.32 **Policy D3 (Optimising site capacity through the design-led approach)** is clear that development proposals should “*enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape*”.
- 5.33 **Policy D4 (Delivering Good Design)** sets out the importance of good design, and also maintaining design quality.
- 5.34 **Policy D5 (Inclusive Design)** seeks to ensure development proposals “*achieve the highest standards of accessible and inclusive design*”, noting submitted DAS’s “*should include an inclusive design statement*”.
- 5.35 **Policy D11 (Safety, security and resilience to energy)** notes the importance of including measures to design out crime and minimise physical risks on site.
- 5.36 **Policy D12 (Fire safety)** is clear that “*all development proposals must achieve the highest standards of fire safety*”.
- 5.37 **Policy D13 (Agent of Change)** is very clear “*Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them*”. The policy is also clear that any noise generating development “*close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents*”.
- 5.38 **Policy D14 (Noise)** sets out the importance of reducing, managing and mitigating noise to improve health and quality of life. Development should manage this by “*avoiding significant adverse noise impacts on health and quality of life*”.
- 5.39 **Policy S3 (Education and childcare facilities)** seeks to “*ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice*” and states proposals for educational facilities should “*maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures*”.
- 5.40 **Policy S4 (Play and informal recreation)** states development proposals for schemes likely to be used by children should “*increase opportunities for play and informal recreation and enable children and young people to be independently mobile*”.

- 5.41 **Policy S5 (Sports and recreation facilities)** further seeks to “*maximise the multiple use of facilities, and encourage the colocation of services between sports providers, schools, colleges, universities and other community facilities*”.
- 5.42 **Policy G5 (Urban Greening)** is clear only major developments are expected to contribute towards the greening of London. Other elements of the policy relate to commercial and residential development.
- 5.43 **Policy G7 (Trees and woodlands)** seeks for additional trees to generally be included in new developments.
- 5.44 **Policy SI 2 (Minimising greenhouse gas emissions)** seeks for minor non-residential development to “*achieve 15 per cent [reduction beyond Building Regulations] through energy efficiency measures*”.
- 5.45 **Policy SI 4 (Managing Heat Risk)** seeks to “*minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure*”.
- 5.46 **Policy SI 12 (Flood risk management)** seeks to ensure proposals minimise and mitigate flood risk.
- 5.47 **Policy SI 13 (Sustainable drainage)** notes the importance of utilising permeable surfaces and minimising surface water run-off.
- 5.48 **Policy T6 (Car parking)** is clear that “*absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets*”. The policy also notes “*adequate provision should be made for efficient deliveries and servicing and emergency access*”.
- 5.49 **Policy T7 (Deliveries, servicing and construction)** sets out development should “*facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street*”. Additionally, “*Construction Logistics Plans and Delivery and Servicing Plans will be required*”.

## Local Policy

### Richmond Local Plan (2018)

- 5.50 Richmond’s Local Plan was adopted in July 2018. Two legal challenges were made and in March 2020 the Council adopted the two matters related to the legal challenges within the Local Plan. The Local Plan maintains full weight as part of the development plan. It contains both strategic and more detailed policies to manage and deliver Richmond’s future sustainable development over a 15-year period up to 2033. The key policies relevant to the determination of this Application are set out below.
- 5.51 The Strategic Vision and Objectives of the Local Plan seek to **protect local character**, aim for a **sustainable future**, and **meet the needs of local people**.
- 5.52 **Policy LP1 (Local Character and Design Quality)** requires “*all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need 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.”*

- 5.53 **Policy LP2 (Building Heights)** requires “*new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building height.*” Buildings will be required to reflect prevailing building heights in the nearby area and will be required to respect the local context.
- 5.54 **Policy LP8 (Amenity and Living Conditions)** requires all development “*to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties*”. Particularly, the Council will ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting.
- 5.55 **Policy LP10 (Local Environmental Impacts, Pollution and Land Contamination)** requires the submission of a Construction Management Statements (CMS) for the development of sites in confined locations, or near sensitive receptors.
- 5.56 **Policy LP16 (Trees, Woodlands and Landscape)** encourages “*planting, including new trees, shrubs and other significant vegetation where appropriate*”.
- 5.57 **Policy LP17 (Green Roofs and Walls)** notes green/brown roofs and walls should be included on major new developments, while it is “*encouraged and supported on smaller developments*”.
- 5.58 **Policy LP20 (Climate Change Adaptation)** seeks for new development to “*minimise the effects of overheating as well as minimise energy consumption*”.
- 5.59 **Policy LP21 (Flood Risk and Sustainable Drainage)** is clear that “*all developments should avoid, or minimise, contributing to all sources of flooding*”, while the Council “*require the use of Sustainable Drainage Systems (SuDS) in all development proposals*”.
- 5.60 **Policy LP22 (Sustainable Design and Construction)** requires development to achieve “*the highest standards of sustainable design and construction to mitigate the likely effects of climate change*”. Development of over 100 sq m of non-residential floorspace is “*required to complete the Sustainable Construction Checklist SPD*”.
- 5.61 **Policy LP28 (Social and Community Infrastructure)** supports new social and community infrastructure where it is provided in “*multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access*”.
- 5.62 The supporting text to Policy LP28 is very clear:
- “Multi-use means, for example, that a school uses the school and playing fields during the school day, during term time and the facilities are available for use by the community outside school hours i.e. evenings, weekends and during school holidays.”*
- 5.63 **Policy LP29 (Education and Training)** is clear the Council will **support** “*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*”, and will **encourage** “*the potential to maximise existing educational sites through*

*extensions, redevelopment or refurbishment to meet identified educational needs” and “flexible and adaptable buildings, multi-use and co-location with other social infrastructure”.*

- 5.64 **Policy LP31 (Public Open Space, Play Space, Sport and Recreation)** seeks to protect and enhance young people’s play facilities – *“improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged”*. This includes private open space in recreational use.
- 5.65 **Policy LP44 (Sustainable Travel Choices)** requires minor developments to be accompanied by a Transport Statement.
- 5.66 **Policy LP45 (Parking Standards and Servicing)** requires new development to provide for the needs of the development.

#### **New Local Plan for Richmond (2020)**

- 5.67 The new Local Plan for Richmond underwent consultation on the first stage of the engagement process for future development between 24 February 2020 to 5 April 2020. This document carries only limited weight at present, and is not considered in detail.

#### **Richmond Supplementary Planning Documents (SPD)**

- 5.68 The **Design Quality SPD** sets out the importance of high quality, inclusive design.
- 5.69 The **Noise Generating and Noise Sensitive Development SPD** notes that Schools and residential properties are noise sensitive premises, while it is noted that some activities at educational establishments are also likely to generate noise, with any such applications to be assessed on a case by case basis.
- 5.70 The **Sustainable Construction Checklist SPD** allows the assessment of new build and conversion development against guidance.
- 5.71 The **Transport SPD** provides guidance on the contents of Transport Statements, to be submitted alongside minor applications.
- 5.72 The **Hampton Village Planning Guidance** acts as an SPD, and seeks to provide a more diverse range of high quality schools to reinforce Hampton as a vibrant community within the Borough. Hampton Pre-Prep lies on the edge of Character Area 11, referenced as being *“in the centre of Hampton”*. It notes *“Wensleydale Road supports an array of attractive buildings from the Victorian, Edwardian and interwar periods, all set in large plots. The streets character is enhanced by distinctive plane trees running the length of the road”*.

#### **Richmond Supplementary Planning Guidance (SPG)**

The **Security by Design SPG** contains advice on crime reduction measures.

## DfE Area Guidelines

5.73 DfE Area Guidelines<sup>6</sup> provide recommended floorspace and ceiling height figures for primary schools. The table below compares the Guidance of 105 pupils or less against the existing and proposed measurements.

	DfE Recommended Areas	Existing Pre-Prep	Proposed Pre-Prep
Hall/Dining Area	150 sq m	43 sq m	91 sq m
Hall/Dining Height	4.5 m	2.5 m	3.2 m

5.74 The Guidelines are clear at page 36:

*“On restricted sites, where space will be at a premium, a flexible approach to the site area and the management of the use of that area will be needed.”*

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<sup>6</sup> Annex A: Building Areas [DfE Area guidelines for mainstream schools, 2014]

## 6. Planning Assessment

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- 6.1 This section of the Planning Statement assesses the proposals against the key planning considerations from the Development Plan, and the material considerations summarised above.
- 6.2 All levels of planning policy support sustainable development and the principle of improving educational provision. It is important to remember the Schools proposals constitute minor development only (i.e. under 1,000 sq m at 105.7 sq m), and as such, many policies applicable only to major development do not apply – however, the School is still seeking to best meet policy aspirations, even when only applicable to major development.

### Appeal Precedent

- 6.3 As is set out in the preceding section, the need to improve education provision is given great weight by the planning system, with school related applications rarely refused<sup>7</sup>. There are however rare instances of local authorities refusing applications, which are generally allowed at appeal, with the significant weight in favour of schools applied.
- 6.4 A recent appeal<sup>8</sup> in Gloucester, allowed by the Inspector, made clear that “*the effect of the planning system is to operate in the public interest and not to protect individual rights*” and that “*decision makers should give great weight to the need to create schools through decisions on applications*”.
- 6.5 A further recent appeal in Maidstone<sup>9</sup>, also allowed by the Inspector, provides helpful guidance on the application of the DfE Guidance, setting out “*BB103 [the DfE Guidance] sets out clearly that where sites are restricted and space is at a premium then a flexible approach to site area and the management of the use of that area is required.*” ... “*the wording of [BB103] makes it clear that this is non-statutory guidance and is intended to be used in a flexible manner*” ... “*whilst there would be some conflict with this documents it would not be significant*”... “*BB103 is a material consideration to which I attach moderate weight*”.

### Compliance with Relevant Policy

- 6.6 It is considered that the Proposed Development accords with the LBRuT Development Plan (when read as a whole). This means that the presumption in favour of the Development Plan, which is provided for by Section 38(6) of the Planning and Compulsory Purchase Act (2004), amounts in this matter to a (strong) presumption in favour of approving the proposals. It follows that unless material considerations indicate otherwise, planning permission should be granted. Far from indicating otherwise to the grant of permission, the material considerations lend very substantial further weight to permission being granted and in accordance with NPPF paragraph 11(c), this should be done without delay.

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<sup>7</sup> See paragraph 2.12 of this Planning Statement for Richmond school related applications

<sup>8</sup> APP/U1620/W/18/3204339 - Erection of a primary school and associated infrastructure

<sup>9</sup> APP/U2235/W/17/3187474 (Appeal A) - Extension to the existing school building of 967 sq m

6.7 Compliance with the relevant policy, as set out in detail in the previous section, is considered below. The principal issues considered include:

- **Principle of Improving Education Provision;**
- **Neighbouring Amenity;**
- **Design and Massing;**
- **Community Use;**
- **Sustainability;**
- **Transport;** and
- **Environment.**

6.8 As is set out earlier, the Applicant sought to maintain an open dialogue with Planning Officers at LBRuT since the inception of the project to seek to understand the principal issues to consider. However, in direct conflict of all levels of planning policy, LBRuT have not taken a proactive, positive or collaborative approach<sup>10</sup> to working with the School, with no formal pre-application advice received.

### Principle of Improving Education Provision

6.9 All levels of planning policy place great weight on the need to improve education provision. The School has provided an excellent education for its pupils within the accommodation available for decades, however, the School is keen to make improvements to better meet current DfE Guidelines.

6.10 The principle of education provision at the Site is established by the existing use, and as such the minor expansion of the School should be considered a sustainable and effective use of land. The need for improving the education provision is established in the DfE Guidelines. The Proposed Development is therefore in accordance with **NPPF paragraphs 7, 94, 117, 121 and 122**, and is clearly supported and encouraged by **London Plan Policy 3.18, ItP London Plan Policy S3 and LBRuT Policy LP29**.

6.11 Improved education provision will enhance the quality of life for present and future residents, in accordance with **London Plan Policy 2.6**.

6.12 The enhancing of recreation facilities is supported by **London Plan Policy 3.19**. The new hall and reconfiguration of the playground will increase opportunities for play and informal recreation in accordance with **ItP London Plan Policy S4**.

### Neighbouring Amenity

6.13 The School is a sensitive receptor, a noise generating use, and is also neighboured by sensitive receptors with residential properties to the north, south and west – as defined by the **LBRuT Noise Generating and Noise Sensitive Development SPD**.

6.14 The ‘Agent of Change’ principle set out by **ItP London Plan Policy D13** is clear that established noise generating uses should be designed to remain viable and continue to grow without unreasonable

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<sup>10</sup> See Paragraph 94 [National Planning Policy Framework, 2019] and Policy LP29 [Richmond Local Plan, 2018]



restrictions being placed on them. The policy is also clear that measures should be put in place to mitigate and minimise any noise impacts for neighbouring residents.

- 6.15 While the Proposed Development will not materially increase the use of the School, new acoustic fencing is proposed along the southern boundary of the property, following consultation and agreement with neighbours (and feedback from the Secure by Design Officer). This principally seeks to address the aspirations of **London Plan Policy 7.15** to manage noise impacts, but also the Agent of Change principle. As such, the Proposed Development will not have any adverse impact on the health or quality of life of neighbouring residents, nor the amenity of neighbouring properties, as required by **ItP London Plan Policy D14** and **LBRuT Policy LP8**.
- 6.16 Minimising construction time and disruption to the School and neighbouring properties is of high priority. Modular construction is an effective means of addressing these issues and is a construction method frequently used in education projects where the majority of construction work must be completed during the school summer holiday period.
- 6.17 As addressed in detail below, careful consideration has also been given to neighbouring amenity, in the consideration of the design and massing of the Proposed Development.

## Design and Massing

- 6.18 The School has worked hard to balance the needs of its pupils, DfE Guidance, neighbouring amenity, and the existing local context. The Proposed Development seeks to deliver this balance, while according with the aspirations of planning policy. It provides a much more efficient and considered layout to the rear of the School, consolidating much of the existing storage and bringing a clear and modern single structure that sits well in the existing context. The amendments also provide significant improvements to the internal layout of the existing School building.
- 6.19 The Proposed Development has carefully considered **NPPF paragraphs 124** and **127**, **London Plan Policy 7.4**, **ItP London Plan Policy D4**, **LBRuT Policy LP1** and the **LBRuT Design Quality SPD**, with a high-quality of design, considerate of the surrounding local character – as is set out in detail in the **Design and Access Statement**.
- 6.20 While in a predominately residential area, the School, and many other local schools have been established in this part of Hampton for decades, and as such all form a significant part of its local context. In line with the aspirations of **London Plan Policy 7.6** and **ItP London Plan Policy D3**, the Proposed Development seeks to complement, but not necessarily replicate, the local character – with consideration given to the **Hampton Village Planning Guidance**.
- 6.21 In line with **ItP London Plan Policy GG2** and DfE Guidance, the Proposed Development optimises the use of the Site, with the proposals bringing forward a more efficient, effective and accessible development for the School. These changes to the overall layout of the Site also enable the School to achieve the highest standards of fire safety, as required by **ItP London Plan Policy D12**.
- 6.22 The Design Out Crime Officer at Teddington Police Station has been consulted on the proposals, in accordance with **NPPF paragraph 127 (f)**, **London Plan Policy 7.3** and **ItP London Plan Policy D11**, with consideration given to the **Security by Design SPG**.

## Extension to the School

- 6.23 The new entrance to the School, provided by the modest extension, establishes a strong sense of place and legibility on the street, helping to subtly, but clearly identify the School on Wensleydale Road, in accordance with **London Plan Policy 7.1**. This offers an opportunity to make its presence as an educational establishment a little more obvious. A tall window is proposed to face the road, offering glimpses in to staff and pupils moving between ground and first floor. The flank wall is in patterned brickwork comprising a combination of the yellow multi-stock brickwork prevalent in the surrounding houses and subtle blue bricks. This approach accords with **London Plan Policy D4** and **LBRuT Policy 7.4**.
- 6.24 The height of the extension where it adjoins the Wensleydale Road façade of the existing building aligns with eaves height, in accordance with **LBRuT Policy LP2**, with the extension not overbearing when considered as part of the existing street scene.

## Hall / Dining Area

- 6.25 DfE Area Guidelines<sup>11</sup> provide recommended floorspace and ceiling height figures for primary schools. The table below compares the Guidance of 105 pupils or less against the existing and proposed measurements.

	DfE Recommended Areas	Existing Pre-Prep	Proposed Pre-Prep
Hall/Dining Area	150 sq m	43 sq m	91 sq m
Hall/Dining Height	4.5 m	2.5 m	3.2 m

- 6.26 An appropriate building height and floorspace is proposed for the new Hall / Dining Area which strikes a balance between meeting the needs of the School, while being sensitive to the amenity neighbouring residential users in accordance with **LBRuT Policy LP2** and **LP8**. The height of the proposed school hall is comparable to the existing storage buildings (3.4m existing, 3.75m proposed) to be demolished as part of the Proposed Development.
- 6.27 The new hall achieves the highest standards of accessible and inclusive design, in accordance with **ItP London Plan Policy D5**, with further details provided in the **Design and Access Statement**.
- 6.28 Trellises are provided on the side of the new Hall, and also as part of the new fencing, seeking to meet the green wall aspirations of **London Plan Policy 5.10**, **ItP London Plan Policy SI 4** and **LBRuT Policy LP17**. **ItP London Plan Policy G5** is clear that only major developments are expected to provide green roofs.

## Playground

- 6.29 The Proposed Development allows the opportunity to enhance the playground, creating an improved layout that is of high quality, well-designed, flexible, and secure in accordance with **London Plan Policy 3.6** and **LBRuT Policy LP31**.

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<sup>11</sup> Annex A: Building Areas [DfE Area guidelines for mainstream schools, 2014]

## Community Use

- 6.30 **LBRuT Policy LP28** is clear that new social and community infrastructure, such as school facilities being made available for use by the community outside school hours, will be supported.
- 6.31 In accordance with the aspirations of **LP28**, the Applicant is proposing to extend the use of the hall to local community users. The School would be welcoming discussions with LBRUT on how to secure this during the determination period. This approach is also supported by **ItP London Plan Policy S3**, **ItP London Plan Policy S5** and **London Plan Policy 3.16** and **3.18**.

## Sustainability

- 6.32 An **Energy Statement** has been submitted, which should be read alongside this Planning Statement. This sets out in detail how the Proposed Development addresses the aspirations of all levels of energy and sustainability planning policy.
- 6.33 A 3.5% reduction in anticipated energy consumption can be achieved through energy efficiency measures, delivering on the aspirations of **ItP London Plan Policy SI 2** and **LBRuT Policy LP20**. However, the roof of the Hall has enough available area to accommodate a significant number of PV panels. This contributes to a total offset of 72.8% carbon emissions, far in exceeded of the 35% required by **LBRuT Policy LP22**.
- 6.34 The Applicant has worked hard to deliver the highest standards of sustainable design and construction, in accordance with **London Plan Policy 5.3**, with the modular building forming the bulk of the Proposed Development. Prefabrication techniques offer a low energy approach and fast track construction processes provide low energy consumption, both equating to minimised carbon emissions.
- 6.35 While **LBRuT Policy LP22** seeks for BREEAM Excellent for new buildings of over 100 sq m, the limited scale of the Proposed Development and the Site constraints mean it would not be practicable due to technical and financial constraints to achieve a BREEAM rating of Excellent. The current prediction is that a 'Very Good' rating is likely to be achieved, with a score of 60.57%, where evidence is supplied to support the award of the BREEAM credits. The prediction indicates that all minimum standards will be achieved to meet the BREEAM 'Very Good' rating.
- 6.36 A **Sustainable Constriction Checklist** has been submitted as part of this Application.

## Transport

- 6.37 No changes to pupil numbers, staff numbers, or car parking is proposed as a result of the Proposed Development.
- 6.38 **NPPF paragraphs 109** and **111** are clear the development should not be prevented on highways grounds, with no significant additional movement generated by the Proposed Development.
- 6.39 **ItP London Plan Policy T6** is clear that boroughs should implement parking controls if considered necessary, and the existing absence of such controls should not be a barrier to new development.
- 6.40 The existing driveway will remain in situ, to enable adequate provision for deliveries, servicing and emergency access in accordance with **ItP London Plan Policies T6** and **T7**, and **LBRuT Policy LP45**.

A **Construction Management Plan** is submitted as part of this Application in accordance with **LBRuT Policy LP10**.

- 6.41 Any movements associated with the community use of the Hall would be outside of peak hours, and would not have an impact on the local highways network.
- 6.42 In accordance with **ItP London Plan Policy D13**, the 'Agent of Change' principle is clear that established nuisance generating uses should be designed to remain viable and continue to grow without unreasonable restrictions being placed on them.
- 6.43 A **Transport Statement** is provided as part of this Application, as required by **LBRuT Policy LP44**. This has been prepared, with reference to the **LBRuT Transport SPD**, which confirms the Proposed Development does not meet thresholds required to provide a travel plan.

## Environment

### Drainage

- 6.44 The built form of the Proposed Development will connect into the existing mains, with the external playground area utilising SUDS in accordance with **London Plan Policy 5.13** and **ItP London Plan Policies SI 12** and **SI 13**, and **LBRuT Policy LP21**.

### Trees

- 6.45 Two low quality trees are required to be felled as a result of the proposals. This provides an opportunity to provide improved and interesting trees, ideally suited to the space available, in accordance with **ItP London Plan Policy G7** and **LBRuT Policy LP16**.

## 7. Conclusion and Application Benefits

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- 7.1 This Planning Statement has been prepared by Quod, on behalf of the Trustees of Hampton School Trust in support of a Full Planning Application at Hampton Pre-Prep School, 41-43 Wensleydale Road, Hampton.
- 7.2 As is set out in this Planning Statement, the Proposed Development will provide a wide range of benefits, with the principal benefits being:
- A new 91 sq m Hall / Dining Area, able to accommodate dining, assembly, and performance, replacing the existing undersized and unsatisfactory existing space.
  - Significantly improved internal layouts for the main School building, and the playground area.
- 7.3 The School has worked hard to balance the needs of its pupils, DfE Guidance, neighbouring amenity, and the existing local context. The proposed new Hall / Dining Area is still significantly short of DfE Guidance, but is considered to deliver this important balance, while also according with the aspirations of planning policy.
- 7.4 The Applicant has sought to follow best practice, with early engagement attempted with LBRUT Officers and a well-received Webinar held, with feedback incorporated in the Proposed Development.
- 7.5 As is set out above, this Planning Statement demonstrates the Application accords with the aims and objectives of national, regional and local planning policy, and indeed the development plan (when read as a whole). This means that the presumption in favour of the development plan, which is provided for by Section 38(6) of the Planning and Compulsory Purchase Act (2004), amounts in this matter to a (strong) presumption in favour of approving the proposals. It follows that unless material considerations indicate otherwise, planning permission should be granted. Far from indicating otherwise to the grant of permission, the material considerations lend very substantial further weight to permission being granted and in accordance with NPPF paragraph 11 (c), this should be done without delay. Accordingly, we respectfully request that planning permission is granted.