



King's House School, Richmond Planning Statement

Final Report

Prepared by LUC
April 2021

King's House School, Richmond
Planning Statement

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Chapter 1

Executive Summary

1.1 This Planning Statement has been prepared to accompany a planning application for proposals at King's House School, in the London Borough of Richmond upon Thames. The application is a resubmission of 20/0165/FUL which was refused at planning committee in June 2020 due to an adverse impact on the St Mathias Conservation Area, and trees. The re-submission scheme addresses these concerns and has significant benefits for pupils, staff and visitors to the School, as well as benefits to heritage, biodiversity and trees and sustainability.

1.2 The main benefits of the scheme are:

- Improved accessibility – The proposals will significantly improve accessibility of the School increasing the accessible area from 38% to 54%.
- Improved logistics – due to piecemeal development over time the school is difficult to navigate and bottlenecks are common, the proposals will open areas up and improve the flow of people around the School.
- Improved facilities – many of the Schools facilities are outdated, for example a number of the classrooms are too small for modern day teaching requirements. The new facilities will provide far better quality learning and teaching environments for not only pupils and staff, but also for those community groups who benefit from being able to use the School.
- landscape improvements – the proposals will greatly enhance the landscape around the School, providing additional native wildflower, shrub and tree planting as well as flexible playspace and outdoor learning environments. The landscaping will complement both the existing buildings on site and the new building.
- Biodiversity and trees – the proposals will only result in the loss of two trees and overall a net gain in trees on site will be achieved (22 are proposed to be planted resulting in a gain of 20 trees). Trees will be fully protected during the construction process. Native planting, green roofs and walls and faunal boxes will also help result in a Biodiversity Net Gain across the site. The retained and additional tree planting will contribute to the character of the Conservation Area.
- Sustainability – the new buildings will be constructed to strict sustainability criteria and standards, resulting in

efficient and sustainable buildings on site which will replace less efficient infrastructure.

- Heritage – there will be heritage benefits on site, through the removal of unsightly buildings that have been added in a piecemeal way since the main Victorian buildings were constructed. In particular the modern garage to the side of number 66 compromises the legibility of this building's façade and its removal will be beneficial both to this Building of Townscape Merit and also the Conservation Area. The new buildings with their considered materiality and green roofs and walls are designed to complement and enhance the Buildings of Townscape Merit on site and integrate well within the garden setting, contributing to the green, landscaped character of the site.

1.3 The proposed development would have a neutral effect on the heritage significance of the two Buildings of Townscape Merit (66 and 68 Kings Road) and the contribution they make to the Conservation Area. Therefore, overall the development will preserve the character and appearance of the St Matthias Conservation Area.

1.4 Overall, it is concluded that, in light of the significant benefits of the scheme, its compliance with local, regional and national policy and limited impacts on the surrounding environment, planning permission should be granted.

Chapter 2

Introduction

2.1 This Planning Statement accompanies a full planning application for the proposed development at the existing King's House School Senior Department at 66-68 Kings Road, Richmond, TW10 6ES, in the London Borough of Richmond upon Thames (LBRuT).

2.2 The proposed development comprises the demolition of several school buildings, construction of a new music, arts and teaching block, some internal refurbishment work and landscape works.

2.3 The application is a revision of 20/0165/FUL which was refused permission at Committee in June 2020 due to its impact on trees, and on the Conservation Area. The current proposals that are set out in this planning statement address these issues. More detail is set out in Chapter 6.

2.4 Reference is made throughout the Statement to supporting information that forms part of the full planning application package. The full list of submitted documents to accompany this application is set out in Table 2.1 below.

Table 2.1: Supporting Information

Document Title
Site Location Plan, Existing and Proposed Plans, David Miller Architects
Design and Access Statement, David Miller Architects
Noise Report, Cundall
Play Area Noise Assessment, Cundall
Method of Construction Statement & Transport Plan, MCS Construction
Energy and Sustainability Statement and LBRUT Sustainable Construction Checklist, Cundall
BREEAM Summary, Cundall
Flood Risk Assessment, Elliot Wood
SuDS Proforma and Drainage Strategy, Elliot Wood

Document Title
Arboricultural Assessment and Outline Method Statement, Nicholas Jones Consultants Ltd
Ground Level Tree Assessment, The Ecology Consultancy
Preliminary Ecological Appraisal, The Ecology Consultancy
Bat Roost Assessment, The Ecology Consultancy
Biodiversity Net Gain calculations and Enhancement Summary, The Ecology Consultancy
Heritage and Archaeology Statement, LUC
Daylight and Sunlight Review, Avison Young
External Lighting Plan, Cundall
Transport Statement, Velocity Transport Planning
Statement of Need – King's House School

Chapter 3

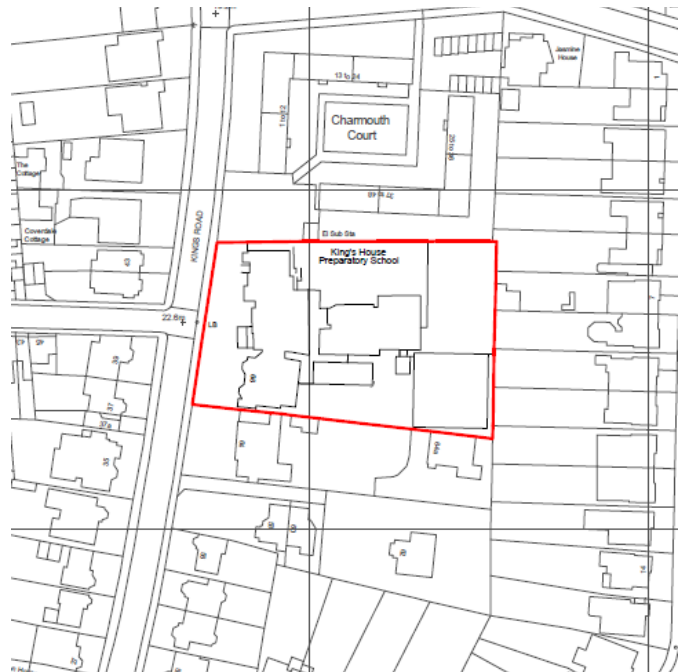
The Site

Site Location

3.1 King's House School is an independent preparatory school which comprises a Nursery Department, Junior Department and Senior Department along with a separate sports ground in Chiswick. This application concerns the Senior Department which is located at 66-68 Kings Road in Richmond, London.

3.2 As shown in Figure 3.1 below, the site is located between Spring Grove Road and Marchmont Road, with Denbigh Gardens to the rear. The Kings Road junction with Audley Road is opposite the site.

Figure 3.1: Site location plan



3.3 The School is bounded by residential properties on all sides, including a three storey residential block of flats known as Charmouth Court to the north of the site, No. 64 Kings Road and No. 64A Kings Road along the southern boundary, and residential properties to the east along Denbigh Gardens.

3.4 The site is also located approximately 900m east of the River Thames and, according to the Flood Risk Assessment, has a low risk of flooding.

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The Site

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3.5 The site is within the St Matthias Conservation Area. There are no designated or non-designated archaeological assets within the site, nor is the site located in a locally designated Archaeological Priority Area.

3.6 Access for vehicles and pedestrians into the School is from Kings Road and on-site staff and visitor parking is provided to the front of the buildings. Access for pupils is via a side gate located to the north of the site. Staff can access the site via the main entrance to No. 68 Kings Road and separate access is provided for visitors and deliveries at entrances in between No. 68 and No. 66 Kings Road.

King's House School

3.7 King's House School provides education and sports facilities for boys aged 3-13 with Co-ed Nursery. The Senior Department is the base for pupils in Years 4 to 8 (ages 8-13). The Senior Department provides lessons in English, Mathematics, Science, History, Geography, Religious Studies, Computing, Art and Design Technology, Physical Education (PE), Swimming, Drama, Games, Music, French and Latin.

3.8 The existing capacity of the Senior Department is 230 pupils. This is controlled by condition U39897 of the existing planning permission (Ref: 07/2790/FUL dated May 2011) and the School has no plan to increase pupil numbers with this application.

3.9 The site is approximately 0.45ha and consists of two historic buildings (No. 66 and No. 68 Kings Road) which are locally listed.

3.10 According to the Heritage and Archaeological Statement, No. 68 Kings Road was originally the vicarage to the Holy Trinity Church on Sheen Road and was converted to a school in 1946. Over the last 25 years there have been many additions and alterations including extensions both to the front and rear of the building. Further details of the planning history can be found in Chapter 4 of this report.

3.11 No. 66 Kings Road was originally a large two-storey villa and in 1969 planning permission was granted to use the ground floor as a school building (Ref: 69/0247).

Figure 3.2: Photograph of the front of No. 68 Kings Road



Figure 3.3: Photograph of the rear of No. 68 Kings Road



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The Site

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Figure 3.4: Photograph of the front of No. 66 Kings Road



Figure 3.5: Photograph of the rear of No. 66 Kings Road



3.12 The School was granted permission with the condition that the rear garden was not to be used for a playground or other school purposes in order to prevent prejudicing the neighbouring occupiers' enjoyment of their garden. In the following year this was amended (Planning Application Ref: 69/2032) to allow approximately two thirds of the rear garden to be used as an external instructional area, but not that adjacent to the house.

Figure 3.6: Photograph of the garden to the rear of No. 66 Kings Road



Figure 3.7: Photograph of the external instructional area to the rear of No. 66 Kings Road



3.13 Subsequently, some alterations and additions were made to the building and its grounds.

3.14 There has been a piecemeal approach to the School's extensions in the past, which has created a number of logistical issues for the School. Most notably the buildings are difficult to navigate, and it is easy to get lost. Accessibility is a challenge as there are numerous level changes between the different buildings and across the sloping site in general. The new proposal rationalises and improves the accommodation so that the Senior Department is more accessible and inclusive for a wider range of users.

Chapter 4

Planning History

4.1 The School has an extensive planning history, much of which relates to tree works. The following records are considered pertinent to this application:

- Planning permission was granted in March 1969 (Ref: 69/0247) for the change of use of part of a residential property (No. 66) to a school. This was subject to a condition that the garden area at the rear of the existing building shall not be used as a playground or other school purposes.
- Planning permission was granted in January 1970 (Ref: 69/2032) for the use of part of the rear garden as an external instructional area, but not that adjacent to the existing building.
- Planning permission was granted in November 1971 (Ref: 71/2083) for the erection of a prefabricated gymnasium at the rear of the existing school house.
- Planning permission was granted in August 1972 (Ref: 72/1870) for the erection of a single storey extension to the school gymnasium to provide an entrance lobby and storeroom.
- Planning permission was granted in March 1975 (Ref: 75/0030) for the erection of a teaching room at 2nd floor roof level to the front of the building; erection of single-storey front and side extension to provide entrance hall and Secretary's room.
- Planning permission was granted in January 1976 (Ref: 75/1123) for the erection of a single storey extension to the gymnasium.
- Planning permission was granted in June 1978 (Ref: 78/0251) for the erection of a single storey extension to the existing gymnasium.
- Planning permission was granted in April 1981 (Ref: 81/0001) for the erection of a single storey store and car port in the front involving the demolition of the existing prefabricated garage and timber shed.
- Planning permission was refused in July 1981 (Ref: 81/0440) for the erection of a single storey prefabricated classroom building at the rear.
- A revised application was received for the erection of a single storey extension at the rear and planning permission was granted in March 1982 (Ref: 82/0195).

Chapter 4

Planning History

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- Planning permission was granted in May 1983 (Ref: 83/0053) for the construction of a new single storey classroom building at the rear, alterations and erection of ground and first floor extension between Nos. 66 and 68 Kings Road.
- Planning permission was granted in September 1990 (Ref: 90/1340/FUL) for the erection of a three-storey extension.
- Planning permission was granted in August 1996 (Ref: 96/0975/FUL) for the removal of prefabricated classroom, removal of end of gymnasium building and erection of classroom building and stair and new hall. Amendments to this permission were subsequently submitted and approved in October 1998 (Ref: 98/2000).
- Planning permission was granted in May 2003 (Ref: 03/1064/FUL) for the extension to south wing to create a new IT room and improved access for people with disabilities.
- Planning permission was granted in October 2005 (Ref: 05/2446/FUL) for a roof extension and installation of windows on second floor.
- A certificate of lawful development was issued in February 2007 (Ref: 06/3500/ES191) for use of first floor and second floors of 66 Kings House for residential use incidental to use as a school.
- An application for the variation of condition NS02U (relating to pupil numbers) of planning permission 98/2000/FUL dated 28/10/1998, was granted in May 2011 (07/2790/FUL) to amend the maximum number of pupils on the roll of the senior school as extended to at no time exceed 230.
- Planning permission was granted in October 2014 (Ref: 14/2009/FUL) for a two-storey extension to dining room and classroom with new office.
- Planning permission was granted in March 2017 (Ref: 16/2129/FUL) for an extension to the theatre to create a multi-purpose hall, replacement of existing gymnasium by six classrooms, extension to form three new rooms and store. Permission was also granted for an art room in 68 Kings Road which has been built.
- Planning permission was granted in September 2020 (Ref: 16/2129/DD02) for details pursuant to condition U0019695-NS03 (tree planting scheme) of planning permission 16/2129/FUL.
- Planning permission was refused in June 2020 (Ref: 20/0165/FUL) for the demolition of a number of existing school buildings and erection of buildings including new classrooms; new music ensemble room and practice rooms including drama; extension of existing sports hall; enlarged dining area; reconfigured play/PE area; comprising part single-storey, part three-storey extension to existing auditorium and associated hard and soft landscaping. The reasons for refusal included an unacceptable impact on trees, and on the Conservation Area. The application that is the subject of this planning statement addresses these reasons for refusal.

Chapter 5

Community Engagement Report

Public Consultation

5.1 The proposals set out within this planning statement and accompanying information are a revision to the previous application (Ref: 20/0165/FUL) which was refused at Committee in June 2020. The reasons for refusal included the impact on trees, and the Conservation Area. The current proposals address these issues, but as a re-submission scheme, extensive further public consultation was not deemed necessary. The consultation set out in the list below was that undertaken for the previous scheme, but it remains relevant to this application.

5.2 The design team and King's House School were proactive in engaging with the neighbouring residents and keeping them informed of the design of the development. Several public consultation events took place to support the planning application.

- **23rd November 2018: Residents' Consultation Event**
– This was an initial consultation event to obtain first thoughts.
- **29th April 2019: Neighbourly Presentation to Charmouth Court Residents** – Charmouth Court AGM with full Development Team and plans. During this consultation, residents of the Charmouth Court block, and those with links to residents, raised concerns about noise, traffic and dust and reference to the intention to increase pupil numbers.
- **1st May 2019: Kings Road Residents' Association Information Session at King's House School** – During this meeting the main points were to do with pupil numbers, increased community use and the impact on traffic and noise. Tree loss was also raised.
- **19th June 2019: Parent Information and Consultation**
– 25 parents attended. Feedback was very positive. Most questions related to timings and disruption to pupils' learning during the build.
- **20th June 2019: Denbigh Gardens Residents Information Evening** – Feedback was positive about the development. Comments were mainly related to

noise associated with community and private lettings during the school holidays.

- **19th September 2019: Kings Road Residents' Committee Meeting** – This meeting was between representatives of the School and Kings Road Residents' Committee to discuss the development. Objections to the new location of the buildings close to the boundary with No. 64 and No. 64A Kings Road were raised.
- **14th October 2019: Junior Department Information Drop-in Session** – Overwhelming positive feedback as these parents recognised their sons will benefit from the facilities to be provided.
- **16th October 2019: Senior Department Parents Information Drop-in Session** – 10 parents attended. Feedback was positive.
- **16th October 2019: Residents' Information Drop-in Session** – Approximately 30 local residents attended following a letter and email drop invitation to Charmouth Court; Denbigh Gardens, 12-18 Marchmont Road and Kings Road as far as Charmouth Court (to the North) and Marchmont Road (to the South). The design presented during this event addressed most of the issues raised during the previous consultations with its altered configuration. The majority of residents were pleased that the location and configuration of the teaching block had been altered. Residents from Denbigh Gardens were not concerned as the new teaching block location is still a significant distance away from their respective properties. There were also no significant issues with building works, however residents at No. 64 Kings Road raised concerns about the new location of the music, arts and teaching block. No written comments were received apart from No. 64 Kings Road.

5.3 Although further public consultation has not been considered necessary for this re-submission scheme, in the interest of transparency, in February 2021 the current proposals were presented in a digital exhibition which allowed residents, neighbours, parents, pupils etc. to view the plans, and leave comments if they wished. Approximately 45 people viewed the exhibition, this was generally a mixture of parents and local residents.

5.4 It is also noted that a meeting with representatives of Kings Road Residents Association, to review alternative proposals for the site was held on the 8th October 2020.

5.5 A further meeting with residents from Kings Road, Denbigh Gardens and Charmouth Court was held on the 25th March 2021 before the proposals were due to be submitted. This was to explain the finalised scheme and gather any feedback. The feedback was reflected upon and the questions

and concerns of the residents and the application team's responses to these are set out in **Appendix A**. This table also includes responses to queries raised at the online consultation in February 2021.

5.6 On the 13th April 2021, residents from 64 King's Road attended site to look at the two Holm Oak trees that were planted along the boundary in 2018.

Internal and External Stakeholder Consultation

5.7 This section has been split into stakeholder consultation that was undertaken for the refused scheme (Ref: 20/0165/FUL) which is still relevant, and that which has been undertaken for the revised re-submission scheme, since the June 2020 refusal.

Previous Scheme (20/0165/FUL)

5.8 As well as public consultation, the previous scheme was subject to extensive consultation with other internal and external stakeholders. As this is still relevant, details of this consultation, is set out below.

5.9 In addition to staff, pupils and parents of the school, the following external stakeholders were consulted:

- London Borough of Richmond upon Thames planning officers
- Tree Officer
- Ecology Officer
- Design Officer
- The Greater London Archaeological Advisory Service (GLAAS)

London Borough of Richmond upon Thames (LBRuT)

5.10 From August 2018, various requests for pre-application advice took place, including the following.

- **August 2018: Pre-Application 1 Submission** – The first iteration of the proposed masterplan for the School was the subject of a request for pre-application advice from LBRuT.. An image of this first design is shown in Figure 5.1.

Figure 5.1: Image of the first design iteration

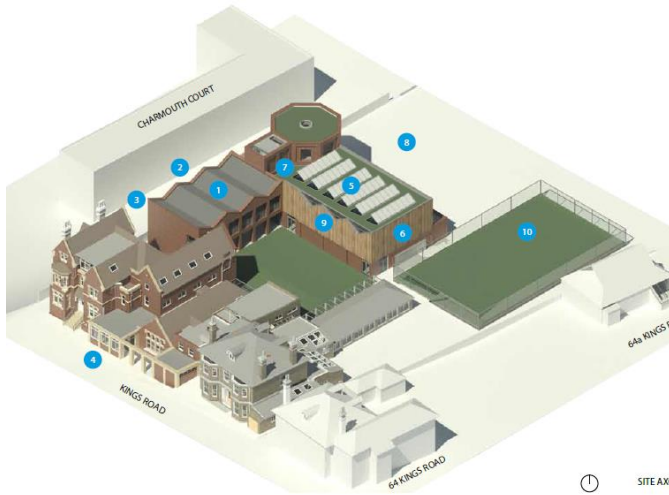


Figure 5.2: Second iteration of design



- **21st August 2018: Pre-App Meeting with Kreena Patel of LBRuT** – This meeting highlighted concerns over the proximity of the proposed school buildings to the neighbouring Charmouth Court and the existing London Plane trees along the boundary.
- **May 2019: Pre-Application 2 Submission** – Following the initial pre-application meeting, the massing and design of the classroom block was revised, and the classroom block was moved an additional 300mm away from the northern boundary. In addition, play space calculations were provided demonstrating an increase of 0.3%.
- **13th June 2019: Second Pre-application meeting with Kreena Patel of LBRuT** – A second advice meeting was held following the second pre-application submission. Whilst overall the principle of the development was received favourably, the meeting still highlighted issues with the proximity to Charmouth Court and the potential daylight/sunlight issues, and the protection of the number of London Plane trees.

5.11 Following these meetings a rigorous design development review was undertaken. The changes included the relocation of the teaching block to the south side of the sports hall and reconfiguration of the PE area. The second iteration of the design is shown below.

- **November 2019: Pre-Application 3 Submission** – Following the relocation of the teaching block, a third pre-application submission took place.

- **21st November 2019: Pre-App Meeting with Kreena Patel of LBRuT** – LBRuT acknowledged the design team had responded to feedback from the second pre-application meeting and further feedback was received in relation to the height of the building and the brick materiality.

Design Response

5.12 Following the initial pre-application meetings and public consultation events in 2018 and 2019 described above, a rigorous design development review was undertaken to address concerns over the protection of the existing London Plane trees and proximity to Charmouth Court and allow the relationship with Charmouth Court to remain largely unaltered. The changes reduced the impact on the daylight and sunlight received by Charmouth Court as well as reducing impacts on their outlook and potential for overlooking. The reconfigured play / PE area adjacent to the boundary with 64A Kings Road, which was of concern to this resident, was replaced with teaching classrooms, which would act as a barrier to any noise associated with the outdoor play areas.

Tree Officer

- **29th August 2019: Site meeting with Tree Officer** – Meeting at King's House School to review the original proposals to relocate the building on site, and its impact on trees. The Tree Officer viewed the location change favourably. It was suggested that the building be raised by circa 600mm, so it sits above any existing tree roots, and avoiding impact entirely. Subsequently an investigation was undertaken to determine the level of the existing tree roots. The result of the investigation demonstrated that raising the proposed building was

unnecessary and tree roots would not be affected with the original proposed building level. The Tree Officer was satisfied that raising the proposed building by circa 600mm was not necessary at a later meeting.

- **18th December 2019: Site meeting with Tree Officer** – Trial holes were dug to inspect the tree roots and inform the design detail. Please refer to the Arboricultural Assessment for more information.

Design Officer:

- **29th August 2019: Site meeting with Design Officer** - Meeting at King's House School to review the proposals to relocate the building on site.

Ecology Officer

- **18th December 2019: Site meeting with Ecology Officer** – Meeting at King's House School to inspect the site and review the original proposals.

GLAAS

- Diane Abrams, the GLAAS advisor for the Borough of Richmond was contacted by email on October 31st 2019 regarding active information relating to the site. A response was received from her colleague Louise Davies on 11th November 2019, who confirmed that there was no work taking place or recently completed near the vicinity of the site and that the GLHER was therefore representative of the area's archaeology.

5.13 The application was then submitted on 21/01/2020 and refused at Committee on 06/08/2020. Since then the reasons for refusal have been reviewed and the design has been amended to address these issues.

Current re-submission scheme

5.14 Since the refusal of the original scheme in June 2020, three further pre-application meetings have taken place with LBRuT:

- **27th August 2020: pre-application meeting with planning officer and tree officer** – The purpose of this meeting was to receive feedback from officers on the revised scheme. It was agreed that the design reasons for refusal had been addressed and the scheme was worth submitting.
- **15th October 2020: pre-application meeting with planning officer and tree officer** – The purpose of this meeting was to present a worked up scheme to the planning officer. It was confirmed that there was no objection from the conservation officer, and the tree officer regarded the proposals as a big improvement.

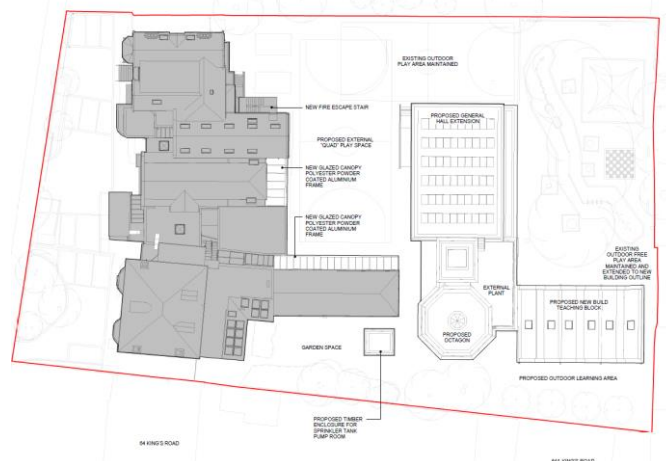
Chapter 6

Description of the Development

6.1 King's House School is seeking consent for the following:

- **Demolition of a number of existing school buildings**, which have been added since the original Victorian and Edwardian houses.
- **The erection of a two and three storey new build teaching block**, linking to the existing sports hall which will be extended. This new teaching facility consists of **music and drama classrooms, music practice rooms and six general teaching classrooms**. There are also associated areas for staff, storage and services which support the running of the building.
- Internal refurbishment work to the existing main school buildings to improve circulation and logistical issues, such as **enlarging the existing dining hall and library**. This involves some external modifications to the rear of the buildings (east elevation).

Figure 6.1: Proposed site block plan



6.2 Full details can be found in the Design and Access Statement and submitted plans.

6.3 The improvements resolve most of the existing issues associated with logistics and circulation that the School faces on a daily basis. The proposals will improve the quality of the facilities and buildings, improve accessibility across the site, aid the smooth running of the School and improve the educational offering. The proposals also seek to restore the

historic aspects of the School and better integrate the school buildings within the neighbourhood. The benefits of the scheme are explained further in the following chapter.

Demolition

6.4 As part of the proposals, the existing two-storey music block and gym will be demolished to make space for a new central courtyard. The external stairs on the first and second floors will also be removed.

Figure 6.2: Photograph of the existing music block



6.5 The single storey external store, existing boiler room and P.E. store will also be demolished as part of the enabling works.

Figure 6.3: Photograph of the existing external store



6.6 The scheme also requires demolition of the garage and part of a classroom to facilitate the construction of the new build elements.

Figure 6.4: Photograph of the garage to be demolished



Figure 6.5: Photograph of the section of classroom to be demolished



New Teaching Block

6.7 The new two and three storey music, arts and teaching block will be linked to the existing sports hall and consists of the following:

- Six general teaching classrooms;
- Five music practice rooms;
- An AV recording room
- A music classroom;
- A drama studio
- A music office and admin space;
- Changing rooms and WCs; and
- Storage, plant and circulation space.

Internal Modifications

6.8 Internal modifications to the existing Victorian blocks will open up circulation routes and help with wayfinding and general accessibility. As part of this, it is proposed to enlarge the existing dining hall and library by removing the existing stores at the back and the mezzanine level above.

Figure 6.6: Photograph of the existing dining hall



Materials

6.9 Cladding materials have been selected that are sympathetic to the Buildings of Townscape Merit (BTM) that sit on the site as well as the wider context of the neighbourhood and Conservation Area.

6.10 Richmond blend bricks are proposed as the primary cladding material, with a larger percentage of red tones to the hall, classroom and arts block. A larger percentage of buff brick tones are proposed for the circulation core to distinguish it from the other blocks and complement the different red and buff brick tones on the site and within the local area.

6.11 A red bronze coloured metal cladding is proposed to the main hall and at the top of the arts block to complement tones of the traditional material palette.

6.12 A green wall connecting the arts and classroom blocks is proposed to separate the distinct building forms.

6.13 Green roofs are provided where possible while a red clay tile is proposed on the pitched roofs of the classroom block.

6.14 More details on the materials proposed can be found in the Design and Access Statement.

External Space and landscape

6.15 It is proposed to create a central courtyard which will form the heart of the School. From this 'Quad' space, all blocks can be accessed.

6.16 The 'Quad' will be sheltered by buildings on three sides, which will minimise acoustic breakout to the neighbouring properties.

6.17 Outdoor space is broken down into outdoor play and PE, outdoor learning and the garden area.

6.18 There will be a very minor reduction in overall outdoor space at the School. Currently there is 2099 sqm of outdoor space, under the new proposals there would be 2084 sqm of outdoor space. However, 319 sqm of this outdoor space will be designated as 'outdoor learning' and will provide a valuable outdoor learning environment for children. Currently only 161 sqm of space is designated for this use.

6.19 The play and PE space will be flexible, and will allow for informal play at breaktimes, as well as more formal games during PE lessons.

6.20 The garden area will be retained as a buffer to protect the amenity of number 64 Kings Road.

6.21 A landscaping scheme has been developed alongside the proposals. This is included in the Design and Access Statement. The scheme shows further strengthening of the planting on the southern boundary of the site and will use native and wildlife friendly species to encourage biodiversity. The outdoor uses also reinforce the low key and quiet use of the spaces adjacent to the houses along the southern boundary.

Trees

6.22 One of the two reasons for refusal of the previous scheme was the loss of trees:

"By reason of the loss of trees of amenity value, inadequate on-site replacement tree provision and in the absence of a binding agreement to secure an appropriate financial contribution towards off site tree provision, the development would have a detrimental impact on the quality and character of the environment including the character and appearance of the Conservation Area, amenity and biodiversity in general."

6.23 The revised scheme has been designed around retaining as many of the trees on site as possible. As a result of moving the sports hall north, all but two trees will now be retained. One Holly tree will be removed to facilitate construction access to the site, and one Common Ash will be removed. These trees will be replaced in line with LBRuT policy.

6.24 Additional tree planting, (including four new hornbeams as per application ref 16/2129/DD02) within the School grounds and along the boundary with numbers 64 and 64a Kings Road is illustrated on the landscape plan submitted with the application. In total 22 new trees will be planted, along with other native species planting, meaning there will be a net gain in trees on site.

6.25 Existing trees on the site will be enhanced and protected. An Arboricultural Method Statement and Outline Tree Protection Plan have been submitted with the application. They set out how the trees will be protected during construction and operation.

6.26 The two young Holm Oak trees planted in 2018 alongside the boundary with 64 Kings Road will be removed during construction to protect them. They will be stored in containers off site and replanted in the same position once the construction access is no longer being used. This method has been approved by the Arboricultural Consultant. If there appears to be issues with the long-term viability of the trees, they will be replaced with trees of the same type and size, in the same location. This will be at the School's expense.

6.27 It is noted that the two existing young Holm Oaks are not shown on the tree survey or tree protection plan. This is because they fall below the size that would afford them protection within the Conservation Area (75mm in diameter at 1.5m above ground level). However, these trees are shown on landscape plans, and as set out above will be protected and retained.

6.28 The latest scheme has been discussed with the council's Tree Officer who has confirmed that it would be acceptable, subject to appropriate mitigation, planting and methods.

Impact on the Conservation Area

6.29 The second reason for refusal of the previous scheme was due to impact the proposals would have on the Conservation Area:

"The development of the music and classroom blocks, by reason of their siting, scale, height, massing and design, loss of trees and absence of sufficient space to plant new trees to mitigate the loss of those that would be removed, would result in a dominant and visually intrusive form of development that would be detrimental to the character and appearance of this part of the Conservation Area."

6.30 In order to address this:

- The sports hall and music block have been moved further north to allow retention of two more trees (as explained previously). Additional trees will be planted along the southern boundary. Overall there will be a net gain in trees on site.

- The massing and bulk of the building have been reduced, through stepping in the top floor of the arts block and introducing flat roof tops to the classroom block.
- Red bronze coloured metal cladding has been added to the top floor of the arts block and hall to contrast the brickwork.
- Rooflight windows have been added to limit overlooking and the number of windows has been reduced.
- Green walls and screening have been added to improve outlook and increase Biodiversity Net Gain.
- The sprinkler tank has been relocated from the outdoor learning area, which leaves more useable outdoor space.

6.31 The changes to the scheme are set out in more detail in the Design and Access Statement.

6.32 Due to the above, the impact on the Buildings of Townscape Merit and the Conservation Area is now considered to be neutral, and overall, the proposed development is considered to preserve the character and appearance of the Conservation Area and the special character of the Buildings of Townscape merit. More detail is set out in the accompanying Heritage Assessment.

6.33 Furthermore, it is noted that the proposals still include the demolition of some of the poor quality buildings at the School, which have been added in a piecemeal way since the Victorian and Edwardian buildings. This would have a positive impact on the Conservation Area, in particular the removal of the garage to the south of 66 Kings Road would be beneficial in improving the legibility of the building's façade and the contribution it makes to the Conservation Area's special interest.

Chapter 7

Need for, and Benefits of the Scheme

Accessibility

7.1 The proposals will increase the accessibility of the School. The School currently suffers with challenging access due to level changes. This is coupled with issues with logistics and circulation and poor navigation.

7.2 Most of the School is inaccessible for a student or staff member in a wheelchair. There are numerous dead end corridors making it difficult to navigate and difficult to group departments together to allow them to share resources. One classroom is accessed from the library, which is disruptive and the locker storage in corridors creates bottlenecks.

7.3 Accessibility is defined as being level access suitable for a wheelchair user. Currently approximately 38% of the School space is accessible under this definition. This would rise to 54% with the new scheme. In terms of general teaching classrooms currently only 7 of 17 are accessible whereas, this would rise to 13 of 18 with the new scheme, which would also include accessible specialist teaching and learning resource spaces which the School currently lacks. Furthermore, the outdoor PE and playspace provided in the quad and to the north will become fully accessible to all from within the School.

7.4 As mentioned previously the proposals will also resolve the current logistical and circulation issues, and aid the smooth running of the School throughout the day. More detail and diagrams are provided in the Design and Access Statement.

Teaching environment

7.5 The proposals will improve the quality of the facilities and buildings, improve accessibility across the site, aid the smooth running of the School and improve the educational offering.

7.6 There are a number of issues that the School is currently facing:

- Due to the nature of the existing Victorian building, many of the existing classrooms are too small for modern day teaching requirements, and generally are adequate for approximately 17 pupils. The School currently manages this by controlling group sizes.

- There is a lack of group rooms to support focussed learning in smaller groups.
- There is a small gym which is not utilised to its full potential owing to its size.
- There is a lack of staff offices and some of these spaces fall below the area recommended by BB 103.

7.7 The proposals will address the above issues, resulting in a much improved teaching and learning environment for pupils, staff and visitors alike.

7.8 There will also be enhanced outdoor provision of spaces for outdoor learning.

Community use

7.9 The School currently offers out a number of its spaces for use by community groups, and the Senior Department is the primary site for this. Examples of groups which use the site include:

- The Alberts Community Association
- Charmouth Court Residents Association
- The Friends of Richmond Park
- The Holly Lodge Centre - The Holly Lodge Centre is a unique small charity in the heart of Richmond Park, specialising in activities for people with special educational needs.
- Shooting Star Chase – Children's hospice charity caring for babies, children and young people with life-limiting conditions.
- David Adams Leukaemia Appeal

7.10 The site also hosts the following activities:

- ASA Football
- Mei Quan Tai Chi
- National Childbirth Trust (NCT) – Various classes
- Stagecoach
- The Judo Factory
- Weight Loss/Fitness Classes
- Weekly Birthday Parties

7.11 Community hire is limited during term time due to a lack of guaranteed good quality space. While it is not proposed to increase community use, the proposals will provide enhanced facilities for existing groups which use the site, as well as providing more inclusive access.

7.12 As mentioned above, it is not proposed as part of the scheme to increase community use at the School. Instead the

School would continue to offer out its facilities to existing groups as it does at present between 17:00 and 22:00 during term time, between 09:00 and 17:00 on the weekends and between 08:00 and 18:00 during the school holidays. The School was willing to facilitate an increase in community use but in discussion with LBRuT decided not to due to the potential impacts on neighbours of increased use. It is noted that, if there is the appetite for this from members or in the community and it can be demonstrated that there will be no adverse effects on the surrounding area, the School would remain open to increasing community use on site.

7.13 It is also worth noting that the School is an important local employer with around 83 FTE employees. It uses supply chains within the borough as far as possible providing employment for local people and investing in the local economy.

Biodiversity and sustainability

7.14 it is noted that the proposals will result in a Biodiversity Net Gain on site of 12.53%. this will be achieved through green roofs, green walls, climbing plants and new native species planting. An Ecological Enhancement Summary has also been submitted with the application which recommends that bird and bat boxes are integrated into the development.

7.15 The proposals will also result in improved sustainability performance of the School's buildings through greater energy efficiency. The new buildings have been designed to strict criteria to ensure they are sustainable. More detail is provided in the Energy and Sustainability Assessment submitted with the application. It is noted that the new build areas will seek to achieve BREEAM Excellent rating.

Heritage

7.16 The later additions to the School, which will be demolished, are of poor quality and obscure parts of the main, western façades of the Buildings of Townscape Merit (66 and 68 Kings Road). The additions to the rear also conceal parts of the historic buildings and their architectural details. This reduces their legibility and as such they are detrimental to the architectural value of the buildings and in turn to the Conservation Area.

7.17 The removal of the garage to the south of 66 Kings Road will improve the legibility of the building's façade and the contribution it makes to the Conservation Areas special interest. Similarly demolition of the buildings to the rear – e.g. the existing gym, music block and store rooms will improve the legibility of the rear of the buildings.

7.18 The new teaching block will sit entirely to the rear of the site, separate from the Buildings of Townscape Merit, allowing them to retain their legibility. Mature trees will be retained and

new trees planted which will contribute positively to the character of the site and wider Conservation Area. The materials will complement and reference the existing buildings on site as well as those in the wider area. The massing, form and design detail are considered to respond positively to the character of the Conservation Area and overall will result in more considered and coherent development.

7.19 In addition, the key mature trees which contribute to the character of the Conservation Area will be retained, and new planting will be introduced.

Landscape

7.20 A landscape scheme has been developed which will maximise the potential of the external spaces, providing environments that foster learning and development as well as promoting biodiversity. They add a new diversity to the outdoor space, and support and enhance the architectural proposals, as well as the character of the Conservation Area.

7.21 Existing trees and new tree planting will improve the outdoor space, strengthening the sense of place and identity as well as providing screening and buffering from neighbouring properties. With additional native planting, biodiversity on the site will increase.

7.22 The playspace will be transformed into a flexible area which can be used for informal games during breaktimes and more formal games during PE lessons.

7.23 The outdoor learning garden will provide new valuable learning opportunities for students as well as improving the setting of the School.

7.24 The buffer area of the Headmasters garden will be retained, to protect the amenity of 64 Kings Road.

Chapter 8

Planning Policy

8.1 This chapter summarises the relevant planning policy context at national, regional and local policy levels to the proposed scheme, and considers the statutory development plan policies against which this planning application should be considered, as well as other material considerations.

8.2 The proposals at King's House School comply with national, regional and local level policy and legislation, including the spatial planning policies of the London Plan and the local planning policies of LBRuT.

8.3 The policy context is set out below under the following headings:

- Statutory Development Plan Policy
- Material Planning Considerations

Statutory Development Plan Policy

8.4 Policy 9.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

'If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise'.

8.5 The statutory development plan comprises the London Plan and the London Borough of Richmond upon Thames's Local Plan (2018) and Supplementary Planning Documents. These set out the Council's vision and spatial strategy for the borough, focussing on the key planning issues to be addressed.

The London Plan

8.6 The London Plan sets out the spatial development strategy for Greater London, providing a strategic, London-wide policy context within which boroughs should set their local planning policies.

8.7 The current London Plan was adopted on the 2nd March 2021. This supersedes the 2016 London Plan.

8.8 During the time the proposals were being developed, and the application was being prepared, the London Plan was that adopted in 2016, while the newly adopted 2021 London

Plan was at the 'Intend to Publish' and 'Publication' stages. Therefore, the development and the application have been prepared in line with the 2016 London Plan.

8.9 However, while supporting documentation has been prepared in line with the 2016 London Plan, in all documents the newly adopted 2021 London Plan (at that stage the 'Publication Plan') has been considered as material consideration, with significant weight given to this.

8.10 Furthermore, it is noted that the relevant policy context and requirements for this scheme have not materially changed between the 2016 Plan and the 2021 Plan and it is considered that the proposals and application fully comply with the 2021 London Plan.

8.11 This Planning Statement has appraised the scheme against both the 2016 London Plan and the newly adopted 2021 London Plan. Relevant policies are set out below, and the appraisal is included in the following chapter.

The 2016 London Plan

8.12 The policies in the 2016 London Plan of relevance to the proposed scheme, are outlined below.

- **Policy 3.18 Education Facilities** supports development proposals which enhance education and skills provision, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and projected shortage of secondary school places will be particularly encouraged.
- **Policy 3.19 Sports Facilities** states development proposals that increase or enhance the provision of sports and recreation facilities will be supported.
- **Policy 5.2 Minimising Carbon Dioxide Emissions** requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in line with the energy hierarchy.
- **Policy 5.3 Sustainable Design and Construction** requires development proposals to demonstrate high standards of sustainable design and construction to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.
- **Policy 5.7 Renewable Energy** states that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- **Policy 5.9 Overheating and Cooling** states that major development proposals should reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy.
- **Policy 5.10 and 5.11 Urban Greening and Green Roofs** promotes and supports green infrastructure including tree planting, green roofs and walls and soft landscaping.
- **5.13 Sustainable Drainage** promotes the use of sustainable urban drainage systems (SUDS) and states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- **Policy 5.15 Water Use and Supplies** requires development to minimise the use of mains water by incorporating water saving measures and equipment.
- **Policy 6.3 Assessing Effects of Development on Transport Capacity** requires development proposals to ensure impacts on transport capacity are fully assessed.
- **Policy 7.3 Designing Out Crime** states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.
- **Policy 7.4 Local Character** requires development proposals to have regard to the pattern and grain of existing spaces and create a positive relationship between the urban structure and natural landscape features.
- **Policy 7.6 Architecture** requires buildings and structures to be of the highest quality architecture and make a positive contribution to a coherent public realm and streetscape.
- **Policy 7.8 Heritage Assets and Archaeology** requires development proposals affecting heritage assets and their setting to be sympathetic to their form, scale, materials and architectural detail.
- **Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes** seeks to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development.
- **Policy 7.19 Biodiversity and Access to Nature** seeks to protect, create, enhance and manage biodiversity including locally, nationally and internationally designated sites and protected species.
- **Policy 7.21 Trees and Woodlands** requires existing trees of value to be retained and any loss as a result of development should be replaced and the planting of

additional trees should be included in new developments.

Adopted London Plan (2021)

8.13 . Policies from the current adopted London Plan relevant to this development include the following:

- **Policy GG1 – Building strong and inclusive communities** requires development to build on the city's tradition of openness, diversity and equality and help deliver strong and inclusive communities.
- **Policy GG2 – Making the best use of land** requires a design led approach to determine the optimum development capacity of sites.
- **Policy GG6 – Increasing efficiency and resilience** states that developments should seek to improve energy efficiency, ensure buildings are designed to adapt to an changing climate and create a safe and secure environment.
- **Policy D1 – London's form, character and capacity for growth** requires a design led approach to establish optimised site capacity including height, scale and massing.
- **Policy D3 – Optimising site capacity through the design led approach** states that buildings should be delivered that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape.
- **Policy D4 – Delivering good design** ensures the design quality of development is retained through to completion.
- **Policy D5 – Inclusive design** requires development proposals to achieve the highest standard of accessible and inclusive design.
- **Policy D11 – Safety, security and resilience to emergency** states that development proposals should maximise building resilience and minimise potential physical risks and as well as including measures to design out crime.
- **Policy D12 – Fire safety** requires developments to achieve the highest standards of fire safety.
- **Policy D14 – Noise** requires developments to reduce, manage and mitigate noise to improve health and quality of life. significant adverse noise impacts should be avoided.
- **Policy S1 – Developing London's social infrastructure** states that developments that provide high quality, inclusive social infrastructure should be supported.
- **Policy S3 – Education and childcare facilities** aims to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice.
- **Policy S5 – Sports and recreation facilities** aims to increase opportunities for play and informal recreation.
- **Policy HC1 – Heritage conservation and growth** requires development proposals affecting heritage assets and their settings to conserve their significance by being sympathetic to assets significance and appreciate within their surroundings. Harm should be avoided and enhancement opportunities identified.
- **Policy G1 – Green infrastructure** encourages development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- **Policy G5 – Urban greening** states major development proposals should contribute to the greening of London by incorporating measures such as high quality landscaping, green roofs, green walls and nature based sustainable drainage.
- **Policy G6 – Biodiversity and access to nature** requires development proposals to manage their impact biodiversity and aim to secure biodiversity net gain.
- **Policy G7 – Trees and woodlands** aims to ensure that wherever possible existing trees of value are retained and planting of new trees is included.
- **Policy S11 – Improving air quality** states that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality.
- **Policy S12 – Minimising greenhouse gas emissions** requires a minimum on-site reduction of at least 35% beyond Building Regulations for major developments, 15% should be through building efficiency measures.
- **Policy S14 – Managing heat risk** requires development proposals to minimise adverse impacts on the urban heat island effect through design, layout, orientation, materials and the incorporation of green infrastructure.
- **Policy S15 – Water infrastructure** requires development proposals to minimise the use mains water and incorporate water saving measures.

- **Policy SI7 – Reducing waste and supporting the circular economy** promotes resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going for disposal.
- **Policy SI13 – Sustainable drainage** states the development proposals should aim to achieve green field run off rates and ensure that surface water run off is managed as close to the source as possible. Drainage should be designed and implemented in ways that promote multiple benefits.
- **Policy T4 – Assessing and mitigating transport impacts** states that when required transport statements should be submitted with development proposals to ensure that any impacts on the transport network are fully assessed.

London Borough of Richmond upon Thames Local Plan (2018)

8.14 The London Borough of Richmond upon Thames's Local Plan contains the strategic vision and objectives and sets out the planning framework for the borough for the next 15 years.

8.15 The following policies are relevant to the proposals:

- **Policy LP 1 Local Character and Design Quality** requires all development to be of high architectural and urban design quality to respect, contribute and enhance the local environment and character.
- **Policy LP 2 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 heights.
- **Policy LP 3 Designated Heritage Asset** requires development to conserve, and where possible, take opportunities to make a positive contribution to the historic environment of the borough.
- **Policy LP 5 Views and Vistas** seeks improvements to views within Conservation Areas.
- **Policy LP 8 Amenity and Living Conditions** requires new development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:
 1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
 2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;
 3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;
 4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.
- **Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination** states that the Council promotes good air quality, good acoustic design, well designed artificial lighting, minimised impacts from odour and fumes, remediation of contaminated land and limited environmental disturbance during construction and demolition.
- **Policy LP 15 Biodiversity** aims to protect and enhance the borough's biodiversity.
- **Policy LP 16 Trees** requires the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance.
- **Policy LP 17 Green Roofs and Walls** requires green roofs 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.
- **Policy LP 20 Climate Change Adaptation** states that the Council will promote and encourage development to be fully resilient to the future impacts of climate change, including minimising the effects of overheating.
- **Policy LP 21 Flood Risk and Sustainable Drainage** states that the Council will require the use of SuDS in all development proposals.
- **Policy LP 22 Sustainable Design and Construction** requires new non-residential buildings over 100sqm to meet BREEAM 'Excellent' standard and achieve a 35% reduction in carbon emissions.
- **Policy LP 24 Waste Management** requires all developments to provide adequate refuse and recycling storage space and facilities. In addition, all major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to

arrange for the efficient handling of construction, excavation and demolition waste and materials.

- **Policy LP 28 Social and Community Infrastructure** states that proposals for new or extensions to existing social and community infrastructure will be supported where:
 - it provides for an identified need;
 - is of 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.
- **Policy LP 29 Education and Training** supports 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.
- **Policy LP 31 Public Open Space, Play Space, Sport and Recreation** seeks to protect and, where possible, enhance formal and informal sports grounds and playing fields.
- **Policy LP 39 Infill, Backland and Backgarden Development** requires development to reflect the character of the surrounding area and protect the amenity and living conditions of neighbours.
- **Policy LP44 Sustainable Travel Choices** requires the provision of a Transport Statement for minor development. Material Planning Considerations

The National Planning Policy Framework (2019)

8.16 The most recent version of the National Planning Policy Framework (NPPF) was published in July 2018 and updated in June 2019. The NPPF constitutes guidance for local planning authorities as a material consideration in determining planning applications.

8.17 The NPPF does not change the statutory status of the development plan as the starting point for decision making, stating that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

8.18 At the heart of the NPPF is a presumption in favour of sustainable development that should run through both plan-making and decision-taking. In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

8.19 In terms of delivering sustainable development, the NPPF sets out a number of overarching policies which, taken as a whole, contribute to the achievement of sustainable development.

8.20 Those of relevance to this proposal at King's House School include:

- Promoting healthy communities;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment.

8.21 In relation to schools and education, paragraph 94 states the following:

"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."*

8.22 With regards to the preservation and enhancement of the historic environment, paragraph 185 of the NPPF states that local planning authorities, when determining planning applications, should take account of the following:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Chapter 9

Compliance with Policy

9.1 This chapter explains how the proposed scheme complies with current planning policy and the material planning considerations set out above. It should be read together with the preceding sections of this Statement, which provide further detail on how the proposed scheme is being delivered and the principles that have influenced the design.

Principle of the Development

9.2 The site has been used as a school since the 1940s and will continue to be used for the same purpose. There will be no increase in usage as the Senior Department is not intending to extend its existing capacity (currently 230 pupils). There will also be no change to the agreed hours of operation. Therefore, it will not result in an increase in traffic or parking.

9.3 Development proposals which enhance education and skills provision are supported by Policy 3.18 of the 2016 London Plan, S3 of the adopted London Plan and Policy LP 29 of LBRuT's Local Plan. Those developments which enhance social and community infrastructure and sports facilities are also supported by the 2016 London Plan (Policy 3.19), adopted London Plan Policy S5 and LBRuT (Policy LP 28, LP 29 and LP 31).

9.4 Given that the proposals seek to resolve some of the existing issues associated with logistics and circulation around the School; improve the quality of the existing music and sporting facilities; improve accessibility across the site; and improve the overall educational offering, it is considered that the proposed development accords with all relevant policy.

Heritage and Archaeology

9.5 The Heritage and Archaeology Statement prepared by LUC has assessed the effect of the development proposals on the Buildings of Townscape Merit on the site (66 and 68 Kings Road), as well as the surrounding St Matthias Conservation Area.

9.6 The Heritage Assessment has identified that the demolition of the existing poor-quality modern extensions to the rear of the Buildings of Townscape Merit (BTMs) will not affect their heritage significance or the contribution that they make to the St Matthias Conservation Area; indeed, the removal of the garage to the south of No. 66 Kings Road would be beneficial in improving the legibility of the building's façade and the contribution it makes to the Conservation Area's special interest. Furthermore, the work that is to be

done internally to open-up and reinstate the character and proportions of the hall in No. 68 will have a beneficial impact on its innate aesthetic interest – admittedly this is only a material consideration in this instance, but it is nevertheless a welcome consequence and a sympathetic approach to a building of local interest.

9.7 The construction of the new building in place of those that are to be demolished will marginally alter the site's appearance in glimpsed views from within the Conservation Area. However, given the physical distance between the proposed development and the two Buildings of Townscape Merit, these glimpsed views of the new building would not detract from the architectural interest of the buildings or disrupt the hierarchy of the site as they allow the principal buildings to remain dominant in the streetscape. Also, the ability to experience the new development in tandem with the Buildings of Townscape Merit would be very limited due to screening provided by neighbouring properties and strong tree cover. As a result, from street level along King's Road the proposed development would be barely perceptible.

9.8 Due to the above, and changes made to the proposals since the previous scheme, in terms of tree retention and planting, landscaping and reductions in massing, scale and design improvements the development would have a neutral impact on the Conservation Area and the Buildings of Townscape Merit.

9.9 In terms of archaeology, the site has low potential for prehistoric and Roman archaeology and very low potential for remains of early medieval to early post-medieval date. There are known assets of late post-medieval and modern date within the site, but these are thought to comprise outbuildings – most likely sheds and glasshouse – of negligible heritage significance. Both the known, and any previously unknown assets on the site, may already have been subject to some damage as a result of the past agricultural use of the site, as well as the existing post-medieval and modern development.

9.10 The ground intrusive works associated with the demolition and construction of the proposed development are likely to result in the total loss of the known assets and, if present, the partial removal/ truncation of any unknown assets.

9.11 It is possible that GLAAS may require an archaeological investigation in order to clarify and confirm the truncation and archaeological potential of the site, as well as to redress the lack of investigations in the general area. If archaeological potential is identified, then an appropriate mitigation strategy would be required; this would most likely entail preservation by record. Given the low archaeological potential of the site, and the phased manner of demolition and construction that would take place over a number of years, it is suggested that, if

required, a staged programme of investigation, could be secured by planning condition.

9.12 Based on the above conclusions, the development proposals accord with the 2016 London Plan Policy 7.8, adopted London Plan Policy HC1 and LBRuT's Policies LP 3, LP 5 and LP 39.

Landscape works and Trees

9.13 To accompany the proposal, a landscaping scheme has been developed which ties the teaching blocks together, creating logical navigation through the school grounds, enhancing the landscaping surrounding the School and complementing the architectural elements.

9.14 Additional planting will be provided along the southern boundary of the site, increasing privacy for the residential dwellings here. Planting will be native and wildlife friendly species to increase biodiversity.

Figure 9.1: Proposed landscape plan



Trees

9.15 The proposed music, arts and teaching block has been positioned in a location which avoids damaging any of the existing and retained mature trees. Only two trees will be lost to the development. Others will be protected during construction, as set out in the Outline Tree Protection Plan.

9.16 The two young Holm Oak trees, planted along the boundary with 64 Kings Road in 2018 will be removed and stored during construction. These will be replanted in the same position once the construction access is no longer used. If there appears to be issues with their long term viability, they will be replaced in the same position with trees of the same type and size.

Figure 9.2: Photograph of one of the mature trees



9.17 Where the removal of two trees is required, these will be replaced with similar planting, in line with LBRuT's Policy LP 16, Policy 7.21 of the 2016 London Plan and Policy G7 of the adopted London Plan. The latest scheme has been discussed with the council's Tree Officer who has confirmed that it would be acceptable, subject to appropriate mitigation, planting and methods. Overall, there will be a net gain in trees on the site.

Play Space

9.18 There will be a very small reduction in total outdoor space (circa 15 sqm) as a result of the proposals. However, there will be an increase in the area dedicated to outdoor learning and all play spaces will be enhanced and set out for optimum and most efficient usage. This aligns with Policy S5 of the adopted London Plan.

The Garden

9.19 In accordance with the existing planning permission and associated condition, the garden to the rear of No. 66 Kings Road is to be retained to prevent prejudicing the neighbouring occupiers' enjoyment of their garden. This area will be enhanced with additional planting.

Green Roofs

9.20 Approximately 336 sqm of green roof and 21 sqm of green wall will be provided on the new build elements to increase the biodiversity of the site. This accords with the 2016 London Plan Policies 5.10 and 5.11, adopted London Plan Policies G1 and G5 and LBRuT's Policy LP 17.

Residential Amenity and Living Conditions

9.21 Overall, and as explained in more detail in the preceding sections, the proposed development has addressed Policy LP 8 of the LBRuT's Local Plan through:

- Minimising the impact of the new teaching block on Charmouth Court and 64A Kings Road in terms of daylight and sunlight amenity;
- Mitigating concerns of overlooking and privacy between No. 64A and the new teaching block through the specification of obscure glazing, reduction in the number of windows and introduction of rooflights;
- Ensuring the design of the new teaching block is both pleasant and sympathetic in terms of outlook from the neighbouring buildings, including No. 64A Kings Road;
- Ensuring the impact of noise is mitigated through suitable measures (e.g. siting, screening or acoustic attenuators);
- Ensuring the massing and building heights are in keeping with the surrounding context; and
- Ensuring there is no harm to the reasonable enjoyment of the use of No. 64 and No. 64A Kings Road and their gardens through an appropriate site layout.

Visual Intrusion, Privacy and Outlook

9.22 Charmouth Court: The latest scheme allows the relationship with Charmouth Court to remain largely unaltered. This alleviates concerns for the impact on the daylight and sunlight as well as loss of outlook and potential for overlooking.

9.23 No. 64 and 64A Kings Road: Given the tight constraints of the site it has not been possible to achieve the full 13.5 metres separation distance between No. 64a Kings Road and the new music, arts and teaching block. However, in this latest scheme the arts block has been moved 3 metres to the north which increases the distances to windows to 11.5 metres at the closest point. Also, in order to mitigate concerns of overlooking to No. 64a Kings Road, it is proposed to use obscure glazing to restrict views out from the School. This will be applied to windows where overlooking and privacy is perceived to be problematic. Furthermore, the latest scheme has added rooflight windows and reduced the number of windows to limit overlooking. Further details are provided in the Design and Access Statement. In terms of outlook from No. 64a Kings Road, the new music, arts and teaching block has been designed to be both pleasant and sympathetic to the existing school, particularly in terms of the brickwork façade. The height, bulk and massing of the building has been reduced, cladding has been added to complement the brick work and screening and a green wall have been added to

improve outlook. Under the circumstances, the above is considered acceptable in relation to Policy LP 8 of the LBRuT's Local Plan and its supporting text.

Daylight/Sunlight

9.24 A full daylight and sunlight technical assessment has been undertaken by Avison Young, and is submitted with this application.

9.25 This assesses the impact of the development in relation to number 64a and Charmouth Court. The assessment concludes that there will be no impact on Charmouth Court and that all windows and rooms that have been assessed within number 64a Kings Road will fully comply with the recommended BRA criteria for daylight and sunlight and thus will experience a negligible impact as a result of the proposed development. This is in accordance with Policy LP8 of the Local Plan.

Noise

9.26 An Environmental Noise Assessment has been carried out by Cundall in accordance with the assessment procedure set out by LBRuT. The report concludes that, if the noise limits and advice outlined in the report are complied with, it is considered that the proposed development will meet the planning noise requirements of LBRuT. In addition, the development would be considered unlikely to result in a significant adverse impact on sensitive receptors as a result of noise.

9.27 Particular attention has been given to both external plant noise and music noise as requested by LBRuT. In terms of plant noise, the assessment concludes that suitable mitigation measures (e.g. screening or acoustic attenuators) should be specified as necessary to comply with the noise emissions limits and to minimise any adverse impacts at the nearest noise sensitive receptors. Initial calculations of the music noise limits show that that glazing providing approximately 37dB Rw + Ctr sound insulation would provide sufficient sound insulation to meet the noise limits. It is noted that this is a cumulative assessment, assuming that all four rooms which face the nearest sensitive receptor are being used simultaneously, which is very unlikely. This confirms that, with appropriate mitigation, the proposed development will accord with Policy 7.15 of the 2016 London Plan, Policy D14 of the adopted London Plan and Policies LP 8 and LP 10 of the LBRuT's Local Plan.

9.28 An additional noise assessment has been carried out after concerns were raised regarding a potential increase in

playground noise adjacent to Charmouth Court. The assessment concluded that, for the majority of the facades it is predicted that noise impacts are likely to be negligible. At a very small number of facades there may be a minor adverse impact in terms of noise change. However, when this is considered in terms of absolute noise levels, these remain below the level recommended by Sport England, which is 50 dB LAeq¹.

9.29 The report concludes that adverse noise impacts as a result of proposed play area layout changes are unlikely to occur at Charmouth Court.

9.30 With regards to the southern boundary, the existing astro-turf play area is proposed to be replaced partly with the new classroom block and partly with an outdoor learning area. The classroom block will be subject to noise control, and the outdoor learning area will be used for supervised learning, not unsupervised play. Therefore, any noise from this area of the site is expected to be significantly lower than that currently generated from the astro-turf.

9.31 Furthermore, the headmaster's garden area will be retained as a buffer zone, with access restricted, in order to continue to protect the amenity of number 64.

9.32 The buildings have been sited and designed around the internal 'quod' area in order to limit noise spill to adjacent properties.

External Lighting

9.33 An External Lighting Plan and assessment has been prepared by Cundall and identifies the locations of the new external lights to be positioned around the new teaching block and quad. Where possible and appropriate the wall mounted lights will be covered with 'eye lids' to minimise light pollution and any impact on the neighbouring properties. As the assessment shows, the external lighting design complies fully with the relevant standards.

Building Heights

9.34 The highest part of the new teaching building is the arts block which houses the music and drama department. At this point the building is circa 10.4 metres in height. This is a drop of 0.6 metres when compared to the original scheme. The height drops to circa 9.3 metres over the main hall and the lowest point is the ridge to the classroom block at circa 8 metres in height. This is a reduction of 1 metre when compared to the original scheme. The Design and Access

¹ Available at: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/agp-acoustics-planning-implications.pdf?eORPPBrK6irJ2FqvHWitOASeYu6U.egt>

Statement sets out how the reduction in height has been achieved.

9.35 The massing is seen to be in keeping with the surrounding context in that many of the existing Victorian houses along Kings Road have three floors, including the existing blocks within the School. The proposed massing reduces to two storeys towards the boundary with 11 to 13 Denbigh Gardens in respect for its neighbours.

9.36 Therefore, the proposals comply with Policy LP 2 of the LBRuT's Local Plan which 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 heights.

Reasonable Enjoyment

9.37 The scheme replaces part of the existing P.E./play area with a new teaching block comprising of classrooms and a supervised outdoor learning area. This will help to ensure there is no harm to the reasonable enjoyment of the use of No. 64A Kings Road and its garden, particularly in terms of noise associated with outdoor play areas. It is expected that noise generated from the proposed uses along this boundary will be less than that of the current use. The noise report has confirmed that there should be no adverse noise impacts at Charmouth Court.

9.38 The proposed development is also not seeking to increase the current capacity of the Senior Department (230 pupils). Therefore, there is not expected to be an increase in traffic, servicing or parking.

Design

9.39 The proposals have been designed to improve the quality, legibility and accessibility of the existing buildings. It is also proposed to restore the historic aspects of the School and integrate the school buildings within the neighbourhood. This accords with Policies 7.4 and 7.6 of the 2016 London Plan policies D4 and D5 of the adopted London Plan and policy LP 1 of LBRuT's Local Plan.

9.40 The design of the new teaching block is high quality, sustainable and uses materials that complement the surrounding school buildings and Conservation Area. As set out in the preceding sections the design has been adjusted to respond to the reasons for refusal of the original application.

9.41 As set out in the BREEAM Summary by Cundall, the new music, arts and teaching block will target a BREEAM 'Excellent' rating which represents a high standard of sustainable design and construction. This is in accordance with Policy 5.3 of the 2016 London Plan and Policy LP 22 of LBRuT's Local Plan.

Energy and Sustainability

9.42 As detailed within the Energy and Sustainability Statement by Cundall, the proposed development will target the following:

- A 49.5% reduction in CO₂ emissions over Part L 2013 for the new aspects of the development;
- A 38.5% reduction in CO₂ emissions over Part L 2013 for the refurbishment aspects of the development;
- A BREEAM 'Excellent' rating.

9.43 The energy strategy has been developed in line with the London Plan's Energy Hierarchy (*Be Lean, Be Clean, Be Green*).

9.44 Passive design techniques and energy efficiency measures contribute to the energy strategy under the '*Be Lean*' section include the following:

- The envelope of all buildings will be designed to perform significantly better than the Building Regulation standards with low U-values, G-values and low air leakage rates.
- Analysis has been carried out to balance the façade design and optimise window sizing and placement so that heat losses are minimised whilst the access to natural light is improved.
- Natural ventilation has been included where possible. Where mechanical ventilation is necessary, high efficiency equipment has been specified beyond the minimum standards.
- Energy efficient services employed in the development include high efficacy LED lighting coupled with occupancy and daylight controls to significantly reduce the lighting energy use.
- Electrical and mechanical systems within the development will be tightly metered and controlled with a full Building Management System (BMS). This will enable energy use to be tracked and opportunities for efficiency improvements to be made.

9.45 Following the '*Be Clean*' step of the energy hierarchy, the feasibility of connecting to an existing or proposed district network has been investigated for the site in accordance with Policy 5.6 of the 2016 London Plan. The London Heat Map indicates that there are no existing or planned heat networks within a feasible connection distance of the development, therefore no connection is proposed.

9.46 Combined Heat and Power (CHP) is not considered appropriate for this development due to the air quality issues it will create in the school context and residential area; as well

as the decarbonisation of the electrical grid which reduces the carbon emissions benefit of CHP.

9.47 For the 'Be Green' stage of the energy hierarchy, heat pumps are introduced to the drama and music rooms to complement the mechanical ventilation system. Variable refrigerant flow (VRF) air source heat pumps (ASHPs) provide heating and cooling at high efficiencies and benefit from the new GLA carbon factors for electricity.

9.48 Photovoltaic panels are also included in the energy strategy. There is sufficient roof space within the development to incorporate a PV array. Initial analysis suggests an 14kWp PV array (approximately 80m² of panels), could be accommodated on the sports hall roof. This array could generate 11,700kWh of electricity (primarily for use in the new aspects of the development) reducing emissions by 2.9 tonnes annually.

9.49 In respect of sustainability, the new build elements will include the following features:

- Building materials, where possible, will be sourced locally to reduce transportation pollution and support the local economy;
- All timber will be procured from responsible forest sources;
- Recycling facilities will be provided on site for construction and operational waste;
- Water use will be minimised by the specification of water efficient taps, dual flush toilets and low water use appliances;
- Water metering will be installed to monitor and minimise wastage;
- The construction site will be managed in an environmentally sound manner in terms of resource use, storage, waste management, pollution. A Site Waste Management Plan (SWMP) will be produced for the works; and
- Secure bicycle storage and changing facilities are be provided to incentivise building users to cycle.

9.50 A copy of the LBRuT's Sustainable Construction Checklist has been submitted with this application.

9.51 The above measures comply with the 2016 London Plan Policies 5.2, 5.3, 5.7 and 5.15, adopted London Plan Policies GG6, SI2, SI3, SI4, SI5, and LBRuT's Policies LP 20, 22 and 24.

Flooding and Sustainable Drainage

9.52 The Flood Risk Assessment prepared by Elliot Wood Partnership Ltd confirms that the site has been found to be at a low risk of flooding from all sources.

9.53 The drainage proposals include a large on-site attenuation tank to hold the site's storm water and slowly release it to avoid overwhelming the local system in the event of a storm. Green roofs and additional tree planting are also proposed which will help to attenuate water on-site. This accords with Policy 5.13 of the 2016 London Plan, SI 13 of the adopted London Plan and Policy LP 21 of LBRuT's Local Plan.

Overheating and Cooling

9.54 The Energy and Sustainability Statement by Cundall sets out the overheating and cooling strategy for the new music, arts and teaching block. Firstly, low energy lighting with occupancy and daylight sensors will be used to minimise internal heat gains. Solar gains will be reduced through limiting the ratio of opaque fabric to transparent fabric and the specification of low g-value glazing. Exposed thermal mass will be used where possible to absorb heat gains and passive ventilation through openable windows and doors will help to mitigate overheating during warm periods. Mechanical ventilation and active cooling systems have been specified to provide fresh air to the music and drama spaces where windows need to be sealed shut to prevent noise egress.

9.55 The above measures comply with Policy 5.9 of the 2016 London Plan, GG6, SI2 and SI4 of the adopted London Plan and Policy LP 20 of the LBRuT's Local Plan.

Ecology

9.56 A Preliminary Ecology Appraisal (PEA) was carried out by The Ecology Consultancy in December 2020 comprising a Phase 1 Habitat Survey, Protected Species Assessment, and Ecological Evaluation of the site. The main findings of the report included:

- The site comprises of bare ground, semi improved grassland, ephemeral short / perennial, scattered scrub, and scattered trees. All habitats are of site value and potential assemblages of notable species on site are not expected to exceed local value.
- The site does not form part of any statutory or non-statutory nature conservation site.
- **Bats** – Some buildings and trees with bat potential were identified on site. However, the majority of areas were assessed as having negligible potential to support roosting bats. A Ground Level Tree Assessment and Preliminary Roost Assessment were carried out.

- **Breeding birds**— scattered trees, and introduced shrubs have potential to support breeding birds. Where these features are to be affected, they should be removed outside of the breeding bird season or cleared following a nesting bird check by an ecologist up to 48 hours prior to removal.
- **Invasive species** – Montbretia was present within the site. Measures should be taken to prevent the spread of this species into the wild.

9.57 Recommendations are provided in the report to enhance the biodiversity value of the site. These include native scrub and tree planting, biodiverse roof, climbing plants, species-rich lawn turf and faunal boxes. These measures will be implemented by the Applicant in order to comply with Policy 7.19 of the 2016 London Plan, Policies G5, G6 and G7 of the adopted London Plan and LBRuT's Policy LP 15.

9.58 Following the PEA, a Preliminary Roost Assessment was carried out by The Ecology Consultancy and identified the following:

- Some sections of the buildings were assessed as having moderate potential to support summer roosting bats and low potential to support hibernating bats. The majority of areas have negligible potential to support roosting bats.
- During the emergence surveys carried out in 2019, no bats were recorded emerging or were suspected to have emerged from the sections of the buildings which are being demolished or impacted.
- There were low levels of commuting activity from up to three species of bat recorded during the dawn and dusk surveys. The refurbishment and alterations to the buildings, would only have a minor effect on the commuting route, provided sensitive artificial lighting is employed.

9.59 It is considered that, for the purposes of this planning application the survey information undertaken in 2019, which recorded no emerging bats, is still valid.

9.60 Recommendations are provided in the report with respect to timings and further surveys. These will be adhered to by the Applicant in order to protect any existing species on site in accordance with Policy 7.19 of the 2016 London Plan and LBRuT's Policy LP 15. Lighting should not illuminate any of the potential roosting features on site.

9.61 A Ground Level Tree Assessment was also undertaken, which concluded that there are five trees on site with low potential to support roosting bats. All of these trees are due to be retained. The remainder of the trees on site have negligible potential to support roosting bats.

9.62 In line with Policy G6 of the adopted London Plan, a Biodiversity Net Gain calculation was carried out for the site. This illustrated that, due to the onsite enhancements, the scheme will achieve a Biodiversity Net Gain of 12.53%, which exceeds the 10% target set out in policy.

Construction Management

9.63 In accordance with Policies LP 10 and LP 24 of the LBRuT's Local Plan, a Method of Construction Statement & Transport Plan has been prepared by Management & Construction Services Ltd and is submitted with this application.

9.64 The report includes a Site Layout & Logistics Plan for Phases 1 and 2, including details of the demolition of the existing garage and part of a classroom to create a 3.1m wide access route for the construction of the new build elements. The following details are also set out within the report:

- **Site access arrangements, traffic management and deliveries** including temporary signage, restricted vehicular access, re-routed pedestrian access, timed deliveries and Banksman supervision.
- **Loading and unloading** including delivery times, pedestrian access and Banksman assistance.
- **Site welfare facilities** including office and canteen units, toilets, drying room and Banksmen's outbuilding.
- **Restricted site parking** for operatives and the promotion of public transport.
- **Site boundaries and security arrangements** including fencing/hoarding, steel gates and letter drops to neighbours prior to work starting.
- **Materials, plant handling and storage arrangements** including the use of cranes, raised pallets and secure steel containers for dry storage and plant.
- **Wheel washing facilities** at the exit of the site.
- **Control of noise, vibration and dust method statement** including restricted working hours, dampening down and the use of silenced tools, dust screens, Personal Protective Equipment and anti-vibration gloves.
- **Waste management and demolition** including the use of skips and recycling facilities.

9.65 It is noted that all ecological and arboricultural recommendations will be complied with.

Transport Statement

9.66 King's House School has been accredited the Silver Level by the STARS (Sustainable Travel: Active, Responsible,

Safe) programme. This was awarded for their achievements and commitment to road safety, reducing car use and working to increase levels of walking, scooting, cycling and use of public transport for the journey to and from school.

9.67 The proposed application is not seeking to increase the current capacity of the Senior Department in terms of pupils (230 pupils) or staff and will not increase community use above current levels therefore, there is not expected to be an increase in traffic, servicing or parking during school hours.

9.68 However, a Transport Statement has been prepared to support the application. This concludes that there will be no impact from the proposed development on highways grounds due to the fact there will be no increase in pupil or staff numbers, no proposed changes to community use and the existing access points and onsite parking provision will be retained. This is in accordance with Policy 6.3 of the 2016 London Plan, Policy T4 of the adopted London Plan and Policy LP44 of the Local Plan.

Safety and Security

9.69 A meeting was held with the local Design out Crime Officer (DOCO) on 20th November 2018, based on the previous scheme, and recommendations were made in respect of security measures for the site. During the detailed design stage, consultation will continue to take place to ensure that the new build elements comply with Building Regulations Part Q and Secured by Design where possible. This will accord with the 2016 London Plan Policy 7.3 and adopted London Plan policy D11.

Chapter 10

Conclusion

10.1 This Planning Statement including Community Engagement Report supports an application for improvements to the existing King's House School in the London Borough of Richmond upon Thames.

10.2 The application is a re-submission of 20/0165/FUL, which was refused at committee in June 2020 due to adverse impacts on trees and the Conservation Area. The updated and amended proposals set out in this Planning Statement and supporting documentation have aimed to address those reasons for refusal.

10.3 As outlined in this Statement, the proposed development complies with current planning policy, including that provided by:

- The National Planning Policy Framework (2019);
- The London Plan 2021 and 2016; and
- The London Borough of Richmond upon Thames Local Plan (2018).

10.4 The impacts of the proposed development will be minimal as the site is already used for the proposed purpose (i.e. senior school) and the development will not change the duration or intensity of the current use.

10.5 Furthermore, the proposals will significantly improve the existing facilities, particularly in regards to accessibility and logistics, as well as the quality of the teaching environment and outdoor space, and will also result in biodiversity and sustainability benefits. The removal of the garage and the internal work to open up and reinstate the character and proportions of the hall in No. 68 will provide heritage benefits to the School. The proposals will not cause any significant impact to neighbouring properties.

10.6 Any impacts with respect to existing ecology, trees and noise will be suitably and appropriately mitigated in accordance with the specialists' recommendations.

10.7 In light of the significant benefits of the proposed development, and lack of significant detrimental impacts, we recommend that the proposed development is approved.

Appendix A

Residents Consultation Responses

A meeting was held with residents of Charmouth Court, Denbigh Gardens and King's Road on the 25th March 2021. The purpose of this meeting was to present and explain the proposals and the changes from the original scheme. Following the meeting, resident's comments and concerns were considered. The table below has been prepared as a response to these, as well as responses to the online consultation event and further email feedback that has been received. The table demonstrates that the concerns raised have been addressed through the design and mitigation proposals.

Resident query / concern	Response
Conservation Area and design	
1. What is the height difference between the amended classroom block and arts block and the original classroom block and arts block and how has this been achieved?	The height to the top of the original arts block was 11 metres, while the amended height is 10.4 metres. This has been achieved by adjusting the floor to ceiling height on the top floor and lowering the parapet height. The height to the ridge line of the original classroom block was 9.1 metres, whereas this is now 8 metres. This has been achieved by reducing the eaves height and flattening the tops of the roofs.
2. Will the changes in height result in lower ceiling heights and will these areas still be useable?	These spaces are still fully useable and in line with building regulations. How the height difference has been achieved is set out above.
3. It is disappointing that the changes do not seem to address the reasons for refusal.	The reasons for refusal included the loss of trees and an adverse impact on the Conservation Area. In our opinion the changes to the scheme do address these issues. For example, only two trees will now be lost, and these will be replaced with 22 trees and a CAVAT payment.
4. The site has been overdeveloped and the neighbours have not been consulted.	The School recognises that the site is constrained. The proposed scheme, which has been the subject of extensive evaluation and discussion with the planning, design, conservation and tree officers, represents the most efficient use of the available space. Neighbours were extensively consulted on the first scheme, with four consultation events taking place. For the revised scheme two meetings with residents have taken place (October and March) and a virtual consultation was undertaken (February).
5. The proposal prepared by Andraos Associates on behalf of neighbours has not been fully considered.	This proposal has been fully considered as part of the review of design options. It has a number of weaknesses which meant it was not considered viable. The analysis of this scheme is set out in detail in section 2.7 of the Design and Access Statement.
Trees and biodiversity	

Resident query / concern	Response
6. Of the two trees next to the arts block that are being retained, will the tree that is located closest to the arts block be impacted by the building?	No, this tree will be retained and protected. It has been assessed by both the team's arboricultural consultant and the Council's tree officer and found to be acceptable. How the tree will be protected during the works is set out in the Tree Protection Plan.
7. Will the lost trees be replaced?	Yes. Two trees will be lost as part of the proposals. A Holly tree and an Ash tree. The Holly tree will be replaced like for like. A further 21 additional trees will be planted on the site which will result in a net gain of 20 trees. A CAVAT payment will also be made to fund the planting of further trees in South Richmond.
8. On the 13 th April, residents of number 64 Kings Road visited the school to look at the two Holm Oaks that were planted on the boundary in 2018. Concerns had been raised about whether these would be impacted by the proposals.	<p>The two small Holm Oaks recently planted along the southern boundary of the site will be temporarily removed during construction and re-planted once construction is complete. If there are any concerns with the long term viability of the trees they will be replaced in the same location, with trees of the same type and size. This will be at the school's expense.</p> <p>It is noted that these are not marked on the tree layout plan as they are not of a size that would afford them protection within the Conservation Area.</p>
9. Will there be any impact of pruning or construction on the Strawberry Tree at the front of the site?	The Strawberry Tree at the front of the site was included in the assessment by the arboriculturalist, and no concerns were raised. No concerns have been raised by the council's tree officer who has approved the pruning application.
10. It was commented that replacing a mature tree with saplings is not the same, and the full benefit will not be seen by residents.	The trees planted will not be saplings. While fully grown mature trees cannot be planted, the species selected will be an appropriate size for the location. There will be a net gain of 20 trees. Furthermore, a CAVAT payment will be made to fund the planting of other trees where there is need in South Richmond.
11. It was remarked that planning condition U0019695-NS03 on the 2017 application (16/2129/FUL) required 20 trees to be planted on site. Only 7 have been planted and the 4 hornbeams are located too close to the wall of 64a and will not grow, so will not have any beneficial impacts on amenity.	<p>The final planning condition actually required 7 trees to be planted on site and a CAVAT payment to be made. The 7 trees have now been planted on the site and the payment was made at the time.</p> <p>The 4 hornbeams were planted in consultation with an arboriculturalist and the Council's tree officer who were happy with the location and would expect them to grow and mature.</p>
12. Will there be an ecological balance sheet submitted with the application?	A Biodiversity Net Gain Assessment is submitted with the application. This demonstrates that there will be a 12.5% net gain in biodiversity which exceeds the target of 10%.
Accessibility	
13. How has accessibility been defined?	For the purpose of this application accessibility has been defined as level access suitable for a wheelchair user.
14. What were the reasons in terms of accessibility, for why the building needs to be sited where it currently is?	Level changes across the site mean the current location was the most appropriate in terms of achieving level access into and around the building, and around the rest of the site including the play areas. While this could have been

Resident query / concern	Response
	<p>achieved in other locations with more intervention / works, it is noted that there are other considerations and constraints that led to the building being located in its current position. This included for example daylight / sunlight impacts to Charmouth Court, impacts on the Holm Oak trees, logistics and flow and construction accessibility.</p>
<p>15. Are accessibility improvements being made to 66 and 68 King's Road?</p>	<p>Some small changes will be made to 66 and 68 Kings Road to improve logistics and flow however, significant accessibility improvements would not be possible without significant intervention to these locally listed buildings.</p>
<p>Amenity and noise</p>	
<p>16. Is the classroom block still located 7.5 metres from the wall of 64a?</p>	<p>Yes, the classroom block has not been moved further north in order to protect the Holm Oak trees. However, the 7.5 metre distance is to the blank wall of 64a which is located hard up against the School's boundary. This is the closest point. The distance to the windows on the upper floor of 64a is 11.5 metres. The amendments to the design have also meant that obscured glazing has been added to the upper floor windows of the arts block and classroom block. It is noted that this point was not raised as a concern in the June 2020 planning committee.</p>
<p>17. There are long running concerns re. out of hours community use, and requests that a limit on hours is secured through a Section 106 agreement.</p>	<p>This is noted however, the current level of community use of facilities at the school will not change as a result of the scheme.</p> <p>Control of hours is secured via planning condition. This is standard practice in planning and a condition which controls this meets all of the tests of conditions. Therefore, this would not need to be included in any Section 106 agreement.</p>
<p>18. Concerns that the landscaping plan will generate more noise adjacent to Charmouth Court and 64 and 6Aa King's Road. Noted that the amphitheatre is close to the kitchen of 64a.</p>	<p>The landscaping plan does not result in an increase in outdoor space. The play area adjacent to Charmouth Court is as existing (there are some changes to pitch layout etc.). A noise assessment of this area has been undertaken and this concludes that any adverse noise impacts as a result of proposed play area layout changes are unlikely to occur at Charmouth Court.</p> <p>The proposed uses adjacent to 64 and 64a are expected to be quieter than the existing astro-turf. The buffer zone (of the Headmaster's garden) will remain in place and an outdoor learning area will replace the astro-turf. The outdoor learning area will be a supervised learning environment while the astro-turf is currently used for play.</p>
<p>19. Will the Headmaster's Garden Area now be used by pupils? It is noted that the design shows paths running through this and there are concerns that this will result in more noise than the current astro-turf.</p> <p>This area is required by condition to remain as a buffer zone to protect the amenity of 64 Kings Road.</p>	<p>The garden area will not be used by pupils as a play space and will be retained as a buffer zone. The area will be used to enhance biodiversity. There will be fences and gates located between this area and the outdoor learning area / cherry tree walk to prevent pupils from entering unsupervised. Access will be allowed in emergencies and for those with limited mobility and it is noted that access through the garden area is permitted for the resident of the flat.</p> <p>The original condition, which was placed on planning permission 69/0247 simply stated 'The garden area at the rear of the existing building shall not be used for playground</p>

Resident query / concern	Response
	<p>or for other school purposes'. The boundary of this garden area was never formally defined and therefore it is the intention with this application to formalise the boundary of this garden area, the use of which will remain compliant with the original condition.</p>
<p>20. Windows to the classrooms should be unopenable and doors should remain closed during lessons to restrict noise. The outdoor leaning area and amphitheatre should be removed from the scheme due to noise concerns.</p>	<p>The windows must be openable to allow natural ventilation. The doors to the classroom would only be opened during lesson times when pupils are supervised by a teacher and in a learning environment. Similarly, the outdoor learning area and amphitheatre would only be used during lessons.</p> <p>It is also worth noting that the "amphitheatre" measures 5m x 4m and is largely informal in character. It is situated on a flat area of the learning garden with log seating laid out in a semi-circle centred on a small circular "stage". It is envisaged that this will be used for quiet outdoor learning activities or for reading.</p> <p>The noise emitted from open classroom windows and doors, and from the outdoor learning area will be significantly less than the noise currently generated from the use of the astro-turf.</p>
<p>21. The development is located right up against the School boundaries and is seen to encroach on neighbours space. It is overbearing.</p>	<p>The School notes that this is a constrained site. A number of different options / locations were considered and it was concluded that the current location is preferable for the reasons set out in the Design and Access Statement.</p> <p>The amendments to the scheme reduce the height and massing and mitigation such as green walls and obscured glazing have been added.</p>
<p>Traffic</p>	
<p>22. There are long running concerns over traffic during school pick up and drop off times.</p>	<p>This is noted however, pupil / staff numbers and community use will not be increasing as a result of the proposals.</p> <p>A Transport Statement is submitted with the application which demonstrates there will be no impact from the proposals on traffic and transport.</p>
<p>23. Concerns over the level of traffic generated during construction.</p>	<p>An outline Construction Management Plan has been submitted with the application and sets out how impacts from the construction phase will be limited / mitigated. It is expected that a full Construction Management Plan would be added as a condition to any planning permission granted.</p>