



# RIDGE

**PLANNING STATEMENT**

**INCLUDING COMMUNITY  
ENGAGEMENT DETAILS AND OPEN  
SPACE CONSIDERATIONS**

**ST MARY'S UNIVERSITY BUILDING R,  
TWICKENHAM**

**RIDGE  
OCTOBER 2024**



**PLANNING STATEMENT: ST MARY'S UNIVERSITY BUILDING R  
RIDGE**

October 2024

**Prepared for**

St Mary's University

**Prepared by**

Ridge and Partners LLP  
3 Valentine Place  
London  
SE1 8QH

Tel: 020 7593 3400

**Contact**

Nick Stafford  
Partner  
nickstafford@ridge.co.uk  
07551 661 112

**Version Control**

Project	5025909
Issue Date	31 October 2024
Originator	SW
Checked	NS
Version	v3 - FINAL
Notes	Client approved

**CONTENTS**

<b>1.</b>	<b>INTRODUCTION</b>	<b>3</b>
<b>2.</b>	<b>SITE AND SURROUNDINGS</b>	<b>4</b>
<b>3.</b>	<b>PLANNING HISTORY</b>	<b>7</b>
	Pre-Application Advice – 24/P0235/PREAPP	8
<b>4.</b>	<b>PROPOSED DEVELOPMENT</b>	<b>10</b>
<b>5.</b>	<b>PLANNING DESIGNATIONS AND POLICY</b>	<b>12</b>
<b>6.</b>	<b>PLANNING ASSESSMENT INCL COMMUNITY ENAGEMENT DETAILS AND OPEN SPACE CONSIDERATIONS</b>	<b>16</b>
<b>7.</b>	<b>SUMMARY</b>	<b>22</b>

## 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Ridge and Partners ('Ridge') on behalf of St Mary's University, Twickenham (the 'applicant').
- 1.2 The purpose of this document is to support the planning application for the demolition of 'Building R' on the Strawberry Hill Campus at St Mary's University and the erection of a replacement teaching block (Use Class F1) to provide facilities appropriate for the proposed operation of a medical school facility. It provides a detailed summary and assessment of the various planning and design considerations, concluding on the appropriateness of the proposal.
- 1.3 The site is shown in the below image.

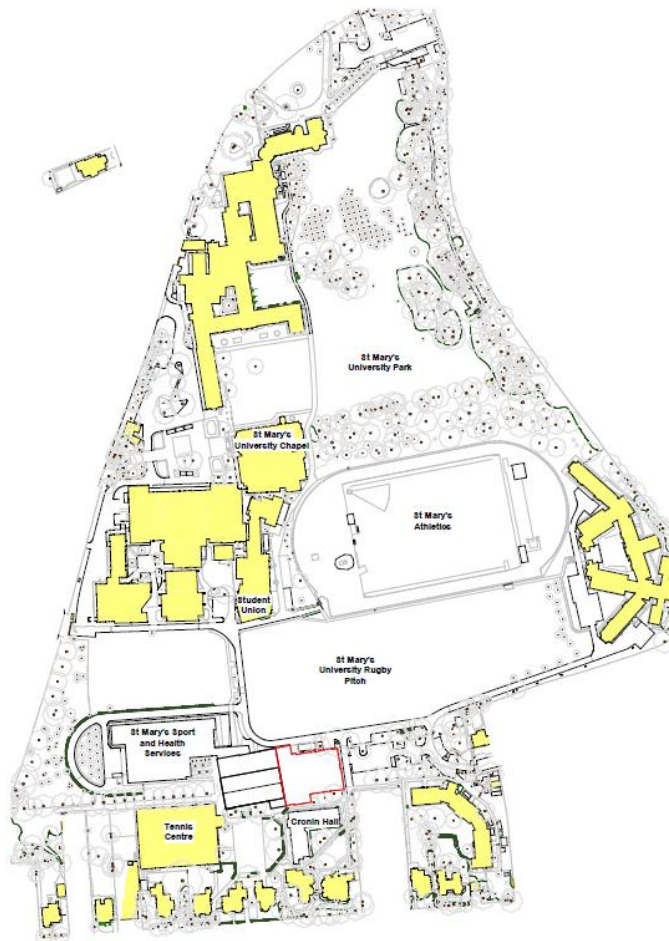


- 1.4 This document is structured as follows:
  - o Section 2: Provides context on the Site and the surrounding area
  - o Section 3: Reviews the Planning History and provides comment on pre-application engagement
  - o Section 4: Describes the proposed development
  - o Section 5: Sets out the relevant planning policy
  - o Section 6: Assesses the development against those planning policies
  - o Section 7: Provides a summary and conclusions
- 1.5 It should be read in conjunction with all supporting material, including the full suite of application drawings and the Design & Access Statement prepared by Ridge.

## 2. SITE AND SURROUNDINGS

### The Site

- 2.1 Building R is located on the Strawberry Hill campus at St Mary's University, Twickenham. The building in question is situated at the southern end of the campus adjacent to the sports pitch, with the sports centre, tennis centre, and car parking at each side and backing on to the houses and student halls on Waldegrave Park. It is accessed from Waldegrave Road via the internal road within campus.
  
- 2.2 The Application site is approximately 0.15ha and comprises a two-storey block formed of stock brick with timber windows and uPVC porch at the front. application site currently comprises an existing single block, historically used for various teaching and physical education uses, but currently not fully utilised. It adjoins the sports centre opened in 2012, which will remain in situ. A Location Plan extract is below:



- 2.3 There are further university-owned buildings to the rear, and private residential properties further to the south fronting Waldegrave Park, and to the east on Clive Road.

- 2.4 Otherwise, the surrounding context is primarily dominated by uses relating to the University, with indoor sports and teaching facilities immediately to the west, and sports pitches immediately to the front (north) with the athletics track beyond.
- 2.5 The site is within the South Twickenham ward of the London Borough of Richmond upon Thames, who are the local planning authority.

### Site Constraints

#### Land allocation

- 2.6 There are several 2018 local policy allocations relevant to the application site.



- 2.7 The Proposals Map (extract above) shows that the footprint of the existing building is tightly surrounded to the front and sides by Metropolitan Open Land (MOL), a highly constrained land designation with relevant policies comparable to Green Belt. The footprint of the existing building, on which the new proposal is sited, is excluded from the MOL designation.
- 2.8 Importantly, the Strawberry Hill Campus, including R Block, is washed over by a policy designation supporting appropriate developments across the campus, to improve facilities for current and future students, and allowing the University to grow and improve.
- 2.9 The site is also washed over by a designation indicating that the area is poorly provided with Public Open Space. However, given the nature of the proposals the applicant would suggest that this policy is not directly relevant, though we do expand on this in a section of this Planning Statement.

2.10 The impacts of these policies and designations are discussed in full detail later in this statement.

## **Arboriculture**

2.11 There are significant trees immediately adjacent the existing and proposed building, several of which are subject to TPO. Seed Arboriculture are appointed as arborists on the project, and their surveys and reporting are included within the application material.

2.12 Importantly, the scheme has been designed to accommodate and protect existing trees, which are to be retained within the proposals. Please refer to the Seed information for full details and assessment.

## **Heritage Assets**

2.13 The existing building lies immediately adjacent to the Conservation Area to the rear. However, the proposed layout does not result in any incursion into the Conservation Area.

2.14 The site lies well outside of the Archaeological Priority Zone which covers the northern part of the campus.

2.15 Border Archaeology have assessed the site and the proposal and have prepared an Archaeology and Heritage statement, submitted in support of the proposals.

## **Ecology**

2.16 There are no significant ecological designations on the site in respect of ecology.

2.17 Aspect Ecology have undertaken the necessary surveys in respect of the site, and their reporting is submitted with this application, including Biodiversity Net Gain calculations and considerations.

## **Flood Zone/Drainage**

2.18 Based upon the Environment Agency's ('EA') online Flood Risk Map for Planning, the Site is located within Flood Zone 1 (low risk) in respect of flooding from rivers and has no surface water drainage issues.

2.19 Whilst it is not necessary to include a full flood risk assessment, a detailed drainage strategy is provided

### 3 PLANNING HISTORY

#### Site Planning History

3.7 The site has an extensive planning history, including the erection or replacement of buildings. It is thought that the following historic applications are most pertinent when considering the current proposals:

<b>Application Ref.</b>	<b>Description</b>	<b>Decision and Date</b>
05/0805/FUL	Erection Of A New Portacabin Type Physiotherapy Rooms Adjacent To The Existing Sports Hall 'R Block'.	10/05/2005 REFUSED
05/1708/FUL	Erection Of A New Portacabin Type Physiotherapy Rooms Adjacent To The Existing Sports Hall 'R Block'.	28/07/2005 APPROVED
09/0481/FUL	New plant room (G23) to facilitate the separation of services from St Mary's University College. The new single-storey building will be constructed on the footprint of the lost scullery. New concrete paved path to rear staff entrance. New external disabled access ramp to serve lower ground floor of the Waldegrave Wing, together with the provision of disabled car parking. New external access ramp to education rooms and new internal disabled hoist.	24/07/2009 APPROVED
16/1082/FUL	Temporary permission for the retention of R Block Portacabin for storage and office space (5-year temporary permission previously granted by planning permission ref. 05/1708/FUL granted 28.07.2005)	10/10/2016 APPROVED
16/4643/FUL	Erection of a temporary single storey storage facility for 3 years.	19/01/2017 APPROVED
17/0776/FUL	Erection of temporary single storey storage facility (for storing external sporting equipment) for a period of 3 years.	24/04/2017 APPROVED
20/2169/FUL	New link building, between existing Cafe & Library Buildings and associated works.	28/09/2020 APPROVED
23/1020/GPX13	The proposed development comprises of two new extensions, which includes a new entrance foyer and extending the main function with a new raised terrace. The building would be increased in height to provide a new mezzanine floor above the main function room. This new mezzanine mansard roof would be lower than the existing adjoining roof.	14/06/2023 REFUSED



23/1833/GPX13	New entrance foyer on west elevation of the Student Union building with associated signage; extension at first floor level to create mezzanine with external roof terrace; green wall to side elevation; raised terrace to east elevation.	18/08/2023 APPROVED
---------------	--	------------------------

- 3.8 The most recent proposals of note have included the new sports facility, approved in 2010 ahead of the 2012 London Olympics (LPA Ref 07/4107/FUL). This represented a significant and important development on the campus. The major difference to the current proposals in terms of planning context and issues at play was the site’s location wholly in MOL.
- 3.9 Permission was granted in 2020 for a new link building between the café and library buildings (LPA Ref 20/2169/FUL). There were significant archaeological matters at play on that part of the site which were sufficiently addressed, and the improvements to the facilities on site were supported by the London Borough of Richmond in granting planning permission.
- 3.10 A prior approval application to extend the Student Heart Building (J Block) to provide additional flexible space for students (LPA Ref 23/1020/GPX13) was refused in June 2023. The prior approval was refused on the grounds of parking (given the loss of off-street parking), and design (given it’s extension in to MOL). The current proposals will be submitted as a full planning application and will fully address all policy matters including transport and MOL considerations.
- 3.11 A revised prior approval submission at J Block (LPA Ref 23/1833/GPX13) was approved in August 2023, after that proposal did not enter MOL.
- 3.12 There is no recent planning history of relevance relating to R Block itself to note.
- 3.13 Searches have been limited to the available online Council files. They demonstrate general support for improvements at the campus, subject primarily to Metropolitan Open Land and heritage considerations.

**Pre-Application Advice – 24/P0235/PREAPP**

- 3.14 In August 2024, the applicant submitted proposals to the planning department at pre-application stage, to inform them of the scheme and to seek feedback on principle and the scope of the planning application.
- 3.15 A meeting was held with James Phillips and Lucy Thatcher, on 20 September, and written feedback received under cover dated 11 October 2024.

3.16 This confirmed a number of key points:

- There is policy support for improvements to the university campus
- There is in principle support for the redevelopment of Building R and the creation of a school of medicine
- Permanent built form should be kept out of the MOL area
- The applicant should demonstrate there will be no loss of facilities
- The Council would like to see a masterplan for the wider campus area
- Heritage analysis should be provided
- Any parking lost should be re-provided
- Community engagement should be undertaken
- A PPA should be drafted and agreed

3.17 There were a number of additional points covered, and advice given in terms of the scope of the application.

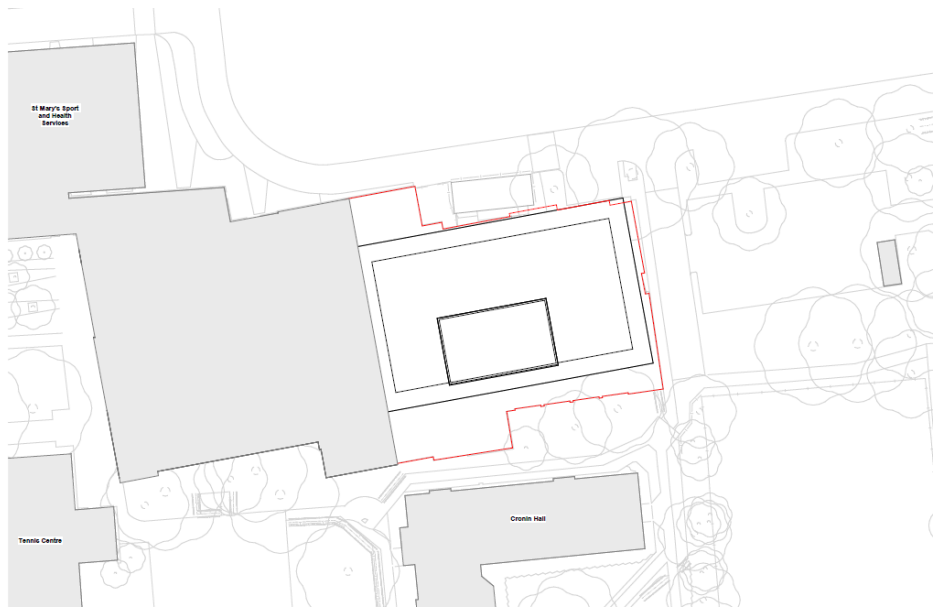
3.18 In terms of the PPA, this was agreed between the university and planners at Richmond, and put in to place ahead of submission. This sets timeframes and expectations relating to the application, and targets a February 2025 planning committee decision.

3.19 Notwithstanding the points made in the pre-app response, the university do not have a wider masterplan in place, nor do they intend to produce one at the current time. The current scheme – which replaces an existing building – will in no way restrict or limit future development. In taking its design cues from other development on the campus, it is of appropriate character, and will not create new or in any way controversial design approaches that may be detrimental to future development or create a hotch-potch character.

3.20 All other points are addressed throughout this statement, the Design & Access Statement, and other technical supporting material within the application submission.

#### 4 PROPOSED DEVELOPMENT

4.1 R Block is part of a wider single building at this southern part of this campus. The section adjoining to the west will remain in situ.



4.2 The proposed development is for the demolition of existing R Block and the erection of a replacement teaching block (Use Class F1) to provide facilities appropriate for the proposed operation of a School of Medicine facility at the Strawberry Hill Campus.

4.3 The existing R Block will be replaced due to its outdated areas, poor internal layouts, and the impracticality of internal reconfiguration. Currently, it has oversized WCs, changing rooms, large internal corridors, and other inefficient spaces meaning it is not being fully utilised, and is in urgent need of upgrade.

4.4 The new building will offer 1,424 sqm of space, including new teaching facilities over two storeys.

4.5 The principal aim is to create flexible teaching spaces, typically for groups of 30, but accommodating larger groups when needed.

4.6 The proposed works are aiming to achieve a BREEAM score of Excellent, as set out in more detail later in this statement in in sustainability-led material supporting this application.

4.7 The facility will provide:

- Classrooms
- Lecture Theatre

- Seminar rooms
- Clinical Teaching Spaces
- Anatomage Teaching Space
- Clinical ward
- Offices
- Meeting spaces.

4.8 The building will have a smaller footprint than the existing one, creating more external space among surrounding trees and neighbouring buildings while maximizing usable floor area. With the benefit of the full retention of the existing trees, preserving biodiversity and providing shade, reducing overheating.

4.9 Internally, most main medical classrooms will be on the ground floor for easy access, with general teaching areas above. Rooms requiring darkness are strategically placed to ensure natural light in other teaching spaces throughout the day.

4.10 The building will feature white brick cladding, corrugated metal panels, and chamfer details, reflecting the campus's heritage architecture. The entrance will have a distinct glazed façade for easy wayfinding, located on the left to maintain access to the adjacent sports centre.

4.11 An external seating and garden area is included, enhancing the site's attractiveness and biodiversity.



## 5 PLANNING DESIGNATIONS AND POLICY

5.1 As previously identified, the site is within the administrative authority of the London Borough of Richmond upon Thames.

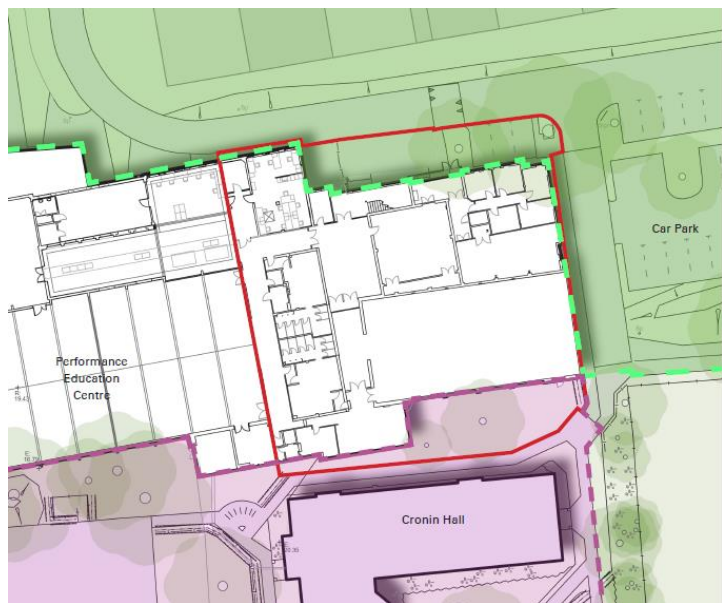
### Local Planning Land Designations

5.2 Reference has already been made to the Metropolitan Open Land (MOL) designation which wraps around the north and the east of the existing footprint:



5.3 The MOL is the green shading in the Proposals Map extract above. The purple hatching shows the conservation area to the rear (south) of the building footprint.

5.4 As shown on the plan below, the proposed building has been designed to respect both of these policy designations, keeping the built footprint outside of the MOL and the conservation. Whilst the landscaped area to the frontage is within the MOL, there will be no permanent structures in this area. Wider MOL considerations are set out later in this Statement, supported by the DAS.



Planning Policy

- 5.5 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the development plan for the area is the Richmond Local Plan (2018), and the London Plan 2021. At a national level, the NPPF constitutes guidance which the LPA must have regard to. The NPPF does not change the statutory status of the development plan as the starting point for decision making but is a material consideration in any subsequent determination. It is also material that the new Local Plan for Richmond is at an advanced stage, having reached Examination. Reference is made to emerging policies where relevant.
- 5.6 It is considered that the proposal is presented in full accordance with policy, and would not constitute harm to the area when the relevant policy is applied, or site considerations taken into account.

General

- 5.7 **Section 2** in the NPPF (2023) relates to **achieving Sustainable Development** and states that all plans 'should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.'
- 5.8 **Section 8** of the NPPF relates to the promotion of healthy and safe communities. At its core and referenced throughout is the need to provide accessible spaces that are well-designed, promoting social interaction. It also relates to the improvement of green infrastructure and wellbeing enhancements.

**Metropolitan Open Land**

5.9 As mentioned already, the MOL designation adjacent to the building is a key consideration. The relevant Local Plan policy is **Policy LP 13** which essentially provides MOL the same protection and affords the same policy consideration as Green Belt – the main aim being to protect and retain these areas in predominantly open use. This is reflective of national policy in the **NPPF** at **Paragraph 154(b)**.

**Strawberry Hill Improvements**

5.10 Both the existing and emerging Local Plans have a specific policy relating to the Strawberry Hill Campus. **Policy SA8** in the current Local Plan, and **Site Allocation 10** in the emerging Local Plan.

5.11 Both are supportive of enhancement to University facilities. It is worth setting out the new Local Plan Policy in full, as all elements to it are directly of relevance:

**Vision: Proposed site - St Mary's University, Strawberry Hill**

**The retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation is supported. Upgrade works include refurbishment, adaption, intensification, extensions and new build elements on site where justified fully, with full regard to national policies and the Development Management Plan, will be supported. A Masterplan and/or site development brief (SPD), which encompasses the main campus in Strawberry Hill as well as Teddington Lock, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.**

- **There is a need to take account of the future demand for university places as evidenced in the Local Housing Needs Assessment 2021. There is a need to improve and upgrade existing facilities at St Mary's University as well as a need to provide additional educational floorspace, student residential accommodation and other associated facilities. The Council will support and work with St Mary's University to ensure it remains a highly regarded, competitive and viable higher education facility in the future and to assist in meeting the future educational needs of students.**
- **The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided off site. Any re-provision of facilities should be equal or better standard than existing.**
- **It is acknowledged that this is a constrained site, with the majority of land not built on designated as MOL. Future development should protect and enhance the character and openness of the designated open land, including views and vistas. There are also listed buildings, BTMs proximity to conservation areas and also sports fields. Any development proposal should protect and, where possible, enhance the highly significant heritage assets and respect the special and unique location and setting of St Mary's University, including the Grade I Listed Chapel, adjoining Grade I listed building Strawberry Hill House and the associated Historic Park and Garden (II\*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

## Design

- 5.12 **Policy 44** of the new Local Plan strongly encourages engaging with the Council through pre-application enquiries, which the applicant has undertaken and – indeed – made design alterations in response to comments received at and after the meeting.
- 5.13 The policy goes on to state that design quality must be maintained in accordance with **London Plan Policy D4**, which advocates the delivery of good design through a design-led approach.

## Sustainability

- 5.14 Currently Local Plan **Policy LP 22** states that all new build developments over 100sqm should seek to achieve BREEAM Excellent.
- 5.15 This reflects **London Plan** policy, which at Paragraph 6.3.24 summarises the same requirements and expectations for new non-residential buildings over 1000sq m.
- 5.16 This also sets out the need for a GLA Sustainable Construction Checklist to be completed as part of major planning applications.

## Heritage

- 5.17 **Policy LP3** of the Local Plan considers heritage assets including the impact on conservation areas. It sets out a number of criteria to be complied with, including ensuring appropriate design, and providing information to assess any impact on a conservation area or its setting.

## Access and Parking

- 5.18 **Policy LP 45** sets out parking standards. Parking is considered within the planning assessment below, and within the supporting assessment provided by Evoke, given the displacement on parking on site rather than the need to provide additional.
- 5.19 In terms of **London Plan** policy, **Policy T6** sets out the broad policy, with parking standards set out in supplementary tables including **Policy T6.5**. This is supported by **Policy T5** which requires sufficient cycle parking within new developments.



## 6 PLANNING ASSESSMENT INCL COMMUNITY ENAGEMENT DETAILS AND OPEN SPACE CONSIDERATIONS

6.1 The following section of this statement provides an assessment of the application scheme against the planning policies set out in the section above. The sub-headers used for the assessment are based upon the anticipated categories to be reviewed by Council planning officers.

### **Principle of Development / Use**

6.2 The pre-applications process was helpful in engaging with Officers and confirming their acknowledgement of the Local Plan policy and vision for the Strawberry Hill Campus.

6.3 This meant they were able to confirm their in principle support for the proposals, which clearly enhance and improve facilities on site.

6.4 The provision of a School of Medicine represents a significant milestone for the University and the facilities and courses that they are able to offer. Whilst overall university student numbers will not increase as a result of the proposal, the goal is to make St Mary's more attractive to a wider range of potential students with a medical interest.

6.5 The new facility is located on the footprint of Building R, and older and under-utilised training block. There is no change of use proposed – the existing building being in Class F1 use.

6.6 Some of the existing space is used by local sports and community groups, including for training, and for some mother / baby type classes. It has been confirmed by the university that ALL of these groups will still have space to continue to operate, in adjacent buildings or the main sports hall building. There will be no loss of provision as a result of these proposals.

6.7 The building in its current form is not able to be brought to the standards required to provide a state-of-the art facility, and the provision of a new purpose-built operation will have multiple benefits. This includes inclusive access, ensuring that the building will be fit to be used by all groups regardless of physical capabilities.

6.8 Although it is not a re-used building, the new development achieves BREEAM Excellent standards, demonstrating that there are significant sustainability benefits to the scheme. The BNG calculations show a net gain of 20%, so there are also significant environmental benefits. In addition to the attractive and inviting learning environment, with usable landscaped amenity to the frontage.

6.9 The new building will have a reduced footprint, kept out of MOL and the conservation area, and a height commensurate with the existing, meaning there will be no detrimental impact on surrounding uses or neighbours.

6.10 It is clear that there is in principle support for the application scheme, subject to addressing various technical matters which are satisfied within the application material, with key considerations summarised below.

### **Metropolitan Open Land**

6.11 It is clear that a main constraint at the site is the MOL boundary, which wraps tightly to the front (north) and side (east) of the existing footprint.

6.12 In full accordance with the relevant Local Policy, the MOL is kept free from permanent structure.

6.13 The footprint of the building is kept wholly outside of the MOL.

6.14 Whilst the red lien encompasses land to the frontage within MOL, there will clearly be a net improvement to the situation, with the area that is currently all hardstanding being transformed in to an attractive landscaped area of usable space for students and staff to enjoy. Any planters or seating will be temporary.

6.15 It was the view of Officers at pre-app that this area is much more appropriate as landscaping rather than parking and, accordingly, it is not considered that the MOL would see any negative impact from the development.

6.16 Further, Section 4.7 of the Design and Access Statement sets out a number of wider views of the proposed building from viewpoints to the north, within the MOL.

6.17 It is the applicant's strong view that the high quality design approach to a building of reduced scale to the existing means that views to the site from MOL will be enhanced as a result of the application scheme.

6.18 Overall, the scheme will result in a positive impact to the adjacent MOL setting.

### **Design**

6.19 Please refer to the Design and Access Statement for full details on the design approach taken, including full justification, assessment of context, and the materials used.

6.20 Local Plan Policy 44 and London Plan Policy D4 are fully satisfied through the design-led approach that has been taken to this scheme from RIBA Stage 0.

6.21 This has resulted in a scheme being submitted for planning that meets all regs and standards, and provides a high-quality and attractive development, enhancing this part of the Strawberry Hill campus.

### **Trees & Ecology**

6.22 An important feature of the emerging proposals from concept stage has been the desire to retain the significant mature trees to the frontage of the building.

- 6.23 This is achieved through the design and layout of the scheme, with the building designed above and below ground to retain and protect trees through demolition, construction, and in to the future post-occupation.
- 6.24 The documentation prepared by Seed Arboriculture details how this is achieved.
- 6.25 In summary, no trees are lost as a result of this proposal. This, in addition to the new landscaping and the proposed green roof elements, also has a positive impact in terms of ecology.
- 6.26 Aspect Ecology have prepared supporting reports, including a BNG assessment which shows the scheme delivers 20% enhancement – a significant improvement on this relatively small site. This is a material consideration in favour of the scheme.

### **Sustainability**

- 6.27 The proposed development successfully achieves BREEAM 'Excellent', meeting the expectations of London and Local Plan policy.
- 6.28 The accompanying report prepared by specialist consultants within Ridge details their involvement in working with the various technical specialisms from an early stage of the design process, and where credits have been obtained and throughout, alongside their value.
- 6.29 The report demonstrates how BREEAM Excellent is achieved.
- 6.30 The GLA Sustainable Construction Checklist has also been completed and is submitted, demonstrating engagement from all consultants on the design team to ensure that sustainability objectives and goals have been integral to all specialist inputs.

### **Access and Parking**

- 6.31 At pre-application stage, Officers were clear that they were expecting any spaces lost as part of the development to be re-provided.
- 6.32 An important feature on the proposed layout is the provision of a disabled parking bay on-site, to the frontage of the building. This meets accessible standards in terms of dimensions, and also provides EV charging.
- 6.33 3 standard spaces exist to the front of the current building. These will be re-provided in existing car parking to the east of the site, in an area indicated on the red line plan. This is within an existing hardstanding car park, in an area currently used for material storage. Parking will be opened up and provided in perpetuity as a result of this application scheme. There will therefore be no additional pressures on site or surrounding roads, with proposals also seeking to endorse the university's objectives to minimise car travel to the campus.
- 6.34 14 secure cycle parking spaces are provided to the rear of the proposed building, in full accordance with London and Local Plan policy requirements.

- 6.35 The Transport Statement provided by Evoke sets out full details around car and cycle parking, including Travel Plan summary information.
- 6.36 They have also provided an initial Construction Traffic Management Plan, detailing appropriate arrangements for the servicing of the site during the construction phase, and which will be updated on appointment of a contractor.

### Heritage

- 6.37 Being within an Archaeological Priority Areas plus the immediately adjacent conservation area meant that specialist input has been provided to address heritage interests and Local Plan Policy LP3.
- 6.38 Border Archaeology's report is submitted as part of the planning application material.
- 6.39 It is clear from their expert assessment that there will be no harm to the conservation area setting, the conclusion being that any impact is neutral to slight, with a positive improvement in terms of building design and no increase in footprint or height.
- 6.40 In terms of archaeology, the moderate risk means that additional information may be required as the project progresses. It is recommended that the most appropriate involvement is via a watching brief to groundworks.

### Fire

- 6.41 London Plan **Policy D12** requires all major developments to submit a fire statement which details the building's construction, means of escape, other relevant features, access to safety equipment, fire appliance access, and any other matters of relevant.
- 6.42 The applicant's fire consultant – Trigon – have been an integral member of the consultant design team as the scheme has evolved, and have advised on layout and the general principles of the scheme, as well as now providing a detailed Fire Statement, in full accordance with London Plan and other relevant regulations detailed within their Statement.

### Community Engagement

- 6.43 Neighbours have been informed of the proposals via an engagement exercise led directly by the university.
- 6.44 Leaflets were delivered by hand to properties on Waldegrave Park, Clive Road, Strawberry Hill Road, part of Waldegrave Road (Shacklegate Lane to Waldegrave Garden), Strawberry Holl Close, and Field End.
- 6.45 This updated on the objectives of the university, directing people via a QR Code to visit a designated website with a summary of the proposals including a full suite of drawings.
- 6.46 Contact details have been provided for further discussion / information, and a direct email to the university comms team to submit any comments or thoughts.

6.47 Several responses had been received ahead of submission, and further details provided in response to specific queries direct to residents in respect of matters relating to:

- Student numbers
- Courses that will be offered
- Construction management
- Protection of trees

6.48 No comments received ahead of submission raised any objections in principle.

6.49 This is a consultation exercise commensurate with the scale and nature of the proposals, seeking to replace an existing building on this established site. It is intended to continue the engagement with residents during the course of the planning application.

### **Open Space**

6.50 The accompanying Health Impact Assessment sets out an assessment of the site and surroundings, including open space provision.

6.51 There is no loss of open space as a result of this application. Indeed, the additional landscaped amenity area to the frontage is a net benefit.

6.52 There are significant areas of open space across the campus and within the surrounding area for students to freely use.

6.53 The proposed building replaces an existing teaching facility. There is no change of use and there is no increase in student numbers as a result of this application, and therefore no additional pressure on open space use. It is not considered that the scheme needs to provide additional of-site provision in the circumstances.

### **Planning Balance and Conclusion**

6.54 The proposed development will provide enhanced, modern facilities at the Strawberry Hill Campus, allowing the University to deliver on its School of Medicine ambitions.

6.55 The nature of the scheme is clearly in full compliance with supportive planning policies seeking the continued enhancement of the campus and its facilities. This is achieved in full compliance with other key development plan policies, including around heritage and the full protection of existing Metropolitan Open Land.

6.56 The development represents a highly sustainable high quality scheme, that will seek to deliver BREEAM Excellent and on net zero carbon ambitions.

- 6.57 There would be no identification of the site or wider area, with no uplift in student numbers. Residential amenities are not at risk of being harmed.
- 6.58 It is clear, therefore, that the proposal is appropriate and can be supported accordingly – we look forward to discussing the detail with officers.

## 7 SUMMARY

- 7.1 This Planning Application has been submitted following positive pre-application engagement with officers, whether the principle of the development was agreed subject to more detailed justification.
- 7.2 This Planning Statement provides that justification, and clearly demonstrates why the proposal is acceptable in policy and design terms.
- 7.3 The application, on behalf of the University, is for a modern, purpose-built facility replacing the existing Block R, to help deliver School of Medicine provision.
- 7.4 There is a clear recognition from Richmond of the importance of the University, and supporting its enhanced provision. A scheme of this nature will support those ambitions, whilst remaining in compliance with other development plan policy.
- 7.5 It will not increase the existing footprint, and the nature of use will not detrimentally impact existing residents.
- 7.6 There will be no impact on the adjacent Metropolitan Open Land – both in respect of ensuring now permanent structures are erected within this area, but also in terms of the enhancement / improvement of views of the site from the MOL, as shown in the viewpoints within the Design and Access Statement.
- 7.7 It will deliver on high quality design, environmental and sustainability credentials, achieving BREEAM Excellent and delivering 20% BNG.
- 7.8 All existing uses will be enabled to continue unencumbered elsewhere on university facilities, meaning there would be no detrimental impact on the local community.
- 7.9 Full and extensive technical information accompanies this planning application, to fully meet validation requirements and address design, policy, and site-specific requirements.
- 7.10 It is considered that the planning justification for the scheme is compelling. We look forward to working with Officers via the PPA to help achieve planning permission to be granted accordingly.