

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

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. 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.

2 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."*

3 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.

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

Site description

5 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).

6 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.

7 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.

8 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

9 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

10 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.

11 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

12 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*

13 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).

14 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

15 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."*

16 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.*

17 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.

18 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

19 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.

20 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.

21 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

22 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.

23 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%

24 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.

25 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

26 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.

27 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

28 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

29 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%.

30 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.

31 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.

32 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.

33 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.

34 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

35 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).

36 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.

37 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.

38 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.

39 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.

40 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

41 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.

42 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

43 230 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.

44 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.

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

46 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.

47 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

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

Highway Impact

49 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 Lanhorn Drive.

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

51 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

52 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.

53 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

54 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.

55 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 50sqm short-stay.

56 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.

57 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.

58 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.

59 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

60 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.

61 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

62 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

63 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

64 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

65 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.

66 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

67 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

68 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

69 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.

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

71 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

72 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.

73 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

74 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.

75 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

76 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.

77 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.

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

79 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

80 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

81 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.

82 The approach is considered to be good practice give 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

83 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

84 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.

85 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.

86 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.

87 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).

88 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

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

Legal considerations

90 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

91 There are no financial considerations at this stage.

Conclusion

92 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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