



Hampton Pre-Prep School

Transport Statement

1 Introduction

- 1.1 This Transport Statement has been prepared by Quod, on behalf of the Trustees of Hampton School ('the Applicant') in support of a full application at Hampton Pre-Prep School, Wensleydale Road, Hampton ('the Site').
- 1.2 This Transport Statement utilises the National Planning Policy Framework (NPPF), the London Plan (Adopted and Intend to Publish), the adopted Richmond Local Plan (2018) and the Richmond Transport Supplementary Planning Document as the starting point for ascertaining the requirements of a Transport Statement for the proposed development.
- 1.3 This Statement begins by setting out the Proposed Development for the Site before reviewing the above sources for policy requirements regarding travel plans and assessments.

2 Proposed Development

- 2.1 The Description of Development for the Proposed Development is set out below:
"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"
- 2.2 The proposals generate an additional 109 sq m of floorspace.

3 Transport Impacts

- 3.1 The development proposals do not result in any increase in pupil or staff numbers, and as such there is no increase in vehicle or other operational transport movement.
- 3.2 Any construction related transport impacts will be addressed via a Construction Management Plan.

4 National Planning Policy Framework

- 4.1 The NPPF is clear at paragraph 109:
"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."
- 4.2 While the NPPF states at paragraph 111 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".



Note continued

- 4.3 Given the minor nature of the Proposed Development at the Site, and the noted absence of a proposed increase in either pupil or staff numbers, it is evident that this development will not generate any changes in movement and as such the development should not be prevented or refused on highways grounds.
- 4.4 National policy is clear that only development generating significant amounts of movement should be required to provide a travel plan, a transport statement or transport assessment. Neither a transport plan, assessment or statement are required by national policy.

5 London Plan (Adopted)

- 5.1 The London Plan states at Policy 6.3:
“Transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice Guidance for major planning applications.”
- 5.2 The adopted London Plan is clear that a Transport Assessment is not required for a minor application.

6 London Plan (Intend to Publish)

- 6.1 The Intend to Publish London Plan states at Policy T4:
“When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed”.
- 6.2 The Intend to Publish London Plan confirms that transport assessments/statements are only required when this would be in accordance with national or local guidance to enable assessment.

7 Richmond Local Plan

- 7.1 Supporting text for Policy LP44 (Sustainable Travel Choices) states
“All planning applications for major developments must be accompanied by a Transport Assessment, or for minor developments a Transport Statement. This may include Travel Plans, Delivery and Servicing Plans and Construction and Logistic Plans. Matters to be included are set out in the London Plan, the latest Department for Transport as well as Transport for London guidance, the Council’s Local Validation Checklist and will also be included in a forthcoming SPD on Sustainable Transport Choices, which is being developed by the Council”.
- 7.2 According to this policy, this minor application must be accompanied by a Transport Statement.
- 7.3 The matters to be included are to be guided from the London Plan, Transport for London (TfL) guidance, Department for Transport, the Council’s Local validation list and the forthcoming SPD and these are set out below. Many of these resources are clear a Transport Statement



Note continued

(or similar) is not required for an application of this nature, and as such the information contained in this Transport Statement is limited.

8 Transport Supplementary Planning Document

- 8.1 Richmond Borough Council adopted a Transport Supplementary Planning Document (SPD) in June 2020. This sets out that Transport Statements should be submitted in accordance with Transport for London (TfL) guidance and the Council's Local Plan. It also sets out a Transport Statement should be submitted alongside this planning application.

9 Validation Checklist

- 9.1 The validation checklist requires a full Travel Plan to be submitted if the threshold set out in TfL guidance is met. The checklist also states that a Travel Plan Statement will be required for schemes that either employ 20 or more staff, comprise over 50 residential units or is a car free housing development. While the School employ over 20 staff, this figure is not proposed to change. However, for completeness it is important to consider to the TfL Travel Planning guidance to understand the extent of the Travel Plan Statement required.

10 Transport for London Guidance

- 10.1 The TfL guidance on transport assessments is key in determining the transport statement requirements. The guidance states *"you should do a TA [transport assessment] for all developments of strategic importance"*. A development of strategic importance is one which must be referred to the Mayor as it is of strategic importance to London. These fall in to one of three categories: large-scale development; major infrastructure; or developments that may affect strategic policies.
- 10.2 Further the TfL guidance states, *"a transport statement is a shorter, simpler version of a TA. You can use it when transport impacts are limited"*¹.
- 10.3 TfL use national guidance from 2007 to decide when a transport assessment or statement is needed for different types or sizes of development. The 2007 guidance states that for land use D1, within which a school is defined, development of less than 500sq m, does not require a transport assessment.
- 10.4 The Proposed Development generates an additional 109 sq m of floorspace, with no transport impacts anticipated. TfL guidance is therefore clear that no formal transport assessment or statement is required.

11 Conclusion

- 11.1 The Proposed Development has considered the NPPF, the London Plan, Richmond Local Plan, the Council's Validation Checklist and TfL Guidance.

¹<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>



Note continued

- 11.2 Given the minor nature of the Proposed Development, coupled with the principle that there is no increase in pupil or staff number proposed, it is considered that the proposed application is in accordance with the aforementioned policies and guidance and does not meet the thresholds to provide a full transport statement or travel plan.