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PLANNING AND HERITAGE STATEMENT

KNELLER HALL

65 KNELLER ROAD

TWICKENHAM TW2 7DN

Date: September 2022

Ref: 15750

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1.0 INTRODUCTION AND EXECUTIVE SUMMARY

1.1 This Planning and Heritage Statement has been prepared by DWD on behalf of Dukes Education and Radnor House School Limited (the Applicant) to support the full planning application and listed building consent at Kneller Hall, 65 Kneller Road, Twickenham, TW2 7DN (the Site).

1.2 Planning permission and listed building is sought from the London Borough of Richmond upon Thames (the Council and LBR) for the following development (the Proposed Development):

“The demolition of existing modern buildings on the Site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller, extension to the Band Practice Hall and re-opening of Whitton Dene Site entrance.”

1.3 It is proposed that pupils from years 7 to 11 and the sixth form, that are currently located at Radnor House School, which is part of the Duke’s Education Group, will be relocated to Kneller Hall. When the school opens, it is expected to have up to circa 500 pupils. The school will grow over subsequent years to provide teaching for up to 1,000 children. The school will be called Kneller Hall School.

1.4 The Applicant intends to provide high quality indoor and outdoor sports facilities at the Site. In addition, as a result of the extensive tree cover across the Site and the proposed ecology corridor, the Applicant intends to introduce a Forest School programme at the Site. These facilities will serve the pupils at the Site. The Applicant also wishes to ensure that these excellent facilities can be used by other local schools and local community groups. The school will provide managed access to these facilities, which will be secured as part of the planning application.

1.5 The existing outside bandstand in the grounds, which is part of the Site’s historical musical legacy, will be retained and used by the school. Music-based events and concerts will continue to be able to held at the Site, including events that the public can be invited to.

1.6 Significant investment is needed to ensure the long term restoration and protection of Kneller Hall, an important heritage asset. The use of the Site for educational uses will ensure much needed investment into the property and its long-term protection and maintenance. The proposal

therefore provides an opportunity for significant heritage benefits through the restoration of Kneller Hall.

- 1.7 The proposed new build development has been designed to be high quality and achieve BREEAM 'Excellent', with a Site- wide low carbon energy strategy utilising both ground and air source heat pumps proposed. The masterplan has been landscape led, with the enhancement of the existing landscaping at the Site, and an assessment of the historic landscape, being taken into consideration when developing the landscape strategy. The scheme will result in biodiversity net gain and a net additional trees across the Site.
- 1.8 This full planning and listed building consent follows pre-application engagement with the Council over the last 12 months (ref: 21/P0412/PREAPP).

Report Layout

- 1.9 This Planning Statement describes the Proposed Development and assesses the development with regards to the relevant planning policies of the Development Plan, national policies and other material considerations. This Statement will also outline the material benefits of the proposal.
- 1.10 This application is supported by plans and technical reports that should be read in conjunction with the Planning Statement. A full schedule of the accompanying reports and plans, has been submitted as part of the planning application. Please see submitted 'Schedule of Plans and Supporting Reports'.
- 1.11 The remainder of this Statement is set out as follows:
 - Section 2 identifies the Site's context and surroundings;
 - Section 3 reviews the Site's planning history;
 - Section 4 details the Applicant's pre-application engagement with the LPA and the local community;
 - Section 5 introduces Dukes Education and Radnor House School;
 - Section 6 outlines the proposals for the Site subject of this planning application;
 - Section 7 assesses the Proposed Development against the relevant national and local planning policies and other material considerations;
 - Section 8 sets out the expected heads of terms/ planning obligations
 - Section 9 sets out our overall conclusions.

EIA Considerations

- 1.12 An Environmental Impact Assessment (EIA) Screening Opinion Request was submitted in June 2022. Confirmation was subsequently provided by the Council in August 2022, that the development was not considered to be EIA development and that all relevant matters could be fully assessed through the technical reports that accompany this full planning submission.
- 1.13 The screening report concluded that *“having completed the screening exercise, the Local Planning Authority consider that the proposal is not like to have significant effects on the environment and the proposal does not require a further Environmental Statement under the terms of the EIA Regulations to accompany any future application. Material planning considerations can be fully assessed as part of an application.”*

2.0 THE SITE

The Site

- 2.1 The Kneller Hall Site is located in Twickenham, West London within the London Borough of Richmond upon Thames (LBR).
- 2.2 The Site was formerly occupied by the Royal Military School of Music which included residential accommodation (Use Class C2). The Site was owned by the Ministry of Defence (MoD). It was sold and vacated by the MOD in the summer of 2021. The Site has now been acquired by Dukes Education.
- 2.3 The Site extends to approximately 9.7 hectares. Over half of the Site is designated as Metropolitan Open Land (MOL).
- 2.4 The Site is accessed by road via Kneller Road, a 'Local distributor road' (Kneller Road/Warren Road) which provides access to Chertsey Road (A316), which links Richmond to Central London via Hammersmith and the M3 to the west.
- 2.5 Buildings are largely located in the western two thirds of the Site. Kneller Hall (Grade II Listed) is the most prominent building (equivalent of 4 storeys), with a range of other buildings within the Site, which vary in scale (1-3 storeys). The Guards House and Band Practice Hall are curtilage listed. Some of the existing buildings are located within the part of the Site that is allocated as MOL. The buildings are all set within a wider context of parking and circulation areas, green spaces and sports facilities.
- 2.6 The western part of the Site contains a large amount of hardstanding and car parking. The overarching landscape typology of the eastern part of the Site is a parkland setting, comprising a large number of trees across the Site. Many of the trees are mature and the trees are protected by a Site-wide Tree Preservation Order. The eastern part of the Site also comprises of grassed fields, playing fields, with some sports pitches, buildings and structures.
- 2.7 In addition to the aforementioned partial MOL allocation, the Site has its own LBR Local Plan (July 2018) policy, Policy SA 14 Kneller Hall, Whitton. The Site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020).
- 2.8 The Site has a secure boundary, comprising a combination of walls, railings and fencing. The four gate piers along the boundary wall are also designated Grade II Listed. The boundary to the Site (including the listed wall) varies considerably in quality and style. The Site is located within the LBR's Whitton Archaeological Priority Area.

2.9 The Site is not located within a Conservation Area. The closest Conservation Area is Rosecroft Gardens, which is located approximately 300m to the south and separated by the A316 and residential roads.

2.10 The Site is within Flood Zone 1, and therefore at low risk of fluvial flooding. It is however understood that parts of the Site are at risk of surface water flooding and the entire Site at risk of groundwater flooding and is within a Critical Drainage Area.

Site Context

2.11 The prevailing character of the area surrounding the Site is residential, with the predominant typology being suburban, semi-detached, and detached housing accompanied by generous front and rear gardens all within a green setting. Neighbouring buildings in the immediate surrounds are modest in height, with the majority at a scale of two-storeys along the northern, southern, and western boundaries of the Site. The residential flats to the east of the Site boundary are three storeys in height.

2.12 The Site is not within a town centre but is located approximately 700 metres (8-minute walk) from Whitton district centre and a 20-minute walk from Twickenham district centre. It is also situated directly west of Twickenham Stadium and the northern part of the Site neighbours Whitton Tennis Club.

2.13 The Site has good access to a range of public transport services within walking distance, including several local bus stops in the immediate surroundings with access to services 281, 481, 681 and H22. These services provide regular buses to locations such as Twickenham, Hounslow, Teddington, Kingston and Richmond. Train stations within a 20-minute walk from the Site include Whitton (1km), Hounslow (1.4km) and Twickenham (1.5km), all of which provide regular services into Central London.

2.14 The Site has excellent access to a range of shops and services, with the following located in close proximity:

- Local Parades on Whitton Dene, Kneller Road and Nelson Road including the Duke of Cambridge Pub on Kneller Road (100m);
- Whitton District Centre which includes a Tesco Metro convenience store (900m);
- Tesco Extra Twickenham (1.3km north east);
- Twickenham District Centre which includes a Waitrose and Marks & Spencer Simply Food (1.5km);

- Hounslow Town Centre (1.5km north-west which includes an ASDA and the Treaty Shopping Centre; and
 - Ivybridge Retail Park which includes an ASDA, TK Maxx, Sports Direct and Halfords (1.5km).
- 2.15 The Site is also well provided for in terms of access to community facilities, with the following located near to the Site:
- Whitton Social Centre (50m) on Kneller Road;
 - Chase Bridge Primary School (400m) to the east;
 - Nelson Primary School and St Edmund’s Catholic Primary School (700m) to the west; and
 - Richmond upon Thames College (1.3km) to the south east.
- 2.16 The following leisure/tourism and hotel facilities are also located near to the Site:
- Whitton Tennis Club (200m) to the north east;
 - Twickenham Stadium, home to England Rugby RfU, (800m) directly to the east;
 - Twickenham Stoop (Harlequins Rugby Club) (800m) to the south east;
 - London Marriot Hotel (Twickenham Stadium) (800m) to the east;
 - Travelodge (Twickenham Station) (1.5km); and
 - Premier Inn Twickenham Stadium (Whitton) (1km).
- 2.17 There are also a wider range of public open spaces nearby, these include:
- Murray Park (160m);
 - Hounslow open space (180m);
 - Hounslow Heath (1.6km);
 - Crane Park (1.8km);
 - Syon Park (3km); and
 - Richmond Park (4km).
- 2.18 The closest local schools are Chase Bridge Primary School (50m east), Richmond upon Thames Secondary School and College (300m south-east), St Edmund's Catholic Primary School (1km west), Nelson Primary School (1km west), St Richard Reynolds Catholic High School (1km south-east).

3.0 PLANNING HISTORY

Kneller Hall Site History

3.1 A review of the Council’s online planning history database has identified a number of relevant planning applications, which are identified in the below table.

Table 3.1 Planning History of Kneller Hall

PLANNING HISTORY			
Application Ref:	Description of development	Decision	Decision Date
22/0344/DD01	Details pursuant to Condition U0131800 - Methodology for Lifting of Floorboards	Granted Permission	09/09/2022
22/1157/FUL	Temporary use of existing buildings and land for film-making purposes	Granted Permission	13/06/2022
22/1158/LBC	Temporary use of existing buildings and land for film-making purposes	Granted Permission	13/06/2022
22/0344/LBC	Internal works at Kneller Hall associated with investigations, opening up and enabling works, to inform future development proposals	Granted Permission	07/07/2022
15/0080/LBC	Proposed Structural Alterations works at Third Floor of Sergeants Mess Annexe.	Granted Permission	10/03/2015
10/2799/FUL	Installation of above and below ground cables within the Site.	Granted Permission	23/12/2010
08/3983/LBC	Internal modifications to the Existing Guardroom Within Building No.4 To Upgrade Existing Facilities.	Granted Permission	23/12/2008
08/0665/LBC	Installation of small A/C plant, with pipework running thru internal floors and against internal walls, wall mounted chiller unit on lower basement external wall.	Granted Permission	06/05/2008
06/2982/FUL	Provision of Weather Protection to Existing Band Stand in The Grounds of Kneller Hall.	Granted Permission	26/10/2006
06/0614/LBC	Proposed construction of a chair store with forklift garage and fuel store.	Granted Permission	07/04/2006
06/0569/FUL	Construction of Chair Store Incorporating Parking Garage for ForkLift Truck and Fuel Storage.	Granted Permission	07/04/2006
05/0229/C84	Installation of a gatehouse at the main gate.	Subject to Objection	15/03/2005
04/2932/C84	Erection of a single storey office block.	Decided as No Further Action be Taken	28/07/2005

99/2049	Development of New Practice Accommodation for Solo Instrumentalists at Rssm Kneller Hall	Decided the Council raises no objection	27/09/1999
95/1775/C84	Replacement of Bandstand (amendment To Previous Scheme Submitted Under 94/2950/c84).	Decided the Council raises no objection	20/07/1995
94/2950/C84	Replacement Bandstand	Decided as No Further Action be Taken	06/01/1995
94/0358/C84	Replacement of Bandstand	Decided as No Further Action be Taken	21/04/1994
93/1240/C84	Demolition of The Existing Quartermasters Stores Building & 12 No Garages. Construction of new Multi-use Hall, Music Practice Rooms, Officer's Accommodation,5 New Buildings Of 1 2,3-storeys To Accommodate A Quartermasters Stores And 12 No Garages.	Decided the Council raises no objection	28/04/1994
93/0411/C84	Internal Works to West Wing of Kneller Hall.	Decided the Council raises no objection	26/04/1993

- 3.2 It is noted the above is not a comprehensive list of all applications, and only a summary of notable applications, that are considered relevant to the current development proposals.
- 3.3 The applications demonstrate that the Kneller Hall Site has a long history of application for works to the main listed building and curtilage listed buildings and also development across the Site, to facilitate the previous occupier's use. It is however considered that none of the applications have any direct impacts on the principle of the proposed change of use and wider development of the Site.

4.0 PRE-APPLICATION ENGAGEMENT

- 4.1 We have identified design and good place making as one of the key considerations to ensure the new Kneller Hall School is successful and supported by the Local Planning Authority and local community.
- 4.2 The scheme has evolved through consultation with the local planning authority and other relevant consultees. We also agreed a Planning Performance Agreement with LBR and submitted to the LBR Design Review Panel twice. We have undertaken a significant amount of consultation with the, as set out below, to ensure the proposals can be supported by LBR and other consultees.

Pre- Application Engagement with LBR

The pre-application reference number is 21/P0412/PREAPP. Detailed below is a summary of the LBR pre-application engagement:

- October – December 2021: Initial meeting took place with Council officers and the Applicant in October 2021. Then in December 2021, a Site visit was attended with planning, heritage, urban design and ecology/arboriculture officers to establish the Site context, constraints and opportunities.
- January 2022- Comprehensive written feedback was received from the Council. Officers confirmed that the principal of development for an educational use was acceptable on the Site subject to a suitable community use being secured and the applicant demonstrating need. Officers were supportive of the removal of the existing poor quality scattered buildings within the MOL and the retention of the bandstand and its distinctive avenue. Officers raised no objections to the demolition of the majority of the former MOD blocks. At this early stage no scaled Site sections or detailed elevations were submitted for comment on height, scale and massing. Officers noted careful consideration must be given to new buildings and hard standing within the MOL; an Open Space Assessment must be provided to allow the LPA to determine whether this is inappropriate development or not.
- March 2022 – April 2022: A further pre-application submission and meeting took place in March 2022, with written advice received in April 2022. Officers were not supportive of the positioning of the swimming pool in the ecology corridor. They advised that further information was needed to demonstrate the need for the quantum of facilities proposed. Concern raised regarding the massing of development, proposed proximate to the western Site boundary. At this stage, Officers also noted insufficient information was provided to

confirm whether the proposal would be inappropriate development within the MOL or whether very special circumstances would apply. Officers advised to review the spaciousness of the Site when observed from the outside, as well as the buildings proximity to the boundary. Additional information was requested to assess the biodiversity of the proposal and concern raised regarding the extent of trees proposed to be removed, as a result of the positioning and extent of development proposed.

- June - August 2022: A further pre-application meeting took place at the end of June, with the officer's follow up written advice issued in late August 2022. Officers provided detailed feedback on the submitted Open Space Assessment and Transport Scoping Report. Officers welcomed the realignment of buildings away from the boundary and the reduction in the 'congestion', including combining the sports hall and swimming pool building. Recommendations made on the design development of the teaching block and Sports Centre, to improve these buildings appearance. Officers requested human scale visuals at ground level to ascertain the acceptability of the streetscene. Officers welcomed the removal of built form within the wildlife corridor and encouraged a detailed landscaping plan. Officers welcomed the community use and proposed timetable for public access. They requested that a draft Community Use Agreement accompanied the full planning application. Guidance was also provided on the Flood Risk Sequential Test requirements.
- August 2022 – September 2022: A Site visit took place between the project architect and planning officer and heritage officer, to discuss the proposed listed building consent works. This involved a walkaround of Kneller Hall and the curtilage listed buildings. Feedback was received in September 2022 on the proposals, including the internal works to the listed and curtilage listed buildings and the proposed extensions. As part of the written advice, feedback was also received on draft submitted Ecology, Daylight and Sunlight and Drainage reports.

4.3 The project team have sought to address and respond to the advice and recommendations provided by the LBR and the Proposed Development is a result of on-going engagement since October 2021. Where the project team have not been able to fully address the recommendations of the LBR, due to constraints of the scheme, justification for this has been set out in the submission documents.

LBR Design Review Panel

- 4.4 The draft proposals were submitted to the Richmond Design Review Panel (RDRP) twice, to discuss the draft proposals. Meetings took place with the RDRP on both the 22nd March 2022 (online) and 26th July 2022 (in person at the Site). Written feedback was received following both meetings.
- 4.5 Key feedback received at the first meeting related to:
- The impact on trees/ ecology of the proposed swimming pool being positioned in the ecology corridor. This building has subsequently been removed from the ecology corridor.
 - The constraints associated with seeking to re-use the two accommodation blocks and it was recommended that the demolition and rebuild of these two buildings was instead considered. It was subsequently agreed by the design team that an improved scheme could be delivered through the removal of these blocks.
 - Importance of considering the movements into and through the Site and how the buildings link together, as well as the Site's landscape strategy. Close engagement between the transport consultants, landscape architect and main project architects has taken place to ensure the movement strategy is well considered and that the development scheme is landscape led.
- 4.6 Key feedback from the second meeting is discussed in detail in the submitted Design and Access Statement.

Public Consultation Events

- 4.7 Two public consultation events were held at Kneller Hall on 9th May 2022 and 8th September 2022.
- 4.8 The public consultation events were attended and overall the responses received in relation to the proposals at the Site were positive, and the proposed school use and scheme was well received. In particular, attendees welcomed the restoration and protection of the existing listed building, and the community use opportunities proposed. There were some concerns raised with regards to the transport considerations, and the project transport consultant attended both events to respond to residents questions.
- 4.9 For further information on these events and the feedback received, please see the Statement of Community Involvement prepared by BECG, which has been submitted with this application.

Engagement with Local Schools and Community Groups

- 4.10 Engagement has taken place with a number of local community groups and local schools, in order to better understand their interests and needs associated with the proposed access of sports and other facilities at the Site. This feedback has enabled a Draft Community Use Agreement to be prepared.

- 4.11 For full details of the engagement that has taken place, please see the submitted Sports Provision Statement prepared by ADP that has been submitted with this planning application.

5.0 DUKES EDUCATION AND RADNOR HOUSE SCHOOL

Dukes Education

- 5.1 Dukes Education is a family of UK nurseries, schools and colleges united by a common purpose; to give children the foundations for an extraordinary life through education. Founded in 2015 by its chairman Aatif Hassan, Dukes Education has 23 schools and colleges, and 20 nurseries, with Sites across London, Cambridge, Kent, and Cardiff.
- 5.2 Dukes Education also owns and runs wraparound advisory services and summer schools at each stage of the education journey, from academic summer schools to university application consultancy services. Dukes is a dynamic, future-focused organisation committed to providing a gold standard of education for young people in the UK.
- 5.3 Dukes have significant experience operating schools in and restoring listed buildings. In recent years, Dukes Education converted a Grade II listed office building in the London Borough of Hackney to a primary school, for The Lyceum School. In the City of Westminster, a Grade I listed building at 106 Piccadilly was converted to facilitate occupation by Eaton Square School. Eaton Square School also occupy a number of other listed properties within the City of Westminster. The existing Radnor House School, at Pope's Villa, Cross Deep falls within the Grade II listed Pope's Garden parks and gardens designation.

Radnor House

- 5.4 Radnor House is part of the Dukes Education Group. Radnor House is an independent selective co-educational day school currently located at Pope's Villa, Cross Deep, Twickenham, London, TW1 4QG. Radnor House pupils learn in small classes with a strong focus on individual attention. The school educates girls and boys from ages 9 (Year 5) to 18 (sixth form), with three main entry points in Year 5, Year 7 and Year 12.
- 5.5 The school is currently at full capacity in most year groups and have a waiting list for spaces. The school wishes to expand to enable it to improve the facilities that it provides to existing students and also to further grow the school.
- 5.6 The school, at its current Site, has a shortage of space and is unable to provide bespoke facilities to serve specific age groups. Due to a lack of space, they are also restricted in the curriculum that they can offer. Pupils at the school currently utilise off Site facilities for sport due to a lack of available space on the Site.

- 5.7 The school needs additional space to ensure that it can continue to provide a high standard of education for its current pupils and so that it can provide a more diverse curriculum with a wide range of facilities. The school has a waiting list and has identified that there is demand for additional school places.
- 5.8 Dukes Education has been searching for a suitable additional property in the local area for a number of years. Notably, a pre-application was submitted in December 2020 at St George House, 76 Crown Road, Twickenham (Ref. 20/P0295/PREAPP). However, the loss of employment was not supported by the Council and the possible purchase of the Site fell through.
- 5.9 Kneller Hall was identified in 2021 by Dukes Education and they subsequently acquired the freehold interest in the Site from the MOD.
- 5.10 It is proposed that all pupils in Years 7 to 11 and in the sixth form who are currently located at Pope’s Villa, will be relocated to Kneller Hall. There will also be room for further growth at Kneller Hall, with additional forms being introduced each year. When the school initially opens, it is expected that there will be up to circa 500 pupils. The Kneller Hall Site will have capacity for up to a total of up to 1,000 pupils.
- 5.11 Year 5 and 6 pupils will remain at Pope’s Villa. The school will grow in size and will be a junior school to accommodate up to approximately 300 pupils.

Kneller Hall School

- 5.12 The new Site will provide improved and larger learning spaces for all pupils and to broaden their learning curriculum, to enhance the school’s education offering and the facilities that pupils can benefit from. It will enable the facilities at the Site to be bespoke for the age groups located at the Site.
- 5.13 The Site will be self-contained, providing all the facilities that pupils require and therefore pupils and staff will not need to move between the existing and proposed Site. Pupils at the Pope’s Villa Site, will travel on minibuses to Kneller Hall to access the proposed sports facilities.
- 5.14 Approximately 100 of the circa 120 staff members at Radnor House currently employed to support the existing Year 7 to 11 and sixth form will move across to Kneller Hall. Further staff will be employed at Kneller Hall as pupil numbers increase. Once the school reaches 1,000 pupils it is expected that there will be a total of 160- 170 staff employed at the school. This results in a net addition of up to 70 jobs at the Site. Further new jobs will also be created at the Pope’s Villa Site, resulting in a total of circa 85 additional jobs across the two Sites.

- 5.15 A high quality and well equipped sports facility is proposed to be delivered. This will provide a multi-purpose indoor sports hall, indoor swimming pool and changing facilities. This is proposed to be positioned on the western part of the Site.
- 5.16 Sports pitches will be provided on the eastern part of the Site and the existing tennis courts will be retained. Changing facilities to support the outdoor sports facilities will also be provided on this part of the Site. The extensive open space at the Site, and the proximity to Twickenham Stadium means provides an excellent opportunity to deliver high quality sports facilities. These will be used by the school at the Site and also by the Year 5 and 6 pupils based at the Radnor House junior school (at Pope’s Villa). Dukes Education will also facilitate managed access to the outdoor sports facilities for local community groups and other local schools.
- 5.17 An existing building on the northern part of the Site will be refurbished to provide a base for the Forest School learning programme. The [Forest School Association](#) provides a child-centred inspirational learning process, that offers opportunities for holistic growth, play and exploration. It seeks to develop confidence and self-esteem through learner inspired, hands-on experiences in a natural setting. This learning takes place in woodland or natural environments and therefore the grounds of Kneller Hall is considered to be a perfect location for this programme. The Forest School Association webSite currently does not list any registered providers of the Forest School programme in South West London. This facility at Kneller Hall will support the learning of pupils at the Site, pupils from Radnor House junior school and it is proposed that other local schools could also be provided with access to the Forest School facilities.
- 5.18 In addition to the teaching facilities. High quality indoor and outdoor sports facilities are proposed, as well music and drama facilities. Department for Education and Sports England guidance has been used by the project architects to confirm the extent of floorspace required and types of facilities across the Site.
- 5.19 Dukes want to ensure that the Site’s historical musical legacy is retained. They will continue to use the existing outside bandstand and are also proposing to build a performing arts and music hall. This provides an opportunity for music-based events and concerts to continue to be held at the Site, including events that the public can be invited to.
- 5.20 The new facilities at the Site, provide the opportunity for collaboration between Kneller Hall School and other local schools and community groups and the sharing of facilities.
- 5.21 For further information please see the Proposed Educational Use and Community Use document prepared by Dukes Education, which has been submitted with this planning application.

6.0 PROPOSED DEVELOPMENT

6.1 This section of the document provides a description of the Proposed Development, with detailed design principals discussed in the accompanying Design and Access Statement. This section should be read in conjunction with the submitted plans and technical documents.

6.2 The full description of development comprises of:

“The demolition of existing modern buildings on the Site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.”

6.3 The Proposed Development comprises of the following core elements which together create a high quality, inspiring teaching and recreational space for the students:

- Use of the main Grade II listed Kneller Hall for Education Use (Use Class F1);
- Use of Guard Room and Band Practice Hall for Education Use (Class F1);
- Demolition of existing modern buildings on the Site and the conversion of other existing single storey modern buildings to use as an energy centre and for maintenance storage, ancillary to the main school use (Use Class F1);
- New build development to provide new purpose-built buildings for school use including, teaching space and classrooms, an indoor sports facility with a swimming pool and sporting pavilion (Use Class F1);
- Upgrading and enhancing the existing playing fields and outside sports pitches at the Site;
- Ancillary works to facilitate the use of the Site as a school to include high quality sports facilities and a Forest School programme; and
- Facilitation of managed local school and local community group access to the outdoor sports and forest school facilities.

6.4 Further details of the proposed buildings are set out below:

- New build teaching building – 3 storeys in height (Maximum of 14.52 m in height);

- Sports Centre, with indoor swimming pool – 2 storeys in height (Maximum of 10.95 m in height);
- Sports Pavilion – 1 storey in height (Maximum of 4.6 m in height);
- Energy Centre and Grounds Maintenance – Conversion of existing building with modest extensions of 1 storey in height;
- Extension to Band Practice Hall to provide School Hall, together with plant enclosure – 1 storey in height; and
- Demolition and re-build of single storey rear extension to west wing of Kneller Hall.

6.5 The Site will be used as a day school. The Site will have capacity for up to 1,000 pupils. The pupils will be aged between 11 and 18 years of age and from Year 7 through to sixth form. There will be no boarding/ residential accommodation at the Site.

Kneller Hall, the Guard Room and Band Practice Hall

6.6 It is proposed that internal and some external alterations will be undertaken to Kneller Hall, the Guard Room and Band Practice Hall. These works will be to restore the buildings, to support their ongoing maintenance and to facilitate the school use. The building’s previous use by the military school means that the existing layout is well suited to the day school use and therefore this limits the extent to which alterations are required.

6.7 Notable works to Kneller Hall comprise of the demolition of the modern rear single storey extension to the west wing. This detractive element is considered to have no heritage significance. In addition, a modern existing 1970s staircase on the west side of the building and central wall is proposed to be removed, to enable a lift to be installed. The heritage consultant has advised that this wall and staircase are considered to hold neutral significance and their removal is considered to cause no harm to the Hall.

6.8 The floorspace schedule of the existing historic buildings that will be retained is as follows:

Building	Approximate Areas (GIA sqm)
Kneller Hall	3,928.1 retained plus new build extension of 221.8 = 4,114.5
Band Practice Hall	230.7 plus newbuild extension of 129.3 = 366
Guard Room	465.5

Total	4,624.3 sqm (4,946 sqm including new build extensions)
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6.9 For more information on the internal arrangement of the buildings please refer to the Design and Access Statement and submitted plans.

New Build Teaching Block

6.10 New teaching facilities are proposed through the construction of a purpose built 3 storey L shaped building on the western part of the Site.

6.11 Early masterplan options explored the conversion of the two existing three storey buildings to the north of the existing Band Practice Hall (the accommodation blocks), to utilise as teaching accommodation but it was subsequently concluded that this would not be feasible. The built form on the Site is to be consolidated and will enable the removal of some of the modern piecemeal development that has taken place across the northern and western parts of the Site.

6.12 The indicative floorspace schedule proposed for the new build teaching block is as follows:

Building	Approximate Area (GIA sqm)
New Build Teaching Block	5,069

Sports Centre with Swimming Pool

6.13 New sporting facilities are proposed on the central part of the Site. This development will be enabled via the removal of existing modern buildings and the provision of one new high-quality building.

6.14 The indicative floorspace schedule proposed for the new build Sports Centre is as follows:

Building	Approximate Area (GIA sqm)
Sports Centre including indoor Swimming Pool	2,977

Outdoor Sports Pitches and Ancillary Sports Pavilion

6.15 The eastern part of the Site has historically been used as sports pitches, by the Military School of Music, and the Proposed Development seeks to continue to utilise this area for outdoor sports. As shown on the Proposed Site Masterplan, the following sports pitches are proposed:

- Football Pitch (grass);
- Rugby Pitch (grass);

- Cricket Pitch (grass) (can only be used when football and rugby pitch not in use);
- Hockey Pitch (all weather astro turf);
- Tennis Court (x2) (hardstanding); and
- Basketball Court (hardstanding).

6.16 To support the continued use of the eastern part of the Site for outdoor sports and recreation, a new sports pavilion is proposed. This will replace the existing buildings and hardstanding to the east of Kneller Hall within the MOL. The pavilion will sit on a footprint very similar to the existing buildings on this part of the Site. The pavilion will provide ancillary facilities associated with the sporting use of the land, including changing rooms and storage space. Whilst these facilities will be used by the school during the school day, there will also be managed access at evenings, weekends and during school holidays, for other local schools and community groups to use these facilities.

6.17 The indicative floorspace schedule proposed for the new build Sports Pavilion is as follows:

Building	Approximate Area (GIA sqm)
Sports Pavilion	305.4

Other Outside Facilities

6.18 The outside bandstand will be retained, to ensure that the Site’s historical musical legacy is retained. It will provide an opportunity for music-based events and concerts to continue to be held at the Site, including events that local residents can be invited to in the summer months.

6.19 It is also proposed to create a ecology corridor at the north of the Site. This will include a Forest School programme which will utilise a small covered canopy or shed like structure, as a base for this programme. The Forest School facilities will be able to be used by other local schools and community groups.

6.20 An extensive landscaping scheme and Site wide urban greening strategy is proposed. This proposes the introduction of courtyards between buildings to be used for recreation by pupils, food growing opportunities, areas to sit, walking routes, wildflower planting, acid grassland enhancement and biodiversity enhancement. Please see the submitted Landscape Design and Access Statement for further details. The masterplan seeks to ensure that cars remain on the edges of the Site and do not come into the heart of the school. This allows courtyards and walking routes between buildings to be car-free zones. The parade ground at the front of the Site will be used as the drop-off and

pick-up zone, to create a one way loop system for vehicle drop-offs. Outside of these times, the parade ground will be kept free of vehicles and remain open.

- 6.21 Access to the Site will be via Kneller Road for pedestrians and cyclists. There will be two access points, one by the Guard Room and one at the bottom of the long driveway. Vehicle access for parents, visitors and community groups users will be via Kneller Road and up the long driveway. Vehicle access for staff will be via Whitton Denee. An existing closed off opening, will be opened up to facilitate this.
- 6.22 Cycle stores for pupils, staff and visitors are proposed. There is also 40 staff car parking spaces proposed on the Site plus 3 visitor bay for disabled users. In addition, an existing hardstanding/ parking area, will be flexibility used to provide a hard surfaced play area during the school day and to offer an area for the school minibuses and coaches to drop-off and pick up pupils and for community groups users, particularly those coming by coach or minibus to park.
- 6.23 Furthermore, there are two bin stores proposed on the Site, to accommodate all refuse and recycling.

Supporting Facilities and Infrastructure

- 6.24 An energy centre is required to house the required plant and machinery associated with meeting the energy requirements for the Site. A Site- wide energy strategy is proposed, that utilises ground and air source pumps and PV panels. Please see the submitted Energy and Sustainability Statement, prepared by SRE that has been submitted with the planning application, for further details.
- 6.25 There is also required to be a grounds maintenance store on the Site. These elements are proposed to be located on the northern part of the Site, within existing buildings that will be converted with modest extensions. They will comprise of:

Building	Approximate Existing Area to be Converted (GIA sqm)	Approximate Area to be Extension (GIA sqm)	Approximate Total Area (GIA sqm)
Energy Centre and Ground Maintenance (3 Buildings)	313.8	109.6	413.4

- 6.26 The implementation of the proposed energy and sustainability strategy means that the scheme is targeting achieving BREEAM ‘Excellent’ for the new build accommodation and BREEAM ‘Very Good’ for the historic buildings that are being converted. The energy strategy has been developed inline

with the Energy Hierarchy and is shown to achieve and exceed the required 35% CO2 emissions offset. SRE has calculated that a £25,080 carbon offset payment will be required to be paid.

Summary of Proposed Development

- 6.27 The Proposed Development will provide high quality and well designed modern accommodation and the sensitive conversion and restoration of existing buildings, to deliver the new Kneller Hall School, with capacity for up to 1,000 pupils.
- 6.28 It will provide outdoor and indoor sports facilities and other non sporting facilities both to support the pupils but also for other local schools and community groups.
- 6.29 The table below provides a summary of the extent of existing floorspace at the Site, together with the floorspace to be demolished and new build floorspace:

Building	Approximate Existing Area (GIA sqm)	Approximate Demolition (GIA sqm)	Approximate New Build (GIA sqm)	Approximate Total Floor area (GIA sqm)
Whole Site	9,811	4,863	8,812	13,756

7.0 PLANNING POLICY AND ASSESSMENT

- 7.1 The Site is located within the London Borough of Richmond upon Thames. The currently adopted Development Plan Documents for the Council is the Local Plan (2018) and the London Plan (2021).
- 7.2 As of December 2021, consultation started on the Council’s Pre-Publication (Regulation 18) Draft Local Plan. This includes an updated Site allocation for Keller Hall. In accordance with paragraph 48 of the NPPF, as the Council is at an early stage in the plan preparation, the Draft Plan is not currently applicable for Development Management consideration for this submission.
- 7.3 In addition to adopted Development Plan Documents, material consideration must be given to the National Planning Policy Framework (2021) (‘NPPF’) and other Richmond upon Thames Planning Guidance documents, notably the Kneller Hall SPD (2020).

Loss of Existing C2 Use

Policy

- 7.4 The Site’s lawful use is considered to be a C2 use as ‘Residential Institution’. The Site when in use by the Royal Military School of Music provided musical training, with living accommodation provided for those undertaking training courses at the Site. Local Plan Policy LP 37 ‘Housing Needs of Different Groups’ states that *“The loss of existing housing will be resisted where it meets identified specific community needs...”*.
- 7.5 The principle of the loss of this C2 accommodation is considered to be confirmed within the Kneller Hall SPD which states that *“There is an excellent opportunity to re-use Kneller Hall by finding a new viable use that fits in well with the existing structure and at the same time maintains the cultural and historical legacy of the Royal Military School of Music.”* The SPD then confirms the new use for Kneller Hall could potentially be for residential, a hotel, for employment, for community uses or institutional use.

Assessment

- 7.6 Whilst the current use is considered to fall within Use Class C2 and the new day school would be Use Class F1, it is notable the main function of the previous use was for a military school. The proposed use seeks to retain the education use at the Site.
- 7.7 Due to the unique use of the Site as a military school, and the adopted status of the SPD, it is considered the principle of the Site being used for an alternative use, other than C2 is established. The SPD suggests that a potential new use for Kneller Hall could be an institutional use. It is considered that the proposed day school use is an institutional use.

- 7.8 The existing outside bandstand in the grounds will be retained and used by the school. This provides an opportunity for music-based events and concerts to continue to be held at the Site, including events that local residents can be invited to. In addition, a Music Centre with music practice rooms is also proposed in the Guard Room. The Band Practice Hall will be used as a school hall, with circa 270 seats; allowing it to be used for school performances, including music concerts. These facilities will help to ensure that the historical musical legacy of the Site is retained.
- 7.9 The new day school use will retain and upgrade the existing playing fields, to support the continued use of the eastern part of the Site for outdoor sports and recreation. In addition, a new sports pavilion will provide ancillary facilities associated with the sporting use of the land, including changing rooms and storage space. Managed access is proposed at evenings, weekends and during school holidays for other local schools and community groups to use these facilities, supporting the health and community use at the Site. See below ‘*Community Use*’ for more information on this.

Principle of Proposed Educational Use

Policy

- 7.10 NPPF Paragraph 95 states *“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.”*
- 7.11 Local Plan Policy LP29 ‘Education and Training’ demonstrates the councils support for education and training facilities for people of all ages. This policy states in part ‘A’ that *“The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means: 1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities; [...]; 4. encouraging the potential to maximise existing educational Sites through extensions, redevelopment or refurbishment to meet identified educational needs [...].”*
- 7.12 Paragraph 8.2.10 in the Local Plan recognises that the independent sector makes a contribution to providing education facilities.
- 7.13 London Plan Policy S3 ‘Education and childcare facilities’ identifies that there is a need to *“ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice”*.
- 7.14 Policy S3 also states that *“development proposals for education and childcare facilities should:*

- 1) *locate facilities in areas of identified need*
 - 2) *locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling*
 - 3) *locate entrances and playgrounds away from busy roads, with traffic calming at entrances*
 - 4) *link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)*
 - 5) *maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures*
 - 6) *encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers*
 - 7) *ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach*
 - 8) *ensure that facilities incorporate suitable, accessible outdoor space*
 - 9) *locate facilities next to parks or green spaces, where possible*
- 7.15 Within the Kneller Hall SPD it is stated that *“The Council would welcome other alternative uses which are appropriate to the character and significance of the Hall and in accordance with national and local planning policy.”*

Assessment

- 7.16 The Proposed Development complies with the policy aspiration at both the local, London and national level to improve and increase educational facilities and educational choice. It is in compliance with local policy LP29, which supports the expansion of an existing education provider in the borough.
- 7.17 ADP has considered the Department for Education guidance on the classroom numbers and sizes, and all the other associated facilities that are required for a 1,000 pupil school. The Teaching Block and Kneller Hall will house the majority of the teaching spaces required for the senior school. A copy of the space requirements for a senior school of this size is set out in the Department of Education accommodation schedule appended to ADP’s Design and Access Statement.

7.18 Set out below is the requirements of London Plan Policy S3 ‘Education and childcare facilities’ when new education facilities are proposed together with how the Proposed Development is considered to meet this policy requirement.

1) locate facilities in areas of identified need

Radnor House School is at capacity and has a waiting list for the majority of year groups. It is therefore considered that this expansion to Kneller Hall will allow this need to be met, and account for future growth. It will also enable the school to significantly improve the quality and range of facilities that the pupils have access to. Further details of the educational need are submitted in the Proposed Education Use and Community Use document, prepared by Dukes Education and submitted with this application.

The community access to the proposed facilities will also meet an identified need for local schools and community groups to have access to the sporting facilities provided at the Site. Community groups and local schools that have been engaged with have been very excited about the potential that the new facilities will offer them, to address their existing need. Please see the submitted Sports Provision Statement for further details.

2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling

The Proposed Development Site is served by a number of different bus services as well as being within 1km of Whitton Station. It is therefore considered to be in an accessible location for a school. Radnor House School currently operate a school bus service. A school bus service will also be provided at the new Site. This will operate on the existing routes and new routes will be added to cater for additional demand.

3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances

There is pavement space at the front of the Site and two access options for pedestrians. Both access options are separate to the vehicle access points, providing dedicated pedestrian and cycle access into the Site. This will allow for safe access and egress of pupils from the Site. The local road network is not considered to be a particularly busy road and is considered to be a safe road for pupils to walk along.

The large Site benefits from grassed areas and trees across the Site, as well as areas of hardstanding. Courtyard spaces are also proposed between the buildings. There is a large amount of space available for pupils to play, and to undertake different activities, which will be located away from

the roads. Relative to the access to open space at many London schools, including the current Pope's Villa Site, Kneller Hall provides the opportunity to provide pupils with direct access to large areas of open space and to also introduce a Forest School at the Site and outside food growing opportunities.

A Transport Assessment provided by Caneparo Associates has been submitted as part of the planning application.

4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)

The Site is located in a highly accessible location with footpaths connecting the Site to local public transport. As confirmed above, the existing vehicle access into the Site will be pedestrian and cycle access only, with separate vehicle access. This will allow pupils to safely arrive by bike or on foot. For further details of movement in and access to the Site please see the submitted Transport Assessment.

5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures

See below 'Community Use' section. Full details of the community use access opportunities are set out in the Draft Community Use Agreement.

6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers

As confirmed above, the school is open to sharing its facilities with other local schools and community groups. This will be secured via the Community Use Agreement.

7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach

There are several new and existing buildings within the Site, all of which have been given step free access. A lift is proposed to be introduced to Kneller Hall. A lift will also serve the proposed teaching block. The Guard Room will have step free access to the ground floor.

8) ensure that facilities incorporate suitable, accessible outdoor space

Pupils will have access to a large area of outside amenity space.

9) locate facilities next to parks or green spaces, where possible"

The Site is in part Metropolitan Open Land and therefore is adequately located, providing pupils with access to green space.

- 7.19 It is therefore considered that the Site meets the policy objectives of Policy S3 and the principal of an education use at the Site is considered acceptable.

Heritage Significance and Assessment

Policy

- 7.20 NPPF Chapter 16 ‘Conserving and enhancing the historic environment’ identifies at paragraph 194 that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”*.
- 7.21 Paragraph 197 states that *“In determining applications, local planning authorities should take account of ... the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”*.
- 7.22 Local Plan Policy LP3 ‘Designated Heritage Assets’ identifies that Richmond upon Thames will resist the change of use within listed building where their significance would be harmed.
- 7.23 Policy LP3 also requires the retention and preservation of the original structure, layout, architectural features, materials and later features and resist the removal and modification of features both internally and externally that contribute to the significance of the asset.
- 7.24 London Plan Policy HC1 ‘Heritage conservation and growth’ states that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”*
- 7.25 One of the key visions within the Kneller Hall SPD is to provide *“A long-term viable use for Kneller Hall that secures its future and keeps intact its historic and cultural legacy as a historic home, including for the Royal Military School of Music, whilst contributing to the local community and supporting the vitality of both Whitton and the wider area.”*
- 7.26 The Kneller Hall SPD goes on to note *“The Parade Ground’s open character must be retained and, if possible, enhanced to maintain views towards the Hall. It should provide access to the formal*

entrance on the south side of the Hall, but must be kept free from permanent parking. Any planting in this area and adjacent to the boundary wall would need to be carefully designed, so as not to interrupt views from Kneller Road”.

7.27 Detailed guidance on important heritage assets at the Site is also set out within the Kneller Hall SPD.

Assessment

7.28 The significance of Kneller Hall resides primarily in the architecture of the Grade II listed building itself, including the Neo-Jacobean frontage onto Kneller Road and first and second floor chapel.

7.29 The surviving listed boundary walls and curtilage listed gatehouse and band practice room also have some historical significance as does the sweeping drive to Kneller Hall leading from the lodge gate and the northern part of the Metropolitan Open Land in relation to the historic landscape. The bandstand, whilst of no architectural significance has communal value as the focus of community events held at Kneller Hall throughout the history of the School.

7.30 The Proposed Development will retain the Grade II listed Kneller Hall, Guard Room and Band Practice Hall and refurbish and convert this accommodation to provide teaching spaces and ancillary school facilities.

7.31 The use of the Site as a school will facilitate the long-term viable use for Kneller Hall. The proposed school use requires limited internal and external alterations when considered in comparison to other potential uses such as residential. The use will secure Kneller Hall’s future and the retention of its historic and cultural legacy. The proposal will also introduce a community use of the Site contributing to the wider vitality of Kneller Hall within Whitton.

7.32 The Proposed Development’s main vehicle access point and one of the pedestrian/ cycle access points is via the long driveway leading to Kneller Hall, from Kneller Road. This enables a good appreciation of the building’s architectural quality which arriving at the Site. The approach is framed by trees, before arriving on the Parade Ground, where the whole of the main façade is revealed. Ensuring the Parade Ground remains open is important not just to this experience of the building, but also to the way it is experienced from the public views into the Site from Kneller Road. The Proposed Development ensures this.

7.33 The proposed landscaping within the Parade Ground will be hard landscaping only, there will be no greening to this area. This ensures that Kneller Hall remains open to reflect its historic importance as a parade ground.

- 7.34 The successful conversion of the buildings, balanced with the re-use of the Site and landscaping strategy, whilst introducing interventions to comply with the necessary fire and healthy and safety regulations, is considered to be in compliance with the relevant local and national policies.
- 7.35 A more in-depth heritage assessment and impact report has been provided by Icen Projects, in the submitted Heritage Statement.

Metropolitan Open Land

Policy

- 7.36 Local Plan Policy LP 13 ‘Green Belt, Metropolitan Open Land and Local Green Space’ Part A states that:

“A. The borough’s Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless ‘very special circumstances’ can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land. Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.”

- 7.37 London Plan Policy G3 ‘Metropolitan Open Land’ (‘MOL’) states that *“A Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt”*. The policy confirms that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.

- 7.38 Paragraph 149 of the NPPF states that the construction of new buildings in the Green Belt should be considered as inappropriate development. There are exceptions to this, which include:

“the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;”

- 7.39 Within the Kneller Hall SPD it is stated that *“The eastern part of the site, designated as Metropolitan Open Land (MOL), is to remain as open space and will become a significant new publicly accessible park for Whitton. This subarea provides an opportunity to create a multifunctional green space incorporating a range of recreation and leisure activities including the provision of sports pitches*

and play space together with habitat enhancements and sustainable drainage features. The provision of performance space within the Park should be explored in order to maintain the Site's musical legacy.

There are a number of existing buildings and structures within the MOL which do not have any historic or architectural value. Under Local Plan Policy LP 13 there is a potential opportunity to reprovide the buildings in a consolidated footprint, which enhances the sense of openness of the MOL and creates more usable space for uses which support the functioning of the Park."

Assessment

- 7.40 The existing buildings which are scattered across the MOL have a footprint of circa 1,149 sqm. The Proposed Development will reduce the footprint inside of the MOL to only 538 sqm. A large proportion of the western part of the land designated as MOL comprises hardstanding in the form of road connections, a car park, tennis courts and a basketball court.
- 7.41 The proposals therefore provide the opportunity to reduce the footprint of built development within the MOL.
- 7.42 The MOL land was previously used as sports pitches by the previous owner, MOD. These sports pitches and facilities are dated and in need of being upgraded and properly maintained. The Applicant proposes to provide outdoor sports pitches on the MOL land to continue this use but upgrade the facilities. To ensure that the school, and other local schools and community groups can use these facilities all year round, it will be necessary for an all-weather pitch to be provided. It will also be necessary for ancillary changing, club room and a storage facility to be provided, adjacent to the sports pitches and on the MOL land.
- 7.43 The proposed sports pavilion will be single storey, approximately 3.6 metres in height with accommodation designed in accordance with the relevant Sports England and ECB guidance. The pavilion would be sited in an area of existing buildings and hard standing, consolidating the multiple buildings on the eastern part of the Site. The single storey building, its design using large amounts of glazing and the green roof will ensure that this building lessens the impact on the openness of the MOL and improve the visual amenity, relative to the existing buildings on this footprint.
- 7.44 The energy centre will be within two existing buildings converted to use for the storage of energy plant and equipment and equipment for the groundsmen. Both buildings are of permanent and substantial construction and Building 2 is located on the edge of the MOL and are currently surrounded by a number of other buildings which will be removed. Converting existing buildings is a sustainable solution as it allows the existing building to be re-used. It would not be considered

inappropriate development within the MOL, in accordance with part d) of paragraph 150 of the NPPF as it constitutes *“the re-use of buildings provided that the buildings are of permanent and substantial construction”*.

- 7.45 Part of the hardstanding within the MOL was used by the previous owner for car parking. This hardstanding will be used as an outside play area for pupils. It will also be used as the coach/ minibus drop-off zone and community use parking area, outside of the school day.
- 7.46 A full assessment of the development within the MOL is set out in the submitted Open Space Assessment, prepared by DWD. This report concludes that the Proposed Development, is appropriate in the MOL and will when considered as a whole, preserve the openness of the MOL.
- 7.47 The proposal will provide managed access to the facilities and sports pitches for members of the public, including local schools and community groups. Under the previous ownership there was no public access to the sports pitches or tennis courts on Site. The proposal therefore reflects an improvement in terms of quality and quantity of outdoor recreation within the Borough. As such, the continuation of open recreation and sport use within the MOL is considered acceptable in this location.
- 7.48 The MOL land will also be used as play space for the school children and to provide outdoor learning as part of the Forest School programme.
- 7.49 Whilst the Kneller Hall SPD has an aspiration for the eastern part of the Site to be a publicly accessible park, this is not a feasible option for the school. This is discussed further in the submitted Landscape Design and Access Statement, prepared by ADP. Dukes Education must ensure the safety and security of their children. They cannot therefore facilitate access on to the Site or the grounds, that is not managed. Currently there is no public access to the Site, Dukes Education seeks to provide improved public access through offering the shared use of its proposed outdoor sports and Forest School facilities to local schools and local community groups.
- 7.50 These community uses will be managed by the school, to ensure that Dukes manage who enters the Site and when, and that this use does not compromise their own pupils’ safety or enjoyment of the school facilities.

Design

Policy

- 7.51 Local Plan Policy LP1 ‘Local Character and Design Quality’ requires *“all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and*

its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area”.

- 7.52 Local Plan Policy LP2 ‘Building Heights’ requires *“all 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”*. It further notes that buildings should *“preserve and enhance the borough’s heritage assets, their significance and their setting”*.
- 7.53 The Kneller Hall SPD also considers building heights. In the west / south west periphery, and in the context of the Band Practice Hall development is to be 2 - 3 storeys in height, recognising the increased visibility of development in this part of the Site from properties on Whitton Dene and Kneller Road. The development should be set back from the boundary wall giving consideration to existing protected trees. The SPD advises that increased buildings heights of up to 5 storeys if a flat, green roofed design is proposed, may be appropriate towards the centre of the Site.

Assessment

- 7.54 Local Plan policies relating to design describe a number of ways by which new development can achieve this, including responding to local character and context, providing a healthy and convenient environment for all users, and achieving a resource efficient and climate responsive design. Ongoing pre-application discussions with the LBR and RDRP have contributed to the design development.
- 7.55 The Proposed Development has been designed to complement the heritage assets and introduce modern exemplar designed teaching and sports facility buildings to the Site. The choice of materials and finishes of the new proposed building have been chosen to complement the existing buildings in a contemporary way.
- 7.56 The built development has been set back from the western and southern site boundary. The Teaching Block is proposed to be 3 storeys in height, which is in accordance with the Kneller Hall SPD. The building will be 12.7m in height, raising up to a maximum height of 14.52m inclusive of the rooftop plant and enclosures. Following feedback from officers and RDRP, the massing of this block has been further broken down to create visual interest and ensure that the western elevation does not appear monotonous. The RDRP suggested that the Teaching Block and Sports Centre could be swapped around. However, this was explored by ADP at an early design stage and it was considered that positioned the teaching block on the western extent of the Site is a better

solution as it allows a more active elevation, that the Sports Centre facilitated. This view was shared by officers in the August 2022 written pre-application advice.

7.57 The Sports Centre building will be 2 storeys in height, ranging from 8m – 10.5 m and up to a maximum height of 10.95 m when accounting for the roof top plant and enclosures. This height falls below the maximum height of 5 storeys suggested in the Kneller Hall SPD for this part of the Site. The elevational treatment of the building has evolved, in response to feedback from officers to provide a high quality and visually interesting building. The building height varies across the length of the building, to create visual interest and different materials are also used. At ground level, across a large proportion of the western elevation and along the northern elevation climbing plants are proposed.

7.58 The submitted Design and Access Statement and Heritage Statement also considers the historic context of the Site and appropriateness of the design, to address local policy LP1 and LP2. In addition, the submitted Fire Statement confirms the fire strategy, which has been considered as part of the design development, to ensure that the development can meet the relevant Building Regulation requirements.

Landscape and Ecology

Policy

7.59 Local Plan Policy LP12 ‘Green Infrastructure’ states that *“To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, the following will be taken into account when assessing development proposals:*

- a) the need to protect the integrity of the green spaces and features that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;*
- b) its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation; and*
- c) incorporating green infrastructure features, which make a positive contribution to the wider green infrastructure network.”*

7.60 Local Plan Policy LP15 ‘Biodiversity’ states that *“The Council will protect and enhance the borough’s biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats”*. This approach is supported by the principals of the NFFP.

- 7.61 Local Plan Policy LP16 ‘Trees, Woodlands and Landscape’ states that *“The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits”*.
- 7.62 Local Plan Policy LP 17 ‘Green Roofs and Walls’ seeks to ensure that *“green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact”*.
- 7.63 One of the key strategies within the Kneller Hall SPD is to provide a habitat corridor to support a net gain in ecological value and provide an east-west green link connection towards the existing open spaces.
- 7.64 The ecology and biodiversity objectives within the Local Plan are in line with the principals of the NPPF, and London Plan Policy G5 ‘Urban Greening’ and G6 ‘Biodiversity and Access to Nature’ which collectively seek to contribute to the greening of London, manage impacts on biodiversity and aim to secure net biodiversity gain.

Assessment

- 7.65 The current site conditions consist of buildings, hard standing and extensive soft landscaping including woodland, grassed playing pitches and a variety of grass types. A Preliminary Ecological Appraisal was undertaken by RPS. This was followed by a number of site investigations by RPS, including to investigate bat roosting potential and acid grassland, to enable an Ecological Survey Report to be prepared and then an Ecological Enhancement Strategy.
- 7.66 Trees scattered across the Site are covered by a site-wide TPO (T0865 January, 2016). A Tree Survey, Arboricultural Impact Assessment and Arboricultural Management Plan, prepared by Marcus Foster has been submitted with the application. Early iterations of the masterplan required a high number of trees to be removed. The final masterplan result in the requirement for the removal of only a modest number of only 13 trees/ hedges, to facilitate the development plus 15 further Category C trees that are recommended for removal in the next few years due to their condition. Mitigation planting is proposed at a ratio of in excess of 2 proposed trees, for every 1 tree removed. Tree protection measures will also be implemented, to ensure that existing trees on the Site are protected during both the construction and operation phase.
- 7.67 The proposal represents an opportunity for biodiversity net gain at the Site and would incorporate meaningful biodiversity measures, including the creation of a habitat corridor to the north of the

Site, as outlined in the Kneller Hall SPD. In addition, enhancement of the acid grass land in the northern part of the Site and wildflower planting across the Site is proposed.

- 7.68 Additional urban greening is provided via a range of measures such as; wildflower meadow, grassed areas, amenity garden planting and flower gardens, green roofs and green walls/climbing plants, and a new native hedgerow. The proposal would result in an Urban Greening Factor of 0.795 which would considerably exceed the GLA benchmark of 0.3.
- 7.69 Green roofs are also proposed on the proposed new buildings. These will cover in excess of 70% of the proposed new build roofs, as required by local policy LP 17.
- 7.70 Overall, the proposal would further support the biodiversity at the Site by supplementing the forested area to the north of the Site to create a green corridor, creating additional trees and hedgerows, wildflower meadows, and green roofs and walls.
- 7.71 Full information on the landscaping scheme and the ecology enhancement strategy is provided within the technical reports submitted with this application, namely the Landscape Design and Access Statement and Ecological Enhancement Strategy. It is considered that the Proposed Development meets the relevant local and London Plan policies relating to ecology, biodiversity, trees and urban greening.

Community Use

Policy

- 7.72 Local Plan Policy LP 28 ‘Social Infrastructure’ confirms that proposals for new or extensions to existing social and community infrastructure will be supported where it provides for an identified need; is of a high quality and inclusive design and where practicable is provided in multi-use buildings or co-located with other social infrastructure which increases public access.
- 7.73 Local Plan Policy LP29 ‘Education and Training’ demonstrates the councils support for education and training facilities for people of all ages.
- 7.74 Local Plan Policy LP 31 confirms that applicants should assess the need and feasibility of on-site provision of new playing fields and ancillary sports facilities in line with the boroughs Playing Pitch Strategy.
- 7.75 Local Plan Policy SA14 ‘Kneller Hall’ notes within the explanatory text *“social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored”*. It further notes *“any scheme will need to ensure that the site establishes a positive relationship with the surrounding area”*.

7.76 Within the Kneller Hall SPD it is stated *“the area is to become a new publicly accessible park, ‘Kneller Park’, accommodating a variety of sports, play and recreational facilities to be secured by way of a legal agreement. This local green space will benefit the local community, be enhanced for biodiversity gain and provide opportunities for shared use by, for example, neighbouring schools and the nearby Twickenham Stadium”*.

Assessment

7.77 The Proposed Development will introduce new high-quality indoor and outdoor sports facilities and a Forest School programme to the Site. This will benefit the pupils of the school and also other local schools and community groups. It is evident from the engagement with local groups, which is set out in the submitted Sports Provision Statement that there is a demand for the sporting facilities that are proposed. The facilities will be high quality and of an inclusive design, to allow them to be used flexibly by a range of different groups, and for different sporting purposes. It is therefore considered that the development aligns with local policy LP 28 and LP 31.

7.78 It is expected that during the school day, the facilities will be needed by the pupils for the vast majority of the school day. There are also safeguarding concerns regarding permitting other users on the Site when there are pupils on site. Therefore, the majority of opportunities for community group use is in the evenings, at weekends and during school holidays.

7.79 The retention of the band stand would provide the school the possibility to explore hosting music events for the wider community. This would further strengthen Kneller Hall’s significance as a ‘home of music’ and its position within the wider community.

7.80 Full details on the Community Use and how this would be operated and managed are provided in the draft Community Use Agreement, submitted as part of this application. The community use of the facilities is considered to meet Local Plan Policy SA14, LP 28 and LP 31.

Transport and Amenity Impact

Policy

7.81 Local Plan Policy LP 8 ‘Amenity and Living Conditions’ states that *“All development will be required to [...] 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...”*. The same principles are included within the London Plan and NPPF.

7.82 Local Plan Policy LP 45 ‘Parking Standards and Servicing’ states that the Council will *“require new development to make provision for the accommodation of vehicles in order to provide for the needs*

of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.”

- 7.83 ‘Parking Standards’ in Appendix 3 of the Local Plan, state that maximum parking requirements for schools are 1 space per 2 staff with arrangements made for visitor and disabled parking spaces as per London Plan. This would mean 5% of spaces would need to be disabled ready for visitors plus any for existing employees, with a further 5% able to be converted if required.
- 7.84 London Plan Policy T1 ‘Strategic Approach to Transport’ notes that all development *“should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated”*.
- 7.85 London Plan Policy T5 ‘Cycling’ seeks to promote cycling through the provision of appropriate levels of cycle parking which should be *“fit for purpose, secure and well-located”*.
- 7.86 The approach of modal shifting the transport system towards walking, cycling and public transport is supported by the principals of the NFFP.

Assessment

- 7.87 An on-site car park will be required to provide staff and visitor car parking, for those that cannot travel by public transport. A total of 43 car parking spaces will be provided on the Site, of which 7 will be disabled bays. 40 spaces will be for staff parking and 3 will be for visitor parking. All the visitor bays will be disabled compliant bays. Staff parking will be allocated to those staff members that need to drive to the Site, with the remainder of staff required to travel to the Site by public transport.
- 7.88 1 in 5 (20%) of parking spaces will provide an active electrical charging point. 8 EV charging points are proposed. All other parking spaces will have a passive electric charging provision.
- 7.89 The proposal would install multiple cycle storage locations within the Site, with 144 spaces allocated for pupils, 28 for staff and 10 for short stay.
- 7.90 The school will operate a school bus, serving several routes in the morning and at the end of the day. This will aim to reduce the need for parent drop-offs at the Site.
- 7.91 Transport and highways advice have been provided by Caneparo Transport Consultants and their Transport Assessment has been submitted with this submission.

- 7.92 Historically, the entrance to Kneller Hall was from the south gate on Kneller Road, where vehicles would travel towards the parade ground and arrive with a full view of Kneller Hall. This will become the main vehicle entrance. The proposal implements a drop off system utilising the existing road and south gate, and the parade ground. This would also create the opportunity to safely separate vehicle access and pedestrian and cycle access into the Site.
- 7.93 The proposal would re-open the historic entrance to the north west of the Site, on Whitton Dene, for a staff car park and services entrance. Again, this would allow the safe separation of pupils and cars on the Site. No pupils will have access via the Whitton Dene entrance.
- 7.94 Through the implementation of the Travel Plans, Delivery and Servicing Management Plan and Site Waste Management Plan, once the school opens and the Construction Management and Logistics Plan during the construction phase, it is considered that the development will meet the relevant transport policies set out in both the Local Plan and NPPF and represent a sustainable development, that will not have an adverse impact on the local highways network.

Existing Residents' Amenity

Policy

- 7.95 Local Plan policy LP 8 'Amenity and Living Conditions' states that *"All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties."* It goes on to consider the importance of daylight and sunlight, overlooking, noise disturbance, traffic, air pollution and odour.

Assessment

- 7.96 The amenity impacts of the proposal have been considered throughout the design progresses. A number of technical reports have been submitted with the planning application, which demonstrate that the Proposed Development will not have a negative impact on the living conditions of existing local residents. This includes daylight and sunlight, overlooking, noise disturbance, traffic, air pollution and odour.

Drainage and Flooding

Policy

- 7.97 Local Plan Policy LP21 'Flood Risk and Sustainable Drainage' seeks to avoid or minimise the impact development has on all sources of flooding.
- 7.98 Part C of Policy LP21 Part C states that *"The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:*

1. *A reduction in surface water discharge to greenfield run-off rates wherever feasible.*
2. *Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development."*

7.99 The above Local Plan policy is supported by The London Plan Policies SI12 'Flood Risk Management' and SI13 'Sustainable Drainage' which collectively aim to minimise the risk of flooding and reduce the rate and volume of surface water run-off close to greenfield run-off rates.

Assessment

7.100 The planning application is accompanied by a Flood Risk Assessment prepared by RPS and a Drainage Strategy prepared by AKS Ward.

7.101 The proposed surface water drainage strategy follows the drainage hierarchy and would control run off from impermeable areas at the source and attenuate through SuDs features. It is proposed that a soakaway, infiltration basin and permeable paving is to be installed as a solution for the surface water discharge. Green roofs are also proposed to all new buildings on the Site.

7.102 The proposal would reduce the drainage water discharge run off rates to a betterment of 84.7%.

7.103 Full details on the drainage strategy and how this would be maintained are provided in the drainage statement and flood risk assessment documents, submitted as part of this application.

Energy and Sustainability

Policy

7.104 Local Plan Policy LP20 'Climate Change Adaptation' seeks to encourage development to be fully resilient to the future impacts of climate change and encourages opportunities to adapt existing buildings.

7.105 Part B of LP20 states that *"New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:*

1. *minimise internal heat generation through energy efficient design,*
2. *reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls,*

3. *manage the heat within the building through exposed internal thermal mass and high ceilings,*
4. *passive ventilation,*
5. *mechanical ventilation,*
6. *active cooling systems (ensuring they are the lowest carbon options)”*

7.106 Local Plan Policy LP22 ‘Sustainable Design and Construction’ seeks to ensure that all new development and refurbishment is as sustainable as possible in order to mitigate the impact of development on the environment.

7.107 Policy LP22 states that,

1. *“Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.*
2. *New non-residential buildings over 100sqm will be required to meet BREEAM ‘Excellent’ standard”.*

7.108 LP Policy LP22 further goes on to note that,

“Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:

1. *All new major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy.*
2. *All other new residential buildings should achieve a 35% reduction.*
3. *All non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy. Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.*

This should be achieved by following the Energy Hierarchy:

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

“High standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting”.

7.109 London Plan policy SI2 ‘Minimising greenhouse gas emissions’ supports the above zero-carbon targets and notes *“the energy hierarchy should inform the design, construction and operation of new buildings”.*

7.110 London Plan in Policy SI4 ‘Managing Heat Risk’ seeks to *“limit internal heat gain through the cooling hierarchy”.*

Assessment

7.111 All new buildings as part of the proposal, the new teaching block, sports centre, sports pavilion and extensions to Kneller Hall, will achieve a site-wide improvement of in excess of 35% over Baseline CO₂ emissions. This would be acceptable in line with Building Regulations 2021 Part L V1 and the aspirations set out in Local Plan LP 22 and The London Plan.

7.112 The energy strategy for the Proposed Development is set out in the submitted Energy and Sustainability Statement prepared by SRE. In addition, the submitted BREEAM Pre- Assessments by SRE confirm that the new build development will achieve ‘Excellent’ as required by LP 22. For the converted historic buildings, ‘Very Good’ will be achieved, due to the heritage constraints.

Acoustics, Air Quality, Lighting and Fire

Policy

7.113 Local Plan Policy LP10 ‘Local Environmental Impacts, Pollution and Land Contamination’ seeks to *“ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.”*

7.114 London Plan D12 ‘Fire Safety’ notes that *“all development proposals must achieve the highest standards of fire safety”*, and that *“all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor”.*

7.115 London Plan Policy D14 ‘Noise’ seek the management of noise both internal and external to promote good health and good quality of life.

7.116 London Plan Policy S1 ‘Improving Air Quality’ seeks to *“ensure new developments are designed and built, as far as possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”*

Assessment

7.117 The proposal is located within a residential setting and the existing use was educational. The proposal has considered the impact on surrounding noise sensitive receptors and provided mitigation measures where necessary.

7.118 Plant associated with the new buildings has been appropriately positioned or screened with acoustic screening, to prevent noise impacts on local residents. The use of the sports pitches has also been assessed by the Acoustic Consultant, and through the implementation of an acoustic barrier, the consultant has concluded that the proposed use of the sports pitches, will not have a detrimental impact on local residents amenity.

7.119 The proposal would install heating and hot water systems which emit no on site NO_x emissions, in addition to the installation of Photovoltaic (PV) panels will replace the import of electricity from the National Grid with PV electricity which produces no emissions during operation.

7.120 Further, the school will promote the use of public transport and sustainable transport methods to limit any increased noise and air quality impacts which may result from increased transportation.

7.121 The internal and external layout of the Site has been considered to avoid any significant impacts on glare, privacy, overheating, and light pollution. In addition, the external lighting strategy has been designed in conjunction with the project’s ecologist.

7.122 The submitted Fire Statement provides a detailed assessment of the fire safety measures that have been applied to the development and assessment against the London Plan Policy D12.

7.123 The submitted Energy and Sustainability Statement, Staff and Pupil Travel Plan and Fire Statement provide further information and should be read in conjunction with this proposal.

Summary

7.124 The Local Plan and Kneller Hall SPD seek to protect the heritage value of Kneller Hall, however there is policy support for the conversion of this property to an alternative use, which could include an institutional use. This is provided that the works to facilitate the use are sympathetic to the

property's heritage significance. Further, there is policy support for the improvement of educational facilities within the Borough and enhancement of social infrastructure.

- 7.125 The above assessment has demonstrated that whilst the proposed use of the building will change, it is considered to be acceptable within the Site's location and designation as a heritage asset. The Kneller Hall SPD acknowledges that there is potential to consolidate the existing built development in the MOL. The Proposed Development provides a significant reduction in build floorspace, hardstanding and volume in the MOL, with new development in the MOL when considered as a whole will preserve the openness of the MOL.
- 7.126 The impact of the new use of the Site has been considered throughout the design process, and has been found to maintain and enhance the Site and MOL as well as introduce high quality facilities for community use. Similarly, the scale and massing of the new development would be in accordance with the scale of development already existing on site and would be subservient to the listed building and curtilage listed buildings.
- 7.127 The above information and technical reports submitted with this application confirms that the proposals comply with the detailed development management policies within the adopted Local Plan, The London Plan and the aims and objectives of the National Planning Policy Framework.

8.0 HEADS OF TERMS/ PLANNING OBLIGATIONS

8.1 It is expected that a S106 legal agreement will be entered into between the Applicant and LBR as part of the planning permission. At this stage, the full extent of obligations is not known. We have set out below the obligations anticipated at this stage taken from our engagement with the LBR and a review of the LBR Planning Obligations Supplementary Planning Document (SPD) (adopted June 2020). Further engagement on the heads of terms and obligations, will take place during the determination period.

1. Community Use Agreement – This will secure the local community group and local schools access to the Site. A draft agreement has been submitted as part of the planning application.
2. Pupil and Staff Travel Plan – See copies of these reports, that have been submitted as part of the planning application, prepared by Caneparo Transport Consultants.
3. Off- site transport requirements/ highways works, associated with the Proposed Development – See submitted Transport Assessment, prepared by Caneparo Transport Consultants.
4. Local Employment Agreement - To include employment opportunities generated by construction, as well as the end use of the development, including those created within one year of the completion of the development. A template for this agreement forms part of the LBR Planning Obligations SPD.
5. Local Procurement - Opportunities to ensure that local businesses benefit from the construction of developments. Including to promote and advertise tender opportunities and to achieve the procurement of construction contracts and goods and services from companies and organisations based in the borough.
6. Landscape Management Plan – to ensure long term management and maintenance of the proposed landscape strategy and strategy to deliver Biodiversity Net Gain. A Landscape Management Plan has been submitted as part of the planning application.
7. Delivery of the SuDS – A Drainage Strategy, including the implementation of SuDS has been submitted as part of the planning application.
8. Carbon Offset Payment – This is estimated in the submitted Energy and Sustainability Statement prepared by SRE to be a payment of £25,080.

9.0 CONCLUSION

9.1 The application seeks planning permission and listed building consent from London Borough of Richmond upon Thames for:

“The demolition of existing modern buildings on the site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.”

9.2 Dukes Education’s overall aim is to provide a new home for Radnor House School which can accommodate future growth of the school to further expand its offering as an educational establishment both in terms of student capacity and the quality and range of facilities, to enhance students learning opportunities.

9.3 The new educational facility will create a high-quality educational site within Whitton, to support the learning of children in Year 7 to 11 and sixth form learners. It will also provide high quality indoor and outdoor sports facilities that other local schools and community groups can have access to. It is apparent that there is a demand for these facilities from local community groups and schools.

9.4 The Proposed Development and conversion works will be undertaken to ensure that they are sympathetic to the Site’s heritage significance. The proposed education use for the Site will help ensure the long term maintenance and protection of the listed building, as a result of the significant investment planned by the Applicant at the Site.

9.1 The massing of the Proposed Development is considered to be in accordance with the guidance set out in the Kneller Hall SPD and is sympathetic to the existing development, It is therefore considered acceptable in principle.

9.2 With regards to impacts on heritage assets, the Proposed Development is considered acceptable given the sympathetic restoration proposed of the existing buildings which are significant landmarks in the local area and an important piece of the history in the area. Further details have

also been provided on the materiality of the development and how the Applicant has sought to create exemplar design consistency between the retained buildings and the new-build elements.

- 9.1 The Proposed Development also includes visual amenity improvements to the Site's boundaries and at the Site's frontage. It proposes to create safe and welcoming education facility for students, staff and visitors.
- 9.2 The amenity impacts of users of the Proposed Developments and nearby occupiers has also been considered. The Design and Access Statement and suite of technical documents confirms that there will be no impacts on nearby users from a noise, odour, overlooking, air quality, traffic, daylight/sunlight and overshadowing perspective.
- 9.3 The Proposed Development will comply with the ecology mitigation and enhancement measures as identified in the submitted Ecological Enhancement Strategy and Landscape Design and Access Statement.
- 9.4 The Proposed Development will include sustainability measures including a high- performance building fabric and green roofs. It will exceed the requirement for 35% side-wide improvement over baseline carbon emissions. The scheme will implement low carbon technologies and a site- wide energy strategy. BREEAM 'Excellent' will be achieved for the new build development.
- 9.5 The Proposed Development will include substantial landscape improvements across the Site, including within the MOL. This will result in the introduction of a green corridor, additional trees and native rich planting throughout the Site.
- 9.6 In summary, this application has been designed to provides a high-quality design for the new use proposed and is considered to meet all technical requirements. Significant weight should be afforded to the sympathetic restoration of the existing listed buildings to ensure their long- term viable use. Similarly, the socio-economic benefits of the community use will be significant for the reasons set out within this statement and should be viewed positively by officers.
- 9.7 Throughout the preparation of the application, we have sought to engage with the LPA, local stakeholders and local residents to ensure that the development not only responds to the physical context of the area, but also the desires of the local community. We therefore hope that the application can be determined positively, in order to provide these benefits to the school and wider Whitton area.