

7 April 2016

Richmond-upon-Thames College, Twickenham

in the London Borough of Richmond

planning application no. 15/3038/OUT

Strategic planning application stage 2 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

An outline application for: demolition of existing college buildings, site clearance and groundworks together with the redevelopment of the site to provide: 1) a new campus for education and enterprise purposes, comprising; Replacement College (D1 Use Class) of up to 16,000 sq.m. to accommodate up to 3,400 FTE day time students, as well as evening and weekend use; a Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100 sq.m.; 2) a new Secondary School (D1 Use Class) of up to 4,000 sq.m. for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700 sq.m.; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900 sq.m. to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping; and, 9) a new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

The applicant

The applicant is **Richmond-upon-Thames College**, and the agent is **CgMs Consulting**.

Strategic issues

The principle of this 'Education and Enterprise Campus' is supported by strategic planning policy. The applicant has provided further information regarding MOL/loss of playing fields, housing, affordable housing, urban design, transport, inclusive access and climate change to address the strategic issues raised in the Mayor's earlier representation.

Recommendation

That Richmond Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 25 September 2015, the Mayor of London received documents from Richmond Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Categories 1A, 1B and 1C of the Schedule to the Order 2008:

- 1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
- 1B “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”
- 3E “Development (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Class Order – ... class D1 (non-residential institutions; (xii) class D2 (assembly and leisure).”
- 3F “Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.”

2 On 4 November 2015 the Mayor considered planning report D&P/3560/01, and subsequently advised Richmond Council that the application did not fully comply with the London Plan, for the reasons set out in paragraph 91 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 7 March 2016, Richmond Council decided that it was minded to grant planning permission. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Richmond Council under Article 6 to refuse the application or issue a direction to Richmond Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 11 April 2016 to notify the Council of his decision and to issue any direction.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

6 At the consultation stage Richmond Council was advised that the principle of the ‘Education and Enterprise Campus’ was in general accordance with strategic planning policy and was supported. However, the proposal raised a number of strategic planning issues that needed to be resolved in order for the application to comply with the London Plan. These issues are detailed below:

- **MOL/Loss of playing field:** Further visualisations of the existing and proposed facilities for the playing fields to the south of the subject site are required to ensure the proposal complies with the London Plan. Additional visualisations from the west and south of the proposed development site are also required by GLA officers to determine whether the proposed development is likely to cause harm to the wider expanse of MOL. These visualisations should be submitted prior to the application being referred back to the Mayor.
- **Housing:** In order for GLA officers to appropriately assess the housing quality of the proposal, further details are required regarding the design of the residential element of the proposal.
- **Affordable housing:** Currently the proposal is not meeting the requirements for affordable housing, however a viability report has been undertaken that demonstrates that the proposed 15% of affordable units is the maximum amount of affordable housing that can be provided on the site. The independent assessment being undertaken by Richmond Council should be submitted to GLA officers prior to the application being referred back to the Mayor. The tenure of affordable housing in the proposal is also required.
- **Urban design:** While the proposal is broadly consistent with London Plan Policy 7.1, further details are required in the design code to ensure this outline application secures the design quality of the proposal. The additional information required is set out in further detail in the main body of this report and should be addressed and submitted prior to the application being referred back to the Mayor.
- **Transport:** The application does not currently comply with the London Plan with regards to transport. Further discussions are required with TfL on a range of issues outlined in the body of this report.
- **Inclusive access:** A condition should be included by Richmond Council to ensure the development complies with Building Regulations standards M4 (2) and M4 (3). The application should also ensure that the 10% provision of wheelchair accessible/adaptable homes is provided across all housing typologies. Blue-badge parking should also be provided on a 1:1 basis for wheelchair accessible dwellings. These standards should be incorporated into the design code, as well as key landscaping principles.
- **Climate change:** Further information and discussion (detailed in the main body of this report) is required to verify the application complies with London Plan policies. The council should also attach a condition securing climate change adaptation measures within the proposed development should be included when the application is referred back to the Mayor.

7 Since the Mayor made these initial representations, additional information has been provided. An updated assessment against the issues raised previously is provided under the corresponding headings below.

Metropolitan Open Land/Loss of playing fields

8 At the consultation stage, the applicant was informed that the uses were not problematic in strategic terms as they comply with the criteria for development in the Green Belt set out in the NPPF, which equally applies to Metropolitan Open Land (MOL). However, further visualisations were requested to determine whether the proposal would impact on the openness of the MOL for both the site area including MOL as well as the wider expanse of MOL.

9 The applicant has provided further visualisations within the amended Design and Access Statement. Furthermore, the Council considers that on balance; subject to further details being provided regarding the artificial surface, the retractable nets suitability conditioned, in addition to a commitment to ensure no floodlighting and ensuring the proposed fencing will ensure permeability, the impact upon the MOL is deemed acceptable and would be 'minor to moderate adverse', GLA officers concur with this view. The Council has secured the appropriate conditions and therefore the proposal is acceptable in accordance with London Plan Policy 7.17.

Housing

10 At stage 1, the principle of increased provision of residential accommodation was supported. The applicant's Design Code ensures the residential quality accords with strategic policy. Richmond Council has also secured compliance with the Design Code through condition 04 of the draft decision notice. The application complies with London Plan policies 3.3, 3.4, 3.5 and 3.8.

11 At the consultation stage the applicant provided a viability appraisal that concluded that 15% was the maximum reasonable amount of affordable housing that the scheme could viably provide. As requested, Richmond Council has supplied the independent assessment of this viability appraisal. The independent assessment had a different build cost rate for the flats and houses, build cost of the college, sales levels and profit level. The appraisal was rerun with the reduced build cost for the flats and houses, the predicted sales prices were increased and the profit level was reduced from 20% to 17.5%.

12 The independent viability appraisal concluded that 15% was not the maximum reasonable amount that could be provided; however given the phased nature of the residential component a review mechanism was recommended to reassess the viability before each of the residential phases commence. For the purposes of a baseline being established for the basis of future review, 15% affordable housing has been accepted by the Council for this purpose only. If it is deemed that 15% affordable housing is not the maximum reasonable amount through the review mechanism, an adjusted number, mix and tenure will be delivered or a financial contribution in lieu of on-site affordable housing will be required to be made to the local planning authority.

13 The draft s106 agreement has been supplied to GLA officers which details the review mechanism. As the review mechanism has been secured by the Council, the application complies with London Plan policies 3.11 and 3.12.

Urban design

14 At the consultation stage, the applicant was asked to include details in the Design Code securing the quality of frontages, setting out maximum percentage of inactive frontages such as car park access, refuse storage and other uninhabited uses facing the public realm, and the solid to void ratio of the facades of buildings facing the public realm. The Design Code was also required to provide information regarding the maximum percentage of single aspect units, clear floor to ceiling heights of 2.5 metres and a minimum unit size in accordance with the London Plan. In addition to this, further specifications were required in the Design Code regarding the development parameters of the college and school buildings.

15 The applicant has supplied an amended Design Code that addresses the comments raised during the consultation stage. Section 5.2 of the Design Code has been amended and states that inactive frontages will not exceed 15 metres in length and should be limited in number and frequency. Furthermore, Section 5.12 of the Design Code sets out that the residential component should be built in accordance with the London Plan and the London Housing SPG. All two bedroom units are required to be dual aspect and north facing single aspect units will only be acceptable where other aspects of the dwelling can be demonstrated to outweigh this limitation. In addition, the amended Design Code sets out clear ceiling heights.

16 Given the amendments to the Design Code and the Council securing compliance with the Design Code by condition 04 in the draft decision notice the proposal is in accordance with London Plan policies 7.1, 7.4, 7.5 and 7.6.

Inclusive access

17 In line with London Plan Policy 3.8, the applicant has stated in the Design Code that 90% of dwellings will be designed to be in accordance with Building Regulation M4 (2) and 10% will be in accordance with Building Regulation M4 (3). Additionally, the Council has secured compliance with Building Regulation M4(2) and M4(3) via condition 36 of the draft decision notice.

18 The Design Code secures blue badge parking to be provided on a 1:1 basis for wheelchair accessible dwellings. The Council's draft decision notice further secures this requirement at condition 74.

19 Given the above, the application complies with London Plan policies 3.8 and 7.2.

Sustainable development

20 At the consultation stage the applicant was asked to outline measures taken to avoid overheating and minimise cooling demand in line with London Plan Policy 5.9. Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone were also required to support the savings claimed. The required information has been provided. The Council's draft decision notice includes condition 49 which requires a site wide energy statement that follows the London Plan's energy hierarchy, which will include measures to achieve 35% reduction in regulated carbon emissions compared with a Building Regulation 2013 compliant development, measures to avoid overheating and to minimise cooling loads.

21 In addition, a condition requesting a dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 to be undertaken at the reserved matters application stage to assess the risk of overheating for the outline buildings, should be included.

22 As the development is located within a district heating opportunity area, the applicant was asked to investigate the suitability of providing a site wide heat network connection for all buildings from a single energy centre. The applicant was also asked to investigate incorporating suitable technologies in order to maximise the on-site carbon savings for the CHP solution. The applicant provided a technical note assessing three heating options for the scheme. All three options meet the 35% carbon emission target. The applicant also provided evidence that the life cycle cost of providing ASHP is lower than that of CHP. Furthermore, the applicant investigated three different ASHP options. A condition requiring the applicant to commit to installing a communal system that is compatible with connection to a district heat network, should one become available in the future, should be included. In this instance it is accepted for the residential houses' heating system to be individual boilers; however, the compatibility of all other buildings need to be demonstrated by the provision of single communal plant room per block.

23 Additional information was also requested regarding the proposed Solar Thermal panels and was asked to investigate providing photovoltaic panels. The applicant is now providing PV panels and has provided indicative roof layouts for each of the options.

24 Given the above, the application is in accordance with London Plan policies 5.1, 5.2, 5.3, 5.6 and 5.7.

Transport for London's comments

25 TfL highlighted a number of transport issues at stage 1, including car parking, cycle parking, the signalisation of the Langhorn Drive/A316 junction and the modelling of this junction. The need for a travel plan, Delivery and Servicing Plan and Construction logistics Plan to be secured by condition or through the s106 agreement, was also requested.

26 Adequate clarification was provided by the applicant concerning car and cycle parking and TfL now considers this acceptable.

27 An initial LINSIG mode and stage 1 Road Safety Audit has been undertaken and subject to the detailed modelling and design, TfL support the principle of the proposed signalisation of the Langhorn Drive/A316 junction. The s106 agreement secures the requirement for the signalisation of the Langhorn Drive/A316 junction which will be implemented under a s278 agreement.

28 A Delivery and Servicing Plan, Construction Management Plan and Car Park Management Plan have been secured by condition. Workplace, Residential and School Travel Plans are to be secured through the s106 agreement.

29 Bus impacts have been identified and sufficient capacity will be provided when demand arises.

30 In summary, the transport issues raised at stage 1 have been addressed, the application is now considered to be in accordance with the transport policies of the London Plan.

Response to consultation

31 The application was subject to statutory formal consultation; with the application publicised by sending notifications to addresses in the vicinity of the site, and issuing site and press notices. The relevant statutory bodies were also consulted. The representations received in response to the local consultation process are considered in detail within the Council's committee report of 7 March 2016. Furthermore, copies of all representations to public consultation, and any other representations made on the case have been made available to the Mayor in their original form. The Council received 51 objections, seven general observations, and one letter of support.

32 The following objections were made:

- Right hand turn lane being introduced at the 'interface' of the A316 and Langhorn Drive and this being a signalised intersection
- Loss of privacy, sunlight, views and overlooking of surrounding residential dwellings
- Impact of noise and air pollution, both during construction and occupation of the development
- The impact on the openness of the MOL by fencing the playing pitches
- The scheme should retain mature trees and any new trees to be planted should be mature
- Open space should not be developed and the proposal will reduce the amount of open space available to the public, as well as placing an increase in pressure on remaining open space
- Against proposed artificial surfacing
- Not in accordance with the Council's own planning guidelines regarding proposals adjacent to the River Crane corridor and building heights
- Concern regarding the proposed new pathway through Twickenham Junction Rough
- Overdevelopment of site, particularly given other development within the area
- Do not support the phased development, will make it very difficult to monitor the cumulative effects
- The proposal will degrade the fragile eco system of the lower Crane River valley
- Increased pressure on already crowded traffic system and impact on parking
- Concern regarding conflict between different age groups sharing the same public spaces
- Floodlights should be included to enable access from community groups in the evenings after the school/college has finished
- The proposal does not appear to include any changing and storage facilities adjacent to the proposed new pitches, which entirely precludes the sites effective use as a community sports facility
- The exit from the stoop site into Craneford Way should be permanently closed to motor vehicles

- The proposal is not in keeping with the surrounding development context
- Issue with existing college students loitering which will be exacerbated by increase in student numbers
- Impact of construction on residents
- No need for a sixth form college
- Increase in student numbers may lead to an increase in violence in the area
- Object to the location, mass and height of the proposed school building
- It is unclear if landscaping will include new trees to be planted between the proposed school building and existing residential dwellings
- The new school building layout should follow the existing college building footprint
- Existing phone mast currently located on the college building should be relocated away from existing residential dwellings
- Waste water and local sewerage dispersal and disposal will be brought under significantly more strain
- Believe that the limit that the surrounding land can sustainably be developed has already been reached
- Concern regarding the different types of educational services to be provided on the one site, particularly given the site area
- Given the number of staff and students and constrained site believe that the quality of education provision would be under considerable strain within a short space of time
- Consideration should be given to retention of the existing brick architecture of the college building
- Pedestrian routes are already crowded from college students making it difficult to walk, or drive at break and school closing times
- New tenants of the residential zone should not be given local parking permits
- Operational hours of the construction works should be limited and not conducted seven days a week
- Request consideration of student free areas between college/school property and adjoining residential properties
- Existing road barrier on Egerton Road should not be removed, either permanently or temporary
- Concern that surrounding small residential streets will be used as rat run for dropping off of students
- For all phases of the development access should only be via Langhorn Drive
- Council tax reduction should be offered to local residents during construction as compensation for the adverse impacts of construction works
- Concern that students will be travelling in from other boroughs for the college services
- The college is taking away a recreational facility, what is the public benefit from the scheme
- The use of the playing fields in Craneford Way generates a lot of noise that impacts on local residents, an increase in this would be unacceptable
- There should be no floodlighting
- Concern regarding noise reduction barriers and that these will fall prey to graffiti artists
- Do not believe that local infrastructure will be able to cope with increased capacity generated from the new sports facilities
- Development pays no attention to the 'green chain' that local residents have fought so hard to preserve and enhance
- Pressure on parking resulting from use of the playing fields
- The school building should be moved west to increase the space between existing residential buildings along Egerton Road

33 Heatham Alliance raised an objection to the proposal. The general objections raised included: the Environmental Statement contains numerous errors of fact, omissions, opinions and incomplete statements; overdevelopment of the site, difficult to identify worst case scenarios properly used in related to the main conclusions in the impact assessments; vehicle and pedestrian routes to and from the proposed campus/schools; building heights and campus gateway; proposed upgrade of Craneford Way East Field, including the impacts of noise and fencing; loss/reduction of public access and amenity; Council policies on MOL; community benefits; and, inadequate provision of activities for the benefit of the members of the local community, including reference to existing amenities which are free for the public to use.

34 Friends of the River Crane (FORCE) objected to the application due to: failure to take account of the impacts of the development on the overall planning strategy for the Lower Crane Valley; inadequacy of the proposals to restore and naturalise the banks of the Lower Crane to increase its environmental and community value; failure to consider impacts on and potential improvements to the environmental value and public access along the Duke of Northumberland's River; deeply negative impacts on Craneford East Field and Craneford West Field; inappropriateness of proposed improvements to pedestrian pathways; and, failure to include a management plan for the open spaces.

35 The general observations made include:

- Vehicular access should be only via the A316/Langhorn Drive for all phases of the development
- Court Way, Heathfield South and Heathfield North cannot support any additional vehicular traffic
- The car parking podium will adversely impact the visual amenity of the area
- Residential units should be biased toward four bedroom plus houses rather than current mix
- Providing 190 parking spaces for 180 residential units is excessive
- The proposal should have delivered a pedestrian pathway from the college to the station alongside the River Crane
- New playing fields should not be fenced
- New residents of the proposal should not be permitted to park in surrounding residential roads
- Modifications to the junction between A316 and Langhorn Drive are essential for the redevelopment of the college
- Concerned about proposed pathway through Twickenham Junction Rough being the principal pedestrian access, will need to be designed so that residents and students feel safe using this secluded route
- There should be restriction in the hours of operation of the college building and have noise restrictions in place
- College building should have glass in windows that do not allow a straight view out
- Mature trees should be planted, existing trees protected and any damaged trees should be replaced
- Construction hours should only be 8am to 7pm during the week and 9am to 1pm on weekends
- Secondary school should hold two community meetings a year and provide a member of staff as a contact for neighbours
- A similar junction that is planned for Langhorne Drive should be provided at the junction of Rosebine Avenue and the A316, including a surface pedestrian crossing
- Regular public transport along the A316 could help the college and residents living along the A316

36 Comments in support for the proposal included:

- The proposal will provide much needed educational facilities in the area
- Residential zones two and four should be changed to a single zone in order to reduce disruption, due to construction works, to surrounding residents
- The intensification of the playing field off Craneford Way remains a concern

- Welcome the proposed access to this area from the junction of Edgerton Road and Craneford Way, although it is not clear as to whether this is a vehicular access and whether car parking will be provided in association with the playing fields
- Welcome the restriction on floodlighting
- Should be a restriction in the operational hours of the playing fields and all weather games areas

37 Thames Water raised no objections to the proposal provided that details of surface water site drainage works as laid out in Appendix 13.2 'Outline Drainage Assessment' are adhered to, and conditions with regards to the submission and approval of a drainage strategy, requirement of a Groundwater Risk Management Permit from Thames Water will be required for any discharging groundwater into a public sewer, impact studies of existing water infrastructure, and a piling method statement, are secured. Thames Water also recommended the installation of a properly maintained fat trap on all catering establishments, petrol/oil interceptors be fitted in all car parking/washing/repair facilities.

38 Natural England did not think it was a priority to advise on the application.

39 The Environment Agency raised no objections to the proposal subject to the inclusion of conditions relating to a buffer zone along the River Crane, site contamination, remediation measures, no infiltration of surface water drainage into the ground being permitted and no piling or any other foundation designs using penetrative methods not being permitted.

40 Hounslow Council does not object to the principle of the development; however, the Council has concerns in respect to the impact the proposal will have upon the highway network.

41 Sport England raised an objection to the proposal on the basis that the development results in a loss of playing field, is not considered to comply with Sport England's policy or paragraph 74 of the NPPF. As such the application will need to be referred to the National Planning Casework Unit.

42 Historic England (archaeological) raised no objections subject to the inclusion of a condition requiring a two-stage process of archaeological investigation comprising evaluation to clarify the nature and extent of surviving remains, followed if necessary by a full investigation.

43 NHS England raised no objection but will seek to use CIL receipts to mitigate the cumulative impact of the development in the Twickenham area.

44 In relation to the objections and points raised in the consultation have been addressed in this report, the earlier representation made by the Mayor, or in the Council's Committee Report.

Article 7: Direction that the Mayor is to be the local planning authority

45 Under Article 7 of the Order the Mayor could take over the application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

46 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purposes of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

47 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses rising from an appeal.

48 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

49 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

50 Further information and clarification has been provided regarding MOL/loss of playing fields, housing, affordable housing, urban design, transport, inclusive access and climate change; which together with conditions and planning obligations imposed by Richmond Council address the outstanding issues that were raised at stage 1. On this basis there are no sound reasons for the Mayor to intervene in this particular case.

51 Having regard to the details of the application, the matters set out in Richmond Council's Committee Report and draft decision notice, this scheme is on balance acceptable in strategic planning terms.

for further information, contact GLA Planning Unit (Development & Projects Team):

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4 November 2015

Richmond-upon-Thames College, Twickenham

in the London Borough of Richmond

planning application no. 15/3038/OUT

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

An Outline Application for: demolition of existing college buildings, site clearance and groundworks together with the redevelopment of the site to provide: 1) A new campus for education and enterprise purposes, comprising; Replacement College (D1 Use Class) of up to 16,000sqm to accommodate up to 3,400 FTE day time students, as well as evening and weekend use; a Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100sqm; 2) A new Secondary School (D1 Use Class) of up to 7,000sqm for up to 750 students; 3) A new Special Educational Needs (SEN) School (D1 Use Class) of up to 4,000sqm for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700sqm; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900sqm to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations to the A316 footbridge and minor realignments of Langhorn Drive, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping; and, 9) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

The applicant

The applicant is **Richmond-upon-Thames College** and the architect is **HOK**.

Strategic issues

The principle of this 'Education and Enterprise Campus' is supported by strategic planning policy. However, further information and discussion is required on **MOL/Loss of playing field, housing, affordable housing, urban design, transport, inclusive access, and climate change** to ensure compliance with the London Plan.

Recommendation

That Richmond Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 91 of this report; but that the possible remedies set out in paragraph 91 of this report could address these deficiencies.

Context

52 On 25 September 2015 the Mayor of London received documents from Richmond Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

53 The application is referable under Categories 1A, 1B, 3C and 3E of the Schedule to the Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*;
- 1B *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings... outside Central London and with a total floorspace of more than 15,000 square metres."*;
- 3C *"Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which... is used as a playing field at the time the relevant application for planning permission is made."*; and
- 3D *"Development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building."*

54 Once Richmond Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

55 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

56 The site is 11.5 hectares and is located approximately 750 metres to the north-west of Twickenham town centre, in the London Borough of Richmond-upon-Thames. The site is bound by the A316 Chertsey Road to the north, Egerton Road and residential properties to the east, the River Crane to the south and Marsh Farm Lane and Langhorn Drive to the west. The A316 Chertsey Road forms part of the Transport for London Road Network (TLRN).

57 The majority of the site is located within an acceptable 960m walking distance to Twickenham National Rail Station located south east of the site. There are also two bus routes within an acceptable walking distance of the site.

58 The site has a public transport accessibility level (PTAL) ranging from 1a to 2, on a scale of 1 to 6b where 6b is most accessible.

59 The site is currently home to Richmond College, which comprises a series of buildings which total 31,138sq.m. The College is seeking to redevelop the site to provide buildings for a smaller footprint which are fit for purpose, as many of the existing buildings are outdated. The north of the existing site features playing fields which are located alongside the A136 Chertsey Road. The southern part of the site beyond Craneford Way are further playing fields which belong to the college and are designated Metropolitan Open Land. To the east of the site is existing residential development, and to the west is Langhorn Drive which also provides vehicular access into the site with the Harlequins Rugby Club beyond.

Details of the proposal

60 The proposal is to create an 'Education and Enterprise Campus', which has been developed by Richmond-upon-Thames College, Richmond-upon-Thames Council, Haymarket Media Group, Achieving for Children and Harlequins Rugby Club. There are four main components to the proposal:

- An application for Outline Planning Permission is being made for the demolition of the existing college buildings, site clearance and groundworks together with the comprehensive redevelopment to provide: a new campus for education and enterprise, comprising: replacement college (Use Class D1) of up to 16,000sqm. GEA to accommodate up to 3,400 FTE day time students, as well as evening and weekend use; a Science, Technology, Engineering and Maths (STEM) Centre (Use Class D1) of up to 6,100sqm GEA; a new secondary school (Use Class D1) of up to 7,000sqm. GEA for up to 750 students; a new Special Education Needs (SEN) School (Use Class D1) of up to 4,000sqm. GEA for up to 115 students; a new ancillary 'Technical Hub' for Haymarket Media (Use Class B1) of up to 1,700sqm GEA; and, replacement on-site sports centre (Use Class D2) of up to 3,900sqm GEA to serve both the college, schools and the wider community;
- The upgrading of existing Craneford Way Playing Fields for use by the College, schools and the local community;
- Alterations to existing means of access for vehicles, open space and landscaping; and
- New residential development (Class C3) of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping.

Case history

61 A pre application meeting to discuss the redevelopment of the Richmond College were held with GLA officers on 4 February 2015. At the meeting the applicant was advised that:

- The proposed community use of the upgraded facilities is welcome, but further detail is expected to be provided on the exact form that these might take as part of any planning application.
- It must be demonstrated that there is no net loss of sporting facilities, that increased community use can be secured, and that there is no impact on the replacement facilities are in line with local need.
- Residential development will need to fully comply with London Plan policy and guidance.

62 The applicant has amended the proposal to take account of several of the design changes listed above.

Strategic planning issues and relevant policies and guidance

63 The relevant issues and corresponding policies are as follows:

- MOL/Loss Playing Fields *London Plan; NPPF*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate Change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

64 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Richmond Council Core Strategy, Richmond 2011 Development Management Plan, the 'saved' policies of the Richmond Unitary Development Plan – First Review – Adopted 2005 and the London Plan (Consolidated with Alterations since 2011).

65 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance; and
- The Richmond Council's Pre-Publication Site Allocations Plan
- Crane Valley Planning Guidelines
- Richmond-upon-Thames College Planning Brief.

Principle of Development

66 The principle of the proposed redevelopment of the Richmond College site, and the loss of the existing playing fields to the north of the site as part of this proposal, has been established in planning policy for some time through Richmond Council's 2005 UPD Policy T29. This establishes that proposals should *"provide rationalisation, expansion and improvements to the College (either on the site of the current buildings and/or on the College playing field to the immediate south of the A316) with enabling development and associated open space. If development takes place on the College playing field south of the A316 the College's Craneford Way playing field is to be upgraded. All College facilities to have increased public use reflecting the Council's dual use policy. Access to the trunk and local road network will be addressed at the development control stage."*

67 The Council's Pre-Publication Site Allocations DPD (2013) identifies the site as Proposal Site TW10, which is proposed for redevelopment to provide a new college, offices, secondary school and special school, residential, including affordable housing, and open space. The justification for this allocation sets out that *"A new College building and headquarter offices fronting the A316 on the existing playing fields. New open space, including for educational establishments, private residential enabling development to fund redevelopment of College to the south of the site and affordable housing (see proposal for Teddington Studios site). If development takes place on the College playing field south of the A316 the College's Craneford Way playing field to be upgraded. All College and School facilities to have public use reflecting the Council's dual use policy. Access to the trunk and local road network will be addressed at the development control stage. Any vehicular access through Heatham Estate must take account of residential amenity.*

68 Given these historic and emerging local policy designations, there is no strategic concern with the redevelopment of the College site to provide education facilities. The proposals also respond positively to London Plan Policy 3.18, which notes that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes and that those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged. London Plan Policy 3.18 also encourages co-location of services between schools or colleges in order to maximise land-use, reduce costs, and develop the extended school or college's offer, and in that context the principle of creating an education and enterprise campus is strongly supported.

69 It is noted that Richmond-upon-Thames College has applied for funding for this proposal through the FE Capital Investment fund.

Metropolitan Open Land/Loss of playing fields

70 The proposal involves the re-provision of sports facilities on the southern playing fields, which are designated Metropolitan Open Land (MOL). These uses are not problematic in strategic terms as they comply with the criteria for development in the Green Belt set out in the NPPG (which applies equally to MOL), which states that sports facilities are appropriate development on Green Belt land. However, London Plan Policy 7.17, which also applies, notes that: *"Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL"*. As requested at the pre-application meeting, the applicant has provided a visualisation of the view along Marsh Lane from the playing fields. However, GLA officers require further visualisations of existing and proposed facilities to ensure the proposal complies with the London Plan. These should be supplied to the GLA prior to the application being referred back to the Mayor.

71 Following the pre-application meeting GLA officers requested further visualisations from the west and south of the proposed development site. These visualisations are still required to determine whether the proposed development is likely to cause harm to the wider expanse of MOL. These visualisations are required to allow a full assessment of the impact of the proposed development to ensure that there is no wider impact on the openness of MOL.

72 The applicant has noted in their Design & Access Statement that the current access from the subject site to the playing fields at the south is not ideal. The applicant recommends minimising the impact of the separation as much as possible in the redevelopment proposals. This recommendation is welcomed and should be ensured through the design codes and planning conditions.

Housing

73 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordably family homes. The London Housing Strategy sets out strategic housing requirements and Policy 1.1C of the Strategy includes a target for 42% of social rented homes to have three or more bedrooms.

74 The indicative mix submitted by the applicant is detailed below:

| Type | Number | Percentage |
|----------------------------------|------------|-------------|
| 1 Bed flat (2 Person) | 45 | 25% |
| 2 Bed flat/maisonette (4 Person) | 81 | 45% |
| 3 Bed flat/house (5 Person) | 36 | 20% |
| 4 Bed flat/house (6 Person) | 18 | 10% |
| Total | 180 | 100% |

75 London Plan Policy 3.3 (*Increasing housing supply*) affirms the Mayor's determination to work with relevant partners to increase London's housing supply by an average of 32,210 net additional homes to meet the need identified in the plan, enhance the environment, improve housing choice and affordability, and to provide better quality accommodation for Londoners. To achieve that figure, the London Plan has set an annual target of 315 additional dwellings in Richmond upon Thames for the ten-year period from 2015 to 2025.

76 The provision of 180 new dwellings within the Richmond College development represents 57% of the year's annual target. Whilst a detailed residential schedule has not been provided, a good mix of unit sizes is provided and the application is supported in strategic planning terms.

Housing quality

77 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. The Mayor will produce a new Housing SPG (a draft of which was put before the London Plan EIP), on the implementation of Policy 3.5 for all housing tenures, drawing on his London Housing Design Guide, paragraphs 3.37 –3.39 provides further guidance on indicators of quality that the proposed SPG will cover.

78 The applicant has provided a design code document to ensure residential quality accords with strategic policy and will meet the guidance contained in the Mayor's draft Housing SPG. The commitments set out in the design code should be incorporated through any s.106 agreement and/or conditions set out by Richmond Council. Visualisations for the proposed residential element should also be supplied to the GLA prior to the application being referred back to the Mayor.

Density

79 The density of the proposed scheme is 285 habitable rooms per hectare. Having regard to the characteristics of this site (discussed in paragraphs 5 to 8 above) the London Plan density matrix (Table 3.2 in support of Policy 3.4) suggests a residential density of between 150-250hr/ha. Currently the proposal is above the sustainable density matrix, however it is noted the Design & Access Statement and the Design Code of this application take into account the site context and the development's impact on local townscape. Officers consider the design quality of the scheme to be high and the density of development is justified in this instance subject to securing commitments to residential quality in terms of space standards and the Housing SPG design guidance.

Affordable housing

80 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The Mayor has published an early minor alteration to the London Plan to address the introduction of affordable rent, with further guidance set out in a draft Affordable Rent SPG. With regard to tenure split the Mayor's position is that both social rent and affordable rent should be included within the 60%.

81 While the Mayor has set a strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

82 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit or other recognised appraisal methodology is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

83 Richmond Council has set an overall target as required by London Plan Policy 3.11. Richmond Council expects 50% of all new units will be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing.

84 The applicant has completed an affordable housing viability assessment that demonstrates that the proposed 15% of affordable units is the maximum amount of affordable housing that can be provided on the site. Richmond Council is in the process of procuring an independent assessment of the applicant's viability assessment to establish whether the proposal is capable of providing additional affordable housing, the findings of which should be shared with the GLA before the application is referred back to the Mayor.

85 The application proposes 15% affordable housing, or 27 units out of the total of 180 units. The affordable housing tenure is unspecified and should be provided prior to Stage II referral.

Urban design

86 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

87 The reconfigured arrangement of college and school buildings in a perimeter formation has the potential to provide improved legibility and way-finding across the campus, while also providing improved delineation between public realm and campus' private amenity spaces. The relocation of campus buildings to provide a consistent building line along Chertsey Road is welcomed, and will give improved enclosure to the street and introduce a public facing frontage to the college and secondary school.

88 Similarly, the proposed residential perimeter block gives the potential for clear delineation between the street and private amenity spaces within the block. This configuration will provide good levels of enclosure to surrounding streets and enable active frontage to be maximised along all four edges of the block. GLA officers welcome the applicants inclusion of requiring access to maisonette or lower level dwellings should be provided externally, which will optimise street based activity and provide residents with a sense of ownership.

89 As was discussed at the pre-application meeting the applicant has also addressed the positioning and layout of the eastern terrace block to ensure that it does not turn its back onto Egerton Road or the proposed internal street. GLA supports the amendments made by the applicant.

90 Given the application is an outline application; the applicant has submitted a design code to secure design quality of the proposal. Further detail in the design code is required by GLA officers. The Design Code needs to additionally secure the quality of frontage, securing by codes setting out a maximum percentage of inactive frontages such as car park access, refuse storage and other uninhabited uses facing the public realm, and the solid to void ratio of the facades of buildings facing the public realm. The codes also need to provide information regarding the maximum percentage of single aspect units, clear floor to ceiling heights of 2.6m and a minimum unit sizes in accordance with the London Plan.

91 Additionally, the development parameters of the college and school buildings are also required to be further specified in the design code, alongside a clear demonstration of how the individual buildings will be designed to meet the government's baseline design guidance for schools, including minimum floor areas of teaching, ancillary spaces and playspaces, as well as indicators for the provision of acceptable levels of natural daylight and passive ventilation.

Transport for London

Access

92 There are five existing vehicular access points within the site, two of which are directly onto the A316 Chertsey Road. It is proposed to maintain the existing access to the car park via Egerton Road and the A316 Chertsey Road. However, it is proposed to upgrade the existing Lanhorn Drive/A316 Chertsey Road access to a fully signal controlled left in/left and right out junction. TfL require further detailed drawings of the proposed junction and recommend that a Road Safety Audit is undertaken of the proposed junction prior to determination.

93 It is noted that there is an existing vehicle restriction on Egerton Road immediately south of the student car park access which is controlled with a fire access gate. This restriction will be maintained as existing.

Car parking

94 230 car parking spaces are proposed for the non-residential elements of the development. Of these 150 spaces are proposed for the replacement college, a further 40 spaces are proposed for the Secondary School and 30 spaces for the SEN. The car parking provision for the education elements of the development is based on one space per two staff. Whilst the London Plan doesn't include car parking standards for schools or colleges it is considered that the provision proposed would undermine walking, cycling and public transport and is considered to be an over provision, and therefore TfL would recommend that the number is reduced. 10 car parking spaces are proposed for the Technical Hub, whilst this is at the upper end of the range of maximum standards, the spaces proposed are still in accordance with the London Plan.

95 The TA states that 1 space will be provided for all 1-2 bed units and 2 spaces for one 3-bed unit or a total of 1.5 spaces for more than one 3-bed unit and 2 spaces for 4+ bed units. The proposed description taken from the planning application states that parking for up to 190 vehicles will be provided for the residential units. Based on the above this would equate to 1.05 car parking spaces per unit. Given the proximity from Twickenham station, but having regard to the PTAL, TfL requests further discussions in respect of level of parking that would be acceptable.

96 Car parking for the sports centre will be accommodated within the college parking provision, which is welcomed.

97 TfL would encourage the applicant to provide Electric Vehicle Charging Points (EVCP) for all of the education elements of the development. EVCPs including passive provision will also need to be provided in accordance with the London Plan for both the residential units to be allocated, in line with London Plan standards for accessible homes.

98 A car parking management plan setting out the strategy for all uses should be produced and secured through the Section 106 agreement. This should include a mechanism for agreeing a lower level of parking but allowing for an increase should demand dictate.

Trip generation and modal split

99 TfL are generally satisfied with the trip generation assessment for all uses.

Highway Impact

100 The predicted net increase in vehicle trips generated by the development is 160 two way trips in the AM peak hour and 94 in the PM peak hour. The majority of these vehicle trips will access the site from the A316 Chertsey Road via Egerton Road or Langhorn Drive.

101 Traffic modelling for the proposed A316 Chertsey Road / Langhorn Drive signalised junction has been recently supplied and is still reviewed by TfL.

102 TfL requests that s106 obligation be imposed requiring the developer to enter into a section 278 Agreement with TfL for any highway works on TfL's highway, to include the new signal controlled left in / left and right out junction. . Issue of planning permission does not discharge the developer's statutory obligation under the Traffic Management Act 2004. Details can be found at: <http://www.tfl.gov.uk/corporate/modesoftransport/1640.aspx>.

Public Transport

103 The proposed development is predicted to generate an additional 265 bus trips in the AM peak hour and a further 25 in the PM peak hour. Of the 265 AM peak hour bus trips, 220 are predicted to be generated by the Secondary School. The proposed Secondary School is expected to operate as a state-funded 'free school'. TfL has identified that additional bus capacity will be required to meet this demand and a contribution/ payment will be required to mitigate this impact. The total amount and source of funding will need to be agreed with TfL.

104 There is no evidence within the TA to suggest that a bus stop assessment has been undertaken, as requested at the pre-application stage. TfL requires the details of this assessment. Should this identify any necessary improvements, these will need to be funded by the applicant.

Cycle Parking

105 The TA states that cycle parking for the College, Secondary School and SEN will be provided at a minimum of five spaces per classroom. As the number of classrooms is not provided, it is unclear what cycle provision is proposed. The Further Alteration to the London Plan adopted March 2015 requires the Secondary School and SEN to provide 1 space per 8 staff plus 1 space per 8 students long-stay and 1 space per 3 staff short-stay, whilst the College will need to provide 1 space per 4 staff plus 1 space per 20 TFE students long-stay and 1 space per 7 FTE students short-stay.

106 Cycle parking for the Technical Hub has been proposed at a minimum of 1 space per 200 sqm, which falls short of the London Plan standards which require 1 space per 150sqm long-stay and 1 space per 500sqm short-stay.

107 Cycle parking for the residential element of the development is proposed at 1 space per 1-3 bed units and 2 spaces for 4 bed units. This falls short of the London Plan requirement which requires 1 space per studio or 1 bed unit and 2 spaces per all other dwellings plus 1 space per 40 units for visitor parking.

108 18 cycle parking spaces are proposed for the sports centre, a further 22 spaces are required so that it meets the minimum standards set out in the London Plan.

109 TfL require the actual cycle parking provision proposed, broken down by use and type (long stay / short stay) to be specified, along with locations, to ensure that the provision proposed is in accordance with Further Alterations of the London Plan adopted March 2015.

Based on the figures provided within the TA, cycle parking for all elements of the development will need to be uplifted.

110 TfL would advise that shower and locker facilities are also provided for those members of staff wishing to cycle to work. All cycle parking spaces should also be easily accessible from adjacent cycle routes and appropriate signage, should be provided.

Pedestrian and Cycle Access

111 As part of the signalisation of the A316 Chertsey Road / Langhorn Drive junction, a dedicated pedestrian crossing phase is proposed to allow pedestrians to cross the A316 Chertsey Road and Langhorn Drive.

112 A shared cycle / footway scheme along both sides of the A316 Chertsey Road between its junction with Langhorn Drive and the Whitton Road signal controlled is proposed to be implemented by TfL, however this scheme is currently on hold due to the development of the A316 Corridor Strategy.

Taxis

113 No taxi provision has been identified in the TA. Adequate provision should be considered through the TA with safe, legal points for Taxi's to pick up and drop off within the development.

Travel Plan

114 Framework Residential and Workplace Travel Plans have been submitted. However further details on the range of targets and the costs of key measures are required. The final, detailed residential and workplace Travel Plans should be secured, enforced, funded, and monitored as part of a s106 agreement.

Freight and Servicing

115 A Construction Logistics Plan which includes phasing an implementation plans should be secured by condition and discharged in consultation with TfL. The CLP's should be drafted in line with TfL's new guidance available at <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans?intcmp=7830>, and promote road safety in line with current good practice (<http://www.clocs.org.uk/>). An outline Delivery and Servicing Plan has been produced, which is welcomed. A full Delivery and Servicing Plan (DSP) should be secured by condition.

Mitigation

116 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 m² or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in the London Borough Richmond upon Thames.

117 The Borough's CIL Charging Schedule came into effect from 1 November 2014. It is important to ensure that strategic transport and public realm improvements are delivered using CIL where there are included in the borough's regulation 123 list, although s106 contributions may also be required to mitigate site specific impacts.

Inclusive access

118 The applicant has stated in the submitted Design Code that residential development should be designed and built according to the 'Lifetime Homes' standard and that 10% of dwellings should be provided as wheelchair accessible/adaptable. This is supported, however, noting the new national housing standards now apply as part of Building Regulations, the Council is advised to include planning conditions to secure standards M4(2) and M4(3) as per the Mayor's proposed minor alterations to London Plan Policy 3.8. Furthermore, in the interests of supporting housing choice for disabled people, GLA officers expect the 10% provision of wheelchair accessible/adaptable homes to be provided across all housing typologies proposed within the scheme. Blue badge parking should also be provided on a 1:1 basis for wheelchair accessible dwellings. The applicant is encouraged to incorporate these standards within the design code, as well as key landscaping principles (such as the treatment of any shared surface areas).

Climate change

Energy

119 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

120 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

121 The applicant should outline measures taken to avoid overheating and minimise cooling demand in line with Policy 5.9.

122 The development is estimated to achieve a reduction of 239 tonnes per annum (15%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

District heating

123 The applicant has carried out investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. However, the London Heat Map identifies that the development is situated within a district heating opportunity area. The applicant should therefore contact the local borough energy efficiency office to determine the current situation of this opportunity area, evidence of any correspondence should be provided to demonstrate that this has been investigated.

124 The applicant is not proposing to install a site heat network due to the low heat load of the dwellings and the potential seasonal operation of the college buildings, however no analysis has been undertaken. Given, that the development is in a district heating opportunity area the applicant should further investigate the suitability of a site wide heat network connection all buildings from a single energy centre. This should be based on suitable monthly demand profiles for domestic hot water and space heating for the site as a whole. The heat network should also be designed to allow for future connection to a district heating network should one become available.

Combined Heat and Power

125 The application has investigated the feasibility of CHP. However, CHP is not proposed as the applicant states it is incompatible with solar hot water and ASHPs as the CHP would need to be switched off during summer months. This approach is not accepted as following the energy hierarchy CHP should first be optimised before considering renewable technologies. The CHP should therefore be sized to provide a constant baseload throughout the year.

126 The applicant has also stated that CHP will not achieve the same level of carbon reduction versus a solar thermal and ASHP option. However, as Solar thermal is not compatible with CHP the applicant should investigate incorporating suitable technologies in order to maximise the on-site carbon savings for the CHP solution.

Renewable energy technologies

127 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to Air Source Heat Pumps (ASHP) for space heating. For the avoidance of doubt, the use of ASHP systems to supply the space heating requirements is not considered to be a compatible system for future connection to a district heating network. As outlined above the applicant should prioritise a site wide heat network before considering an individual heating system approach.

128 The applicant is also proposing Solar Thermal panels to provide the domestic hot water. The applicant should provide further information on the system proposed including the size of the system (in area), location (on plans) and how the system will be integrated into individual heating systems.

129 A reduction in regulated CO₂ emissions for 255 tonnes per annum (16%) will be achieved through this third element of the energy hierarchy.

130 As outlined above the applicant should also investigate suitable renewable technology for the CHP option such as PV which would have the same amount of roof area available that would otherwise be used by the solar thermal panels.

Flood risk

131 The site is mainly located within Flood Zone 1 with some areas of Flood Zone 2 and some small areas of potential surface water flood risk. A Flood Risk Assessment has been undertaken by ESI Ltd. This confirms that the areas within Flood Zone 2 will remain open space uses and that the small areas of surface water risk do not represent a significant threat to the site. Therefore the proposal is acceptable in principle in flood risk terms.

Surface water run-off

132 The FRA states that the site will manage surface water run-off on site up to the 1 in 100 year storm using a combination of infiltration/soakways. Green roofs, permeable pavements and flood storage.

133 The approach is considered to be good practice given the nature and location of the proposals and is in line with London Plan Policy 5.13 and should be secured via an appropriate planning condition to be discharged in consultation with Richmond Council lead local flood authority.

Climate change adaptation

134 Richmond Council should secure through condition that the reserved matters application responses to strategic policies regarding climate change adaptation including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

Community Infrastructure Levy

135 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

136 The Mayor has arranged boroughs into three charging bands. The rate for Richmond is £50/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised.

137 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. has yet to adopt a scheme has adopted a scheme. See the Council's website for more details.

138 The site is within the area where section 106 contributions for Crossrail will be sought in accordance with London Plan policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail and Mayoral Community Infrastructure Levy' (April 2013).

139 In these situations, the Mayor's CIL charge (but not the borough's) will be treated as a credit towards the S106 liability. The practical effect of this will be that only the larger of the two amounts will normally be sought. As the CIL charge will not be confirmed until development is about to commence, the s106 agreement will need to be worded so that if the s106 contribution based on the assumed CIL proves incorrect the contribution is adjusted accordingly (assuming it is still more than the CIL). Other contributions towards the mitigation of transport impacts may also be sought in accordance with London Plan policy and with relevant legislation.

Local planning authority's position

140 Richmond Council is currently procuring an independent assessment of the affordable housing viability assessment.

Legal considerations

141 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

142 There are no financial considerations at this stage.

Conclusion

143 London Plan policies on MOL/loss of playing fields, housing, affordable housing, urban design, transport, inclusive access and climate change are relevant to this application. In general, the indicative scheme put forward as part of this outline application is supported. However, further discussion and information, as stated below, is required to ensure the proposal complies with the London Plan:

- **MOL/Loss of playing fields** – Further visualisations of the existing and proposed facilities for the playing fields to the south of the subject site are required to ensure the proposal complies with the London Plan. Additional visualisations from the west and south of the proposed development site are also required by GLA officers to determine whether the proposed development is likely to cause harm to the wide expanse of MOL. These visualisations should be submitted prior to the application being referred back to the Mayor.
- **Housing** – In order for GLA officers to appropriately assess the housing quality of the proposal, further details are required regarding the design of the residential element of the proposal.
- **Affordable Housing** – Currently the proposal is not meeting the requirements for affordable housing, however a viability assessment has been undertaken that demonstrates that the proposed 15% of affordable units is the maximum amount of affordable housing that can be provided on the site. The independent assessment being undertaken by Richmond Council should be submitted to GLA officers prior to the application being referred back to the Mayor. The tenure of affordable housing in the proposal is also required.
- **Urban design** – While the proposal is broadly consistent with London Plan Policy 7.1, further details are required in the design code to ensure this outline application secures the design quality of the proposal. The additional information required is set out in further detail in the main body of this report and should be addressed and submitted prior to the application being referred back to the Mayor.
- **Transport** – The application does not currently comply with the London Plan with regards to transport. Further discussions are required with TfL on a range of issues outlined in the body of this report.
- **Inclusive access** – A conditions should be included by Richmond Council to ensure the development complies with Building Regulations standards M4(2) and M4(3). The applicant should also ensure that the 10% provision of wheelchair accessible/adaptable homes to be provided across all housing typologies. Blue-badge parking should also be provided on a 1:1 basis for wheelchair accessible dwellings. These standards should be incorporated into the design code, as well as key landscaping principles.
- **Climate change** – Further information and discussion (detailed in the main body of this report) is required to verify the application complies with London Plan policies. The council should also attach a conditions securing climate change adaptation measures within the proposed development should be included when the application is referred back to the Mayor.

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