

All responses received to the [new additional sites pre-publication consultation](#)
(for inclusion in the Site Allocations Plan)



Consultation from 9 June – 21 July 2014

Published by LBRuT on 20 August 2014

Please note, the responses below are exactly as received from the respondents and have not been edited by the Council.
They are not alphabetically ordered or in any other order of priority.

Respondent reference no.	Name/Organisation
1.	Andree Frieze
2.	Barnes Community Association
3.	Cllr Gareth Roberts
4.	David Woodcock
5.	Tim Hodgson
6.	Dean & Lisa Illis
7.	English Heritage
8.	Environment Agency
9.	Erika Chernavskaya
10.	Eugene Dreyer on behalf of Langham House Estate
11.	Gary Rhoades-Brown
12.	GVA on behalf of Lady Eleanor Holles School
13.	Highways Agency
14.	Indigo on behalf of Berkeley Homes
15.	Janice Merritt
16.	Jenine Langrish
17.	John Reilly
18.	Jon Rowles
19.	Katy Makepeace-Gray
20.	Lambert Smith Hampton on behalf of the Mayor's Office for Policing and Crime
21.	Margaret and Philip Simpson
22.	Michael and Alison Jennings

Respondent reference no.	Name/Organisation
23.	Mr and Mrs Angell-Wells
24.	Mr and Mrs Kyrle-Pope
25.	Mr and Mrs Leicester
26.	Natural England
27.	NLP on behalf of West London Mental Health Trust
28.	NLP on behalf of Harrodian School
29.	NLP on behalf of St Mary's University
30.	PA Spielman
31.	Paul Burrows and Georgina McLaren
32.	Paul Velluet
33.	Paul Velluet on behalf of Old Deer Park Working Group
34.	Savills on behalf of Thames Water
35.	Sport England
36.	Teddington Business Community
37.	Transport for London
38.	Tricia Mole
39.	Unity Harvey
40.	DTZ on behalf of Royal Mail Group Ltd
41.	Robert Monk
42.	BT Openreach

Table 1: All respondents to the consultation

Detailed comments:

Each response has been allocated to the relevant proposal site as set out in the consultation document.

HA 9 – Hampton Traffic Unit		
Ref. no.	Name/Organisation	Detailed comment
3	Cllr Gareth Roberts	A small but important point on the consultation notice which has been posted in Hampton. There are repeated references to Station Avenue, whereas it should be Station Road
5	Tim Hodgson	I am writing in response to the above and in particular Sites HA 9, Station Road Hampton and HA10 Rosehill Hampton. I am in principle supportive of the Council's proposals in both cases but subject to the following caveats: 1. That the Affordable Housing component should not be simply a token but a significant proportion of the developed space and rigidly applied. It is rapidly becoming impossible for young people to remain in Hampton as owner-occupiers and the provision of further high end housing is merely going to exacerbate this problem. 2. That no development take place until measures have been put in place to enable the already overloaded local infrastructure to absorb more numbers. In this regard I am thinking specifically about healthcare, schooling and perhaps the most easily resolvable question of the wholly inadequate public transport links with Twickenham and Richmond.
11	Gary Rhoades-Brown	I fully support the proposed site allocations for the Hampton Traffic Garage and the Hampton Delivery Office sites for residential development with affordable housing. Both sites should not be used for commercial purposes for traffic generation reasons and the overriding need for additional housing in the South east.
15	Janice Merritt	I have my reservations about the development of the Hampton Traffic Unit into residential. There must be adequate parking for the new build (should it go ahead). I live off Station Road and the parking is horrendous as it is. A better idea would be to have less houses/flats and all have allocated parking, and then use some of the land for a public car park to help the shoppers and residents of Hampton. With all the new buildings going on at the moment Hampton is like a builders yard and some of the designs are totally out of character with the surrounding area ie the new build by the road bridge in Hampton. We will lose the 'village atmosphere' for which we paid to move into such a nice area. It is all becoming too dense and over populated. It has already been noticed that the blue glass from the police lamp has been removed when most of the residents wanted it to remain.
20	Lambert Smith Hampton on behalf of the Mayor's Office for Policing and Crime	Lambert Smith Hampton has been instructed by the Mayor's Office for Policing and Crime (MOPAC) to submit representation on the pre-publication consultation on the new additional sites to be included within the Site Allocations Development Plan Document (DPD). The Metropolitan Police supports the inclusion within the Site Allocations plan of site HA 9, Hampton Traffic Unit, 60-68 Station Road, Hampton Road, TW12 2AX for 'residential use, including affordable housing units'. Under the justification, the document states: "If site becomes surplus, re-use of building fronting Station Avenue and redevelopment of rear area for residential use, including affordable housing. The creation of a pedestrian link through the site between Station Avenue and Beveree Sports Ground. The Building of Townscape Merit on the Station Avenue frontage to be retained." The Metropolitan Police position, as detailed as part of the previous consultation on the Draft Site Allocations DPD (in October/November 2013) is as follows: "Hampton Traffic Unit is located within a local centre and designated are for mixed-use. It is in a well connected, sustainable location close to the mainline station and to main arterial roads into and out of Central London. The building currently serves as a policing facility. The services within it will either be re-provided elsewhere or are no longer required following a change in service provision and a rationalisation programme as set out in the MOPAC Police and Crime Plan

		<p>and Estate Strategy.</p> <p>The car park and building to the rear of the site currently do not contribute positively to the character of the Conservatino Area and therefore presents an excellent opportunity to enhance the appearance of the area through redevelopment. Given the locally listed status of the building and its location within the Hampton Village Conservation Area the front building will need to be retained."</p> <p>The property has now become surplus which provides further justification for the allocation of the site for residential purposes. Otherwise the position previously outlined reamins as described and therefore MOPAC supports the proposed allocation. Please do not hesitate to contact me should you wish to discuss these matters furthers.</p>
23	Mr and Mrs Angell Wells	<p>Further to your consultation on Pre-Publication Site Allocation Plan for the old Police Station site, HA 9 Hampton Traffic Unit,60-68 Station Road, Hampton, we would wish to comment as follows:</p> <ol style="list-style-type: none"> 1. We support the proposal that the site to be used for residential use only and not retail. Any development to be architecturally sympathetic to the conservation area of Hampton village. 2. Parking on site. 3. The police station lamp to enjoy the same protection as the frontage of the police station itself. 4. The outside area to be sensitively landscaped in keeping with the conservation area. <p>We would request that the above views be considered as part of your consultation.</p>
25	Mr and Mrs Leicester	<p>Further to your consultation on Pre-Publication Site Allocation Plan for the old Police Station site, HA 9 Hampton Traffic Unit,60-68 Station Road, Hampton, we would wish to comment as follows:</p> <ol style="list-style-type: none"> 1. We support the proposal that the site to be used for residential use only and not retail. Any development to be architecturally sympathetic to the conservation area of Hampton village. 2. Parking on site. 3. The police station lamp to enjoy the same protection as the frontage of the police station itself. 4. The outside area to be sensitively landscaped in keeping with the conservation area. <p>We would request that the above views be considered as part of your consultation.</p>
38	Tricia Mole	<p>Please would you advise me on how best to keep track of building proposals in Hampton. I found your email when looking at comments concerning the old police station in Station Road, Hampton. I must say I was delighted to read that you have no intention of allowing a shop.</p> <p>My particular worry is the type of building/ development that seem to be approved of late, and which may prove detrimental to this area.</p>

HA 10 – Hampton Delivery Office		
Ref. no.	Name/Organisation	Detailed comment
5	Tim Hodgson	<p>I am writing in response to the above and in particular Sites HA 9, Station Road Hampton and HA10 Rosehill Hampton.</p> <p>I am in principle supportive of the Council's proposals in both cases but subject to the following caveats:</p> <ol style="list-style-type: none"> 1. That the Affordable Housing component should not be simply a token but a significant proportion of the developed space and rigidly applied. It is rapidly becoming impossible for young people to remain in Hampton as owner-occupiers and the provision of further high end housing is merely going to exacerbate this problem. 2. That no development take place until measures have been put in place to enable the already overloaded local infrastructure to absorb more numbers. In this regard I am thinking specifically about healthcare, schooling and perhaps the most easily resolvable

		question of the wholly inadequate public transport links with Twickenham and Richmond.
11	Gary Rhoades-Brown	I fully support the proposed site allocations for the Hampton Traffic Garage and the Hampton Delivery Office sites for residential development with affordable housing. Both sites should not be used for commercial purposes for traffic generation reasons and the overriding need for additional housing in the South east.
15	Janice Merritt	Firstly is this going to close? If so where would the residents of Hampton go to collect the missed parcels? There has already been a new build (out of character with the rest of Hampton) at the end of Rosehill. Rosehill has character house along there and anything should be in context with those houses. My argument against this is as above, over crowding and the parking issue.
19	Katy Makepeace-Gray	I would very much like this to remain in its current use. It is part of the local community. It allows the pick up of parcels without the use of a car and encourages people to use local Hampton shops and Hampton Library on route to going to pick up a parcel. It is an essential part of a non-car based community lifestyle. I would hate to think where I would have to go to, to pick up a missed parcel if it disappeared, especially with two small children and no car.
40	DTZ on behalf of Royal Mail Group Ltd	The Strategic Allocation of the above sites within the Local Plan will provide the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality development that will meet the requirements of Richmond Upon Thames Council. The Royal Mail are supportive of the council's assessment and allocation of the sites within the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i> . Royal Mail are also supportive of the objectives and vision of the Draft Local Plan in relation to the suitability of the sites to meet local residents needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth, all in accordance with the National Planning Policy Framework (NPPF). The current allocations have not proposed potential densities of housing units on the sites. Given the sites sustainable location and nature we would propose the following approximate densities (London Plan 2011 recommendations): <ul style="list-style-type: none"> • HA 10 – 10 - 15 units The terms used are: ' <i>should the site become surplus to requirement</i> ' and ' <i>If site becomes surplus</i> '. It is considered that the terms used at present in this draft policy may be misleading. From Royal Mail's perspective, in the context of their obligations, it is vital to use the correct terminology when the council are assessing sites in the public domain. We therefore request that all future policy and supporting text is worded to include the phrase that redevelopment may be forthcoming 'should the site become surplus to requirement following the re-provision of a suitable alternative Delivery office'.

TD 7 – Teddington Delivery Office		
Ref. no.	Name/Organisation	Detailed comment
7	English Heritage	English Heritage would make the following recommendations: <ul style="list-style-type: none"> • That all the site allocations replace the words 'take account of' in relation the historic environment features of the site allocation with the words 'conserve and enhance' in accordance with the NPPF; • That the Sustainability Appraisal acknowledge the uncertainty that attaches to the site allocations in relation to the historic environment element of the townscape and landscape SA objective assessment while there are no specific designs or specific control of scale in the Site Allocations; and while the conservation and enhancement of the relevant heritage assets is not

		specifically identified.
22	Michael and Alison Jennings	TD7: Post Office Delivery Office: Whilst we would have concerns about undelivered mail and parcel collection should the Post Office cease to use the site, in planning terms we would be pleased to see the building fronting the High Street used for retail or employment use with an active frontage to the High Street (especially after the Council made it accessible), with employment and/or housing (including affordable housing) behind.
36	Teddington Business Community	The Teddington Delivery Office provides an important facility to Teddington businesses and our customers and should be retained. It is also an employer that provides jobs for local people. Should the premises ever be vacated, retail would be a viable solution, or a mix of retail with commercial offices. Any proposed retail shop front design should be in keeping with the historic town centre buildings and with consultation with the immediate neighbouring properties and the Teddington Business Community. The size of the proposed retail build, should the premises ever be vacated, needs to be in keeping with small retail. A supermarket or restaurant chain would not be appropriate for this site as it would affect existing retailers and the commercial identity of Teddington as a destination shopping town with special shops.
40	DTZ on behalf of Royal Mail Group Ltd	The Strategic Allocation of the above sites within the Local Plan will provide the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality development that will meet the requirements of Richmond Upon Thames Council. The Royal Mail are supportive of the council's assessment and allocation of the sites within the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i> . Royal Mail are also supportive of the objectives and vision of the Draft Local Plan in relation to the suitability of the sites to meet local residents needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth, all in accordance with the National Planning Policy Framework (NPPF). The current allocations have not proposed potential densities of housing units on the sites. Given the sites sustainable locations and nature we would propose the following approximate densities (London Plan 2011 recommendations): <ul style="list-style-type: none"> • TD7 – 30 - 40 units The terms used are: ' <i>should the site become surplus to requirement</i> ' and ' <i>If site becomes surplus</i> '. It is considered that the terms used at present in this draft policy may be misleading. From Royal Mail's perspective, in the context of their obligations, it is vital to use the correct terminology when the council are assessing sites in the public domain. We therefore request that all future policy and supporting text is worded to include the phrase that redevelopment may be forthcoming 'should the site become surplus to requirement following the re-provision of a suitable alternative Delivery office'.

TD 8 – Teddington Station		
Ref. no.	Name/Organisation	Detailed comment
7	English Heritage	English Heritage would make the following recommendations: <ul style="list-style-type: none"> • That all the site allocations replace the words 'take account of' in relation the historic environment features of the site allocation with the words 'conserve and enhance' in accordance with the NPPF; • That the Sustainability Appraisal acknowledge the uncertainty that attaches to the site allocations in relation to the historic environment element of the townscape and landscape SA objective assessment while there are no specific designs or specific

		control of scale in the Site Allocations; and while the conservation and enhancement of the relevant heritage assets is not specifically identified.
19	Katy Makepeace-Gray	As a mother with a buggy the introduction of lifts to stations is hugely welcomed (Fulwell would also really benefit). I find it hard to imagine how after so many years after disability legislation came in that stations have got away with having no step-free access.
22	Michael and Alison Jennings	TD8: Teddington Station: Whilst we would be pleased to see the installation of lifts, we note with concern that it only refers to "the station building" being retained and enhanced, by which we assume is meant the ticket office building. Whilst the building on the Station Road side is not great architecture, it does house a covered ticket machine area, a waiting room, a café and an attractive canopy. We would hate to see it replaced by something like that inflicted on Norbiton Station - what amounts to a shipping container locked most of the time, with two bike canopies - one of which people are meant to crouch in - and a ticket machine fenced in but open to the elements.
37	Transport for London	None of the new sites appear to affect TfL landholdings, nor lie on the Transport for London Road Network (TLRN) or close to London Underground infrastructure, although I note two of the sites are in ownership of the GLA Group (Metropolitan Police Authority) so I assume you will have consulted the appropriate people in this respect. My only other comment is that TfL can offer support for the provision of step-free access and other general station improvements at Teddington and St Margarets stations, although we are not aware of any schemes having being developed.

TW 18 – St Mary's University College		
Ref. no.	Name/Organisation	Detailed comment
29	NLP on behalf of St Mary's University College	<p>On behalf of our client, St Mary's University (SMU), we are writing with reference to the above document, which the Council is currently consulting on.</p> <p>In November 2013 NLP, on behalf of SMU, submitted representations to the Council's Site Allocations Plan, Pre-publication version, promoting the inclusion and allocation of the SMU site on Waldegrave Road, Twickenham. A copy of the representations are attached at Appendix 1. We are pleased that our representations were taken on board and SMU is now included as an additional site in the draft Site Allocations Plan, and we are grateful for the opportunity to further engage with the Council in the preparation of this document.</p> <p>We summarise below the background to our representation and then provide detailed comments on the draft additional site allocation 'TW 18 St Mary's University College, Twickenham'.</p> <p>Background</p> <p>Having achieved full University status in 2014 (hence the desire to be referred to as SMU, rather than the previous St Mary's University College), SMU is an important asset to both the economy of the Borough and as part of its community. It has a registered student population of around 5,000, many of whom live in and around the Borough, and it creates employment both directly (with approximately 800 staff) and indirectly with a turnover of some £40M. It is vital that SMU is able to continue providing students with excellent teaching, support and guidance if it is to continue to thrive and maintain its position. SMU's Estates Strategy identifies a need to ensure that all services and facilities are fit for purpose and which meet the needs of SMU's diverse community. It recognises that the campus and its facilities are critically important factors in recruiting and retaining both students and staff, particularly with the introduction in 2012 of the £9K tuition fee regime which means that expectations of students continue to increase and the quality and quantity of facilities need to keep pace with these increased demands. These pressures will increase yet further from 2015 when the Student Number Cap on institutions is removed and a full market in higher education will come into place.</p>

	<p>In 2008, SMU had 3,800 students undertaking a wide range of courses (at foundation degree, undergraduate and post graduate level across five academic schools) and employed in the region of 600 staff based both on and off-campus. SMU has expanded since then and over the last few year, these numbers have risen to over 5,000 students and 800 staff.</p> <p>A number of the existing buildings on site, whilst operational and maintained require future investment in order to adapt to and deliver modern teaching standards. Over half of SMU's teaching and learning space was built before 1960, with a number of these buildings listed, and several that would benefit from improvements to better provide for full disabled access. Despite some upgrading, the existing facilities are not sufficient to support the current student population and risk failing to provide a satisfactory amount or quality of space. Essentially the 1,800sq.m Learning Resources Centre, the library, has remained materially unchanged from 1995, despite the student population nearly doubling. Improved and additional facilities are urgently required. During peak times occupancy exceeds 100% and it becomes extremely noisy and busy, not providing an appropriate learning environment for students. There is a particular demand for more clearly defined silent, group and social spaces, fixed computing areas, law library and improved resource areas within the Learning Resource Centre (LRC) as well as additional lecture theatre and teaching rooms able to support larger classes. The University has gone part way to alleviating this situation through the purchase of off-site space but additional library provision on campus is essential.</p> <p>In addition, SMU has a direct need for local and affordable residential accommodation for its students, as currently only 700 of whom live on campus. Current intakes show that there is a substantial 'pent up' demand for additional accommodation estimated at least a further 700 bedrooms (comprising year 1 demand not met and residual demand from years 2 and 3 and from international students). Currently there are restricted opportunities to develop and create additional new accommodation on campus and local property rents are high. Whilst SMU continues to work with local agencies and property providers to seek to satisfy student accommodation a longer term strategy to provide capacity in the surrounding area needs to be prepared and implemented.</p> <p>Planning Policy Context</p> <p>In view of the above, SMU is seeking to establish a position through the Site Allocations Plan to upgrade its existing facilities and provide new build elements (education floorspace, student accommodation and other social/sporting facilities), where appropriate, both on site and in the immediate locality when opportunities might present.</p> <p>As set out previously, the NPPF recognises that <i>"the planning system should play an active role in guiding development to sustainable solutions"</i> (para 8) and advises that <i>"LPAs should positively seek opportunities to meet the development needs of their area..."</i> (para 14).</p> <p>Policy 3.18 of the London Plan, which is referenced at paragraph 2.6.2 of the draft Site Allocations Plan, states that the Mayor will support the provision of higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice. It also states that in preparing their LDF's, Boroughs should provide the framework to secure sites for future provision, recognising local needs and the particular requirements of the education sector.</p> <p>This position is also supported by LB Richmond. Policy CP18 of the Core Strategy supports the provision of education and training facilities and notes that <i>"The potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs"</i>. The supporting text notes that additional need has been identified in post-16 learning, including life-long learning, which is mainly provided in the borough by Richmond Adult Education University, Richmond upon Thames University and St Mary's University, and also through voluntary educational activities. It specifically notes that <i>"...there will be a need to continuously update and refurbish existing facilities to provide modern and up to date facilities which meet the needs of the community, and enable voluntary educational activities to continue"</i> (para 8.3.6.10).</p> <p>Likewise, the supporting text notes that site specific proposals for new or refurbished education facilities should be brought forward through the Site Allocations DPD or through the planning process (para 8.3.6.20).</p>
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	<p>As identified above, there is a pressing need to improve and upgrade existing facilities, as well as provide additional accommodation (educational floorspace, student residential accommodation and other social/sporting facilities) if SMU is to maintain its position and continue to attract staff and students. This is particularly important as it works towards final achievement of “University” status.</p> <p>Comments on Draft Site Allocation ‘TW 18‘St Mary’s University, Waldegrave Road, Twickenham, TW1 4SX’</p> <p>Whilst we support the inclusion of the SMU in the draft Site Allocations document, we do not consider it is sufficiently flexible to enable the University to meet the urgent requirement for additional teaching, library and student residential accommodation as it does not refer to potential extensions or new build elements. Without some elements of new build, it is very unlikely to be possible for the University to meet the identified need and remain a competitive and viable education offer in the future. As part of any masterplan approach for SMU it may also be necessary to consider a strategy where some of the existing sports facilities are re-provided at the University’s sports facility in Teddington Lock or for other elements of SMU’s offer to be provided off-site at alternative locations. We therefore object to the current wording of the ‘Proposal’ as it does not allow SMU to meet the future educational needs of students and therefore cannot be considered ‘sound’ as it is not positively prepared, in accordance with the requirements of para. 182 of the NPPF.</p> <p>We suggest the ‘Proposal’ is re-worded as follows:</p> <p><i>‘TW 18‘St Mary’s University-College, Waldegrave Road, Twickenham, TW1 4SX’</i></p> <p><i>“Retention and upgrading of St Mary’s University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, extensions and new build elements on site where appropriate. A master-plan in conjunction with new estates and residential strategy will be prepared and will guide future development for SMU both on and off site. retention of playing facilities and some upgrading and rebuilding of out dated facilities”.</i></p> <p>In terms of the ‘Justification’, we support the collaborative working with the Council to prepare a masterplan to look at the longer term strategies for the site and alternative off-site options to meet educational needs. We have suggested a small revision to this sentence below:</p> <p><i>“The Council will work with the University on a Masterplan for the longer term upgrading of their sites, taking account of existing site constraints and the potential for alternative off site options to meet the demand for additional teaching, sport and student residential accommodation”.</i></p> <p>We consider that the justification should include the rationale behind the need for the upgrading and new build elements. We therefore recommend that the following sentence is added at the beginning of the Justification to ensure the draft allocation is effective and ‘sound’:</p> <p><i>“There is a pressing need to improve and upgrade existing facilities at St Mary’s University, as well as provide additional accommodation (educational floorspace, student residential accommodation and other social/sporting facilities), if the University is to maintain its position as a well regarded educational institution and continue to attract staff and students with its high quality facilities ”.</i></p> <p>We consider that these amendments would, in our opinion, make the draft Site Allocation ‘sound’, in accordance with para. 182 of the NPPF.</p> <p>Conclusion</p> <p>We trust that the above comments assist in the finalisation of the Site Allocation DPD. We consider that the proposed revisions to the document are appropriate and will assist in ensuring that the document is ‘sound’. Given the importance of this document to SMU, we consider that a meeting would be useful to further discuss St Mary’s future requirements in the context of the emerging Site Allocations Plan.</p>
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SM 4 – St Margarets Station		
Ref. no.	Name/Organisation	Detailed comment
7	English Heritage	<p>Thank you very much for the opportunity to provide comment on the Additional Site Allocations Proposals for the London Borough of Richmond-upon-Thames' Local Plan and their related Sustainability Appraisal (SA). As the Government's adviser on the historic environment, English Heritage is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages of the local planning process.</p> <p>Accordingly, we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, English Heritage would make the following recommendations:</p> <ul style="list-style-type: none"> • That the site allocation for St Margaret's Station, acknowledge the station's location in the Crown Road Conservation Area; • That all the site allocations replace the words 'take account of' in relation the historic environment features of the site allocation with the words 'conserve and enhance' in accordance with the NPPF; • That the Sustainability Appraisal acknowledge the uncertainty that attaches to the site allocations in relation to the historic environment element of the townscape and landscape SA objective assessment while there are no specific designs or specific control of scale in the Site Allocations; and while the conservation and enhancement of the relevant heritage assets is not specifically identified.
17	John Reilly	<p>I have heard there is an application to add lifts to St Margaret's railway station. After a little googling I found it mentioned on page 10 here: http://www.richmond.gov.uk/site_allocations_plan_-_new_additional_sites_-_public_consultation_june-july_2014.pdf I wanted to mail in support of this. My wife and I have a 2 year old son and a child due in 2 months. We have suffered from the lack of lifts at the station and we heartily support their introduction. We've no doubt that by the time they are fitted we will no longer need to use them but we hope that other people in our position may get the benefit in future. There was a document displayed near the station mentioning the proposal which has gone missing. It's a shame this is no longer visible outside the station as I have no doubt others would like to support the proposal as well. Anyway – great to hear about these plans!</p>
32	Paul Velluet	<p>Whilst welcoming and raising no objection to a proposal for providing level-access at one or both of the existing entrances to the Station building fronting St Margaret's Road for those with physical disabilities, parents with prams and buggies and those carrying heavy shopping, baggage and bicycles; for creating level-access to and from Platform 3 via a controlled gate fronting Amyand Park Road; for constructing a lift-shaft and lift to link the island platform (Platforms 1 and 2) and the station-building; and for a possible additional lift-shaft and lift to link Platform 3 and the station-building; and the provision of other improvements, the proposal should state unequivocally that:</p> <ul style="list-style-type: none"> • Such improvements should retain and incorporate the 1906, Station-building fronting St Margaret's Road (which was added thirty years after the original station was first created) and the ancillary station buildings on the island platform (added at the same time, when an additional track and platform-face were created), given the significant contribution they make to the character and appearance of the Crown Road and Twickenham Park Conservation Area; • Such improvements should be of the highest standards of contemporary architectural and engineering design, sensitive to the

		<p>1906 station buildings and their broader setting, and should also provide for the repair and restoration of the canopy serving Platforms 1 and 2, the repair or replacement of the canopy serving Platform 3, the reinstatement of a delicately detailed, glazed canopy on the front of the Station-building, and the removal of unsympathetic alterations and additions carried out in the 1930s and in subsequent years; and</p> <ul style="list-style-type: none"> Such improvements should not involve the creation of additional development over and above the platforms and tracks for non-operational railway use. <p>In this connection, it is noted that the justification for Proposal for Site TD 8 – Teddington Station, refers specifically to the retention and enhancement of the existing station, and to the need for proposals to take account of the conservation area, the listed building, the building of townscape merit and their settings. Whilst St Margaret's Station is not formally listed, it clearly merits a similarly sympathetic approach.</p> <p>Importantly, too, such key objectives are consistent with the environmental improvements outlined under Proposal b.1 of the Council's Crown Road and Twickenham Park Conservation Area Study, published in February, 1997.</p> <p>(Two major reasons for wishing to see this proposal more tightly defined are the risk that Network Rail/South-West Trains may wish to exploit the potential for over-line development at St Margaret's Station sometime in the future, and the disappointing quality of much of the new work currently being undertaken as part of the reconstruction of Putney Station).</p>
37	Andrew Hiley for Transport for London	<p>Thank you for consulting TfL Borough Planning.</p> <p>None of the new sites appear to affect TfL landholdings, nor lie on the Transport for London Road Network (TLRN) or close to London Underground infrastructure, although I note two of the sites are in ownership of the GLA Group (Metropolitan Police Authority) so I assume you will have consulted the appropriate people in this respect.</p> <p>My only other comment is that TfL can offer support for the provision of step-free access and other general station improvements at Teddington and St Margarets stations, although we are not aware of any schemes having being developed.</p>
41	Robert Monk	<p>The only comment I make is that, where appropriate, provision for public toilets should be requested. In St. Margarets, for example, there is no provision at all.</p>

BA 4 – Barnes Green Police Station		
Ref. no.	Name/Organisation	Detailed comment
2	Barnes Community Association	<p>BA4 - Station Road Police Station (please note that this is not on Barnes Green).</p> <p>You have specified "Residential, including affordable units".</p> <p>You will be aware that Berkeley Homes gave an exhibition in the Barnes Green Day Centre on 9th July of their proposals for this site, which were for a group of seven town houses of superior design which were much admired and would fit excellently into the neighbourhood, but were certainly not affordable housing.</p> <p>Barnes does not need any more housing of this standard, however attractive they may be. They are clearly family homes that will place extra strain on local schools and other services. You may be able to extract sufficient 106 compensation to make up for this but there will be no net benefit to Barnes.</p> <p>Our Town Team have taken soundings in the community and have established that there is a genuine need for a B-and-B type hotel where visitors to Barnes can stay inexpensively, and spend money in our shops and restaurants. There is at present no such facility. Alternatively, we understand, local doctors have pointed to a lack of a Nursing Home, not a long term residential</p>

		facility with care, of which we have plenty, nor a Hospital, but an old-fashioned Nursing Home for short-term recuperating patients, which would take pressure off local hospitals, while offering its inmates the chance to be near their families and friends. The BCA Environment Group supports the Town Team in both these suggestions.
4	David Woodcock & Ruth Mitchell	We would like to express our support for Berkeley Homes proposal to develop this site for residential use of 7 units. We recently saw the plans and these appear to fit in very well with the area in general. We were dismayed to learn that the BCA plans to oppose this change of use, in that they are advocating that an hotel be built on this site. It seems bizarre that they could contemplate locating an hotel in an otherwise entirely residential area. This is a view shared by all local residents we have spoken to. You will see from our address that we are directly impacted by whatever will be built on this site and we wish our views to be taken into consideration.
6	Dean & Lisa Illis	We are writing to support the application for change of usage from Commercial to Residential for the site relating to the Old Police Station on Station Road, Barnes. We are in favour of the development of this site to complimentary residential housing.
7	English Heritage	English Heritage would make the following recommendations: <ul style="list-style-type: none"> • That all the site allocations replace the words 'take account of' in relation the historic environment features of the site allocation with the words 'conserve and enhance' in accordance with the NPPF; • That the Sustainability Appraisal acknowledge the uncertainty that attaches to the site allocations in relation to the historic environment element of the townscape and landscape SA objective assessment while there are no specific designs or specific control of scale in the Site Allocations; and while the conservation and enhancement of the relevant heritage assets is not specifically identified.
8	The Environment Agency	The above sites are located in Flood Zone 3 and as such would require a detailed Flood Risk Assessment to accompany any planning application.
14	Indigo on behalf of Berkeley Homes	We write to submit representations in response to the current consultation on additional sites under the emerging Site Allocations Plan, on behalf of our client, Berkeley Homes (Central London) Ltd. The current consultation includes the additional site reference BA 4 identified as Barnes Green Police Station, 96 – 102 Station Road, Barnes. The proposed allocation of the site is for residential use, including affordable units. We note that the justification set out under the proposed allocation states: <i>'Should the site become surplus to requirements, redevelopment for residential use. Affordable housing to be provided in line with policy requirements. Design to take account of view from Richmond Hill, adjoining conservation area, nearby listed building and BTMs [buildings of townscape merit] and their settings.'</i> Where the justification refers to the site becoming surplus to requirements, the supporting sustainability assessment for the site, clarifies that this refers to the use of the site as a police station. The planning history of the site, however, clarifies that the site has not been occupied as a police station since 2000, when the building was refurbished, and was since used as an office for a special investigation unit of the Metropolitan Police, until the building was vacated in October 2013. The disposal of the site has confirmed that the site is surplus to the requirements of the Metropolitan Police. This was confirmed in the sales and marketing information published for the freehold sale of the site. The site is located in a residential neighbourhood with a reasonable level of accessibility to public transport, and good accessibility to an extensive open space network in the area around the site. Residential use and development at the site offers an opportunity to better integrate the site with the predominantly residential character of the location.

		<p>This will also enable improvements to the site to enhance its relationship with the streetscape and with the character of the adjoining conservation area and neighbouring residential properties, including buildings of townscape merit.</p> <p>Our client fully supports the proposed allocation of the site for residential use, as being the only viable use that is suitable in this well established residential area, which benefits from accessibility to public transport, and to an extensive open space network in the area around the site.</p> <p>We welcome the Council's recognition that residential use represents the most sustainable option for the site, and would offer an opportunity to better integrate the site with the predominantly residential character of the location.</p> <p>We trust that our representations will be taken into account and the allocation of the site BA 4 for residential use will be taken forward to the submission version of the emerging Site Allocations Plan.</p> <p>We would be happy to discuss the allocation and any aspect of our letter with you. Please contact me or my colleague, Leanne Croft, in this regard.</p>
24	Mr and Mrs Kyrle-Pope	We support the proposed residential development of this site and the Berkeley Group's designs.

EM 7 – Mortlake and Barnes Delivery Office		
Ref. no.	Name/Organisation	Detailed comment
2	Barnes Community Association	<p>EM7 - Mortlake and Barnes Delivery Office.</p> <p>You have specified "A mixed use scheme with employment and residential uses, including affordable units".</p> <p>This seems a bit "catch-all". We agree with your assessment that it is a key site, and would suggest that it is such a key site that it should if at all possible be considered as part of any plans for the redevelopment of the Brewery. In particular we would hope that the present highly unsatisfactory parking arrangements (whereby Royal Mail vehicles are allowed to park on what should obviously be a pedestrian area, while residents of Barnes, who are more likely than those of Mortlake to have come by car to collect their parcels, have to risk parking on a double yellow line) will not be perpetuated in any future design.</p>
8	The Environment Agency	The above sites are located in Flood Zone 3 and as such would require a detailed Flood Risk Assessment to accompany any planning application.
40	DTZ on behalf of Royal Mail Group Ltd	<p>The Strategic Allocation of the above sites within the Local Plan will provide the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality development that will meet the requirements of Richmond Upon Thames Council.</p> <p>The Royal Mail are supportive of the council's assessment and allocation of the sites within the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i>. Royal Mail are also supportive of the objectives and vision of the Draft Local Plan in relation to the suitability of the sites to meet local residents needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth, all in accordance with the National Planning Policy Framework (NPPF).</p> <p>The current allocations have not proposed potential densities of housing units on the sites. Given the sites sustainable location and nature we would propose the following approximate densities (London Plan 2011 recommendations):</p> <ul style="list-style-type: none"> • EM7 – 200 - 400 units <p>We are of the opinion site EM7 could accommodate higher density housing redevelopment given the nature and need for housing in sustainable locations.</p> <p>The terms used are: 'should the site become surplus to requirement' and 'If site becomes surplus'. It is considered that the terms</p>

		<p>used at present in this draft policy may be misleading.</p> <p>From Royal Mail's perspective, in the context of their obligations, it is vital to use the correct terminology when the council are assessing sites in the public domain. We therefore request that all future policy and supporting text is worded to include the phrase that redevelopment may be forthcoming 'should the site become surplus to requirement following the reprovision of a suitable alternative Delivery office'.</p>
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HP 3 – Cassel Hospital		
Ref. no.	Name/Organisation	Detailed comment
1	Andree Frieze	<p>As part of your consultation about the development of sites in the Richmond borough, I would like to make the following points about Cassel Hospital on Ham Common.</p> <p>As a Governor of Latchmere School in North Kingston, which is already four-form entry and has to take a further 'bulge' class in 2014/5 to cope with the demand for school places in our two boroughs, I believe that North Kingston and Ham needs a whole new primary school. As well as a population growth that our area is having to cope with, there has been an influx of families seeking the excellent schools that we have here. Plus, there's all the new dwellings proposed for Latchmere House, the flats already being built on the river in North Kingston, the impending developments on the gas storage site at Sury Basin, the conversion of the Regal Bingo building that will all bring more and more families into our neighbourhood. Additionally, Ham Close is up for development, one of the options being to knock down the existing blocks of flats and rebuild them with twice as more dwellings on the site, so increasing the local population.</p> <p>There is a possibility that a new primary school will be built to accompany the flats on Sury Basin, but these will only 'mop up' the children in the immediate vicinity and not the roads from Kings Road up towards the Tudor Estate. And, the new primary school near Sury Basin is not even definite as the developer is pushing for student flats instead.</p> <p>Without a new two/three-form entry school in North Kingston/Ham we will hear more and more about distressed families whose children have missed out on school places, or have to travel long distances across the borough to go to other schools. The alternative is that Latchmere becomes five-form entry throughout all school years, and other schools have to expand from two/three to three/four-form entry. All of which will put pressure on resources, building space and hard-pressed playgrounds.</p> <p>The Cassel Hospital building was assessed when St Edwards were considering setting up a Kingston Church School Foundation free school in the area (KET got their bid approved by the DfE to set up Kingston Academy in the North Kingston Centre so St Edwards pulled) and it was deemed a suitable site for a school. It has 20 acres of land around ideal for sports grounds and additional buildings if required. Also, it is easily accessible by foot, bicycle, public transport and car - although too many vehicles would cause problems on this road.</p> <p>I do hope you will take these points into consideration, and instead of considering Cassel Hospital for residential purposes, please take into account local residents needs and let the site be set aside for community use, and more specifically, a primary school.</p>
8	The Environment Agency	Flood zone 1 - no further comments
9	Erika Chernavskaya	<p>I have tried to get further information about proposed plans for 1 Ham Common (Cassel Hospital) from your dept but oddly enough I have been told they have no knowledge that this site is even under review!</p> <p>I have spoken to the hospital who state that there are no plans to sell or redevelop 1 Ham Common, so I am a little perplexed why you are inviting consultation with the public.</p>

		<p>I have read Council's Site Allocations Plan and note that you anticipate that Cassel will be declared surplus as an NHS hospital. This will be a great pity, because Ham Common is an ideal location for a small hospital or clinic especially for inpatients, and has been a hospital since 1919. Cassel Hospital is also a "satellite" hospital connected to the Psychiatry Dept of Charing Cross Hospital and serves an important function.</p> <p>My concerns are as follows, which I am sure are shared by other residents. When we moved to Ham Common it was chosen very carefully by my family for the quietness and limited number of stand-alone properties that surround the Common. Residents also tend to remain for decades, thus guaranteeing that numbers of occupiers and vehicles do not increase to such a degree that it gives Ham Common a congested, hurried feel, which serves to give us a sense of security knowing who our neighbours are.</p> <p>Your Plan states the hospital buildings may be converted to residential units (including affordable units) and community use. Any apartment building that may be considered should be low-rise, but the problem remains of extra vehicles and particularly visitors to the apartments jamming up Ham Common with their vehicles. At the moment, the only vehicles being parked at Cassel are those of doctors and other health professionals, and relatives visiting inpatients.</p> <p>If you build new homes on this site there will be a daily and serious knock-on effect to Petersham Road – the only exit out of Ham Common. Petersham Road is a busy road of course, but currently the congestion and hold-ups occur Monday to Friday, but if you were to build flats on the Cassel site you should anticipate that 2 adult occupants from each flat will probably own a vehicle – thus increasing the amount of traffic several-fold.</p> <p>A further apartment block will irreversibly change the character of Ham Common.</p> <p>Furthermore, Council states that the grounds to the rear of Cassel are designated as being both of Nature Importance and Other Open and that development on this area would not be acceptable. I agree, but inevitably residents of the new flats will need to be provided with at least one parking space and this will eat into the rear grounds.</p> <p>However, if Cassel was declared surplus I would suggest that this listed building be used as a community arts centre for all Ham residents, or indeed as a centre for non-urgent NHS health support services.</p>
10	Eugene Dreyer / Langham House Estate	<p>As an adjacent neighbour the Board of LHEMCo Ltd has noted the decline of the Cassel Hospital site's use as a specialist NHS assessment and treatment facility in recent years. It supports inclusion of the site in the London Borough of Richmond's latest iteration of the Site Allocations Plan.</p> <p>As a site containing a Listed Building, located within a Conservation Area, and adjacent to Metropolitan Open Land, the Cassel Hospital is clearly one of the most significant regeneration opportunities within the London Borough of Richmond upon Thames. It is also of considerable size, and includes significant buildings of historic and architectural merit.</p> <p>The Board believes that the restoration of the site should respect its unique character and identity, as well as the integrity of its landscape and architecture. We are of the view that the Justification included with the Notice is ambiguously worded and should be changed to ensure that this integrity is maintained.</p> <p>Previous attempts to develop on a Site of Nature Importance containing historic badger setts along the North West Boundary of the site must be specifically prevented by policy.</p> <p>In our view a Planning Brief should be prepared for the site which explicitly defines the parameters under which restoration will</p>

		occur. Recent development in the area – notably Butler Farm Close and Morgans House - has been mediocre or poor quality. It is our view that there is a risk of mediocre or poor quality development on this important site without a pro-active brief for its restoration.
21	Margaret and Philip Simpson	<p>Thank you for offering us the opportunity to comment on the proposed development of the above site.</p> <p>We have two main areas of concern:</p> <ul style="list-style-type: none"> • access to the site • trees surrounding the site <p><u>Access to the site</u></p> <p>At present access to the Cassel Hospital site is by the road adjacent to Ham Common. This is a narrow road with parking all along one side allowing only single file traffic. In the morning and afternoon, when Grey Court School is open, the road quickly becomes congested with cyclists adding to the vehicular traffic. The road is also used by heavy delivery vehicles heading to the shops near Ham Green, and to Ham House at all times of the day. If the site is developed for residential uses, detailed attention needs to be paid to the means of access to the site, and parking associated with the new development. This will be especially urgent while the site is being developed. Perhaps the Council should consider what other means of access to the site might be developed.</p> <p><u>Trees surrounding the site</u></p> <p>The consultation document rightly stresses that the Hospital is located in an environment with outstanding natural qualities: the common and surrounding trees contribute significantly to the overall effect and give an exceptionally rural aspect to a London borough. The document also recognises that the buildings on the site and the land at the rear are the subject of special orders and concern. Living in Langham House Close, however, we are naturally concerned that the trees and other vegetation at the side of the site, which screen the Close from the hospital, and vice versa, should be retained in the interests of both parties. Currently, the trees greatly enhance the overall aspect of the site and its adjacent properties. However, it is our understanding that developers are not reluctant to remove trees if additional accommodation can be created because the penalties for so doing are negligible when set against financial gain from increased development. As residents of the Close we clearly have an interest in ensuring that the trees remain, but we also feel that future residents on the site would also value the privacy which the location of the trees offers. The overall appearance of this site adjacent to the Common, in a generally well preserved area, needs to be given very careful consideration and monitoring.</p> <p>We would value any response to our observation and would be happy to develop our remarks if requested so to do.</p>
26	Natural England	<p>Thank you for your consultation on the above dated 06 June 2014.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Pre-Publication Site Allocations Plan – new additional sites & Sustainability Appraisal (SA):</p> <p>Having checked the additional site allocations and the SA that goes with these it is clear that there are no issues which would need to be raised in addition to any of the comments already put forward within the mitigation proposed for sites in the SA report. The only site which it would be worth mentioning in relation to ensuring that it gets adequate protection from unnecessary development in future would be “HP 3 Cassel Hospital, Ham Common, Ham” which is noted correctly as being a difficult site to re-develop due to its setting and Natural England wouldn’t disagree with the suggestion for not allowing development which included any additional land take on that site.</p> <p>Having also recently checked the Habitats Regulations Assessment (HRA) of these sites it is clear that there aren’t any major issues which would need raising at this stage with regard to their proposed uses or their siting. Provided that the plans put forward are in keeping with what is already in the area and make sure to incorporate various elements of Green Infrastructure,</p>

		<p>such as Green Roofs or Walls, then the new sites should broadly have a positive impact post re-development. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>
27	NLP on behalf of West London Mental Health Trust	<p>Earlier this year, on behalf of our client the West London Mental Health NHS Trust ('WLMHT'), we put forward the Cassel Hospital site at No. 1 Ham Common to the Council for its consideration as part of the Site Allocations Plan consultation process. We note that the Council has subsequently identified the site as an additional site which, amongst others, is now the subject of this consultation exercise.</p> <p>We support the Council's proposal that if the Cassel Hospital site becomes surplus to the WLMHT's requirements, suitable alternative uses would be residential and/or community with an appropriate level of affordable housing. We note that the Council has also taken the opportunity to set out its position with respect to development within the grounds. We comment on this below.</p> <p>As explained within our previous representations, the national Emerging Severe Personality Disorder Service (ESPD) occupies a small element of the building (c. 41%). The remainder of the building is vacant and has been since 2011. The WLMHT has no ongoing requirement for this, and can no longer sustain the financial cost of maintaining the predominantly vacant listed premises and extensive grounds, and accordingly it has placed redundant parts of the building and grounds on the Register of Surplus Public Sector Land.</p> <p>The principal planning consideration is bringing the vacant listed building back into viable use which would deliver associated heritage benefits. In order to secure a long term and viable use for site and its listed buildings, the WLMHT is considering future redevelopment options.</p> <p>As the building was originally constructed as a residential dwelling, and the surrounding area is predominantly residential in character, it is considered the conversion of the listed building to residential dwelling(s) is appropriate. Accordingly, we support the proposed allocation of the site in the Site Allocations DPD (Site HP 3) for the conversion to residential use if the hospital is declared surplus to requirements. This fully accords with the Council's Development Management Plan Policy DM SI2 which states that where a particular social infrastructure use ceases, the Council will encourage an alternative social infrastructure use and if not such uses are suitable, residential P2/3 7038505v3 development will normally be required. The WLMHT is currently marketing redundant parts of the site for alternative social infrastructure uses but to date there have been no serious expressions of interest. The building as configured is not suitable for ongoing social infrastructure use.</p> <p>It is fully appreciated that the conversion of this building would need to be undertaken sympathetically given the listed status of the hospital buildings. As such, it is likely that significant investment will be required to convert the building into residential dwellings. Whilst redevelopment proposals are in their infancy and will need to be the subject of further development and testing, it is possible that given the scale of the site, the condition of the building and the works that would be necessary to create a viable residential development, some form of new development may be necessary to enable the delivery of a comprehensive and viable development.</p> <p>As such, it is possible that in order to successfully bring forward the conversion of the site for residential use, and to deliver the associated significant heritage benefits, some flexibility may be required in respect of development within the grounds.</p> <p>We note the grounds to the rear of the building are allocated as "Other Open Land of Townscape Importance" (OOLTI) which should be protected and enhanced (Core Strategy Policy CP10) and as such, there is a presumption against development on this land so the open land is safeguarded and not lost to other uses save in exceptional circumstances (Development Management Plan Policy DM OS 3). We therefore anticipate that any additional development is likely to comprise small scale replacement</p>

		<p>floorspace and extensions. For example, it is considered that the removal of unsightly later additions to the Cassel Hospital building complex and the introduction of high quality development could enhance the heritage asset and the setting of both the listed building and its associated grounds and this would be justified as an exceptional case on enabling grounds to deliver the heritage benefits of bringing the vacant listed building back into use.</p> <p>The NPPF advises that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the dis-benefits of departing from those policies (para. 140). Should such a proposal come forward we are aware of the tests that would need to be satisfied, however, a reflection of this within the Site Allocation HP 3 would ensure that the opportunity to improve the site and create a viable future isn't unduly restricted.</p> <p>We therefore request that the wording to draft policy HP 3 is amended as follows:</p> <p>"If the hospital is declared surplus the listed building is to be converted to residential and/ or community use with an appropriate level of affordable units. The grounds to the rear are designated as being both of Nature Importance and Other Open land of Townscape Importance. and d Development on this area would not be acceptable unless it can be demonstrated that it is necessary to deliver the heritage benefits associated with converting the listed building to residential use. The restoration would need to protect and enhance the listed buildings and conservation area and their settings, as well as taking account of the adjoining Ham Common which is Metropolitan Open Land and also an Other Site of Nature Importance".</p> <p>This would ensure the delivery of the site allocation is effective and consistent with national policy in accordance with the requirements of the NPPF (paragraph 182).</p> <p>We trust that we have explained our client's position in respect of this site. However, if you require any further information to inform the preparation of the Site Allocations DPD please contact Pauline Roberts or me.</p>
31	Paul Burrows and Georgina McLaren	<p>We feel that the area is already very "school dominant" and the Common would be ruined with the increase in parking around Ham Common and the increase in children using the Common after school and associated litter etc, which already happens with schoolchildren using the Common. There is a lot of unused space in this area - in particular in Ham - and there are, therefore, other areas for schools which would not potentially ruin open park spaces that are there to be enjoyed by everyone.</p>

Harrodian School		
Ref. no.	Name/Organisation	Detailed comment
2	Barnes Community Association	<p>Harrodian School (change to existing Metropolitan Open Land boundary).</p> <p>You have specified "Remove the area shown as cross-hatched from the MOL designation)".</p> <p>We are not sure who has instigated this proposal but it appears to regularise an anomalous situation and we would have no objection to its adoption provided that it is made quite clear that under no circumstances will further land be removed from MOL and that the School must finally accept that all future buildings must be in this area. In particular we would hope to see an end to the bi-annual attempt to build a Sports Centre outside this block. We also would comment that MOL is by definition meant to be open land, and even if access by outsiders is not permitted they should be able to enjoy views across it. The School has erected, or retained, opaque boundaries throughout, although its last application for a Sports Hall did offer a sop in the form of a small railed section in its proposals for a wall on Verdun Road. We see no reason why that boundary, and indeed other boundaries should not consist entirely of railings as is done on the St Paul's/Colet Court site.</p>
8	The Environment	The above sites are located in Flood Zone 3 and as such would require a detailed Flood Risk Assessment to accompany any

	Agency	planning application.
18	Jon Rowles	<p>I believe the proposed changes to the boundary should not go ahead. However, if the council are minded to redraw the boundary, it should be redrawn more tightly, to only exclude the existing buildings and not the tennis courts and front lawn areas. The areas should maintain there MOL Status as they are valuable landscaping features of strategic importance.</p> <p>There are lawns and carefully planted hedges that have been designed to hide buildings. It would be a real shame to lose the designation and thus risk that overtime these important buffers are lost. It would also make it harder in the future to insist that future extensions are discrete and hidden from view.</p> <p>Neighbouring council Hounslow, reviewed all there MOL sites. When they looked at Cedars Primary School in Cranford, a school sited in MOL like the Harrodian, they decided the entire site should remain in the MOL. The reason given, was the increased powers MOL gives to resist inappropriate development. Please see http://www.hounslow.gov.uk/green_belt_and_mol_background_paper_2013_chapt_5.pdf page 42</p> <p>Other MOL sites</p> <p>I feel the council should not alter one MOL boundary in isolation. It is unlikely to get the same level of scrutiny than if all the sites were reviewed at once. There are other MOL sites that could do with reviewing such as the RFU Stadium at Twickenham. The Old Latymerians sports ground in Whitton is also at risk of development and would benefit from MOL status. The Old Latymerian Association was dissolved, and ownership passed to the school (which is based in Hammersmith), thus there is a risk it could be sold for housing development etc.</p>
28	NLP on behalf of The Harrodian School	<p>On behalf of our client, The Harrodian School Limited, we write in response to the above consultation.</p> <p>The Council propose to alter the Metropolitan Open Land (MOL) boundary at the school to remove the south west corner from the MOL designation. The School supports this alteration and we set out below the reasons for its support.</p> <p><u>Proposed alteration to MOL boundary</u></p> <p>As set out in our representations to the Site Allocations Plan – Pre-Publication Stage consultation (November 2013), as an important education provider and employer in the Borough, the School looks to policy in the adopted and emerging statutory development plan to guide and support its continued success and to help it in meeting the on-going needs of its pupils and their families. Currently, the entire school is located within MOL on land which in our view doesn't meet the criteria set out in policy for designating land as such.</p> <p>The current MOL policy designation on the site places a very significant constraint on the School and its ability to provide for the needs of the community it serves. National policy within the NPPF attaches the same level of importance – 'great importance' – to both the protection of MOL and to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. It is against this national policy that the School supports the proposed alteration as removing this section of the site from the MOL designation seeks to fairly balance the future needs of the School with its existing designation within MOL. As explained in our November 2013 representations, this reflects the similar arrangement at St Paul's School which works successfully.</p> <p>The proposed change will result in the school being able to provide for the needs of its children and make Harrodian a viable proposition for the children. It is a major employer in Barnes and plays an active role in the wider community. Planning policy must serve to support the School and balance its needs against wider planning policy objectives. This change allows for this to happen. If the School remains at a disadvantage to others like it and cannot meet the needs of the pupils, its closure would mean those needs would have to be met elsewhere in the Borough and place a huge additional burden on infrastructure that probably cannot</p>

		<p>sustain it. The School supports the proposed change for the reasons set out above and in previous representations to the Site Allocation Plan. This change represents a reasonable and balanced application of policy at all levels which relates to protecting MOL and providing for future educational needs, resulting in a sound plan.</p> <p><u>Sustainability Assessment</u> An Addendum Report to the original Sustainability Appraisal for the emerging Site Allocations Plan has been prepared to assess the new additional sites proposed as part of this consultation. The Addendum refers readers to the 2013 Sustainability Appraisal which was carried out for two options at the School, Option A - the whole site staying as designated MOL or Option B - the whole site being removed from the MOL designation. We have carried out a Sustainability Appraisal (attached) using the same methodology for the alteration of the MOL boundary currently being consulted on, Option C to assist the Council in this regard. This shows Option C will have positive impacts in the short to long term on the majority of indicators including travel, health & wellbeing, best use of land and climate mitigation by allowing the school to expand and an increased number of resident's educational needs to be met locally. This will also have a positive impact on the local economy as an increased number of jobs at all skills levels will be created in the local economy. The sustainability appraisal supports the alteration to the MOL boundary being proposed as it shows positive sustainability benefits when compared to Option A. See Appendix A to this document for a copy of the NLP Sustainability Appraisal</p>
35	Sport England	<p>Thank you for consulting Sport England on the above document. Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our national and regional priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>In response to the consultation, Sport England would like to make the following comments on the consultation document: <u>Change to MOL boundary at Harrodian School, Barnes</u> Retaining this part of the Harrodian School site within the MOL designation boundary has the potential of being justified under The London Plan (2011) Policy 3D.10: 'The Mayor will and boroughs should maintain the protection of Metropolitan Open Land (MOL) from inappropriate development. Any alterations to the boundary of MOL should be undertaken by boroughs through the DPD process, in consultation with the Mayor and adjoining authorities. Land designated as MOL should satisfy one or more of the following criteria:</p> <ul style="list-style-type: none"> • land that contributes to the physical structure of London by being clearly distinguishable from the built-up area • land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London • land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level • land that forms part of a Green Chain and meets one of the above criteria. <p>Policies should include a presumption against inappropriate development of MOL and give the same level of protection as the green belt. Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.'</p> <p>Furthermore, Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' (http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf) should be taken into account. The statement details Sport England's three objectives in its involvement in planning matters;</p> <p>1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.</p>

		<p>2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.</p> <p>3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.</p> <p>We hope these comments can be given full consideration. Please do not hesitate to contact me if you have any queries or would like to discuss the response.</p>
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General Comments		
Ref. no.	Name/Organisation	Detailed comment
8	Environment Agency	<p>Under the Flood and Water Management Act 2010, the council as the Lead Local Flood Authority [LLFA] is responsible for local flood risk such as surface runoff, groundwater and from ordinary watercourses.</p> <p>For additional site allocations on land with previous use, detailed comments will be provided at site application stage to ensure adequate investigation and if necessary remediation is carried out to address any contamination and risks to controlled waters. In addition any new proposals should ensure that sustainable drainage design will achieve the same protection. There is no objection in principle to any of the sites from a groundwater protection point of view, providing applications accord with the requirements of the NPPF on protecting groundwater resources.</p>
12	GVA on behalf of Lady Eleanor Holles School	<p>Response summary:</p> <p>1.1 The Lady Eleanor Holles School (LEHS) is an independent school located on Hanworth Road, Hampton. A site location plan is enclosed at Appendix 1. The LEHS provides education to girls aged 7-18 years, spread across a Junior Department (around 180 pupils) and Senior Department (around 680 pupils). The school is not currently able to offer places to younger children (aged 4-7 years).</p> <p>1.2 The School Governors wish to expand the school in order to meet current (and projected future) unmet local demand for additional school places for the 4-7 years age group (referred to as 'pre-prep'). The preliminary expansion plans comprise the development of a new pre-prep facility at the Hanworth Road site, to provide teaching accommodation for 2-forms of entry across 3 year groups (resulting in the addition of 120 pupils).</p> <p>1.3 The site is not currently proposed for allocation in the draft Site Allocations DPD. Further to this, the expansion of the school is constrained by the existing planning designations affecting the site, namely the near blanket MOL designation. Part of the site is excluded from the MOL designation however this land is not suitable for development (in practical layout terms) (the extent of the existing designation is shown on the Core Strategy Proposals Map at Appendix 2).</p> <p>1.4 The NPPF requires local plans to plan positively to meet identified needs. It is in this context that we propose that this site should be allocated for development in the emerging Site Allocations DPD in order to establish an appropriately supportive basis to determine a future planning application. We propose a site specific policy that:</p> <ul style="list-style-type: none"> • Supports the development of additional school buildings (and associated facilities) at the site; and • Amends the existing Metropolitan Open Land boundary in order to accommodate future development. <p>1.5 The purpose of this paper is to set out details of the proposed site specific policy together with the planning rationale to justify this. It sets out the need for development as the exceptional circumstances necessary to justify a revision to the MOL boundary and to underpin the site allocation. It is structured as follows:</p> <ul style="list-style-type: none"> • Section 2 outlines the proposed site specific policy;

		<ul style="list-style-type: none"> • Section 3 describes the site; • Section 4 outlines the need for development; • Section 5 evaluates the key planning issues; and • Section 5 concludes the submission. <p>1.6 This representation follows previous meetings with the Council regarding the school's future in June 2013 and November 2013. The ability to amend the existing MOL designation through the emerging Site Allocations DPD is the appropriate means to allow a basis to bring forward the expansion of the school.</p> <p>Procedural Considerations</p> <p>1.7 We understand that the Council undertook consultation on the pre-publication version of the Site Allocations DPD in October and November 2013. The School did not submit representations in response to this consultation opportunity.</p> <p>1.8 We recognise that the current consultation is intended to focus on proposed additional sites and a proposed change to an MOL boundary designation. However, the Local Plan process allows LPAs to consider comments received as part of this consultation and to make further amendments to the proposed publication version of the plan. We understand that a further round of public consultation will take place on the plan as a whole, to include any further proposed amendments resulting from this current round of consultation, in advance of submission to the Secretary of State for examination. Therefore, we consider that there remains ample opportunity to introduce new sites to the draft Site Allocations DPD, and requests that the Council consider this representation favourably.</p> <p>See Appendix A to this document for a copy of the full response by GVA on behalf of The Lady Eleanor Holles School (July 2014)</p>
13	Highways Agency	<p>Thank you for your letter of 6th June 2014 to the Highways Agency (HA) inviting comment on the Richmond Upon Thames consultation on Pre-Publication Plan – New Additional Sites.</p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the Pre-Publication Site Allocations Plan – new additional sites and associated addendum report documents pertaining to Sustainability Appraisal (SA/SEA) and Equalities Impact of the new additional sites.</p> <p>We have no comments to make at this time.</p>
16	Jenine Langrish	<p>I am disappointed that there is little mention in the plans of the need for safe cycling provision. Please make proper accessible transport a reality in all their plans, rather than occasional lip service to a few cycling stands and some white paint.</p> <p>For example, the Kew plan includes a proposal to move the car park for Kew Gardens. Rather than move it why not have both car parks, and then remove the parking on Kew Road, enabling the cycle lane to be all day, rather than just in the morning rush hour.</p>
30	PA Spielman	All these proposals look acceptable to me. Thank you for consulting me.
33	Paul Velluet on behalf of Old Deer Park Working Group	<p>INTRODUCTION</p> <p>1.1 This submission is made by the Old Deer Park Working Group.</p> <p>1.2 The Group comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. In June, 2012 the Group published the report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement.</p>

	<p>1.3 The Group's aim in publishing the report was to provide a positive contribution to discussion and debate in the context of the falling-in and renewal of all but two of the existing leases granted by The Crown Estate for the land comprising the Old Deer Park, Richmond. Details about each of the local groups who made up the Working Group and their objectives were set out in Appendix 1 of the report. Copies of the report were circulated to The Crown Estate, Council members and officers, representatives of the respective lessees, and to English Heritage, and made available to the broader community. Since publication, the findings and recommendations of the report have been discussed at meetings with The Crown Estate and Council members and officers. A copy of the report is available on the Richmond Society's web-site.</p> <p>1.4 This submission follows the formal submission to the Council made by the Working Group in February, 2013 of The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement - A submission urging review of boundary definitions, February, 2013, and its submission to the Council of November, 2013 responding to consultation on the pre-publication version of The Richmond-upon-Thames Local Plan, Site Allocations Plan published in October, 2013.</p> <p>2. THE CONCERNS OF THE OLD DEER PARK WORKING GROUP</p> <p>2.1 In its submission of November, 2013, the Old Deer Park Working Group not only set out its concerns in relation to Proposal RI 1 - Pools on the Park and surroundings, Old Deer Park, Richmond and Proposal RI 4 – Richmond Rugby, Kew Foot Road, Richmond, but also and importantly, urged that the opportunity should be taken to adjust the definition of the relevant zoning boundaries relating to the Old Deer Park Car-park site shown in the Council's Local Development Framework Proposals Map, Adopted November, 2011, as already highlighted in the Group's submission of February 2013, under the provisions of the Site Allocations Plan.</p> <p>2.2 In this connection, the Group notes that a very significant adjustment in the definition of Metropolitan Open Land of the Harrodian School site in Lonsdale Road, Barnes – another site not included in the pre-publication version of the Site Allocations Plan of October, 2013 - is being advanced under the present consultation document.</p> <p>2.3 In its submission of November, 2013, the Group set out sound and cogent reasons for such adjustments in the existing and highly anomalous definition of the zoning boundaries relating to the Old Deer Park Car-park site under the provisions of the Site Allocation Plan. The Group is accordingly dismayed and disappointed that the Council has failed to address the necessary adjustments within the present consultation document; not least, because of the clear recognition of the case for adjustments in the definition of the relevant zoning boundaries expressed by the Leader of the Council, Cabinet Members, other Councillors and planning officers at useful and constructive meetings held at York House on the 22nd January and 24th February, 2014. Accordingly, the Working Group once again urges the Council to effect the necessary adjustments in the definition of the relevant zoning boundaries under the provisions of the Site Allocations Plan, and to give consideration to the inclusion of the site within the Site Allocations Plan as a means of securing its effective conservation and sustainable future.</p> <p>3. THE OLD DEER PARK CAR-PARK AND THE TWICKEHMAM ROAD</p> <p>3.1 The Old Deer Park Car-park, like the Pools-on-the-Park and the Richmond Athletic Association Ground Sites close by, forms an integral part of the Old Deer Park and is wholly located within the formally designated Old Deer Park Conservation Area and forms part of the area included on English Heritage's Register of Parks and Gardens of to the Special Historic Interest under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. Given the desirability of a coherent approach to the future conservation and enhancement of the Old Deer Park, the Working Group believes that the Council should take the opportunity of remedying the present designation anomalies relating to the Old Deer Park Car-park implicit within the Local Development Framework – Proposals Map – Adopted, 2011 in finalising and</p>
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	<p>adopting the Site Allocations Plan and adjusting the Proposals Map.</p> <p>3.2 The Council-owned Old Deer Car-park is located in that part of the Old Deer Park closest to The Green and at the principal entry-points to the Park for pedestrians from The Green and Park Lane. It presents an open and partly landscaped character and appearance, enjoys unrestricted public access and is in public ownership (through the Council as a lessee of The Crown Estate). It is located entirely within the formally designated Old Deer Park Conservation Area and forms part of the area included on English Heritage's Register of Parks and Gardens of Special Historic Interest under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. Despite these major factors, wholly anomalously and irrationally, the entire car-park site is presently excluded from designation as Public Open Space, and the Council-owned land to the immediate south of the car-park on which the single-storey buildings occupied by the voluntary groups stand, excluded from designation as Public Open Space and Metropolitan Open Land. The latter anomaly is particularly perverse given that the land adjacent to the TA Centre and Richmond Royal Mail Delivery Office only a few yards away, on which the single-storey buildings occupied by the British Legion and other voluntary groups stand, is formally designated as Metropolitan Open Land. Importantly, none of the car-parks in the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Public Open Space.</p> <p>3.3 Similarly, despite the location of the Old Deer Park and the Car-park on the far side of the South-West Trains railway-lines and cutting, quite separate from the heart of the Town beyond The Green; despite the open and partly landscaped character and appearance of the Car-park site; its location within the formally designated Old Deer Park Conservation Area and its inclusion on English Heritage's Register of Parks and Gardens of Special Historic Interest under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park, wholly anomalously and irrationally, the entire car-park site is designated as forming part of the Richmond Town Centre.</p> <p>3.4 The Working Group drew attention to these serious deficiencies of designation in its formal submission of February, 2013, arguing that the need to remedy such anomalies was urgent and essential. The Group urged the Council to include the entirety of the Old Deer Park Car-park within Public Open Space designation, and the land to the immediate south of the car-park on which the single-storey buildings occupied by the voluntary groups stand, within Metropolitan Open Land and Public Open Space designations; and to remove the Old Deer Park Car-park, the land to the immediate south of the Old Deer Park Car-park extending down towards the railway (on which the single-storey buildings occupied by voluntary groups stand), and the Royal Mail Delivery Office and TA Centre from designation as part of the Town Centre.</p> <p>3.5 The Group was much disappointed by the Council's rejection of the Group's sound and reasonable request to exclude the Old Deer Park Car-park and adjacent land and properties from designation as part of the Town Centre as confirmed in Appendix Three – Results of 'Call for Sites' as attached to the Report of the Strategic Cabinet Member for Environment, Planning, Parks and Highways as considered by the Council's Cabinet on the 19th September, 2013. Curiously, the Council was silent on the Group's requests relating to the need to address other designation issues affecting the Old Deer Park Car-park and adjacent land and properties.</p> <p>3.6 The Group considers the Council's stated reason for rejecting its request to remove the Old Deer Park Car-park and adjacent land and properties from designation as part of the Town Centre on the grounds 'that this is an appropriate designation which was supported by the Inspector at the fairly (sic) DMDPD Inquiry' as wholly questionable. The relevant part of the examiner's report is neither identified nor quoted. Indeed, the Group can find no reference to the issue in the Planning Inspectorate's Report to the London Borough of Richmond upon Thames on the examination into the Development Management Plan of the 12th September, 2011. The Council further suggested that 'since then there has (sic) been no significant changes, so the Council maintains its previous position on this matter'. Anomalously, such a claim is inconsistent with the significant changes in the policy context since 2004 brought about by publication of The London Plan, 2011 and the National Planning Policy Framework in March, 2012, and</p>
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		<p>the implementation of the Council's own LDF programme; and, importantly, the imminent falling-in of the leases of the relevant land.</p> <p>3.7 Like the Pools-on-the-Park Site, the land presently occupied by the Twickenham Road (the A.316) and the essential connections between the north-west and south-east parts of the Park that extend below the road, are excluded from designation as Metropolitan Open Land, despite their significant location within the Park, the extensive open, landscaped character of the land to each side of the road, and their location within the formally designated Old Deer Park Conservation Area and their forming part of the area on English Heritage's Register of Parks and Gardens of Special Historic Interest under the grade I entry for the Royal Botanic Gardens, Kew and the Old Deer Park. However, despite these major factors, wholly anomalously and irrationally, the entire road and essential connections between the north-west and south-east parts of the Park that extend below the road the road and the connections that pass beneath it are presently excluded from designation. Curiously, the Council was silent on the Group's request relating to the need to address the designation issues affecting the Twickenham Road as set out in its submission of February, 2013. Importantly, none of the roads that cross the Borough's other major historic parks – Richmond and Bushy Parks are similarly excluded from designation as Metropolitan Open Land.</p> <p>3.8 Once again, the Working Group urges the Council to remedy the serious designation anomalies that presently exist.</p> <p>4. CONCLUSION</p> <p>4.1 The Group remains concerned that any failure by the Council to remedy the various designation anomalies relating to the Old Deer Park Car-park site, and the Pools-on-the Park and Richmond Athletic Association Ground sites too, will continue to leave the relevant areas of the Old Deer Park at significant risk of proposals for substantial built development that will damage the integrity and distinctive character of the Park. As demonstrated by a number of key cases over the last twenty-five years, the Council has shown itself particularly susceptible to accepting the principle of large-scale built development on its own leasehold land within the Park that would have had a damaging impact on the special interest, character, appearance and significance of the Park and the various buildings and structures it contains. In such a context, the Group urges the Council to declare an unambiguous commitment to follow the policies set out in The Crown Estate's The Old Deer Park Richmond - Landscape Strategy, 1999, and to remedy the designation anomalies as a matter of urgency.</p> <p>4.2 As stated in our earlier submissions of February and November, 2013, the Working Group is entirely willing to clarify and discuss this submission in further detail.</p>
34	Savills on behalf of Thames Water	<p>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water. Thames Water are the statutory water and sewerage undertaker for the Borough and have the following comments:</p> <p><u>The Additional Sites – General Comments on Water Supply and Waste Water Infrastructure</u></p> <p>Due to limited information on the size of proposed developments and the complexities of water and sewerage networks, Thames Water are unable to clearly determine the infrastructure needs at this stage.</p> <p>As set out in relation to the previous Site Allocations Consultation, Thames Water have previously met with the Council planning officers and indicated that there is no known strategic sewer capacity or sewer flooding problems or water supply issues. However, if a large unknown/windfall site were to come forward unexpectedly (either in Richmond or adjoining Boroughs), then there may potentially be some strategic issues.</p> <p>Although, there are no known current strategic water/wastewater infrastructure issues, in some cases it is likely that new water and sewerage/drainage infrastructure would be required off site to ensure sufficient capacity is brought forward ahead of the development. In the first instance a water supply/drainage appraisal and report would be required from the developer to</p>

		<p>determine the exact impact on Thames Water's infrastructure and the significance of the new infrastructure required to support the development. It should be noted that in the event of an upgrade being required to Thames Water's sewerage infrastructure, up to three years lead in time will be potentially necessary for the delivery of the infrastructure; alternatively the developer may wish to requisition the infrastructure to deliver it sooner.</p> <p>Thames Water would therefore welcome the Council's support by including appropriate reference to Policy DM SD 10 Water and Sewerage Provision in the Allocations Plan and also the attaching of Grampian planning conditions on any planning approvals ensuring delivery of necessary water/sewerage infrastructure ahead of occupation.</p> <p>Thames Water would be willing to meet with the Council to discuss the water supply and waste water infrastructure requirements of the sites further.</p>
39	Unity Harvey	<p>Thank you for your letter dated 5th June. My contact details are the same but I am only really interested in developments affecting Barn Elms and the immediate locality to the two Sports Centres.</p> <p>Because of this I would be grateful if you would keep me on the contact list.</p>
40	DTZ on behalf of Royal Mail Group Ltd	<p>We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i>.</p> <p>Background</p> <p>Royal Mail is the successor to the former statutory corporation, The Post Office. Royal Mail is currently the sole designated provider of the Universal Postal Service pursuant to the Postal Services Act 2011 and as such is required to deliver the minimum postal service requirements set out by the 2011 Act and Orders made thereunder. These include the Royal Mail letter post delivery and collection service handling letters, postal packets, and high value (registered) packets. Its services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier. Post Office Counters Ltd who operate the national network of post offices and sub-post offices are no longer part of the Royal Mail group of companies and remain wholly owned by HM Government.</p> <p>The United Kingdom letter post business was fully liberalised in January 2006 by Postcomm and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and its real estate needs to respond accordingly.</p> <p>Previous Representations</p> <p>In November 2013, DTZ submitted representations to the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (October 2013)</i>. DTZ put Hampton Delivery Office, Teddington Delivery Office and Mortlake and Barnes Delivery Office forward as potential residential development sites for inclusion in the Plan.</p> <p>These representations remain valid in relation to the current <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i> consultation. We request that in addition to this letter, they are taken forward as part of the on-going plan preparation. A copy of these representations is enclosed with this letter for ease of reference. We do however raise some additional points in relation to these potential allocations, which we would welcome your consideration of in the next stages of Plan preparation.</p> <p>Royal Mail Properties</p> <p>Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the administrative area of the London Borough of Richmond upon Thames. The following freehold Royal Mail properties are located in Richmond upon Thames:</p> <ul style="list-style-type: none"> • Hampton Delivery Office, Rosehill, Hampton, TW12 2AA • Teddington Delivery Office, 19 High Street, Teddington, TW11 8EG

	<ul style="list-style-type: none"> • Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, London, SW14 8JB <p>The following leasehold Royal Mail properties are located in Richmond upon Thames:</p> <ul style="list-style-type: none"> • Richmond Delivery Office, 2 Park Lane, Richmond, TW9 2RL <p>Representations</p> <p>The redevelopment of the sites for residential /mixed use is appropriate in accordance with the requirement of the <i>National Planning Policy Framework</i> for the development of sustainable communities.</p> <p>The sites have been assessed as capable of redevelopment and included within the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i> document as follows:</p> <ul style="list-style-type: none"> • HA 10 (Hampton Delivery Office) - <i>Residential, including affordable units.</i> • TD 7 (Teddington Delivery Office) - <i>Mixed use scheme with active frontage on ground floor to High Street and residential, including affordable units or office use above and to rear.</i> • EM 7 (Mortlake And Barnes Delivery Office) - <i>A mixed use scheme with employment and residential uses, including affordable units.</i> <p>The Strategic Allocation of the above sites within the Local Plan will provide the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality development that will meet the requirements of Richmond Upon Thames Council.</p> <p>The Royal Mail are supportive of the council's assessment and allocation of the sites within the <i>Draft Richmond Upon Thames Local Plan: Site Allocations Plan Pre-Publication (July 2014)</i>. Royal Mail are also supportive of the objectives and vision of the Draft Local Plan in relation to the suitability of the sites to meet local residents needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth, all in accordance with the National Planning Policy Framework (NPPF).</p> <p>The current allocations have not proposed potential densities of housing units on the sites. Given the sites sustainable location and nature we would propose the following approximate densities (London Plan 2011 recommendations):</p> <ul style="list-style-type: none"> • HA 10 – 10 - 15 units • TD7 – 30 - 40 units • EM7 – 200 - 400 units <p>Accordingly, Royal Mail provides support to the Council's commitment to deliver beneficial development at the allocation through the statutory development plan. We are of the opinion site EM7 could accommodate higher density housing redevelopment given the nature and need for housing in sustainable locations.</p> <p>Re-provision</p> <p>Our initial representations highlighted the fact that the Royal Mail has a statutory duty to provide efficient mail sorting and delivery services. It is therefore imperative that if these existing, active sites are to be considered for alternative uses, that alternative provision can be found and delivered elsewhere in the vicinity in order to meet this requirement. The sites put forward for development could and would only come forward for development in the circumstance where an alternative, suitable re-provision was made, to retain the level of service required at that time and for the foreseeable future and the associated jobs.</p> <p>Within the allocations set out in policy and referenced above, varying phrases are quoted to describe the time at which potential development could occur at the sites. The terms used are: '<i>should the site become surplus to requirement</i>' and '<i>If site becomes surplus</i>'. It is considered that the terms used at present in this draft policy may be misleading.</p> <p>From Royal Mail's perspective, in the context of their obligations, it is vital to use the correct terminology when the council are assessing sites in the public domain. We therefore request that all future policy and supporting text is worded to include the</p>
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		<p>phrase that redevelopment may be forthcoming 'should the site become surplus to requirement following the re-provision of a suitable alternative Delivery office'.</p> <p>The relocation/re-provision of Royal Mail's operations is essential prior to redevelopment of the site to meet their legal obligations in this regard. This will ensure that their operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the <i>Postal Services Act 2011</i>.</p> <p>For your reference, in order for the site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of the site will need to yield both sufficient values to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail's continuity of service.</p> <p>Should the site then become surplus to requirement (following the re-provision of a suitable alternative Delivery Office) the site will then come forward for redevelopment.</p> <p>This approach accords with adopted Government guidance set out in the <i>National Planning Policy Statement (NPPF)</i> (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The <i>NPPF</i> also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).</p> <p>Next Steps</p> <p>We formally request that this letter of representation is taken into account in the preparation of the <i>Richmond Upon Thames Local Plan: Site Allocations Plan</i> document.</p> <p>Royal Mail reserves the right to amend or supplement these representations at a later date if necessary.</p> <p>Royal Mail will continue to closely monitor plans for growth throughout Richmond upon Thames and would welcome further discussion with the Council on the delivery of new infrastructure as the plans for the administrative area evolve.</p> <p>I trust that these representations and enclosed site plans are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the preparation of the <i>Richmond Upon Thames Local Plan: Site Allocations Plan</i> document.</p>
41	Robert Monk	The only comment I make is that, where appropriate, provision for public toilets should be requested. In St. Margarets, for example, there is no provision at all.
42	BT Openreach	No comments

Table 2: Detailed responses to the consultation

Appendix A:

- Copy of full response by GVA on behalf of The Lady Eleanor Holles School (July 2014)
- Copy of Nathaniel Lichfield and Partners Sustainability Appraisal for The Harroddian School



GVA
10 Stratton Street
London
W1J 8JR

The Lady Eleanor Holles School

LB Richmond Site Allocations DPD Consultation

Representations to Pre-publication consultation on new additional sites submitted by GVA on behalf of The Lady Eleanor Holles School

July 2014

Prepared By: Tim Sturgess Status: FinalDate: July 2014

Reviewed By: Nick Alston Status: Final.....Date: July 2014

For and on behalf of GVA Grimley Ltd

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Appendices

Appendix I	Site Location Plan
Appendix II	Core Strategy Proposals Map Extract
Appendix III	Aerial Plan
Appendix IV	Proposed Amended MOL Designation Plan

1. Introduction

- 1.1 The Lady Eleanor Holles School (LEHS) is an independent school located on Hanworth Road, Hampton. A site location plan is enclosed at **Appendix 1**. The LEHS provides education to girls aged 7-18 years, spread across a Junior Department (around 180 pupils) and Senior Department (around 680 pupils). The school is not currently able to offer places to younger children (aged 4-7 years).
- 1.2 The School Governors wish to expand the school in order to meet current (and projected future) unmet local demand for additional school places for the 4-7 years age group (referred to as 'pre-prep'). The preliminary expansion plans comprise the development of a new pre-prep facility at the Hanworth Road site, to provide teaching accommodation for 2-forms of entry across 3 year groups (resulting in the addition of 120 pupils).
- 1.3 The site is not currently proposed for allocation in the draft Site Allocations DPD. Further to this, the expansion of the school is constrained by the existing planning designations affecting the site, namely the near blanket MOL designation. Part of the site is excluded from the MOL designation however this land is not suitable for development (in practical layout terms) (the extent of the existing designation is shown on the Core Strategy Proposals Map at **Appendix 2**).
- 1.4 The NPPF requires local plans to plan positively to meet identified needs. It is in this context that we propose that this site should be allocated for development in the emerging Site Allocations DPD in order to establish an appropriately supportive basis to determine a future planning application. We propose a site specific policy that:
- Supports the development of additional school buildings (and associated facilities) at the site; and
 - Amends the existing Metropolitan Open Land boundary in order to accommodate future development.
- 1.5 The purpose of this paper is to set out details of the proposed site specific policy together with the planning rationale to justify this. It sets out the need for development as the exceptional circumstances necessary to justify a revision to the MOL boundary and to underpin the site allocation. It is structured as follows:
- **Section 2** outlines the proposed site specific policy;

- **Section 3** describes the site;
- **Section 4** outlines the need for development;
- **Section 5** evaluates the key planning issues; and
- **Section 5** concludes the submission.

- 1.6 This representation follows previous meetings with the Council regarding the school's future in June 2013 and November 2013. The ability to amend the existing MOL designation through the emerging Site Allocations DPD is the appropriate means to allow a basis to bring forward the expansion of the school.

Procedural Considerations

- 1.7 We understand that the Council undertook consultation on the pre-publication version of the Site Allocations DPD in October and November 2013. The School did not submit representations in response to this consultation opportunity.
- 1.8 We recognise that the current consultation is intended to focus on proposed additional sites and a proposed change to an MOL boundary designation. However, the Local Plan process allows LPAs to consider comments received as part of this consultation and to make further amendments to the proposed publication version of the plan. We understand that a further round of public consultation will take place on the plan as a whole, to include any further proposed amendments resulting from this current round of consultation, in advance of submission to the Secretary of State for examination. Therefore, we consider that there remains ample opportunity to introduce new sites to the draft Site Allocations DPD, and requests that the Council consider this representation favourably.

2. The Site

Location

- 2.1 The site is located in the south west of the London Borough of Richmond-upon-Thames (LBRUT) in Hampton North ward. The site is approximately 4km to the south east of Feltham, 2.5km to the west of Teddington and 4km to the south west of Twickenham.

Description

- 2.2 The site comprises c.9.87 hectares. It is broadly defined by the brook/stream (Longford River) to the north; the rear boundaries of residential properties on Uxbridge Road/Roy Grove to the east; Hanworth Road to the south; and the boundary with Hampton School to the west. A plan illustrating the existing site features is provided at **Appendix 3**.

Existing Development

- 2.3 The main Senior Department school buildings are located in the south central part of the site, fronting Hanworth Road. The main school buildings are between two and three storeys in height centred around small courtyard formations. A new Arts Centre is currently under construction to the eastern side of these buildings and will provide a new theatre, music department and art department, as well as refurbishments to the dining room and drama department. To the north and northwest of the main school buildings are a swimming school and sports hall.
- 2.4 The Junior Department is located in the north western corner of the site (which includes a separate vehicular access point onto Uxbridge Road). The main Junior Department building comprises three storeys, which is supplemented by a one/two storey rear addition. The Junior Department buildings are surrounded by lawned areas which are connected to outdoor playing facilities and the rest of the school site via a pedestrian bridge over the Longford River.
- 2.5 A Caretaker's 'compound' is located in the south western corner of the site. This accommodates a number of single and 2-storey structures used to store equipment, machinery and materials for the maintenance of the school. Within this area there is also

an electricity sub-station, and well as areas of land used for the storage of miscellaneous furniture, waste and school vehicles.

2.6 The site also accommodates six dwellings at 131, 133 and 135 Uxbridge Road (north east corner of site); 113 Uxbridge Road (Rectory Lodge) (east of site); and at 50 and 102 Hanworth Road (south of site). Each of these units benefits from separate vehicular access onto Uxbridge/Hanworth Road. Dwellings are occupied by school staff.

2.7 The site does not include any Listed Buildings.

Landscape

2.8 The site is relatively flat. Formal landscaped (lawned) amenity areas are provided to the front (south) of the main Senior Department school buildings facing Hanworth Road. The remainder of the site comprises mainly playing fields with incidental areas of amenity space/landscaping, playgrounds and sports courts. The site accommodates a number of trees, however these are mainly confined to the site boundaries.

Access Arrangements

2.9 Vehicular and pedestrian access arrangements comprise three main access/egress points onto Hanworth Road and a separate access/egress point onto Uxbridge Road for the Junior Department. These are supplemented by three secondary access/egress points onto Uxbridge/Hanworth Road.

2.10 The main school car/coach park lies to the south of the main Senior Department buildings. This is supplemented by further staff and visitor parking around the Junior Department buildings.

2.11 Parent/carers pick-up/drop-off is on-street.

2.12 The site benefits from a PTAL (Public Transport Accessibility Level) rating of 2 (poor). Numerous bus services operate along Uxbridge and Hanworth Roads.

Neighbouring Development

- 2.13 Directly to the south of the site, a row of two storey detached residential properties face the school. Beyond these properties is a predominantly residential area. To the north of the site, beyond Longford River, there are residential properties of between two and three storeys in height which front on to Uxbridge Road.
- 2.14 To the east of the site, the neighbouring development on Uxbridge Road comprises two to three storey residential properties including ex-local authority housing blocks and detached properties. To the west of the LEHS site is Hampton School (buildings and playing fields), and beyond this is Hampton Academy.

Physical and Environmental Considerations

- Topography – The site is broadly flat.
- Protected Species – We are not aware of any protected species present on the site (survey work will be necessary in order to confirm this).
- Underground Utilities – The site is expected to be constrained by the presence of underground utilities infrastructure (details to be confirmed following survey work).
- Flood Risk – The site falls within Environment Agency Flood Risk Zone 1 (low risk).
- Geo-environmental – We are not aware of any ground contamination issues.
- Trees – A number of trees are present on the site. These offer amenity value but are not considered to pose a significant constraint to development.
- Noise – The school use is a noise generator and the site is located in a noise sensitive (predominantly residential) setting.

Planning Unit and Existing Lawful Use

- 2.15 We consider the site (as outlined on the plan at **Appendix 1**, including the Junior Department, Senior Department, and residential accommodation/dwellings) to function as a single planning unit at present. We consider the existing lawful use to be D1 (non-residential institution) (the staff residential accommodation is ancillary to this principal use).
- 2.16 Notwithstanding this, the dwellings are arguably capable of functioning as separate planning units, which is relevant to their future planning potential for alternative uses.

3. Proposed Site Specific Policy

- 3.1 The existing MOL designation is shown on the Core Strategy Proposals Map at **Appendix 2**. The LEHS propose the following amendments to the existing MOL designation.
- Removal of those areas which are already built on and do not serve the purpose of their designation as MOL.
 - Removal of the strip of MOL to the north of the undesignated area to allow for the planned expansion of the school.
- 3.2 The areas proposed to be removed from the MOL designation are shown highlighted in red cross-hatching on the Plan at **Appendix 4**.
- 3.3 Land which has already been built on should be removed from the MOL designation as it does not serve the purpose for its inclusion. This includes the existing buildings in the north east, south east and south west corners of the site, and the car parking area to the south and south east of the main buildings.
- 3.4 As identified in Section 1 there is an envelope around the existing school buildings which excludes the MOL designation. This includes a playing field space that is undeveloped. It is noted that the OS base on which the existing Core Strategy Proposals Map is based is out dated and does not show the full extent of the school's existing buildings. This is shown on the Aerial Plan at **Appendix 3**. The result of recent additions within the envelope of land not designated as MOL has created an area that forms a 'courtyard' style space within the Senior School. This is the only area of land not subject to MOL designation adjacent to the main school buildings. Expansion of the school on this part of the site risks compromising the operation of the senior school as it conflicts with access and circulation space. Therefore, a minor removal of the MOL designation is sought as a natural extension to the north. This would allow for development to retain and utilise the courtyard style space.

4. Development Need

The Requirement for Expansion

- 4.1 Expansion of the school is required is to provide a pre-prep facility with capacity for 2 forms of entry across 3 year groups (6 classes) (total number of pupils: 120). The Governors consider this to be the most appropriate solution having regard to anticipated levels of demand and in response to operational considerations.
- 4.2 Architects are yet to be appointed, nonetheless the preliminary development specification is as follows:
- Approximately 600sqm floorspace (comprising classrooms and ancillary accommodation) spread over 2-storeys. This should be located within the Hanworth Road site but comprise a discrete facility (disaggregation of the pre-prep facility from the school site would not be feasible on operational grounds).
 - A total land requirement of around 0.15-0.2ha is anticipated, to comprise the building footprint plus outdoor play space (hard and soft play) and associated circulation/amenity space.
 - Parent/carer pick-up/drop-off facilities either adjacent to the building or within close walking distance (indicative capacity to accommodate around 30 cars off-street) (note that no permanent car parking is required). A variety of solutions could satisfy this requirement including a marshalled 'loop' road system and/or short term car – waiting area.

The Education Case

- 4.3 The current shortage of school places in London (particularly for younger children) is well documented. Projected population and demographic changes suggest that need is likely to continue to grow over forthcoming years, placing increasing pressure on education providers in both the state and independent sectors.
- 4.4 The LBRUT Joint Strategic Needs Assessment (2010-12) includes headline data that highlights the key issues:
- There are 72 schools in LBRUT, of which 22 (30%) are independent (2011). An estimated 19% of the school aged population (aged 4-10 years), and 36% of the 11-15

years age group resident in LBRUT, attend independent schools (2010) (around 26% of the borough's total school age population).

- In the period 2000-2009, the population of LBRUT increased by 9.3%, however the age 0-15 population increased by 16%.
- Short term GLA population projections estimate that there will be year-on-year growth of the 4-15 aged population in LBRUT in the period 2010 to 2014, of around 5.8% (around 1.5% per annum).
- This growth in the number of school aged children is projected to continue. Long term 2008-based population projections estimate that the LBRUT age 0-15 population will increase by 19.3% (7,000 people) in the period 2008-2023.

- 4.5 The above headline data clearly demonstrates that not only is the local school-aged population likely to continue growing, but that education providers in both the state and independent sectors must increase capacity in order to cater for this demand (noting that around 25% of pupil growth is likely to be attributable to the independent sector based on current market shares, and that limited/nil growth of the independent sector will further increase pressure on state schools and/or increase the need for pupils to travel further afield for their education).
- 4.6 The LEHS Governors wish to respond proactively to this growing need by implementing plans to expand the school. They are aware of specific existing unmet demand for pre-prep school places (on the basis of parental inquiries), which they expect to continue to grow going forwards.
- 4.7 Logic dictates that policy makers and decision makers at all levels should encourage the growth of the best schools in order to not only increase quantitative provision of school places but also to improve the quality of education provision. The LEHS is a very successful school. In its most recent (2013) Inspection Report, the Independent Schools Inspectorate (ISI) judged that "the quality of the pupil's achievements and learning is exceptional". The Good Schools Guide considers it to be 'one of the top girls' schools in the country'. In 2013 82.5% of A Level results, 49.2% (upper sixth)/60.3% (lower sixth) of AS Level results, and 95.2% of GCSE results were A or A*. Clearly, the expansion in the number of 'outstanding' school places should be supported.

Economic Benefits

- 4.8 The proposed development will involve capital investment of around £3m, the generation of 40 FTE (full time equivalent) construction related jobs (calculated on the basis of industry-standard multipliers), and approximately 12 permanent teaching related jobs. Furthermore, the ability to access high quality education is a fundamental determinant of the life chances of London's children and their potential future economic output, ensuring that the scheme will contribute towards achieving short and longer term economic development objectives.

5. Planning Rationale

The Principal Matter

- 5.1 The principal planning matter (which outweighs all other matters) is the Government's presumption in favour of sustainable development established in the NPPF, which includes specific support for new schools (at paragraph 72):

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted

- 5.2 The NPPF position is reflected in London Plan Policy 3.18 which supports the provision of new education facilities and improved education choice, in particular proposals that address the current projected shortage of primary school places which '*will be particularly encouraged*'. The policy advises that '*proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations*'.
- 5.3 This positive/supportive policy position is carried forward at the local level, specifically in the borough's Core Strategy (Policy CP18) which seeks to maximise the potential of existing education sites.
- 5.4 Clearly, the principle of the planned expansion of the school is supported by policy. Determining whether a proposal is fully acceptable in planning terms will be subject to demonstrating that there is no harm (impacts) that substantially outweighs the benefits of creating additional school places.

Metropolitan Open Land Designation

- 5.5 The majority of the LEHS site is designated as MOL, excluding an envelope of land around the existing main school buildings, the junior school site and Rectory Lodge (113 Uxbridge Road).
- 5.6 The Metropolitan Open Land designation is established in the London Plan. Policy 7.17 requires planning authorities to protect land designated as MOL from inappropriate development other than in exceptional circumstances (affording such land the same level of protection as Green Belt). Appropriate development is defined as small scale structures to support outdoor open space uses that avoid adverse impacts on the openness of the MOL, and/or the replacement of existing buildings provided the new building is not materially larger than the one it replaces (all other development is 'inappropriate').
- 5.7 MOL is afforded the same level of protection as Green Belt which the NPPF (paragraph 80) identifies as serving the following purposes:
- To check unrestricted sprawl of large built up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 5.8 Not all of the above criteria apply to the site, but it is clear that the proposed removal of part of the site from the MOL designation would not conflict with the aims of the policy. The remainder of the site would still retain its MOL designation which would prevent unrestricted sprawl across the site and the school from merging with the existing development to the north. Furthermore, the existing parts of the site which have previously been developed are in direct conflict with the purposes of the policy as they are not able to assist in urban regeneration, as they are unnecessarily protected by the MOL designation.
- 5.9 At the local level, the LBRUT Local Plan adopts a consistent policy stance to the London Plan. Core Strategy Policy CP10 states that the LPA will protect and enhance the open

environment, with Metropolitan Open Land 'safeguarded and improved for biodiversity, sport, recreation and heritage, and for visual reasons'. Policy DMOS2 seeks to protect the openness of MOL from impacts associated with development on adjacent land, but recognises that there may be exceptional cases where appropriate development, such as small scale structures is acceptable, but only if:

- It does not harm the character and openness of the MOL; and
- It is linked to the functional use of the MOL or supports outdoor open space uses; or
- It is for essential utility infrastructure and facilities, for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the MOL.

5.10 The above protectionist policies should be considered in the context of the firmly pro-development policies relating to education facilities discussed above, which gives rise to a strategic policy conflict. There is clear planning policy support for the provision of additional school accommodation, however, the majority of undeveloped land within school sites in LBRUT and much of London (onto which schools could logically physically expand) is protected from development by MOL designation. This places a significant constraint on the potential to develop new school accommodation and the ability to implement policies relating to this.

5.11 It is our view that there is a logical in-principle strategic planning case to justify the release of part of the existing MOL designation on the site to accommodate new school buildings where need can be demonstrated, that land designated as MOL does not serve its intended purpose (i.e. is already developed) and where it is evident that the development potential of land not designated as MOL has been optimised.

Other Relevant Policy Considerations

Playing Fields

5.12 A large proportion of the site's MOL designation comprises land that meets the statutory definition of playing fields. This includes overlap on the land which is proposed to be removed from the existing MOL designation. This land is subject to policy protection from development under the provisions of the NPPF, London Plan (Policy 3.19), and the LBRUT Local Plan and any proposed development would be subject to adequately justifying that

the playing field land is surplus to requirements or that the loss resulting from the proposed development would be replaced by equivalent, or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreational provision (the needs for which clearly outweigh the loss). Therefore, this is not a consideration of this representation.

Historic Assets

- 5.13 The site is adjacent to the Grade II Listed 127 Uxbridge Road. Any proposed future expansion should avoid adversely affecting the setting of this building.

Neighbour Amenity (Nuisance)

- 5.14 The site is surrounded on three sides by residential properties. To the north and east residential properties back directly onto the LEHS site, whilst properties to the south of the site front on to Hanworth Road, which fronts the LEHS site. As such, the amenity of residential neighbours must be considered in the context of the proposed allocation of the site.
- 5.15 Key considerations will be the need to ensure that any future expansion maintains adequate levels of privacy and avoids excessive noise impact. At this stage we assume that these matters would be dealt with via appropriate siting and design with detailed design matters provided as part of an application.

Environmental/Technical

- 5.16 Key environmental constraints include the Longford River which runs along the northern boundary of the site, which is allocated as an 'other site of nature importance'. To be safeguarded and enhanced. Accordingly, the allocation should not adversely impact on Longford River.
- 5.17 The proposed allocation should not have an adverse impact on trees, in particular the old oak tree to the east of the main school buildings and any trees subject to a Tree Preservation Order. An Arboricultural Assessment should be undertaken at the detailed design stage as part of any proposed future development.

- 5.18 There are no known insurmountable environmental/technical constraints at this stage that would restrict allocation of the site. These aspects would be tested as part of the detailed design stage.

6. Conclusions

- 6.1 On the basis of the justification set out within this representation, we propose that the area shaded on the figure at **Appendix 4** be removed from the MOL designation and following wording be adopted as an allocation for The Lady Eleanor Holles School.

"Retention of existing school and expansion of education facilities"

- 6.2 This site specific policy will support the development of additional school buildings (and associated facilities) at the site; and amend the existing Metropolitan Open Land boundary in order to accommodate future development. The key reasons which justify this proposed policy are summarised as follows:

- The NPPF requires local plans to plan positively to meet the identified needs of their borough.
- There is an identified current and projected unmet local demand for additional school places for the 4-7 years age group.
- The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities and requires local planning authorities to take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.
- The expansion of the school is constrained by existing designations. The current land available not suitable for development (in practical layout terms).
- Previously developed land should not be designated as MOL as it does not serve the purpose for its inclusion. The amendment to the MOL as proposed in this representation will not conflict with the aims of MOL policy.
- The amendment to the MOL designation and site allocation will allow the school to positively plan its expansion to meet local demand and provide a choice in school places.

- 6.3 As a key stakeholder and landowner in LB Richmond, LEHS is keen to work closely with the LPA as the Site Allocations DPD progresses. We would welcome the opportunity to continue discussions on this proposed representation and LEHS's expansion plans.
- 6.4 We trust that these representations will be taken into consideration in the progression of the Site Allocations DPD. In the meantime, please do not hesitate to contact Tim Sturgess on 0207 911 2236.

APPENDICES

Appendix 1 - Site Location Plan



Appendix 2 - Proposals Map Extract

Core Strategy (2011) Proposals Map



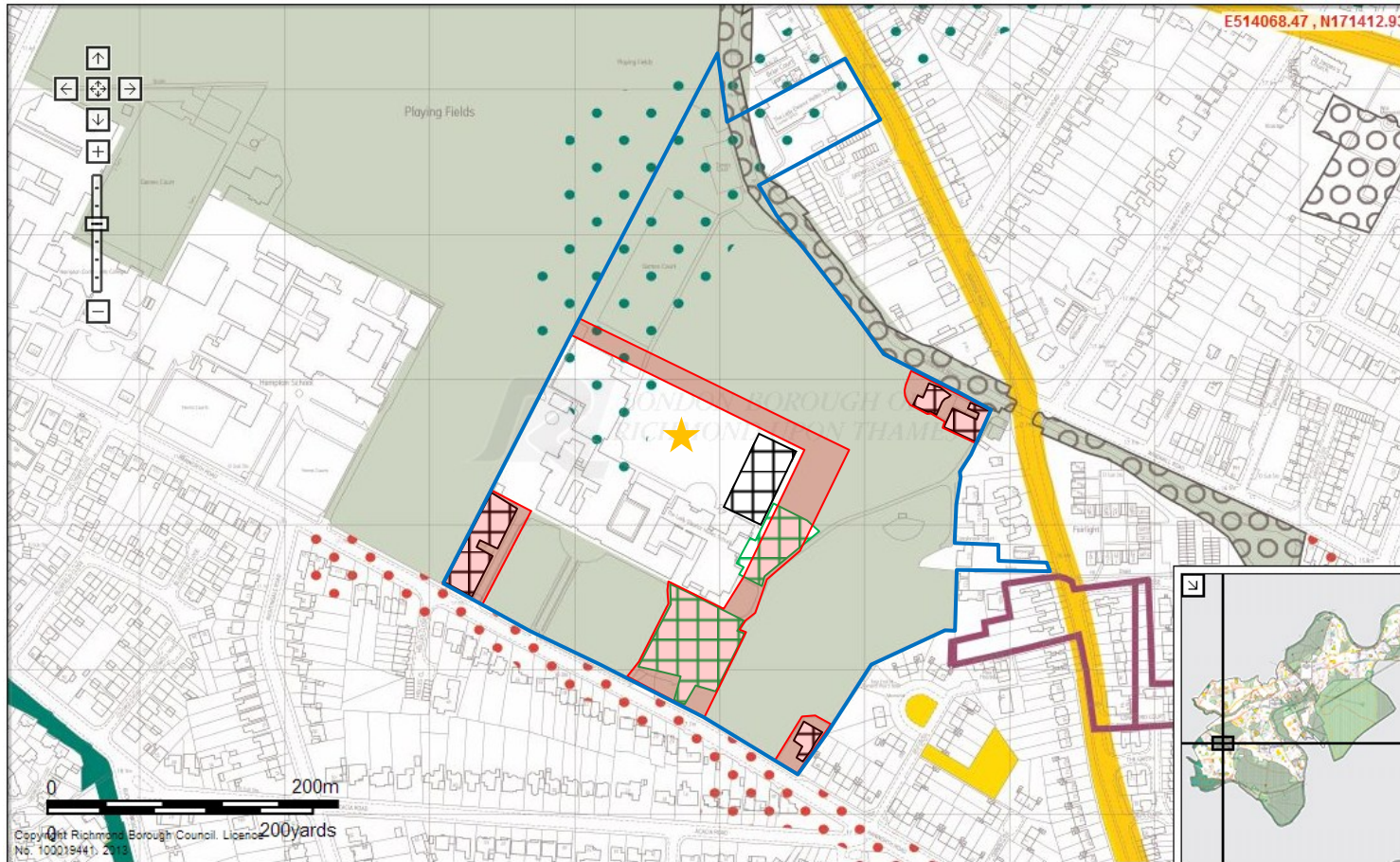
- Key**
- Metropolitan Open Land
 - Area poorly served with Public Open Space
 - Proposed area for tree planting
 - Other site of nature importance
 - Conservation Area
 - Other open land of townscape importance

Appendix 3 - Aerial Plan



Appendix 4 - Proposed Amended Plan

Proposed Amended MOL Designation Plan



Key



Proposed area to remove from Metropolitan Open Land



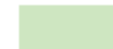
Existing buildings



Existing car parking areas



Area currently unusable due to existing development. Potential for expansion to north to form courtyard



Metropolitan Open Land



Area poorly served with Public Open Space



Proposed area for tree planting



Site boundary

N.B. OS base plan on which the Richmond Proposals Map is based is out of date and does not take account of latter extensions to the school.

NLP Sustainability Appraisal – Pre-Publication Site Allocations Plan - New Additional Sites Consultation (June 2014)

Proposed Site: Harrodian School, Barnes							
Option C: Alteration of MOL boundary to remove south west corner (shown hatched) from MOL designation.							
SA Objectives	Geographic Scale		Assessment/Length of effect			Cumulative	Commentary, uncertainty, mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
1. Waste							Neutral
2. Pollution & soil							Neutral
3. Travel	++ (very sustainable)	+ (sustainable)	+	++	++	++	If the education needs of more residents can be met locally at Harrodian this would reduce the need for pupils, parents and other users of the school to travel to other facilities/locations potentially removing car journeys from the local road network.
4. Climate change mitigation	+	+	+	++	++	++	If the education needs of more residents can be met locally at Harrodian this would reduce the need for pupils, parents and other users of the school to travel to other facilities/locations removing car journeys from the local road network and associated pollution. Opportunities to incorporate low/zero carbon and renewable energy technologies.
5. Climate change adaptation, flood risk	+	+	+	++	++	++	If the education needs of more residents can be met locally at Harrodian this would reduce the need for pupils, parents and other users of the school to travel to other facilities/locations removing car journeys from the local road network and associated pollution.

Proposed Site: Harrodian School, Barnes

Option C: Alteration of MOL boundary to remove south west corner (shown hatched) from MOL designation.

SA Objectives	Geographic Scale		Assessment/Length of effect			Cumulative	Commentary, uncertainty, mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
6. Biodiversity							Neutral. The open areas and hedgerows surroundings these areas would remain within the MOL.
7. Landscape & townscape							Neutral. The alteration relates to the built-up areas of the site and the existing playing fields would remain within the MOL.
8. Parks & Open spaces							Neutral. The existing open spaces on the site would remain within the MOL.
9. Best use of land/sustainable construction	+		+	++	++	++	If the education needs of more residents can be met locally at Harrodian by making most efficient use of a previously developed site this would reduce the need to provide for alternative facilities in new locations.
10. Housing							Neutral
11. Health, wellbeing, secure communities	+	+	+	++	++	++	If the education needs of more residents can be met locally at Harrodian this would reduce the need for pupils, parents and other users of the school to travel to other facilities/locations removing car journeys from the local road network and associated pollution. It would also encourage trips by alternative forms of transport other than the private car such as walking and cycling.
12. Accessible local services	+		+	+	++	+	Expansion of the school would lead to an increase in social infrastructure to the benefit of pupils, parents and the wider community.

Proposed Site: Harroddian School, Barnes

Option C: Alteration of MOL boundary to remove south west corner (shown hatched) from MOL designation.

SA Objectives	Geographic Scale		Assessment/Length of effect			Cumulative	Commentary, uncertainty, mitigation
	Local	Trans-boundary	Short-term	Medium-term	Long-term		
							Opportunities for creating and extending an existing educational facility already well-established within the Barnes community.
13. Town Centres							Neutral
14. Local economy	+		+	++	++	++	If the education needs of more residents can be met locally at Harroddian employment opportunities at all skill levels would be created.
15. Commercial development opportunities							Neutral
Summary of assessment	<p>Altering the MOL boundary as proposed in the Additional New Sites Consultation would deliver sustainability benefits and represents a reasonable and balanced application of policy at all levels relating to protecting MOL and providing for future educational needs, resulting in a sound plan.</p> <p>Development proposals would still require planning permission ensuring the Council retain control over what development is considered to be acceptable, and subsequently approved.</p>						
Possible mitigation							