

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



Consultation from 11 August – 6 October 2014

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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.	Ms Alison McIntosh
2.	Ms Alison Fish
3.	Ms Alison de Lord
4.	Mr Adam Leadercramer
5.	Ms Adele Ottinger
6.	Ms Alana Washington
7.	Mr Andrew Beedham, Ham and Petersham Neighbourhood Forum
8.	Mr Andrew Stancer
9.	Mr Andrew Whitehead, Carlisle Infant School and Hampton Hill Junior School Federation
10.	Mr Andy Haunton
11.	Mr Andy Sutch
12.	Ms Anne Chatterton
13.	Ms Bilge Erengul
14.	Mr Bill Walters
15.	Ms Brita Scharf
16.	Mr Andrew Barnard
17.	CN Stephens
18.	Ms Carmelle Bell, Savills obo Thames Water
19.	Ms Caroline Britton
20.	Charles and Gail Doe
21.	Mr Charles Doe, Ham and Petersham Neighbourhood Forum
22.	Mr Charles Muriithi, Environment Agency
23.	Mr Chris Bemand
24.	Ms Claire Craig, English Heritage
25.	Mr Dale Nolan

Respondent reference no.	Name/Organisation
26.	Ms Danielle Coleman
27.	Mr Dave Munby
28.	David and Patricia Yates
29.	Mr Erik Peterson
30.	Ms Ester Arana
31.	Mr Eugene Dreyer, Langham House Estate Maintenance Company Ltd
32.	Mr Gary Hagreen
33.	Mr Geoff Bond
34.	Mr Geoff Bond, Martingales Close Residents Association
35.	Mr George Longstaff
36.	Ms Georgina Brown
37.	Mr Peter Dines, Gerald Eve LLP obo Churches Extension Trust
38.	Ms Sarah Considine, Greater London Authority
39.	Ms Glynis Becker
40.	Ms Helen Baker
41.	Mr Nigel Easey, Highways Agency
42.	James and Nicola Henderson
43.	Mr James Lloyd, James Lloyd Associates Limited obo Tyton Properties Ltd
44.	Jane and Roy Morrison
45.	Ms Jane Phillips
46.	Mr Jeremy Rodell
47.	Mr John Clinch
48.	Mr John Webb
49.	Ms Judith Catto

Respondent reference no.	Name/Organisation
50.	Ms Julia Kernick MBE
51.	Mrs Juliet Nolan
52.	Ms Karen Skipper
53.	Ms Kate Massey
54.	Mrs Kathy Meek
55.	Mr Kelvin Sutherland, Authentic Estates
56.	Mr Laurent Doliveux
57.	Mr Lawrence Moss
58.	Ms Lizabeth Rohovit
59.	Mr Frank Siebert
60.	Louise and Colin Bell
61.	Mr Mark Brand
62.	Mr Mark Elliott
63.	Mr Markus Hoffmann, TfL
64.	Mr Martin KIRRAGE
65.	Ms Mary Nesbitt
66.	Ms Maura Wall
67.	Mr Michael Tothill
68.	Mr Michael Wall
69.	Namrita Singh
70.	Sally Harries, Natural England
71.	Mr Nick Bagge
72.	Mr Nick Hanmer

Respondent reference no.	Name/Organisation
73.	Mr Oliver Yeates, NLP obo West London Mental Health NHS Trust
74.	Ms Pamela Sloan
75.	Ms Pat Bushnell
76.	Mr Paul Massey
77.	Mr Paul Schofield
78.	Mr Paul Dickinson, PDA obo Sharpe's Recycle Oil
79.	Mr Peter Britton
80.	Ms Philippa Edmunds
81.	Mr Robert Watson
82.	R N Field
83.	Rati Chihambakwe
84.	Rebecca Taplin
85.	Sally and James Boyle
86.	Ms Sophie Matthews, Walsingham Planning
87.	Mr John Devonshire, Spelthorne Borough Council
88.	Ms Su Bonfanti
89.	Ms Susan Parkin
90.	Mr Tim Sturgess, GVA obo Lady Eleanor Holles School
91.	Mr Tom Goulbourn
92.	Mr Huw Williams, CgMs obo RuTC & REEC

Table 1: All respondents to the consultation

Detailed comments:

Each response has been allocated to the relevant proposal site

HH 2 – St Clare Business Park, Holly Road, Hampton		
Ref. no.	Name/Organisation	Detailed comment
3	Alison de Lord	<p>I am writing to log my personal objection to creating a new primary school site at the St Claire's Industrial Estate. Having previously lived in Wolsey Road and now living in Windmill Road I can only see huge traffic issues. The site is not easily accessible and I would have grave concerns over the safety of the children going to and from school. As well as issues for the traders on the high street.</p> <p>In addition, I do not believe there is a need for additional primary places so close to the Carlisle and Hampton Hill junior Federation, surely with investment there is capacity for expansion?</p>
6	Alana Washington	<p>I am writing to voice my objection to the proposed building of a primary school in Holly Road, Hampton Hill. As a local resident with children at a nursery in nearby School Road and Carlisle Infants, I see the traffic already overtaking the area every morning. Cars are forced to reverse up Holly road due to cars parked on either side and one end being accessed by a really narrow bridge over the railway track. The additional number of cars would spoil this area and make it more dangerous for all the children walking to nearby nurseries and Carlisle/Hampton Hill Junior School. I hope that this proposal will be reconsidered as it will surely cause nothing but problems for all the local residence in what is a very narrow, residential road.</p>
8	Andrew Stancer	<p>I wish to make a formal complaint about the proposed building of a new Primary Free School in St Clares business park, Holly Road Hampton Hill.</p> <p>As if the parking and access into Holly road isn't at bursting point .</p> <p>The extra load on this already very busy street would only make the residents of Holly Road (myself and partner included) struggle even more to exit the street when driving to work in the mornings and parking their vehicles after their working day has finished. Also the congestion of vehicles exiting Holly Road either into School Road and past the Greenwood centre (Access here is limited by the road width and already parked vehicles) or onto the High Street where it would be an extra load on the general traffic passing through the village.</p> <p>This is apart from the fact that we do not actually need another free school, Primary or Secondary in Hampton Hill .</p>
9	Andrew Whitehead, Carlisle Infant School and Hampton Hill Junior School Federation	<p>Purpose of this response: To object to the Council's identification of educational provision within the following existing Site Allocations Plan proposal: HH 2 St Clare Business Park, Hampton Hill.</p> <p>Objection 1:</p> <p>There is no defined need for extra primary education in Hampton or Hampton Hill. The Information provided by the council does not identify any need for extra primary provision in Hampton or Hampton Hill either currently or in the medium to long term. 'Background Paper Needs Assessment – Education (Last updated: 13 September 2013)' states "As at present, in the medium to long term it is likely that there will be a need to consider additional provision in the Barnes/East Sheen/ Mortlake; Richmond; Teddington; and Twickenham areas."</p> <p>However the Council's Needs Assessment's conclusion (above) is contradicted in several of the Council's submissions, which wrongly state that there is (or will be) an impending shortage of primary school places in Hampton / Hampton Hill e.g. 'Pre-Publication consultation on new educational sites Consultation from 11 August to 6 October 2014 dated August 2014' wrongly</p>

		<p>states “Additional school places are required in this area and the site is in an excellent location to provide new primary school places”.</p> <p>‘Sustainability Appraisal of new educational sites, July 2014’ wrongly states “[The proposal] provides for much needed primary school places that are required in this area”</p> <p>Objection 2: St Clare is not an appropriate location to provide additional educational provision for Teddington children. Parents would rightly expect to be able to access schools within walkable distance, which wouldn’t be possible from most of the Teddington area. The proposed large new residential development on Broom Road, Teddington will exacerbate demand for primary places in Teddington but is over 1.5 miles (on a straight line basis) from St Clare; this distance exceeds the Council’s aim for location of schools.</p> <p>Objection 3: High quality infant and junior school provision exists within 300 metres (straight line basis) from St Clare. Council policy is that existing schools should be the considered for expansion before an additional school is proposed in the immediate vicinity; neither Carlisle Infants nor Hampton Hill Juniors have been expanded in recent years. ‘Background Paper Needs Assessment – Education (Last updated: 13 September 2013)’ states “The general approach to increasing primary provision will be to expand existing schools where possible...”</p> <p>Objection 4: The area around St Clare is so densely built that travel would be difficult at the start and end of the school day.</p> <ul style="list-style-type: none"> • Holly Road is narrow and vehicular access is further restricted by its narrow bridge; • Hampton Hill High Street’s lack of width means that no cycle lanes exist along its entire length; existing bus stops and other restrictions would cause negative impacts on all traffic as parents attempted drop off and pick up children; • The PTAL (public transport accessibility level) is only 2, so parents will use cars to transport children to/from school. <p>Objection 5: St Clare is currently designated within the Council’s Site Allocations Plan as a ‘Key Employment Site’, and the Council’s published intention is that employment uses should be protected within the borough. ‘Sustainability Appraisal of new educational sites, July 2014’ states “[The proposal] would lead to some loss of employment land”. The proposed change of use would obviously reduce the current number/scope of commercial and charitable operations, and would restrict local entrepreneurship. The Council’s consultation papers do not estimate how much employment land would be lost, but to create a new school with adequate open air play space and parking for teachers’ cars would take a significant proportion, with consequent significant loss of local employment.</p> <p>Objection 6: The proposal to mix commercial and education on one site with unrestricted access may result in child safeguarding issues, and a less than ideal learning environment. Although safeguarding issues can be mitigated by tight security measures, it seems unlikely that a positive learning environment could be created within such a mixed use, open access site.</p>
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12	Anne Chatterton	<p>Thank you for the letter of 8 August 2014 notifying me of the above consultation.</p> <p>I agree that good educational provision is vital. However, I have concerns about the proposed site in relation to traffic and access.</p> <p>I have lived in Myrtle Road, the street immediately next to Holly Road, for 30 years. I can, therefore, recall the traffic problems which existed when Job's Dairy was operating and also when there was a building firm on the business park - and that was when there were far fewer cars generally.</p> <p>I would like my concerns to be taken into account and stress the importance the planners must attach to traffic and access for this proposal.</p>
27	Dave Munby	<p>As someone who accesses Holly Rd on a regular basis and someone whose child uses Holly Rd to and from school, I am appalled at the thought of the traffic chaos that would ensue at school drop off and pick up if the site were developed for school usage. The road is congested at the best of times and the bridge access is a potential grid lock during drop off and pick up. This proposal needs further consideration.</p>
29	Erik Petersen	<p>I have read through the pre- publication and site allocations plan, and also the sustainability appraisal for new educational sites. I have the following comments regarding St Clares Business Park.</p> <p>It is agreed that St Clares is currently underused, and would benefit from redevelopment. However, perhaps the reason that the St Clares is underused is the very limited access and egress due to the narrowness of Holly Rd, and the width restriction on the bridge between Holly Rd and School Rd Avenue.</p> <p>If the park was redeveloped and the only entrance was from Holly Rd, this would have a detrimental effect on the residents of Holly Rd, and also lead to congestion on the High St, as vehicles will back-up onto the high St.</p> <p>Holly Rd is only wide enough for a single vehicle (driving, with parked cars on both sides), and the only passing places are at the entrance to St Clares, and at either end of Holly Rd, (High St end and bridge end).</p> <p>In the event of an emergency in the redeveloped St Clares Park, it is unclear whether emergency vehicle would be able to gain access.</p> <p>It would make sense to create / re-open alternative entrances into St Clares from Windmill Rd or the High St, (both two way traffic).</p> <p>This would ensure proper access and egress for emergency vehicles, deliveries, waste disposal, and pick up and drop off for the school.</p> <p>This proposal would benefit from a considered traffic management plan to ensure road safety, no loss of amenity to the residents of Holly Rd, whilst improving the provision for primary education for the borough.</p>
32	Gary Hagreen	<p>I live in Holly Road and my back garden backs onto the boundary of the proposed site.</p> <p>Whilst I am not opposed to the site being developed In regard to both options B and C I would like to point out that the entrance to the site on Holly Road is quite narrow and cannot facilitate 2 way traffic. At the moment this is just about workable as the site is probably underutilised and hence the actual amount of traffic in and out of the site is quite low and hence 2 way traffic does not</p>

		<p>present a problem although there are often large lorries that get stuck at the entrance because the width of Holly Road is also narrow and does not make a good turning point for large lorries.</p> <p>However if the site was to be developed the likely impact would be increased traffic - and hence the existing entrance which has no potential to be widened would not facilitate 2 way traffic and would still not be able to accommodate large lorries.</p> <p>I would strongly suggest that if the site is to be developed as options B or C you should consider accessing the site from Hampton Hill High Street or Windmill Road. Either of these options would mean a new entrance / access to the site which would give the opportunity to make the access wide enough to accommodate 2 way traffic and larger vehicles.</p>
35	George Longstaff	<p>The HH2 site planned for education, I feel is a bad idea. This site is at present a large industrial estate with a small entrance on to a small domestic road. To put a school on this site will cause more chaos and be dangerous for the pedestrians who use the footpaths. At present we already have constant damage to the footpaths as larger and larger HGV vehicles try and gain access.</p>
43	James Lloyd, James Lloyd Associates Limited obo Tyton Properties Ltd	<p>This e-mail and supporting documents is submitted to the London Borough of Richmond upon Thames (hereafter referred to as the 'Council'), on behalf of Tyton Properties Limited (hereafter referred to as the 'Applicant'), regarding Written Representations to the Council's Site Allocations Development Plan Document: Pre-Publication Consultation on new Education Sites (hereafter referred to as the 'Site Application DPD), in respect of St. Clare Business Park, Hampton Hill (hereafter referred to as the 'Site').</p> <p>This e-mail should be read in conjunction with the following supporting documents:</p> <ul style="list-style-type: none"> • Covering Letter: Supporting Planning Information prepared by JLA Limited • Critique of Draft Allocation prepared by CBRE • Preliminary Comparison of Traffic Issues prepared by Alan Lipscombe <p>On the basis of the above, we recommend that the proposed allocation is deleted.</p> <p>I trust this e-mail and supporting documents is satisfactory and I look forward to receiving an acknowledgement shortly. However, please let me know should you require any additional information or have any queries.</p> <p>See Appendix A to this document for a copy of the full response by James Lloyd Associates Ltd on behalf of Tyton Properties (October 2014).</p>
45	Jane Phillips	<p>HH 2 St. Clare Business Park, Hampton Hill: A quiet area with the railway running alongside which is well 'fenced off' so should not present any problems.</p>
48	John Webb	<p>I write in response to the proposal to designate this property for, in part, a Primary School. Holly Road is effectively a single carriageway with few passing points. At the western end and at a slight angle to Holly Road is a narrow bridge over the railway line. Beyond that and also at a slight angle too it is a similar residential, often fully parked road. The angles eliminate any sight lines, ie cars approaching one way cannot see another coming the other way until they are both entering it.</p> <p>The presence of a school and consequent concentration of family cars approaching from both directions at specific times of weekdays in term times will with certainty have a serious effect. Turning and/or reversing is difficult in current normal usage but</p>

		<p>with these concentrations will be practically impossible.</p> <p>The difficulty of vehicular access through these residential roads was recognised by the Local Planning Authority in 1998. Application 98/0786 was approved with a Sn106 Agreement. See: http://www2.richmond.gov.uk/PlanData2/Planning_CASENO.aspx?strCASENO=98/0786&DocTypeID=61#docs</p> <p>Vehicular movements have increased/worsened in the ensuing 16 years. It was necessary then to restrict the use of the access via Holly Road. It follows that development of the site without such an Agreement or disregarding the 1998 Agreement now would be contrary to the same principles.</p>
56	Laurent Doliveux	<p>HH2 St Clare Business Park Hampton Hill:</p> <p>I am a resident of Holly road where the actual entrance of St Clare Business Park is. Holly road is a very narrow road with a single lane railway bridge at the end of it. Holly road small size doesn't allow two way traffic and drivers often have to reverse to get the traffic moving! Parking is a big issue in Holly Road because of Bushy park and people working in the high street.</p> <p>My main concern is to know where the council is planning to put the entrance when redeveloping this site? Holly Road simply cannot take extra added traffic; it is a small residential road.</p>
60	Louise and Colin Bell	<p>I am writing with great concern and opposition about the proposals to Clare business park for a site for primary school provision. As a resident and a governor of the federated Carlisle and Hampton Hill Junior School of Holly Road with 2 children at Carlisle school I feel there is no need for such provision in this local area. Carlisle and Hampton Hill Junior School provides adequate places to serve this local community of Hampton/Hampton Hill with minimal waiting lists. In the wider community Hampton Infants and Stanley have 3 and 4 form entry. I see there other areas of the borough being considered and the needs elsewhere in Richmond are far greater than the needs in Hampton Hill.</p> <p>As a resident of Holly Road the parking and through traffic down to School Road is already at its worst I cannot imagine the traffic flow problems a school would cause blocking Holly Road and Windmill Road which is already problematic as it is. I feel the plans do not give much detail about access and more consideration is needed to involve more community discussion. The awareness of this consultation has been poor with a note up on a lamppost as the only way a resident of Holly Road would know about it.</p>
65	Mary Nesbitt	<p>I am a resident of Holly Road, Hampton Hill and my house is opposite the St Clare Business Park. I have lived in this road for nearly 10 years and in that time have had two cars damaged multiple times - on the left and right sides - scrapes and dents from lorries driving carelessly and at speed up and down the road. I would like to know what the plans are for the new educational site that are open for consultation at present. It seems that the proposals would allow vehicles to enter the site through Holly Road only. Is that correct? I would support the proposals for the site if the traffic was principally for a school, on the presumption that parents and teachers would be the main users of the site as that would limit the traffic considerably. I would have concerns, however, if the site continued to be open to business traffic - which might include lorries. I would be grateful for your answers to these questions as they will help me to formulate my response to this consultation.</p>

69	Namrita Singh	<p>I am writing to state my strong objections to the proposal of the HH 2 St Clare Business Park as a site identified as a proposed educational site.</p> <p>The above report states that ‘Additional school places are required in this area and the site is in an excellent location to provide new primary school places’. I would take issue with this statement on both accounts.</p> <p>The statement is contradicted in the Oct/Nov 2013 Sites Allocation Plan document which does not identify Hampton Hill as an area where Primary school places are required in the medium or long-term. The report states, ‘In the medium- to long-term, it is possible that there will be a need to consider additional provision in the Barnes/East Sheen/Mortlake; Richmond; Teddington; and Twickenham areas’ – not Hampton Hill.</p> <p>If there is strong, new evidence supporting the need for additional Primary school places in the Hampton Hill area, this should be clearly shown, and if this is the case, the Council’s policy states: ‘The general approach to increasing primary provision will be...To expand existing schools where possible’ Hampton Hill Junior School holds a highly respected position in the local community and is in extremely close proximity to the proposed new school. The newly formed Federation with Carlisle Infant School in September 2014 has strengthened the position of these two schools in providing excellent Primary school provision to families in the area. If therefore there is a genuine need identified for Primary school places in this area, proper current feasibility studies for expansion should be carried out at both Hampton Hill Junior School and Carlisle Infant School in the first instance. This has not been done.</p> <p>The position of the site is also wholly unsuitable as a proposed primary school site. Holly Road is not a suitable road to access a school. It is a narrow, dense residential street packed with parked cars on both sides and a narrow bridge and footpath at one end, and would not be able to cope with the extra traffic etc that a new school would bring. Opening up access to the site from Windmill Road would result in high volumes of traffic and additional parking requirements on this mostly residential street – this would not be feasible. Windmill Road is already used as a main thoroughfare for children and families travelling to and from Hampton Hill Junior School on foot or by car, as well as other users – the proposal would lead to even higher levels of congestion at peak times on this road, and safety concerns for young children exposed to higher volumes of traffic whilst walking to/from school. This should be paramount in the Council’s consideration of this proposal. Families accessing Hampton Hill Day Nursery on School Road, residents of Windmill Road, users of the Greenwood Centre, families using the Norman Jackson Family Centre and traders, shoppers and commuters on Hampton Hill High Street would also suffer from increased traffic, pollution, congestion and pressure on parking and the resulting safety concerns this would bring.</p> <p>The HH 2 St Clare Business Park was previously identified as a ‘Key Employment Site’ showing it to be significantly important to the health of the local economy. A new school on the site will have significant consequences for current and future businesses on this site which are vital to sustaining a diverse local economy in this area. The area required for a new school would have a significant impact on the site’s designation as a ‘Key Employment Site’. The site has also been identified as potentially containing contaminated land – the mix of business/education resources in such close proximity is not desirable.</p> <p>As a resident of Hampton Hill for the past 21 years, a parent and a school governor, I hope the council will take on board all</p>
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		points in this response and revise these plans accordingly.
70	Sally Harries, Natural England	HH 2 St Clare Business Park, Holly Road, Hampton The proposed site is close to Bushy Park and Home Park SSSI; however, we would not expect any significant impact from the proposed allocation. Again there is an opportunity to improve the site by providing an integrated green infrastructure and looking at inclusion of features such as green roofs, walls and rain gardens in addition to features such as bird boxes & bat bricks, to both provide biodiversity benefits and create a more sustainable building with improved energy requirements and flood alleviation.
71	Nick Bagge	I am responding to the consultation on new educational sites, and specifically about the site the LBRuT has identified as HH 2 St Clare Business Park, Hampton Hill. I am most concerned that this is being considered for the following reasons: 1. Access to the site is down narrow and already congested roads. There is already traffic generated by the Greenwood Centre and the local houses, with little or no off-street parking. The additional traffic generated by using this site for a school, would have a severely negative on the area, be potentially dangerous to school-users (both those using cars) and pedestrians. 2. I remain unconvinced of the need for additional primary school places in the area. The nearest school, Hampton Hill Junior, is not massively oversubscribed. The most pressing need is for an additional secondary school and this site is far too small to be considered for that. I am writing this as a parent of a child at HHJS and as a local resident.
72	Nick Hamer	HH 2 St Clare Business Park, Holly Road, Hampton I am writing regarding the above proposal to redevelop the site for educational purposes. As a local resident of Wolsey Road I cannot see how suitable access can be provided for users of the site without causing serious disruption to the local area. With roads around the area only capable of taking one lane of traffic at a time, an increase in road usage will cause untold frustration and chaos - over and above what already happens on a daily basis. Furthermore, I am under the impression the need for primary places in the borough is not the priority and that extra secondary place provision is the focus. With Hampton Hill Junior School on Windmill Road, the proposed site is within 200 metres of the school and cannot see the rationale behind selecting the site when HHJS has the capacity to expand should there be the need for extra school places. Losing a business area like St Clare's would also not follow the Council's own policy on ensuring the community has a good local source of employment - it is identified as a Key Employment Site by the Council.
74	Pamela Sloane	Objection on grounds of access

		<p>The area proposed for a primary school is totally unsuitable with regard to access and the impact of further traffic in the vicinity.</p> <p>This general area is already very congested.</p> <p>-Windmill Road is narrow and only allows traffic to proceed in one direction at several points with give way to traffic from opposite direction signs and traffic calming measures.</p> <p>-Traffic is already generated by The Greenwood Centre, The Norman Jackson Centre and Hampton Hill Junior School.</p> <p>-Hampton Hill High Street is a narrow road, congested with traffic and parking on both sides.</p> <p>Access proposed though Holly Road, a narrow residential street, is impractical at the level generated by a school and could become a hazard. The increase in traffic, and its impact in this already very congested area should not be underestimated</p>
75	Pat Bushnell	<p>I am writing in response to the above proposed re-development. Having lived in Holly Road for 57 years (at No. 18 right next door to the driveway of the Business Park), I must write expressing my grave concerns at these proposals.</p> <p>For many years now myself and my fellow neighbours have lived in what can only be referred to as constant misery, engine noise, fumes and disturbance from vehicles entering and leaving this business park. Parking is at a premium in the street (especially now disabled parking has appeared). What would happen if a school were built on this site no doubt further parking restrictions would be applied which is totally out of order for those living in Holly Road. I am not saying do not build a school but at least have the entrance/exit in Windmill Road. We were led to believe many years ago that the site in Windmill Road next door to the old Library was only on a short lease thus when access was needed for the St Clare site the tenants of that plot of land would be given notice and the entrance gained via that access.</p> <p>What the residents of Holly Road need is for the access driveway to the Business Park to be blocked off (or even a pair of houses built on the site) which would give poor Holly Road a little peace and quiet which is what, I believe as a tax payer, council tax payer and road user what we ultimately deserve</p>
77	Paul Schofield	<p>I am writing with respect to the consultation about developing the St Clare Business Park site on Holly Road, Hampton Hill as an educational site. I strongly oppose this proposal for the following reasons:</p> <ol style="list-style-type: none"> 1. I think that this site is wholly unsuitable for use by a school. Holly Road is a very narrow road and access is further limited by the single lane bridge at one end of the road. 2. There are already a number of educational establishments in the immediate area (2 or 3 nurseries plus Hampton Hill Junior) meaning that Holly Road and surrounding roads are already very busy at school drop off and pick up times. 3. There is nothing to suggest that there is a basic need for more primary places in the immediate vicinity - neither Hampton Hill Junior School nor Carlisle appear to have been asked to take bulge classes and both schools have only small waiting lists. 4. This being the case, it is likely that children attending a new school in Holly Road would be coming from further afield, only adding to the concerns about traffic. 5. Even if there were an increasing need for places in Hampton Hill over coming years, surely the most sensible value for money solution would be to expand HHJS or Carlisle, bearing in mind that both are well-established successful schools on sites that have the potential to accommodate an extension.
81	RL Watson	<p>I wish to object to the proposal of a new primary school on the site of St Clare Business Park, at least in relation to the proposal that the entrance be in Holly Road, the existing entrance.</p>

		<p>This entrance is completely unsuited to the volume of traffic, both vehicular and pedestrian, which will occur if this proposal is adopted. The pavements in Holly Road are narrow and so also is the road. Currently traffic has great problems in negotiating the entrance due to the road being reduced to a single narrow carriageway by cars parked on both sides, being barely able to accommodate a lorry. The battered bollards at the entrance to St Clare bear witness to this. The inevitable increase in cars coming down Holly Road at the beginning and end of school days will lead to chaos. Windmill Road would be a much better entrance.</p> <p>As to the necessity of another school being so close to an existing one, there is no evidence adduced, simply an assertion.</p>
84	Rebecca Taplin	<p>I have been made aware that plans for a primary school on the st Clare's business park are in the pipe line. I am a resident of holly road and do not feel the need for ANOTHER primary school in the area it will increase traffic volume down holly road and the parking is diabolical at the best of times it is near impossible to even park down my street let alone outside my house due to people parking here to go to the town, we do not need another school, we do not need the extra traffic and we defiantly don't need people parking to drop their children of. I feel the road is unsafe for my own children at the best of times due to the traffic volume without adding to the problems.</p>
89	Susan Parkin	<p>I would like to vote against the proposed educational site to be located in Holly Road Hampton Hill on the following grounds:-</p> <p>Holly Road and Windmill Road are already at capacity, in my view, with the increased traffic at school drop-off and pick-up times created by parents attending Hampton Hill Junior School. In addition to this Holly Road is a very narrow road already made narrower with residential parking, there would be gridlock at key points of the day, creating H&S issues for children walking to school and emergency services should they be required to use these roads.</p>
91	Tom Goulbourn	<p>I wish to register my concern at the proposed redevelopment of St Clare Business Park in Hampton Hill.</p> <p>I live in Wolsey Road.</p> <p>The traffic in the vicinity of the site is already horrendous. There are three nurseries, a Sure Start centre, a recreation ground and three schools nearby, not to mention the main artery of the High Street and its businesses.</p> <p>The roads - especially the railway bridge on Holly Road and Wolsey Road - are very narrow and traffic is often blocked. I have seen two ambulances in recent months unable to turn into roads because of the number of parked cars.</p> <p>The volume of traffic and the number of parked cars is a real danger to children.</p> <p>A neighbour has found his house has subsidence which a surveyor has blamed on the traffic volume.</p> <p>I think the proposal for another school for this site is ludicrous and I oppose it. Let it stay for business.</p>

HP 3 – Cassel Hospital, Ham Common, Ham		
Ref. no.	Name/Organisation	Detailed comment
7	Andrew Beedham, Ham and Petersham Neighbourhood Forum	<p>The comments below are the agreed comments of the Ham and Petersham Neighbourhood Forum discussed at the Forum Committee meeting on 10 September 2014. The content is similar to the views expressed at the Cabinet meeting on 21 July 2014 by Andrew Beedham and Geoff Bond representing the Neighbourhood Forum.</p> <ul style="list-style-type: none"> • The Forum believes that including additional education uses at Cassel Hospital and the inclusion of a new site St Michael's Convent makes no sense for whatsoever as there would appear to be more than adequate expansion capacity on the three existing primary school sites within Ham and Petersham. • The School Place Planning Strategy report to Cabinet on 20 March 2014 made no reference in para 3.16 to additional forms of entry being required in Ham and Petersham – it merely stated that 4 were needed in East Sheen/Barnes and 2 in Richmond. • Paragraph 3.21 however identified a further number of primary school expansion options including Expanding The Russell or providing a shared form of entry between Meadlands, St Richard's and the Russell. • All three primary schools in Ham and Petersham have significant spare capacity and therefore new school sites within the area are not needed. The consultation on the Russell/ Strathmore school indicated that this was designed for two form entry whilst both St Richard's and Meadlands have the space for a complete additional form of entry. • We consider it unreasonable for Ham and Petersham to make provision for additional primary school places for those from outside the area to the north. The area is unusual in that access from elsewhere in Richmond is restricted to a single narrow road (Petersham Road) and the additional traffic generated would further clog an already very congested road at peak times – made worse in recent years with the expansion of the German School. With primary school children, as opposed to secondary, it is inevitable that a high percentage will be delivered in cars by parents or carers, irrespective of what 'Green Travel Plan' is put in place. These additional cars would have a detrimental impact on the quality of life of residents and over time have an adverse impact on the wildlife and environment of the area. • Primary schools should generally be local to children's homes but using Cassel and St Michael's convent as school sites to serve children from elsewhere in Richmond will lead to excessively long school journey times, not ideal for young children. • Both sites also have considerable ecological and nature conservation value that will make them both hard and expensive to develop for educational use. • It is therefore requested that educational uses at both Cassel hospital and St Michael's Convent are removed from the additional sites in the Site Allocations Plan. However the Russell/ Strathmore site should be added and if needed Meadlands and St Richard's as well. • The Forum is however aware of the serious difficulties in identifying a suitable supply of school sites across London and believes that if north Kingston (now the two councils are working jointly) has similar school capacity problems then it would make sense for existing school sites in Ham and Petersham being used. Travel distances/ times would be more manageable for parents/ carers of primary school age children and the wider range of roads would allow adequate vehicular access unlike the single Petersham Road to the north.
26	Danielle Nolan	As a local resident, I would like to support the proposed use of Cassel Hospital for educational use or for exclusively affordable housing (ie NO non-affordable housing on the site). I am opposed to it being converted even partially into luxury housing. It is an

		<p>asset that should be used for the common good.</p> <p>I propose that another possible use for the site should be as care home for the elderly, or a community centre with affordable access for local community groups wishing to use the space.</p> <p>We must ensure that this valuable space, including much green space, is used carefully for the benefit of all. I would suggest a Steiner school might be a very appropriate use.</p> <p>I look forward to your response.</p>
31	Eugene Dreyer, Langham House Estate Maintenance Company Ltd	<p>Site Allocations Plan Consultation – Further Comments HP3 Cassel Hospital, Ham Common, Richmond HP4 St Michael’s Convent, Ham Common, Richmond 06 October 2014</p> <p>In addition to the previous submission made in response to the above consultation in July 2014, the Board of the LHEMCo Ltd has the following comments to add specifically in relation to the potential use of these sites for education purposes:</p> <p>1) The Board does not believe that sites HP3 and HP4 are suitable for primary school use. It believes that the use of either for this purpose would cause unacceptable levels of noise and traffic disturbance on an unsuitable road network particularly at drop off and pick up times. The public transport accessibility of both sites is limited.</p> <p>2) The three local schools in the area all have the capacity to expand. We are aware of plans for the Russell School to take on a ‘bulge class’ next year and we have seen plans for its expansion. We believe that greater utilisation of existing school sites – including St Richards and Meadlands Primary Schools – is the most appropriate means of meeting future educational demands in the area.</p> <p>3) Both sites contain Listed Buildings within a Conservation Area. It is our considered view that conversion costs would be high, whilst the suitability of existing buildings for educational purposes would remain low in both cases.</p> <p>4) Site acquisition costs would be high. In our view public funds could be put to far better use than trying to acquire unsuitable buildings for school use in disadvantageous locations.</p> <p>It remains our view that a Planning Brief should be prepared for Site HP3 Cassel Hospital given the size of the complex, and its historic and architectural significance.</p>
45	Jane Phillips	<p>HP 3 Cassel Hospital, Ham Common: The area is a local beauty spot and I think the School has to be kept on the Main Road and well away from the residential areas. I’m not overly keen on the location as there is already one School on the Common and it is very much a prime residential area. My view is that you need to look for a less populous spot.</p>
61	Mark Brand	<p>This email is in response to the above consultant in respect of Site HP3 Cassel Hospital, and is in agreement with, and further to, the submission of the directors of Langham House Estate Maintenance Company from Mr Eugene Dreyer.</p> <p>I respond as resident at Flat 2, Langham House, 11 Ham Common TW10 7JB, being a neighbour to the Cassel Hospital site.</p> <p>With specific reference to potential use of the site for educational purposes:</p> <p>1. I do not believe that the site is appropriate for educational use, being:</p>

		<p>a. In close proximity to existing schools b. Adjacent to Ham Common, with limited capacity for the level of vehicle access required for the traffic likely to be generated</p> <p>2. Further primary and secondary school capacity required by the population of Ham & Petersham can be accommodated by expansion of the existing schools in the area</p> <p>3. Additional school capacity required by the population of North Kingston can be provided by the expansion of existing and planned schools in the area, without exporting significant numbers of pupils to Ham, along with the attendant traffic.</p> <p>4. Inclusion of a school on the site, and associated development would most likely not be in keeping with best practice conservation of the Conservation area in which the site lies, and of the environs of key listed buildings on the site itself and on adjacent sites.</p> <p>5. Inclusion of a school on the site would likely both constrain and devalue other (residential) conservation and development on the site, threatening the quality of site use and architecture on what is a key location beside Ham Common within its conservation area.</p> <p>6. Use of part of the site for educational purposes - be it in part fulfillment of a Section 106 requirement for the development of the rest of the site, or as part of a phased sale of the site - would be equally inappropriate. Indeed, this would be most likely more damaging than as part of a single development of the site, given the lack of co-ordination in any split scheme. I have raised this matter with local councillors, and will be asking my Ward Councillors to request that educational use is ruled-out for this site,</p> <p>To date, I have been reassured by one councillor that the likelihood of a school on the Cassel site is so remote that I need not be concerned by any proposed educational use. I regard this comment as implied agreement that educational use is inappropriate, and that there is no public interest cause for retaining educational use in the site allocation. If educational use remains in scope, I feel that the failure of the Council to write and notify all direct neighbours of the site of this proposed allocation constitutes a failure of consultation which is out of line with current council policies, and would therefore call on the Council to extend this review period and formally consult all neighbours.</p> <p>Thank you for your time and assistance in this matter.</p>
70	Sally Harries, Natural England	<p>HP 3 Cassel Hospital, Ham Common, Ham</p> <p>We welcome the inclusion of 'Other open land of townscape importance' here and would expect this site to take advantage of opportunities to incorporate multi-functional green infrastructure to complement and protect the Cassel Hospital SINC within the site.</p>
73	Oliver Yeates, NLP obo West London Mental Health NHS Trust	<p>Pre-Publication Site Allocations Plan – new educational sites consultation</p> <p>Earlier this year, on behalf of our client the West London Mental Health NHS Trust ('WLMHT'), we put part of the Cassel Hospital site at No. 1 Ham Common forward to the Council for its consideration for alternative residential use as part of the Site Allocations Plan consultation process. Subsequently, the Council identified the site as an additional site for residential and/ or community uses which the WLMHT supported in a letter dated 11 July 2014.</p>

		<p>Background</p> <p>As explained within our previous representations, the Cassel Specialist Personality Disorder Service (CSPD) (previously known as the 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 vacant space and can no longer sustain the financial cost of maintaining this largely empty, listed property and extensive grounds. Accordingly, the WLMHT is considering options for the future of the site and has placed these redundant parts of the building and grounds on the Register of Surplus Public Sector Land.</p> <p>Redundant parts of the building are also on the open market for community uses and neither approach has yielded any market interest for the site from such users.</p> <p>Within our previous representations we supported the Council’s proposal that if the Cassel Hospital site became surplus to the WLMHT’s requirements, suitable alternative uses would be residential and/or community use. We note that the Council has now sought to identify the site for “residential (including affordable housing units) and education uses and/or community uses” (Reference HP 3).</p> <p>We cannot support this recent addition to Policy HP 3 for reasons explained below.</p> <p>Requirement for flexibility</p> <p>The WLMHT is currently exploring a number of options for the future of the Cassel Hospital site and the CSPD service. This work is yet to be concluded and it is possible that the CSPD service may remain on part of the Cassel Hospital site for the foreseeable future.</p> <p>The NPPF specifically requires that plans are positively prepared and that allocated sites promote development and the flexible use of land (para. 157). It is imperative for the WLMHT that the wording of Policy HP 3 is sufficiently flexible to allow it to come forward with proposals that meet their ongoing operational requirements, particularly if the CSPD service remains on-site, and/or proposals for viable alternative uses that serve to secure a future for the listed building and grounds.</p> <p>Design, heritage and viability considerations</p> <p>The principal planning consideration for this site, should it become available for alternative uses, should focus on bringing the vacant listed building back into long-term viable use. In order to successfully bring forward the conversion and re-use of the building, and deliver the associated significant heritage benefits that would arise from this, some flexibility may be required in respect of the potential uses proposed for the site. However, we consider that the proposed uses should be realistic and achievable in the context of this site. We do not consider that the use of a school on this site either alone or in addition to residential development is viable or realistic.</p> <p>Cassel Hospital was originally constructed as a residential dwelling and the surrounding area is predominantly residential in character. The conversion of the listed building to residential dwelling(s), possibly with some small/medium scale residential use in the grounds, would be an appropriate alternative use and would help to secure a long term and viable future for the building and grounds. It is considered that residential use is likely to be the only viable alternative use that would secure a long term</p>
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SM 5 – Ryde House, East Twickenham		
Ref. no.	Name/Organisation	Detailed comment
1	Alison McIntosh	The proposals for schools seem very appropriate. Parking is always an issue which needs to be taken into account.
2	Alison Fish	I feel very strongly that this part of East Twickenham would benefit greatly from a Primary School.
4	Adam Leadercramer	I am in favour of the proposals outlined in relation to SM 5 Ryde House, East Twickenham. I believe that the shopping parade would benefit from additional units and there is a clear need in the area for increased school places/educational provision.
10	Andy Haunton	<p>Thank you for your consultation letter dated 8th August 2014. I wish to register my concerns on two fronts relating to the proposal to designate Ryde House, East Twickenham as a new educational site:</p> <p>1. Should the site be used for educational purposes it will displace retail / commercial activity from this high street location. I feel that this will be of detriment to the location as a retail environment generally, but especially outside term times when the site will presumably see little activity.</p> <p>2. The use of the site for educational purposes is likely to put increased pressure on the transport infrastructure and services, whether journeys are made by private car or public transport. This will be especially so at the beginning and end of the school day, when the infrastructure and services are least able to bear the additional demand:</p> <ul style="list-style-type: none"> • Richmond Road is already especially busy as it accesses one of the few Thames crossings locally. Congestion is commonplace. • Parking is scarce, with there being no local off-street parking and any available on-street parking in heavy demand. Illegal parking is common, especially on the double yellow lines at the southern end of Park Road. • Local bus services, although frequent, are also busy and often crowded, especially at the beginning and end of the working day.
36	Georgina Brown	As a parent living in East Twickenham I would like to register my strong support for the designation of Ryde House for educational use, preferably as a primary school.
39	Glynis Becker	<p>My thoughts on a school being built on the Ryde House site are the same as they would be for anything being built on the site.</p> <p>The use of the access road that crosses over our car park from Ryde House to Richmond Road.</p> <p>The access road has proven to be too narrow for two way traffic of any amount.</p> <p>The dustbin lorry took out my patio wall (it's very obvious even now, as they could not find the same bricks to repair it with) because there is not enough 'turning space' for manoeuvring a three point turn, for larger vehicles.</p> <p>The access road already services the M.O.T Station as well as the rear access of Richmond Bridge Offices, Old Ryde House and the twenty four parking spaces allocated to Ryde Place Flats.</p> <p>There are already two refuse collections on a Tuesday, (for Richmond Bridge offices) one on a Wednesday (for Old Ryde</p>

		<p>House), and another for Ryde Place on a Friday.</p> <p>This is without the number of 'lost drivers', who regularly use our car park as a turning point when they have made an error.</p> <p>Whatever is built on the Ryde House site, will always have the same implications for us as residents of Ryde Place.</p> <p>I can foresee children being 'dropped off' and 'collected' by parents in vehicles, who will not be able to stop on the Richmond Road, and will inevitably want to use our access road and car park to do so.</p>
40	Helen Baker	<p>I want to express my very strong support for the proposal for a new primary school to be located on the currently disused Ryde House site in East Twickenham.</p> <p>I hasten to say that I no longer have school-age children myself, so this does not reflect any personal interests of my own. However, I am well aware that East Twickenham is very poorly provided with school places. I know that many of my fellow residents have great anxiety in trying to find a place for their child and that some families end up with no identified place at the final allocation point. It is also worth pointing out that, of all the villages within Richmond upon Thames, East Twickenham is unique or almost unique in having no school at all within its boundaries. To address this continuing inequity, it is essential that a school is provided within our area. Ryde House is the obvious and very appropriate site.</p> <p>Being a passionate supporter of the community within East Twickenham (and honoured to receive one of this year's Richmond Council Community Awards for my work in this area), I am also very aware of how the different institutions within a neighbourhood contribute to the the working of the community. East Twickenham has a strong sense of its identity, but its community interaction is to an extent undermined through its lack of a school: this is because families these days have to put in considerable time and work supporting their children's schools, but all this volunteer effort is taken outside the boundaries of our community. Bringing a school into our village would be one of the best ways to strengthen the community spirit of our area.</p> <p>In contrast to this, alternative uses for the site would have a very deleterious impact on the neighbourhood. A retail development such as the one proposed quite recently would adversely affect the rich variety of independent stores along the high street, and probably the cafes and coffee shops as well. It would also seriously worsen an already very difficult traffic situation, and the impact of this would be heightened by any elements of housing or hotel development in any plan.</p> <p>A school on the other hand would have much less impact, especially in these days when very strong messages are given by schools to parents about using cars for school journeys. Instead, the comings and goings of school families as pedestrians along the East Twickenham High Street would enrich the daily life of the neighbourhood and directly support the small High Street shops which give the village its character.</p> <p>These are all strong reasons why it is important that the Ryde House site is used for a new school. Thanks you for taking these views into consideration.</p>
42	James and Nicola Henderson	<p>We write in respect of the site allocation proposal for a new primary school at the Ryde House site in East Twickenham.</p> <p>We live close to the site (at 38 Park Road TW1 2PX). There are no primary schools close by and so building a new school would seem to fulfil a need.</p> <p>Accordingly, subject to there being a sensible proposal for how the site would accommodate a new school, we think that having a new primary school in the immediate area sounds like a good idea.</p>

45	Jane Phillips	<p>Ryde House: I had a job to find this and it does seem rather 'remote'. The evidence would indicate that it will be totally 'fenced in', but that concerns me as children will easily get over / round fences and this could be a hazard two ways. One as it is residential, and two because it is easy to access the main road and leap over and onto the pavement which is fairly narrow and on a very busy road.</p>
46	Jeremy Rodell	<p>I would like to register my support for the designation of Ryde House in East Twickenham for educational use as there is a dearth of primary school places in the area.</p> <p>For several years the site has been an unused eyesore. Although its location on a main road is not ideal for a primary school site, not only would it meet a very clear need for school places, but a good quality, well-designed school development would also add vitality to East Twickenham village. The impact on traffic would be limited by the fact that it would appeal to local parents, living within walking distance.</p> <p>There is little local benefit to the use of the site for retail, especially for a supermarket. We already have plenty of good quality convenience store provision and are within easy bus/walking distance of several supermarkets in central Richmond and, a little further away, central Twickenham. It is also clear from the number of delivery vans in the area that increasing numbers of local people are doing their supermarket shopping on-line. We do not need another supermarket.</p>
47	John Clinch	<p>In response to your consultation document dated August 8th 2014 regarding the above I should like to make the following comments:</p> <ol style="list-style-type: none"> 1. Whilst I appreciate the pressure on LBRUT to identify suitable sites for educational use the inclusion in the LBRUT Local Plan to zone the Ryde House site as an educational use would result in the loss of valuable retail and potentially equally or more urgently needed and more appropriate/suitable residential uses wether social rented or open market housing/apartments etc. 2. The Richmond Road and Richmond bridge are major routes for Public transport and essential emergency services and we have a number of issues at the moment with vehicles parking at the junction of Park Road with Richmond Road because non resident parking spaces or a car park park is not available for collecting dry cleaning etc. <p>A school use would inevitably result in a large number of parents dropping off/collecting children and stopping either in Richmond Road or the surrounding residents spaces or the very small area of uncontrolled spaces in Park Road or Beresford Avenue. This problem persists in other areas of Richmond and should not be perpetuated by permitting the inappropriate change of use of this site to an educational use</p> <p>The above are my principle reasons for opposing the proposal, but should LBRUT be minded' following Consultation and due process, to include the site in the Local plan zoning as Educational use I would put forward a more robust argument quoting specific National and local planning policies in my objections to this proposed potential change of zoning/use</p>

49	Judith Catto	I would just like to add my comments in support of Glynis Becker's re our access road and any planned development at Ryde House. This road is very narrow and there is only a short section near the main road end where it is possible for two cars to pass. Not only has Glynis had her patio wall demolished, another resident regularly had the post to her parking bay knocked over and even had her car damaged by reversing vehicles who find themselves in a cul-de-sac. We of course have had to pay for any repairs to our property and further vehicular activity will only exacerbate the situation. I would therefore be against any access via Ryde Place for parents wishing to collect or deliver their children to and from school. It is entirely unsuitable for this level of activity.
50	Julia Kernick	I fully support all that Glynis Becker has said in her email. Whatever is built on the Ryde House site, we do not want our access road involved. It is far too narrow for two vehicles to pass and is already heavily used. It is a private road and car park and it would be unacceptable to Ryde Place residents for parents and school staff etc to add to the use of this road and car park, including when parents are dropping off or collecting their children from school.
57	Lawrence Moss	<p>I note that the Council is inviting views regarding its proposal to establish Ryde House, East Twickenham as a New Educational Site within the Site Allocation Plan.</p> <p>The need for additional primary school places within the Borough, and especially for East Twickenham residents, is well known and the Council is applauded for the imaginative ways it is seeking to address the problem.</p> <p>But I would urge the Council to reject Ryde House as a possible New Educational Site as it is likely to result in a primary school offering cramped facilities, limited outdoor play space and a worse experience for the pupils in comparison to other local primary schools.</p> <p>Lidl was the participating supermarket for the recent unsuccessful planning proposal by the then owners to develop the site. Lidl has since demonstrated its commitment to establish a supermarket by buying the whole Ryde House site. It is not credible for the Council to expect Lidl to revise its original plans for the site and settle for a small local supermarket, allowing for the majority of the site to be allocated to the school.</p> <p>It is more likely that Lidl will stick to its original plan for a large supermarket, and defend this with the Planning Inspector. The consequence would be for the supermarket to occupy much of the ground floor space, with the school taking the upper floors and having limited access to outside space. This is a feasible option, and Lidl could quote the example of Reach Academy which is opposite Tesco, 98 High Street, Feltham TW13 4EX. Few local parents would welcome a new school with the playground on the roof as can be seen at Reach Academy. Moreover, a Free School is likely to occupy the site and its decisions regarding location and facilities fall outside the influence of the Council.</p> <p>I would therefore encourage the Council to seek an alternative New Educational Site to Ryde House and ensure a good educational experience for all our local children.</p>
62	Mark Elliott	<p>I write in support of the site allocation plan SM 5 Ryde House Twickenham proposed for retail and education use.</p> <p>I am a resident local to site.</p>

		<p>I am aware of long-standing need expressed by fellow residents for local school places. I also agree that the right kind of retail provision could act as an anchor store to lift the retail attractiveness of the whole area.</p>
67	Michael Tohill	<p>Thank you for the opportunity to pass comment on the proposed educational sites.</p> <p>I'm a parent who has been living in East Twickenham for ten years. My son was born in 2012. It's a great place to live, and a great place for children - apart from one major issue . I'm deeply concerned about his chances of being accepted into a nearby state primary school. Following the recent rise in birth rate, my advice from the Educational Authority is that we appear to lie outside the shrinking catchment areas of the nearby schools ie. Vineyard (even with the forthcoming expansion), Orleans, St. Marys, St. Stephens etc.</p> <p>I am aware of Bellevue Place Education Trusts' plans to open a primary school in Sept 2015 on the derelict Ryde House. This could be the answer to many people's prayers, killing two birds with one stone as it would i) increase "footfall" on the increasingly quiet Richmond Road, boosting local retail and ii) fill the educational "black hole" of East Twickenham</p> <p>Should these plans fail, the remaining options for many parent like us would be appear to be i) move from East Twickenham or ii) face a lengthy daily journey to Darrell school in Sheen (or possibly even further). Neither of these feel healthy options, either for ourselves or for East Twickenham.</p> <p>I have read the Sustainability Report with interest. I do note that there reports fears that the option of a school at Ryde House could add to traffic congestion. I'd dispute this, as it would offer the opportunity for children living in East Twickenham to walk to a close school rather than face lengthy car rides to far-off schools through the already congested Richmond/Twickenham traffic.</p> <p>Again, thank you for the opportunity to feedback. My strong vote would be for a primary school to open on the Ryde House site in September 2015, this would reinvigorate the local area in so many ways. I sincerely hope and trust that the parties concerned will have the vision and resolve to make this happen</p>
70	Sally Harries, Natural England	<p>SM 5 Ryde House, East Twickenham Syon Park SSSI is within 2km although it is unlikely that this would be significantly affected by the type of development proposed. The Thames Path National Trail passes close by: you should consult the National Trails Officer to check that there are no implications for the path, and consider the potential for improvements and or enhancements.</p>
80	Philippa Edmunds	<p>We fully support Ryde house site being a local school which is needed and will add to the local community which has always struggled to establish an identity, unlike St Margarets and Richmond. East Twickenham has lacked a local school and has it has always been divided between 2 primary schools, Orleans and the Vineyard and children have had to go either way depending on the pressure for places at the time. Currently, local children are having to travel to other ends of the borough which is totally unsatisfactory so a local school here in the heart of East Twickenham is an ideal use for the Ryde House site.</p> <p>However, we do not support a joint site allocation with a supermarket on the site as well as it would lead to a dense development and seems a strange combination of facilities with a school given all the road safety issues around schools. We also question</p>

		<p>whether the site is big enough for both uses.</p> <p>Ryde House is sandwiched between two conservation areas making a school a good choice of development. A school could also be a good neighbour to Old Ryde House.</p> <p>With a supermarket, there remains serious visual impact, privacy, noise and traffic and pollution concerns.</p>
83	Rati Chihambakwe	<p>We have read the proposals for development at Ryde House to include retail and a new primary school. We think this is a fantastic plan. As a derelict site the building does nothing for the area. East Twickenham is in desperate need of a primary school which local children could go to rather than the current system of relying on bulge classes in other schools.</p>
85	Sally and James Boyle	<p>Response to : Site allocations plan pre-publication consultation on educational sites</p> <p>We are writing to support converting Ryde House in East Twickenham to a site for Primary Education.</p> <p>We moved to our current address in Park House Gardens, TW1 2DF in 2010. At the time we did not have children but one of the key reasons we chose the house was the family friendly nature of the area and the community spirit. It is a safe neighbourhood where children can still be found playing football in the street, a modern day rarity.</p> <p>A new primary school in East Twickenham is desperately needed to preserve the character of the area. When we moved into the area children on our street had recently got places at Orleans Infants and the Vineyard Primary schools but as admission has become tighter at these schools we find ourselves in a primary education black hole. This makes the area unattractive to young families.</p> <p>On a personal note, we now have two boys aged 3 years and 5 months and as we consider schools we are saddened at the options available to us. Our eldest is due to start school in September 2015 and we have been advised by Richmond School Admissions that, based on recent experience, it is unlikely he will be offered a place at any of the four closest schools (Orleans, St Stephens, St Mary's and The Vineyard). If we are offered a place through the admissions process then it is likely that the school offered will be :</p> <ul style="list-style-type: none"> - some distance from our home - not of the same standard as our four closest schools and/or - out of borough (Hounslow) <p>Private education is an option but it is not something we are comfortable with. We both have fond memories of attending local state primaries and enjoying the fact that we could walk to school, that our friends lived close by and the community spirit of a 'local school'. This has forced us to consider moving house.</p> <p>Ryde House has been left empty for a number of years and using it for a primary school seems like an excellent idea. Providing a new primary school the area will go a long way to ensuring East Twickenham remains a vibrant, family friendly, safe place to live for everyone.</p> <p>We understand that the Richmond Bridge School is looking to open in September 2015. This would be an ideal school for our</p>

		<p>eldest son but we are concerned that it will not be ready in time. It would be useful if the council could make a clear decision on education sites in the area before the January school admission deadline.</p>
86	Sophie Matthews, Walsingham Planning	<p>I am writing to respond to the pre-publication consultation on new educational sites published on 11 August 2014, in particular proposed site SM5 – Ryde House in East Twickenham. The draft proposal is to allocate this site for retail and education uses.</p> <p>The site lies on the north side of Richmond Road in East Twickenham and forms part of East Twickenham Local Centre. The owners of the site, Lidl GmbH, intend to redevelop it with a new foodstore at ground level and a mixture of private and affordable flats on upper floors. The project team has spent a considerable amount of time developing this proposal in liaison with Council Officers and intends to submit a planning application in the next few months, following public consultation.</p> <p>As noted in the consultation document, “the creation of ground floor retail will consolidate the shopping frontage and add viability” with a “contribution to a more diverse economy due to retail offer and some provision of jobs”. We agree that retail is the most appropriate use for the ground floor level of the mixed use development as the site lies within a designated Local Centre; we therefore support the retail element of the proposed allocation.</p> <p>It is clear from the lengthy vacancy of the existing two retail units abutting the site that there is limited demand in this location for smaller retail units and a foodstore is therefore considered to be more appropriate and viable for the site. As a foodstore (or any larger retail unit) will require car parking and access for deliveries, it is difficult to see how this use could safely and conveniently co-exist with the considerable parking and servicing requirements of a school. The Sustainability Appraisal which forms part of the consultation documents notes that a new school would “exacerbate the congestion and parking problems in the local area”. However, no formal appraisal seems to have been carried out into the compatibility of an education use and a retail use in this location.</p> <p>Although it is recognised that schools need to be accommodated in areas with good access to public transport, education is not a main town centre use and therefore the functionality of the retail element of the scheme must be prioritised. Education and retail uses would not be compatible in this location. In contrast the three other sites included in the consultation are proposed for education with business or residential uses which is considered to be a more appropriate combination of uses.</p> <p>A key concern for the development of a school would be the size and position of the playground. The Department for Education Building Bulletin 103: Area Guidelines for Mainstream Schools (June 2014) sets a guideline requirement of 30-45m² of outdoor space per pupil. It is difficult to see how this outdoor space could be satisfactorily accommodated on the site along with the parking requirements of the retail use also proposed.</p> <p>Including a residential element in a mixed use redevelopment of the site is considered to be a much more suitable option as it would contribute to the Council’s private and affordable housing stock, providing new homes in a location in close proximity to local shops, services and employment opportunities. The Sustainability Appraisal which forms part of the consultation documents notes that a negative impact of the retail / education proposal would be the “loss of an opportunity for providing new (affordable) homes”. A residential scheme would also secure significant CIL payments which could help to fund the construction of schools elsewhere in the Borough as well as other infrastructure priorities.</p>

		In light of the above consideration, Ryde House should not be allocated for education use in the emerging Site Allocations Plan.
88	Su Bonfanti	<p>I am emailing to comment on one of the sites included in this consultation, namely Ryde House, Richmond Road, East Twickenham.</p> <p>I strongly support the proposal that this would be a suitable site for educational use. School places, particularly primary school places, are urgently needed in this part of the borough. It would enhance the amenity of the area to have a school here and a school would be more suited to the site than other uses in terms of its impacts. For instance most school users would be local, so the traffic impact would be low, compared with say a supermarket.</p> <p>However, I do not support the proposal for mixed retail/education use. Firstly, it is difficult to see how both can be accommodated on the site without a big increase in the footprint and/or scale of the building. But last year's decision by the Planning Committee to reject an planning application for a food store and hotel was based on the excessive impact of a taller, more massive building on the streetscene and on the adjacent listed building, Old Ryde House. So there is limited scope for increasing the amount of floorspace.</p> <p>Secondly, it is far from clear that East Twickenham needs or could support more retail space. The evidence presented by the failed applicants last year was contested by local residents, using data from LBRuT's own analyses. There are empty retail spaces on Richmond Road all the time and an excess of charity shops. Both factors suggest that there is already more than enough retail space here. I think it would meet local needs better to allocate the site for education use alone, given that this is a proven and urgent need.</p>

HP 4 – St Michael's Convent, Ham Common		
Ref. no.	Name/Organisation	Detailed comment
5	Adele Ottinger	<p>While educational requirements are clearly well in excess of current provision despite about 8 local schools, it is rather naive to select listed building that both need considerable restoration for educational purposes.</p> <p>Schools have a long history of neglect of listed buildings, and sooner or later either site used for this purpose will fall into ruin and be demolished. Anyone who thinks otherwise clearly lives in fantasy land or has a long term deliberate plan to have the buildings demolished. Schools do not have the funds and neither are they interested in ensuring a sustainable upkeep of the buildings. Nor do they have the funds to heat these buildings sufficiently in winter for children used to the comfort of central heating. For that matter nor do people living in "affordable housing". A few ground floor disabled/less-abled flats for local residents just out of the "affordable criteria" but who can contribute to the upkeep of the buildings and having lived their lives in Ham, would be more appropriate targets.</p> <p>Surely it is far better to allow a small area of one or both sites which has sufficiently large enough rooms for its purpose, to be used for nursery and/or disabled educational uses and the rest residential apartments to enable the upkeep of these historical assets and the environment of the common. Therefore, garden areas could be maintained for both uses, separated as required, but still overall in their original form. For example the vegetable garden at the convent would make a good area for extra parking, leaving the rest of the garden in its current beauty but also maintained. There is sufficient parking out the two areas in the front for residents at the convent. A small school would have limited and more manageable costs for the building upkeep, and perhaps the developer's 106 contribution can go towards long-term upkeep of a smaller educational facility.</p> <p>Otherwise, about 2/3 along the 1970-80s Martingales Close off Ham Common, which is a reasonably wide road, and at the rear of the convent gardens, surely it would be better to create new buildings as an addition to Grey Court or a sister school that could share facilities. This would have limited impact on the aspect of Ham Common and leave the listed buildings for people to live in that will maintain and are proud to live in such a residence, and ensure part of the beautiful gardens remain. If parking was required the vegetable garden of the convent could be used as additional parking, or how about restricting it to children in the vicinity arriving on foot, unless the parent was disabled or less able, as a caveat for a place at the school. This would win on parking, health of children and parents, the environment, traffic, garden space retained and lessen the impact on local residents.</p> <p>If you decide on one or the other being a school, please take into account that the bus stop to Kingston on the north-side of Ham Common near the convent is a few meters adjacent to a fairly dense wood which seems perfect for child abductors and can be scary in the dark. The one on Ham Parade is well lit and has good visibility on all sides.</p>
7	Andrew Beedham, Ham and Petersham Neighbourhood Forum	<p>The comments below are the agreed comments of the Ham and Petersham Neighbourhood Forum discussed at the Forum Committee meeting on 10 September 2014. The content is similar to the views expressed at the Cabinet meeting on 21 July 2014 by Andrew Beedham and Geoff Bond representing the Neighbourhood Forum.</p> <ul style="list-style-type: none"> The Forum believes that including additional education uses at Cassel Hospital and the inclusion of a new site St Michael's Convent makes no sense for whatsoever as there would appear to be more than adequate expansion capacity on the three existing primary school sites within Ham and Petersham.

		<ul style="list-style-type: none"> • The School Place Planning Strategy report to Cabinet on 20 March 2014 made no reference in para 3.16 to additional forms of entry being required in Ham and Petersham – it merely stated that 4 were needed in East Sheen/Barnes and 2 in Richmond. • Paragraph 3.21 however identified a further number of primary school expansion options including Expanding The Russell or providing a shared form of entry between Meadlands, St Richard's and the Russell. • All three primary schools in Ham and Petersham have significant spare capacity and therefore new school sites within the area are not needed. The consultation on the Russell/ Strathmore school indicated that this was designed for two form entry whilst both St Richard's and Meadlands have the space for a complete additional form of entry. • We consider it unreasonable for Ham and Petersham to make provision for additional primary school places for those from outside the area to the north. The area is unusual in that access from elsewhere in Richmond is restricted to a single narrow road (Petersham Road) and the additional traffic generated would further clog an already very congested road at peak times – made worse in recent years with the expansion of the German School. With primary school children, as opposed to secondary, it is inevitable that a high percentage will be delivered in cars by parents or carers, irrespective of what 'Green Travel Plan' is put in place. These additional cars would have a detrimental impact on the quality of life of residents and over time have an adverse impact on the wildlife and environment of the area. • Primary schools should generally be local to children's homes but using Cassel and St Michael's convent as school sites to serve children from elsewhere in Richmond will lead to excessively long school journey times, not ideal for young children. • Both sites also have considerable ecological and nature conservation value that will make them both hard and expensive to develop for educational use. • It is therefore requested that educational uses at both Cassel hospital and St Michael's Convent are removed from the additional sites in the Site Allocations Plan. However the Russell/ Strathmore site should be added and if needed Meadlands and St Richard's as well. • The Forum is however aware of the serious difficulties in identifying a suitable supply of school sites across London and believes that if north Kingston (now the two councils are working jointly) has similar school capacity problems then it would make sense for existing school sites in Ham and Petersham being used. Travel distances/ times would be more manageable for parents/ carers of primary school age children and the wider range of roads would allow adequate vehicular access unlike the single Petersham Road to the north.
13	Bilge Erengul	<p>I understand that the Council intends to add St Michael's Convent to their Site Allocation List, for for educational purposes in the future. Since the gardens of the Convent has historical as well as ecological value I would like to register my agreement that the land and gardens of the Convent should be designated the OOLTI status.</p> <p>As the Ham Common area is already well provided with schools for various age groups (namely Greycourt, The Russell School, St Richards and St Andrews and Meadlands) any further provision required by the Borough would have not only marginal value but will contribute to the congestion on the Petersham Road.</p> <p>Hoping that these points will be considered in the decision making process I remain</p>
14	Bill Walters	<p>With reference to the notice displayed at the end of Martingales Close regarding the designation of OOLTI to the site behind the Convent on Ham Common we would wish to add our support.</p>

		<p>This area adds greatly to the local character and is of significance and value to local people It would be highly detrimental to local residents if access was from Martingales Close as this a narrow road. The convent garden is of value for biodiversity and nature conversation .</p> <p>We do not feel that the Convent building would be suitable for a school . It would need an enormous amount of alteration which would be very expensive and would bring a lot more traffic to an already saturated area.</p>
15	Brita Scharf	<p>I am writing to express that the keeping of the Convent Garden as it is today is seen as very important to us residents of Martingales Close and family with such a wonderful life quality in this calm area of Ham.</p> <p>We are supporting the designation of the Convent Garden as OOLTI for the following reasons:</p> <p>This beautiful park like garden brings such a wonderful contribution to the local character and also Martingales Close scene, as it is a green space which guarantees the calmness of this area with a great biodiversity. The views of the property we live at (Martingales Close No. 17) is part of what gives this area the special attractiveness. Old trees and a variety of different singing birds. This such an add on to life quality which should not be destroyed. The size, virtue and position gives such a tremendous quality.</p> <p>Therefore it would be also unsuitable to turn the Convent into a school, as the calmness of this area would be ruined by the traffic every day of parents bringing their kids to school and picking them up, the parking of cars in the Martingales Close, the noise during breaks on the schoolground.</p>
16	Andrew Barnard	<p>We welcome the opportunity to comment on the proposal to designate land at the rear of St. Michael's Convent as Other Open Land of Townscape Importance. We are fully supportive of the proposal which will do much to preserve the character of the area, maintain privacy of the site as well as shielding the frontage of our own property. The green space adjacent to Martingales Close was a significant factor in our decision to move here.</p> <p>The Convent garden is a long-established haven for wildlife with a number of significant, mature trees and is a most welcome, peaceful open space. It is fitting that a house and garden of this type, originally dating from 1730, should feature a collection of trees along with areas of grass, herbaceous planting and a vegetable garden. The special nature of the garden as a whole has long been recognised by the Convent which has offered it to guests as a retreat to allow time and space for reflection and spiritual refreshment. Its importance is acknowledged annually when the gardens are open to the public and attract a large number of appreciative visitors.</p> <p>It is quite surprising that the trees (and indeed all but one of the trees in Martingales Close) have not benefitted from protection to date. Their removal would leave a gaping hole in the flora and fauna of the area, never mind any other changes which might affect the character of the gardens.</p>
17	CN Stephens	<p>As a resident on Ham Common for almost 50 years I am writing to support the designation of the Convent gardens with the status of Other Open Land of Townscape Importance.</p>

		<p>Ham Common is an area of open space preserved and maintained both by the Council and also by local residents such as those represented by the Ham Amenities Association, the Ham and Petersham Society, the Ham Neighbourhood Forum, and the Martingales Close Residents Association.</p> <p>The gardens of the Convent, together with those of Hardwick House, Manor Lodge, and also with the avenue to Ham House, are an integral part of the locality in preserving its openness and availability. While some of the gardens are relatively private the gardens of the Convent have been open to local residents, on occasion open to the public for charitable purposes, and have even appeared on TV. The planting, particularly of the trees, provide an excellent natural habitat for wildlife such as badgers, foxes, and a variety of birds.</p> <p>On a practical note any housing development in the Convent garden will inevitably lead to problems of access and increasing traffic on surrounding roads already overburdened by the high proportion of on street parking.</p> <p>It is for the above reasons that I hope the appropriate OOLTI will be granted by the Council.</p>
19	Caroline Britton	<p>I am writing to say how strongly I support the proposal to designate the Ham Convent gardens with the status of Other Open Land of Townscape Importance.</p> <p>I have lived at 8 Martingales Close, next to the Convent since 1995 and my parents moved to 18 Martingales Close in 1981, so I have known and loved the area for many years. One of the key reasons is the Convent gardens. They represent an oasis of calm and tranquillity, offering lovely views and adding enormously to the character of Martingales Close and to the wider surrounding area. It is such a pleasure watching the birds and wildlife supported by the gardens. They really are a jewel within Ham.</p> <p>The proposal that the site could become a school concerns me as it would inevitably lead to a substantial rise in traffic. Martingales Close itself is relatively narrow and busy, and the roads nearby are all of a similar nature. There simply isn't the capacity to cope with a lot of extra cars – certainly not without ruining the atmosphere of the Common, which is valued by literally thousands of people as a precious green and open space.</p> <p>I would be grateful if you could keep me in touch with any developments, as this is an issue about which I feel deeply.</p>
20	Charles and Gail Doe	<p>We would like to record our strong support for the OOLTI designation for the gardens at St Michaels Convent.</p> <p>The gardens represent one of the larger private gardens in the area, and are the original gardens of a Grade 2 Listed Building, which in turn is bordered by Ham Common and the Great South Avenue to Ham House. Set within the Ham Common Conservation Area, the gardens are significant and historically important.</p> <p>In addition, the gardens provide a significant area of lawn, flora, horticulture and mature trees and so make a particular contribution to the character of this area. The gardens also provide a natural habitat and haven for wild life and have considerable biodiversity, which need to be protected from development.</p>

		<p>The presence and immediate proximity of the gardens make a very positive contribution to the residents of Martingales Close and provide a unique sense of both security and serenity. The gardens have become a vital resource for everyone. Uninterrupted views across the gardens and of the trees from all the properties in Martingales Close are very highly valued.</p> <p>We are concerned that any development of St Michael's Convent should not harm the setting of the gardens, and not cause congestion on the narrow surrounding roads with additional parking that this may entail.</p>
21	Charles Doe, Ham and Petersham Association	<p>On behalf of our membership, we would like to register our support for the OOLTI designation of the gardens at St Michael's Convent.</p> <p>The gardens lie within the Ham Common Conservation Area, and within the curtilage of a Grade 2 Listed Building. The historical context and character of the Gardens is well established, and so the conservation and preservation of the gardens is paramount.</p> <p>The OOLTI designation will retain the historic boundary and the setting of the Listed Building, and so enhance the overall character of the Ham Common Area.</p> <p>The gardens themselves not only make a significant contribution to the green open spaces of the surrounding area, but importantly form part of the local character of the Conservation Area and Martingales Close.</p> <p>Our members value the presence of the gardens, and views across them, and are concerned about the harm to this natural habitat that any development would bring. The gardens themselves are mature and are well tended, providing significant biodiversity and nature conservation.</p> <p>Parking and access issues may arise from too intensive a development of the existing building, such as breaking it up into a large number of flats, or an educational use with high numbers of students. With limited parking space on site, parking will occur on nearby roads and the Common. Driving and dropping off students could cause congestion at peak periods.</p>
23	Chris Bemand	<p>Having seen the notice regarding planning for St Michaels Convent I would like to express my support for your intention to designate the area a OOLTI for the reasons listed below.</p> <p>Orford Hall/The Convent was once the home of the Duke Of Wellington and the House and Gardens are an important historic local land mark . Its 18c walled garden is one of the few remaining properties around Ham Common that haven't been destroyed by redevelopment. This house and gardens are important to an area famous for its historic buildings and gardens..</p> <p>The Convent Gardens are exceptional in their size and nature adding a great deal of biodiversity . They contain unusual plants, some native only to biblical lands, ancient mulberry trees, vine gardens and vegetable beds. The wild orchard and long grass areas are a vital element for the conservation of smaller wild life in the area.</p> <p>The size and openness provides a set of "lungs" in the area north of Ham Common and the houses (including mine) which border the garden enjoy a fantastic unspoilt view into the gardens.</p>

		<p>Finally, I would strongly object to any school being allowed to operate on this site. The traffic on Richmond Road is already grid locked from Ham Parade to Star and Garter on most mornings and could not support any extra volume. Also, extra traffic around Ham Common would make the existing small roads unsafe for pedestrians and animals, crossing to use the common. The noise from the playground would destroy the semi rural atmosphere in the neighbourhood. Also I'm sure the garden would, over time, end up like other schools and be lost to swings, slide and astroturf .</p>
25	Dale Nolan	<p>I write as a resident of Martingales Close, Ham, to comment on the importance of the site and gardens of The Convent on Ham Common and to strenuously support the designation of the site as an Other Open Land of Townscape Importance (OOLTI). From your notice posted at the end of Martingales Close, you indicate the area is already an OOLTI but I would be grateful if you could confirm that. Given it's local importance I would imagine it is already, but if not, would support its designation. I summarise below the importance of the area based on your policy criteria.</p> <p>Value for biodiversity and nature conservation: As you will know, the Arcadian Thames and Richmond Park are critically important areas of natural importance for London, that, with no understatement, can be described as jewels in our natural and historic heritage, items that mark out London among other of the world's great cities as one that cares for and preserves it's natural and historic sites of importance. An important part of this is the role that the River plays as a Wildlife Corridor through the built up city of London and its suburbs and how it links to other critically important sites such as Richmond Park. The only Wildlife Corridor that exists between the River Thames and Richmond Park, two of the City's greatest wildlife assets, are the Ham Avenues and Ham Common, and any look at an aerial map will illustrate the important of the gardens and trees of The Convent in that narrowing Corridor. This is the primary route that birds and other wildlife travel through our region, and ensures that Richmond Park is not isolated by built up areas from other areas of wildlife migration and movement.</p> <p>The Thames Landscape Strategy, who recognises the role above, and who has as its patron Sir David Attenborough, describes as an example; "The River Thames is one of the most important habitats for bats in southern England...The bats roost in the old veteran trees in nearby parks navigating their way to the river via the 'bat super highways' such as the Ham Avenues that link the river with the open spaces." Nowhere more on this highway can you see the evidence of this in the grounds and environs of the Convent, with bats circling in evening night, stretching into Martingales Close and Ham Common. Woodpeckers and owls are commonly sighted and heard. There are many academic and local organisations that can quote the array of flora and fauna that is supported by the variety of trees, fruit and other, provided by the trees in the area. Damage to this area will vastly reduce the variety of trees and plants that serve this important Wildlife Corridor.</p> <p>Importance for Immediate or longer views into and out of the site, including from surrounding properties: We live at 15 Martingale Close, which looks directly into the rear of the grounds of the Convent. Our front bedroom windows have a view that is solely of the trees of the Convent Gardens. We and our four children personally enjoy the views and sounds of woodpeckers and owls that live in the trees of the Gardens, with, for example, dusk adventures to observe the bats and listen to the owls in the trees.</p> <p>The sense of safety, privacy and calm from living in a road where one side looks onto the trees of the Convent is something we treasure daily in our lives and is always commented upon by visitors to the area. It was a critical determinant in our move to Ham from Clapham and remains so.</p> <p>Contribution to the local character by virtue of its size, position and quality:</p>

		<p>I have touched on Ham's situation from a natural and historic perspective above - I feel preserving areas such as the Convent Gardens with its current essential character and contribution to Ham's critical role as a wildlife corridor is an indication of our understanding of our village's role in preserving this City and ensuring it is a sustainable, green and caring place to live.</p> <p>I strongly highlight the importance of the area, support it's designation as OOLTI and urge you to refer to organisations such as the Thames Landscape Strategy, the All London Green Grid, Ham United Group and many others who can better describe the role of this type of space.</p>
28	David and Patricia Yates	<p>As residents in Martingales Close since it was built in 1969, we are writing to give our strong support to the proposal for the Convent site outlined in your recent notice. In particular we support the proposal to designate the land which is at present the gardens of the Convent as an 'Other Open Land of Townscape Importance' (OOLTI), on the basis that this designation is in fact still only a proposal, as we are advised. We have four points to make:</p> <ol style="list-style-type: none"> 1. At present Martingales Close has a special character and sense of seclusion because the houses are on one side of the road only, with the trees and open land of the Convent garden on the other. This unusual and attractive quality is much valued by the residents and seems exactly the sort of characteristic the status of OOLTI is designed to protect. 2. Almost all the houses in the road, including our own, have views of the Convent garden, particularly from the upstairs front windows, varying of course with the seasons, which we value very highly. 3. Aided by the nuns' avoidance of artificial pesticides and weedkillers ever since their arrival in 1949, the Convent garden makes an irreplaceable contribution to local biodiversity. Perhaps the most important element in this process is the number of mature trees, concentrated in a belt on the Convent side of the Martingales Close wall. These include a Honey Locust <i>Gleditsia triacanthos</i>, a Lombardy Poplar <i>Populus nigra</i>, and many others. Besides their intrinsic merit as landscape elements these trees make a vital contribution to the habitat of the local birds, especially by providing a refuge for them when they are disturbed from lower areas and by providing nesting sites. As a result the local bird population is rich and varied - in our own garden for example we have recorded a remarkable 51 species of birds, and there is every reason to believe that this level of diversity would be much reduced if building development were ever to be allowed on the Convent garden. 4. Together with the adjacent garden of Avenue Lodge, the Convent garden forms part of an irregular green corridor along both sides of the Great South Avenue of Ham House, connecting Richmond Park and Ham Common on the one hand with the Ham Lands and the River Thames on the other. One striking example of the use of this corridor is that on warm summer evenings large numbers of bats fly along it from the direction of Ham House to feed on insects over Ham Pond. Badgers and birds use it too. <p>In summary, the Convent grounds seem eminently well-matched to the criteria for designation as an OOLTI, and we reiterate our strong support for this proposal.</p>
30	Esther Arana	<p>As part of Martingales Neighbourhood community, we would like to raise our concerns re. the new property development at the convent and the gardens.</p>

		We would like to support the proposal to designate the property as Other Open Land of Townscape Importance. We consider it essential for quality of living of the whole community to benefit from the brightness that the gardens offer to us, the biodiversity and all the animals which have their natural habitat there which give the street a very special atmosphere.
31	Eugene Dreyer, Langham House Estate Maintenance Company Ltd	<p>Site Allocations Plan Consultation – Further Comments HP3 Cassel Hospital, Ham Common, Richmond HP4 St Michael’s Convent, Ham Common, Richmond 06 October 2014</p> <p>In addition to the previous submission made in response to the above consultation in July 2014, the Board of the LHEMCo Ltd has the following comments to add specifically in relation to the potential use of these sites for education purposes:</p> <ol style="list-style-type: none"> 1) The Board does not believe that sites HP3 and HP4 are suitable for primary school use. It believes that the use of either for this purpose would cause unacceptable levels of noise and traffic disturbance on an unsuitable road network particularly at drop off and pick up times. The public transport accessibility of both sites is limited. 2) The three local schools in the area all have the capacity to expand. We are aware of plans for the Russell School to take on a ‘bulge class’ next year and we have seen plans for its expansion. We believe that greater utilisation of existing school sites – including St Richards and Meadlands Primary Schools – is the most appropriate means of meeting future educational demands in the area. 3) Both sites contain Listed Buildings within a Conservation Area. It is our considered view that conversion costs would be high, whilst the suitability of existing buildings for educational purposes would remain low in both cases. 4) Site acquisition costs would be high. In our view public funds could be put to far better use than trying to acquire unsuitable buildings for school use in disadvantageous locations. <p>In remains our view that a Planning Brief should be prepared for Site HP3 Cassel Hospital given the size of the complex, and its historic and architectural significance.</p>
33	Geoff Bond	<p>I strongly support the designation of St Michael’s Convent garden as Other Open Land of Townscape Importance.</p> <p>It is hard to think of a more deserving site:</p> <ul style="list-style-type: none"> • Contribution to the local character and/or street scene, by virtue of its size, position and quality. • It gives Martingales Close and the wider Ham Common Conservation much of its semi-rural village like character as a large site that many local houses over look. It has had the current boundary since the grade II listed building was built c1730. The mixed style of the garden is beautiful and a popular when open to the public. • Value to local people for its presence and openness. • Local people, particularly those in Martingales Close gain considerable value from the gardens as provides tranquillity and a closeness to nature to residents. The first noise we hear in the morning and last one at night is birdsong from the gardens and the children love to see the badgers, foxes, toads and even bats come from the gardens. • Immediate or longer views into and out of the site, including from surrounding properties. • My house like many others look into the gardens greatly adding to our wellbeing and happiness. • Value for biodiversity and nature conservation. • The ecological value is significant with a huge range of flora and fauna enjoying the different habitats offered in the garden. Not to mention its crucial location in the green corridor to Ham Common. The garden is simply irreplaceable.

		It would be a strange place to put a school as the access will be very awkward and it would be expensive to buy and convert.
34	Geoff Bond, Martingales Close Residents Association	<p>We support the designation of the St Michael's Convent garden as other open land of townscape importance (OOLTI). The site is ideal for the designation as a "private garden" and "an area of vegetation and mature trees" which offers considerable local value to the area and townscape and it merits protection on these grounds.</p> <p>These gardens are open and natural in character and have probably been little changed since they were laid out when the house was built in c1730 (now grade II listed). They offer mixed habitats between a wide with areas of grass land, two orchards, two ponds, mixed mature wooded areas and an organic vegetable patch. The mulberry tree and vine were probably planted soon after the house was built (see Evelyn Pritchard history of the property for the Richmond Historical society).</p> <p>Specific to the criteria laid out in Policy DM OS 03 of the Development Management Plan and in line with the Core Strategy 8.2.4.2:</p> <ul style="list-style-type: none"> • Contribution to the local character and/or street scene, by virtue of its size, position and quality. • Residents are concerned that the local character of the Ham Common Conservation area and that of Martingales Close (that wraps around the Convent gardens on two sides) would be in danger of being damaged by any development in the gardens. Protection for the gardens would help achieve the Ham & Petersham's Village Plan's intention to maintain the area's considerable character and "The vision based on maintaining and where possible, enhancing, the rural and village character of Ham and Petersham" • Value to local people for its presence and openness. • The convent gardens contribute substantially to the quality of life for local people. In the survey of the residents of the neighbouring Martingales Close (available on request, undertaken by the residents' association) the close's unique tranquillity comes from its houses' close proximity to the gardens with most overlooking the site. Loss of the gardens to future development would substantially harm life for local people who currently enjoy the peace and closeness to nature that the large adjacent gardens bring. • Immediate or longer views into and out of the site, including from surrounding properties. • Almost all the houses of Martingales Close and the other nearby properties enjoy views into the gardens with many residents able to look across the gardens to grade II* listed avenue beyond. Loss of these views would be detrimental to lives of these people. • In addition the gardens have been enjoyed for many years by visitors on its regular garden open days. • Value for biodiversity and nature conservation. <p>The gardens were recommended to the Council by the Council's Ecology officer as worthy of designation as a Site of Importance for Nature Conservation when that legislation is enacted by the council. This recommendation was based on the ecology report that highlighted the garden as an environmentally sensitive area.</p> <p>The report concluded:</p> <ol style="list-style-type: none"> 1. St Michael's Convent Garden is designated as part of a Conservation Area but the environmental sensitivity of the site and its local significance to nature needs additional protection. 2. The gardens form part of a wildlife corridor along both sides of the Great South Avenue of Ham House, connecting Richmond Park and Ham Common on the one hand with the Ham Lands and the River Thames on the other. This makes it ideal for designation as a Local Site of Significance for Nature Conservation. The corridor would be significantly reduced in effectiveness if the Convent Garden was lost. 3. The way the garden has been managed since 1730 has allowed mixed habitats to develop providing an excellent home to a wide range of flora, fauna and animal life to both inhabit and to pass through.

		<p>4. The bird population in the garden and surrounding area at the moment is strong both in number of birds and in number of species. This is only possible by providing excellent mixed habitats in such an ideal protected location.</p> <p>The site's biodiversity makes it ideal to satisfy PPS 9 "to protect and enhance biodiversity wherever possible. Paragraph 12 refers to the networks of natural habitats, which should be protected from development." The protection of the green corridor that the gardens provide satisfy Core Strategy policy CP10 "green corridors will be safeguarded and improved for biodiversity"</p> <p>With regard to the inclusion of the site for educational use we are concerned that the buildings will be expensive to convert and the access to it from the rest of Richmond via the congested Petersham Road mean it is unsuitable location for a school for children from outside of the ward.</p>
37	Peter Dines, Gerald Eve LLP obo Churches Extension Trust	<p>Please find attached our objection to the above draft policy. I should be grateful if you would acknowledge the safe receipt of this document. Yours faithfully Peter Dines, Partner</p> <p>See Appendix A to this document for a copy of the full response by Peter Dines of Gerald Eve LLP on behalf of The Trustees of the Church Extension Association.</p>
44	Jane and Roy Morrison	<p>I note from a notice on the lamp post at the junction of Martingales Close and Ham Common that the Council intend to add St Michael's Convent to their Site Allocation List, for potential use for educational purposes. I also note that it is the intention that the gardens of the Convent should be designated with the status of Other Open Land of Townscape Importance (OOLTI).</p> <p>I would like to register my agreement that the land and gardens of the Convent should be designated the OOLTI status as they clearly meet the criteria for such as set out in the Council's policy, namely</p> <ul style="list-style-type: none"> • Contribute to the local character and/or street scene, by virtue of its size, position and quality • Value to local people for its presence and openness • Immediate or longer views into and out of the site, including from surrounding properties • Value for biodiversity and nature conservation. <p>Having been maintained over the years to a high standard there is historical interest in layout of the kitchen garden, the orchard and greenhouse containing an old vine. The gardens offer a haven for diverse flora and fauna and I believe the secluded ponds provide habits for newts, frogs and many other insects and animals. Foxes, badgers, and a wide variety of birds live within the gardens and the mature trees provide Martingales Close with its unique character.</p> <p>With regard to the use of the buildings as an educational establishment we note that the area is well provided with Infant and Junior schools already in the form of The Russell School, St Richards and St Andrews and Meadlands, as well as serving the needs of Senior School pupils at Greycourt. Any further provision required by the Borough would be better placed on the other side of Richmond, bearing in mind the limited access via Petersham Road, which is already heavily congested during peak hours.</p>

		We trust these views will be taken into account as part of the consultation process.
45	Jane Phillips	<p>St Michael's Convent: I note there is already the German School on the Common and that the area appears to be well supplied with Schools. I guess space is paramount but I do wonder if this one should be located in an area where there are fewer Schools and a larger population? There is no information as to whether it is a 'mixed' or specific 'boys or girls' School. I do understand space is at a premium in this area!</p> <p>I think having 3 Schools crammed into one spot is not a good idea and that you should be seeking to either combine two of them, or alternatively find a different location for at least one of them. The A307 has always been a very 'busy' road and adding to that congestion would not be very helpful.</p>
51	Juliet Nolan	<p>Dear Sir/Madam,</p> <p>I am writing to express my support of the designation of the Convent Gardens on Ham Common as an area of Other Open Land of Townscape Importance.</p> <p>I live in Martingales Close, immediately behind the Convent Gardens, and value them immensely in many ways.</p> <ol style="list-style-type: none"> 1. Our immediate view from our house is into the gardens which we treasure for their rich mix of trees, their year-round greenness and the privacy they offer us. 2. We value the presence of the gardens in our daily life in Ham for their contribution to the sense of peace and calm, and semi-rural nature of this very special village. 3. The size of this plot, so close to Ham Common, means that it is of the utmost importance in the balance of buildings and nature around Ham Common and so we wish it to be preserved. 4. It is an incredibly rich and diverse site for bird-life. We see woodpeckers almost daily, and hear owls every night. It is also an important nesting site for bats which we hope will not be disturbed. The gardens themselves have a rich variety of old apple trees which it would be a shame to see lost. <p>School?</p> <p>We understand that there is also the possibility that the Convent might become a school. We would just like to emphasise that Ham itself has adequate school places for local children so that any new school should be built nearer to the shortfall in North Kingston, or Richmond.</p>
52	Karen Skipper	<p>I am writing in response to the consultation with local residents around St Michael's Convent and the proposal outlined to designate the Convent gardens Other Open Land of Townscape Important (OOLTI).</p> <p>This household fully supports this proposal. The Convent area is a central part of the local character and identity of Ham Common. It is a large site and borders directly on Martingales Close as well as Ham Common. The woodland area within the convent grounds offer a diverse species of trees, many visible from Martingales Close contributing therefore to the environment. It also harbours much wildlife including a badger sett and is a popular site for the local parakeets.</p>

		<p>It is a precious and highly valued resource to locals who appreciate the open space, tranquility and security it offers, including the buildings and the garden areas. We feel strongly that the Convent and its grounds are an integral part of the local community feel of Ham.</p> <p>We fully support the OOLTI proposal.</p>
53	Kate Massey	<p>Site Allocation Plan - OOLTI Designation St Michael's Convent, Ham Common I write in support of the OOLTI designation of St. Michael's Convent Ham Common. I note that one of the criteria of OOLTI designation is that any development 'does not harm the character and openness of the open land.' The Convent enhances the overall character of the Ham Common area. It is an historic building, one of several of character around Ham Common that define the area and make it so special. I welcome and fully support the OOLTI designation for St. Michael's Convent as it will retain the historic boundary and the setting of the Listed Building. In terms of the openness of the open land, the convent lies in the Great South Avenue of Ham House, a 'green corridor' connecting Richmond Park and Ham Common, which locals enjoy and have worked hard to retain and maintain. Ham Common already suffers from hazardous parking which would be seriously aggravated by parking and access issues that would arise from too intensive a development of the existing Convent buildings, such as breaking it up into a large number of flats or using it as an educational building, with high numbers of students: driving and dropping off students is likely to cause complete gridlock in the area during peak periods. The convent garden is a beautiful mix of mature trees, plants and vegetation. It is a traditional, peaceful English garden, the like of which is rare in an urban landscape. It is a delight much enjoyed by all who visit, eg on the Convent's Open Garden days. Those living around the Convent enjoy the openness of the space as well as the biodiversity that exists in the area. These must be preserved, because if lost from the area through over-development, they will never be returned and the special beauty and of this part of Ham Common will be permanently diminished. I therefore strongly support the OOLTI designation</p>
54	Kathy Meek	<p>I believe that the Council is proposing that the Convent gardens off Ham Common be designated with the above status.</p> <p>I would like to record my support for this proposal. It seems clear that these grounds meet all of the criteria set out in the Council's policy statement which has been displayed on lamp posts around the site.</p> <p>The convent and surrounding grounds have for long been a significant part of the local scene and contribute substantially to the ambience of Ham Common. Over the years, the sisters have invited local residents to various events in the chapel, house and garden and their generosity and goodwill have been greatly appreciated. I think it is fair to say that we in Martingales Close have been particularly fortunate in the close proximity of the convent; many of the houses in the Close enjoy views over the gardens and we all treasure the peace and tranquillity of the area.</p> <p>The Convent gardens also offer shelter and nourishment to wildlife and play an important part in helping to conserve plants, animals and insects – all increasingly at risk from pollution, endangered habitats and so on.</p>

		I trust that these comments are helpful.
55	Kelvin Sutherland, Authentic Estates	<p>Objection against the pre-publication site allocations plan (HP4) proposed by the London Borough of Richmond in respect of St Michael's Convent, Ham</p> <p>Submitted by: The Authentic Group (KDS Capital)</p> <p>Background</p> <p>The Authentic Group (KDS Capital) ("the Company") is a property investment and development company that wishes to engage with the current owners of St Michael's Convent, Ham regarding the potential development of a medical health care facility, together with associated amenities, on the site.</p> <p>Basis for Objection - OOLTI</p> <p>While accepting the need to conserve the overall "look and feel" of the gardens at St Michael's Convent, the Company considers the designation of the grounds to St Michael's Convent as "Other Open Land of Townscape Importance" (OOLTI) as unnecessary and inappropriate for the site. Alternative means exist to ensure the retention of the "look and feel" of the property without the requirement for OOLTI status.</p> <p>This view is underpinned by our understanding that a comprehensive review of open land designations in the Borough was carried out seven years ago. The consultants suggested that 35 areas be designated as OOLTI, and a further 65 should be put forward for consideration.</p> <p>St Michael's Convent was not identified in this comprehensive study which forms the basis of formal designations through the 2011 Development Management Development Plan Document (DM DPD), proving clear evidence that the site is not of sufficient value in planning terms to be designated OOLTI.</p> <p>It is however our belief that the gardens should be retained, if not enhanced, in any potential future redevelopment of the site, through active engagement with the current and future owners of the property.</p> <p>Basis for Objection - Educational Use</p> <p>The proposed educational use on the site is highly restrictive and does not appear to be based on a specific current, medium or long term need in this area, as evidenced by the following statement, taken from the Background Paper - Needs Assessment Education, dated 13 September 2013:</p> <p>"As at present, in the medium- to long-term, it is likely that there will be a need to consider additional provision in the Barnes/East Sheen/Mortlake; Richmond; Teddington; and Twickenham areas.</p> <p>If demand were to be exacerbated by variable factors – e.g. continuing economic difficulties altering the proportion of children</p>

		<p>whose parents opt for private schools; large ‘pupil yields’ from housing developments at Twickenham Station, the Royal Mail site, Stag Brewery, etc.; and further improvements in standards across the borough’s primary and secondary schools – then the projections of pupil numbers could be higher than anticipated.”</p> <p>The Ham area is not identified in this needs assessment as being required for educational purposes and alternative (and better suited) sites are understood to be more readily available. The listed building status of St Michael’s Convent is also viewed as impractical for educational uses.</p> <p>On the other hand, a medical use of the property would address a specific demographic need for such facilities in the London Borough of Richmond, where there is an acute shortage of frail care nursing facilities. Those care facilities that do exist are broadly spread across the Borough (for example, in Hampton, Teddington, Twickenham, Kew, Barnes and East Sheen), leaving residents of Ham and Richmond with severely restricted options.</p> <p>We trust the above comments will be considered, with a view to arriving at an appropriate planning proposal for the site.</p>
58	Lizabeth Rohovit and Frank Siebert	<p>My family and I live on 6 Martingales Close. We would like you to know how precious the convent gardens are to us. We think it merits OOLTI status. My husband and I are concerned as the council recently allowed our neighbours behind us on Bishop’s Close to build on without consulting us. My understanding is that our other neighbours on Martingales Close that were affected are also upset that they weren’t consulted. Unfortunately, this has caused us to be especially concerned with what may happen to the gardens.</p> <p>We feel that the gardens contribute to the local character. Even if our house is nothing special, the gardens are. They uplift us all. It enables the geese and other birds to follow their migratory path between the Thames River and Richmond Park. The biodiversity is important. We have a good example for our children, right across our street. The gardens set a tone of beauty and peacefulness for the area. They balance the huge secondary school just on the other side of it (Grey Court School). We chose to purchase our house as it was across from the gardens on a cul de sac. We adopted 3 siblings ages 6, 8,9 (2007) and we needed a safe place for them to grow up- we still do. The gardens help define our neighbourhood. They are large, historic (Biblical garden), and featured on local open garden days. They have greatly contributed a sense of history and beauty to our neighbourhood. Many who live further in Ham walk by the gardens on their way home from the 65 bus stop. Just knowing it is there is reassuring.</p> <p>Please accept this email as our support for the OOLTI status for the Convent Gardens off of Ham Common.</p> <p>My husband, Frank Siebert, may write you independently, but if not, please let this serve as notification from us both that we would like the OOLTI status upheld.</p>
59		<p>[Further email received] I am sorry, but I was not aware that the convent was seriously being considered as an educational site. There are PLENTY of schools, both primary and secondary, in our immediate area, both in Kingston and in Richmond borough. My husband and I would really be against it being used as an educational site. It makes no sense. It clearly would not be servicing local needs and would entail children being bused in.</p>
64	Martin KIRRAGE	I write with reference to the consultation which is being proposed concerning an OOLTI to be designated on the site of the

		<p>gardens of the Convent near Ham Common.</p> <p>Having been a resident of Martingales Close for some years I have had an opportunity to attend events held by the Sisters and have had the opportunity to look at the gardens at close hand. They are truly remarkable, containing some very, very old trees and shrubs. Because of this established habitat there is a wonderful selection of wildlife within the grounds. As Martingales Close abuts to the right hand side and to the rear of the Convent it has proved to be a peaceful and tranquil area in which to live. It is hard to believe that we are only a few short miles from the centre of London.</p> <p>To lose such a beautiful pocket of land containing such trees, shrubs and wildlife would be catastrophic not only to the current generation, but equally important to the generations that follow us.</p> <p>I trust that the foregoing will be of assistance in your deliberations.</p>
66	Maura Wall	<p>I would like to support the proposition that the gardens of St Michaels Convent Ham Common be designated OTHER OPEN LAND OF TOWNSCAPE IMPORTANCE to preserve them and protect them from any form of development . They are an important part of Ham and its story and need protecting.</p>
68	Michael Wall	<p>I heard yesterday of the proposed sale and potential redevelopment of the property.</p> <p>I trust that the change is use if this property will encompass both the historical significance of the property and retain the open space to building ratio of this property which has a major contribution to the amenity of the area surrounding Ham Common.</p> <p>I am confident that between the Council and the Ham and Petersham Association the proper outcome for this property can be achieved.</p>
70	Sally Harries, Natural England	<p>HP 4 St Michael's Convent, Ham Common</p> <p>We welcome the inclusion of 'Other open land of townscape importance' here and would expect this site to take advantage of opportunities to incorporate multi-functional green infrastructure to complement the neighbouring Sites of Nature Conservation Importance including The Copse, Holly Hedge Field and Ham Avenues, Ham Common Local Nature Reserve and Richmond Park and associated areas, and as well as provide recreational facilities and access to nature for health and well-being.</p>
76	Paul Massey	<p>I write in support of the OOLTI designation of St. Michael's Convent Ham Common.</p> <p>St. Michael's Convent is one of those properties which are delightful to have in your area. Many other places in London would welcome it, as a property to value and enjoy.</p> <p>We in Ham are lucky to have it and should protect it at all costs: its size, character and location on the famous Ham Common provide a magnificent backdrop to the area.</p> <p>The gardens in particular provide the local people with an open area of peace and tranquillity (enormously valued in this busy and over populated world). Furthermore, as a result of the way the gardens have been looked after for all these years, providing a haven for wildlife and conservation, they should be enjoyed and preserved for future generations</p> <p>Re Education Use: On the subject of our over-populated world, we in Ham suffer from a restricted road infrastructure as we live in the bend of the Thames. We therefore suffer from high traffic congestion particularly in the "rush hours" affecting travel times</p>

		<p>and pollution. We must therefore strive to minimise additional traffic in this area by ensuring no new schools or public amenities which encourage additional vehicles are built here.</p> <p>I therefore fully support the OOLTI designation,</p>
79	Peter Britton	<p>I have read the consultation document left at the entrance to Martingales Close and wish to strongly support the view expressed there that the area to the rear of the listed Convent building on Ham common should have the status of an Other Open Land of Townscape Importance (OOLTI). The site is a long established area of tranquillity and a natural habitat for many plants and wildlife. It also contributes, by virtue of its profusion of attractive mature trees, to the view from many surrounding properties and from Ham common itself. OOLTI designation would be a recognition of the value of such open spaces in suburban environments.</p> <p>As to the possible future uses of the listed convent building itself, I would not support its conversion to an educational establishment in view of the limited access afforded by the narrow, and already busy, roads in this area.</p>
82	RN Field	<p>Dear Sirs</p> <p>St Michael's Convent, Ham Common</p> <p>Ham and Petersham are largely conservation areas and should be kept as such.</p> <p>Since the 1939-45 war there has been much infilling of gardens, especially in Ham. Thus, the following houses have had their gardens, partially or completely built on by houses: South Lodge, Hardwick House, St Michael's Convent, Avenue Lodge, Langham House, Caddrl Hospital and Ivy House. Furthermore in Ham St. the gardens of Stoke House, Beaufort House and Ham Manor House have been partially infilled with houses. In addition farm land has been built on resulting in Ham Farm Rd, Parkleys and Ashburnham Rd.</p> <p>In the Richmond Council 'Conservation Area Character Appraisal and Management Plans' under the heading 'Key Strengths of Ham Common' it is stated <u>inter alia</u> that there is a collection of exceptional historic buildings set in mature private gardens, fringing Ham Common. It would therefore be highly undesirable for there to be building on the garden on St Michael's Convent since the Conservation Area would be greatly damaged.</p>

General Comments		
Ref. no.	Name/Organisation	Detailed comment
11	Andy Sutch	Not sure there are any new issues with this at this stage
18	Carmelle Bell, Savills obo Thames Water	<p>RICHMOND – EDUCATIONAL SITE ALLOCATIONS DPD – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD</p> <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.</p> <p>As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:</p> <p>Key Issue – Water Supply and Sewerage/Wastewater Infrastructure</p> <p>Thames Water seeks to work closely with the local planning authority to plan for the necessary water and sewerage/wastewater infrastructure to service development in its area in accordance with the National Planning Policy Framework and the National Planning Practice Guidance.</p> <p>New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>The new web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>The information contained within the Sites Allocations DPD will be of significant value to Thames Water as they prepare for the provision of future infrastructure. To enable Thames Water to provide more specific comments on the site proposals we would value the inclusion of the Council's aspiration for each site. For example, in addition to an indication of the type and scale of development also the anticipated timing/phasing of development.</p> <p>When carrying out the necessary early consultations with Thames Water regarding the capacity of sewerage/wastewater</p>

		<p>infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of sewerage/wastewater infrastructure will be important to many consultation responses and the time requires for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and sewerage/wastewater infrastructure to serve development proposals.</p> <p>In order to ensure that the drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications.</p> <p>Thames Water recommend that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply infrastructure both on and off site and can it be met; • The developments demand for wastewater infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water, then the developer needs to contact Thames Water to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at: http://www.thameswater.co.uk/home/11425.htm Or contact can be made with Thames Water Developer Services by: Post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; Telephone on: 0845 850 2777; Email: developer.services@thameswater.co.uk</p> <p>Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.</p> <p>Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. Therefore, Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development either through phasing and Local Plan policies, or the use of Grampian style conditions attached to planning permissions. As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites. We also wish to highlight the opportunity to introduce sustainable urban drainage systems into brownfield development to reduce surface water flows into the sewers. It is important to maximise capacity in the sewers for foul sewage thus reducing the risk of sewer flooding.</p> <p>To accord with the NPPF and the NPPG, text along the lines of the following should be added to the Allocations Document:</p>
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		<p><i>“Water Supply and Sewerage/Waste Water Infrastructure</i> <i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.”</i></p> <p>We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.</p>
22	Charles Muriithi, Environment Agency	<p>Thank you for consulting the Environment Agency on the above which we received on 5 August 2014. We would wish to comment as follows: Sites HH2, HP3 and HP4 all fall within Flood Zone 1 - low risk of fluvial/tidal flooding Site SM5:</p> <ul style="list-style-type: none"> • Lies in Flood Zone 3, but NaFRA low risk due to defences • Risk from river Thames is tidal/fluvial but still protected by defence wall • Main risk is from breach of tidal defence; this location might be included in current remodelling • Less than 1ha – but there may be opportunity to remove potential for surface water flooding locally- the site is just outside critical drainage area. <p>Please do not hesitate to contact me should you wish to discuss this further.</p>
24	Claire Craig, English Heritage	<p>London Borough of Richmond-upon-Thames – Local Plan: Site Allocations Document Pre-Publication Consultation on New Educational Sites</p> <p>Thank you very much for the opportunity to comment on the Site Allocations Development Plan Document (DPD) pre-publication consultation on new educational sites. As the Government’s statutory adviser on the historic environment, and a statutory consultee for the Strategic Environmental Assessment process, English Heritage is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the local planning process.</p> <p>Accordingly, we have reviewed your consultation in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, 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 confirms that it is content in principle with the treatment of the historic environment in the consultation document but requests that some more detail is included in the site allocations concerning Cassel Hospital and St Michael’s Convent as we consider the current reference to “listed buildings” insufficiently clear.</p> <p>The detail that English Heritage wishes to see included is specifying the Grade II listing of each building and stating its place in the Ham Common Conservation Area by name. We also consider that it should be made clearer in the site allocation for Cassel Hospital that there is potential for impacts on the setting of various Grade II listed buildings in the neighbouring Langham Close. In relation to St Michael’s Convent, English Heritage also considers that it needs to make clear that The Cottage is listed Grade II and that Avenue Lodge and Hardwicke House (both listed at Grade II) could need to have their settings considered as part of the</p>

		<p>development.</p> <p>It must be noted here, that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the Site Allocations Document and which may, despite the sustainability appraisal, have adverse effects on the historic environment.</p>
38	Sarah Considine, Greater London Authority	As set out in my email of 29 May, I can confirm that the GLA has no comments to make on the new additional sites. I can also confirm that the additional education sites consultation raises no strategic issues.
41	Nigel Easey, Highways Agency	<p>Further to your email regarding the Pre-Publication Site Allocations Plan – new educational sites, the Highways Agency confirms that we have no comment.</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. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p>
63	Markus Hoffmann, TfL	<p>Re: London Borough of Richmond upon Thames Local Plan consultation on Pre-Publication Site Allocations Plan - New Educational Sites – September 2014</p> <p>The GLA have consulted TfL Borough Planning on the Richmond upon Thames Pre-Publication consultation on new educational sites.</p> <p>None of the new sites appear to affect TfL landholdings. Although TfL has no strategic issues it should be noted that two of the locations at Ham Common are served by bus routes 65 and 371. Due to demand from other schools in the area any further increase in the number of pupils using buses in this area may require mitigation. This should be considered for any schools built at either of these locations.</p>
70	Sally Harries, Natural England	<p>Thank you for your correspondence in respect of the above consultation document, seeking the views and comments of Natural England on the above dated.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations</p> <p>Natural England has previously commented on this Consultation document, this response will be in response to the issues raised in respect of this phase of the consultation, and will be in respect of the areas affecting Natural England's remit.</p> <p>Overall Natural England has no substantive comments to make in respect of the proposed modifications. The proposed changes are in sites that already show some development and are in built up areas.</p> <p>The Site Allocations process includes consideration of many of the natural environment issues within Natural England's remit including biodiversity and green infrastructure. We have provided further comments below and highlighted additional areas / points for consideration in the Site Allocations process which will help ensure that the Plan is consistent with National Planning Policy Framework (NPPF) requirements. In line with paragraph 110 of the NPPF site allocations should be located on land of</p>

		<p>least environmental and amenity value. In particular they should avoid designated sites and landscapes, Best and Most Versatile (BMV) Agricultural Land, green infrastructure, brownfield sites of high environmental value and public access routes. A number of site allocations are in close proximity to locally designated wildlife sites and corridors and it is possible that development may have a direct or indirect adverse impact on the designated interest features of these sites. In line with the NPPF (paragraphs 113, 117, 118) the Authority should ensure that sufficient mitigation or, as a last resort, compensation is available to ensure development will not have an adverse effect on locally designated wildlife sites, including areas of Ancient Woodland.</p> <p>We advise that policies should ensure that all development proposals avoid designated sites, avoid damage to existing biodiversity features, and create opportunities for enhancing biodiversity through the delivery of Local Biodiversity Action Plan (LBAP) targets. Developments should be required to achieve net biodiversity gain where possible, in line with paragraphs 9 and 109 of the NPPF.</p> <p>LBAPs identify the action required at a local level to deliver UK and regional targets for habitats, species, public awareness and involvement. They also identify targets for other habitats and species of importance in the more local context of their geographical area. Further information about Biodiversity in the UK is available on the JNCC website, including details relating to UK BAP priority species and habitats Site allocations should seek to enhance biodiversity and deliver net gains where possible. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p>
78	Mr Paul Dickinson, PDA obo Sharpe's Recycle Oil	<p>I am writing on behalf of Sharpe's Recycle Oil Ltd, owners of Arlington Works, Arlington Road, St Margaret's, Twickenham TW1 2BB ("the Property").</p> <p>The Council has published a Pre-Publication Draft of the Site Allocation Plan ("SAP"). Arlington Works is proposed as part of a Key Employment Site ref SM3.</p> <p>The owners were not consulted or contacted by the Council about this proposed designation. The Council's Site Assessment suggests that an Officer visited the Property in May 2013 but the owner is unaware of any such visit or other contact by the Council about this matter. The lack of direct consultation or contact by the Council is disappointing given the specific proposals outlined for the site. The owners have only just become aware of the proposals in the Draft SAP hence they are making objections at this stage.</p> <p>The owners OBJECT to Arlington Works being identified as part of a Key Employment Site for the following reasons:-</p> <ol style="list-style-type: none"> (1) SAP para 2.4.5 explains that Key Employment Sites are those general employment areas, particularly industrial estates or areas of mixed employment, which are particularly suitable for retention and possible improvement for employment uses. (my emphasis) This is consistent with Core Strategy Policy CP19. (2) Arlington Works is not suitable for continued employment use. The site has been the subject of neighbour complaints in the past particularly in relation to oil recovery activities. It has totally inadequate access and servicing arrangements. Access is only via the wholly residential streets of Rosslyn Road, Ellesmere Road, Ravensbourne Road and Arlington Road. There is also a limited single width entrance to the site. These limitations do not make it appropriate for continuing employment uses. The Core Strategy para 8.3.7.3 acknowledges there may be sites that are unsuitably located due to access and servicing problems. (3) The site is not as convenient to public transport in St Margaret's centre for local businesses compared to the Film

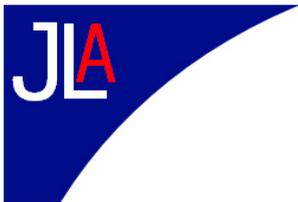
		<p>Studios which has direct access from St Margaret's Road (A3004). There is no pedestrian access via the Film Studios only via Rosslyn Road and Arlington Road.</p> <p>(4) Residential redevelopment could provide a more appropriate re-use for the original buildings on the site which are identified as Buildings of Townscape Merit.</p> <p>(5) The Council's Site Assessment is incorrect in a number of respects. The site is and has been under-occupied for many years. There are access constraints (see above). The site is an oil depot and not a 'waste treatment site'. It lies within Flood Zone 1, not Flood Zone 2/3a as incorrectly stated.</p> <p>(6) We note the SM3 allocation site boundary also (presumably in error) includes the adjoining flats at Howmic Court to the north.</p> <p>The landowner is considering future options for the current business. The business does not provide a locally based service to the business and residential population or help reduce road journeys to non residential sectors (SAP para 2.4.12). Its catchment is the whole of South East and Central England. For example, the nearest comparable oil depots are at Avonmouth (Bristol) and Birmingham. There is no logistical reason for the depot to be located in St Margarets particularly given the inherent access and servicing difficulties.</p> <p>It is considered that residential use would be most appropriate alternative use for the site. This would facilitate the full remediation of any existing contamination from historic uses on the land. Remediation of the site would be particularly beneficial as it adjoins a residential neighbourhood. It would also remove inappropriate oil tankers and large 44 ton HGVs from Rosslyn Road, Ellesmere Road, Ravensbourne Road and Arlington Road.</p> <p>The site is in a sustainable location particularly suited for residential development. As well as the proximity to shops and services in St Margarets centre, the Council's Site Assessment notes that it is well located within 1 km of a primary school and 3 km of a secondary school and within 1 km of a GP surgery.</p> <p>Residential redevelopment of the site would not prejudice the future of the Film Studios and would not have any detrimental effect on any of its activities.</p> <p>Alternatively it is proposed that the Council should consider a mixed use scheme under Policy DM TC2 (St Margaret's Area of Mixed Use) subject to the need for a viable scheme to fund the remediation of the site.</p> <p>We understand the Council intends to publish a further draft of the SAP in Winter 2014 followed by Submission in early 2015 and Examination in the Spring 2015.</p> <p>We request that our details are added to your contact list for future consultations that we can make further representations and ensure involvement with the Examination in due course.</p> <p>I would be pleased to discuss these proposals with you and to arrange for a site visit if this would be helpful.</p>
87	John Devonshire, Spelthorne Borough	Thank you for consulting Spelthorne Borough Council on the London Borough of Richmond-upon-Thames pre-publication Site Allocations Plan as it relates to new educational sites.

	Council	I can confirm that we have no comment to make on the proposed sites as included within the consultation document.
90	Tim Sturgess, GVA obo Lady Eleanor Holles School	<p>We write on behalf of the Lady Eleanor Holles School (LEHS) regarding the current consultation the LB Richmond is currently undertaking in preparation of the Site Allocations DPD.</p> <p>GVA previously submitted representations on behalf of LEHS proposing the allocation of the school for education use and an amendment to the Metropolitan Open Land (MOL) boundary in order to establish a positive policy position to support the expansion of the school. Our representation followed meetings with the Council regarding the school's future in June 2013 and November 2013. We enclose a copy of our representation which in summary concluded:</p> <ul style="list-style-type: none"> • There is a recognised need for additional primary school places within borough and catchment area of the school. • The LEHS are keen to expand their school to cater for the additional demand. • The LEHS is able to deliver additional school places which will take pressure off state schools. • The current MOL designation is restricting the school's expansion and its removal as proposed would not conflict with the aims of MOL policy. • The NPPF identifies great weight should be given to the need to expand schools in order to provide a choice of places and meet the needs of a community. <p>We understand that the current consultation is a response to the Council's recognition that there is an increasing pressure for school places and need to provide sites for education uses in the borough. Whilst we are pleased that this issue has been recognised, the Site Allocations DPD, as currently proposed, is missing the opportunity to positively plan for the provision of additional, much needed school places at LEHS going forward.</p> <p>The current consultation identifies additional education provision on two existing Site Allocation Plan proposal sites and two new additional sites. We note that the Council recognise additional primary school places are required within the catchment of the LEHS, through the acknowledgment set out in the justification to proposed site HH 2 (St Clare Business Park) which is approximately 1km walking distance from the site.</p> <p>In light of our previous representations, we question why our proposed allocation for education uses has not been included within the current consultation. As an established school, it provides a deliverable site that can accommodate the unmet local demand.</p> <p>We recommend that the Council consider designating all existing school sites with policy that protects and positively plans for the expansion of existing schools. The Site Allocations DPD should take the opportunity to address the current issues, but also plan positively and reflect the Government's position, set out within the NPPF, that great importance should be placed on ensuring a sufficient choice in school places is available to meet the demands of new and existing communities. At present, the Site Allocation's failure to recognise the opportunity to plan positively for the expansion of LEHS, does not reflect the position of national policy.</p> <p>As a key stakeholder, landowner and education provider in the LB Richmond, the Lady Eleanor Holles School is keen to work closely with the LPA to address the increasing pressure for school places. The Site Allocations DPD provides the opportunity to recognise the potential the LEHS site can play in delivering additional places.</p>

		<p>We would welcome the opportunity to continue discussions on LEHS's plans and their proposals to accommodate further school places through a meeting with officers. Please do not hesitate to contact Tim Sturgess or me to discuss further.</p>
92	<p>Huw Williams, CgMs obo Richmond-upon-Thames College (RuTC) and Richmond Education and Enterprise Campus (REEC)</p>	<p>CgMs are instructed by Richmond-upon-Thames College and Richmond Education (RuTC) and Enterprise Campus (REEC) to provide planning consultancy advice in relation to the proposed redevelopment of the existing College site at Egerton Road in Twickenham.</p> <p>In this regard I am writing concerning the Council's emerging Site Allocations Development Plan Document (DPD) and, specifically, draft Policy TW10 concerning the redevelopment of the College site and the supporting Justification.</p> <p>For the avoidance of any doubt RuTC and REEC support draft Policy TW10 which designates the College site for: <i>"Redevelopment to provide a new college, offices, secondary school and special school, residential including affordable and open space."</i></p> <p>We are aware that the Justification for the draft policy, that was originally contained in the Pre-Publication Draft of the Plan issued in October 2013, was amended earlier this year to delete reference to 'Headquarters' in draft paragraph 3.4.5.</p> <p>However, as part of its application for the redevelopment of the Teddington Studios site at Broom Road (Application Ref: 14/0914/FUL), Haymarket Media has now confirmed that it no longer intends to relocate its offices to the College site but, instead, will develop specialist accommodation known as a 'Tech-hub' at the College site. The commitment to provide this 'Tech-hub' was clearly material to the Council's decision, on 22nd October, to resolve to grant consent for the redevelopment of the Teddington Studios site and, as a result, we believe that Policy TW10 and the Justification needs to be amended accordingly.</p> <p>A suggested rewording of the draft Policy and the existing Justification is set out below (with proposed deletions shown and additions clearly indicated by underscore):</p> <p><i>TW 10 Richmond upon Thames College, Egerton Road, Twickenham Proposal</i> <i>Redevelopment to provide a new college, ancillary offices, secondary school and special school, residential including affordable and open space</i></p> <p><i>Justification</i> <i>3.4.5 To provide a new College, Secondary School, Special School, and ancillary office accommodation (known as a Tech-hub') Headquarters Offices and residential uses, within a comprehensive scheme. A new College building and 'Tech hub' headquarter offices fronting the A316 on the existing playing fields. New open space, including for educational establishments, private residential enabling development to fund redevelopment of College to the south of the site and affordable housing subject to viability assessment. (see proposal for Teddington Studios site).</i> <i>3.4.6 If development takes place on the College playing field south of the A316 the College's Craneford Way playing field to be upgraded. All College and School facilities to have public use reflecting the Council's dual use policy. Access to the trunk and local road network will be addressed at the development control stage. Any vehicular access through Heatham Estate must take account of residential amenity.</i></p>

		<p>CgMs understand that, following re-consultation on a series of additional sites, the Council intends to issue a Publication Draft of the Revised Site Allocations DPD later this year with the intention of submitting the DPD for Examination early next year. In the circumstances we believe the opportunity should now be taken to revise the draft Policy and the Justification in the way proposed to accurately reflect prevailing circumstances.</p> <p>Similarly, it is also noted that the Sustainability Appraisal originally undertaken in support of the pre-publication draft of the Site Allocations DPD makes reference to 'modern HQ offices' on the College site. We assume that were the above amendments made the Council would, prior to issuing the Publication Draft of the Revised Site Allocations DPD, revisit the Sustainability Appraisal for the Plan and, in the case of the College site, re-assess the latest redevelopment proposal against the relevant Sustainability Objectives. Clearly the inclusion of the proposed 'Tech-hub' is positive in terms of the way in which it will greatly improve the quality, range and accessibility to vocational education and training, and in doing so, enhance opportunities for future employment.</p> <p>We trust this representation is helpful and can be taken into account when preparing the Publication Draft of the Site Allocations DPD and the associated Sustainability Appraisal; if you have any queries or wish to discuss this letter further then please do not hesitate to contact me.</p> <p>Yours sincerely, Huw Williams, Director</p>
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Table 2: Detailed responses to the consultation



Policy and Design Department
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

JL/PB/180

BY E-MAIL

6 October 2014

Dear Sir or Madam,

WRITTEN REPRESENTATIONS - OBJECTION
PRE-PUBLICATION – CONSULTATION ON NEW EDUCATION SITES
ST. CLARE BUSINESS PARK, HAMPTON HILL

This letter is submitted to the London Borough of Richmond upon Thames (hereafter referred to as the 'Council'), on behalf of Tyton Properties Limited (hereafter referred to as the 'Applicant'), regarding Written Representations to the Council's Site Allocations Development Plan Document: Pre-Publication Consultation on new Education Sites (hereafter referred to as the 'Site Application DPD'), in respect of St. Clare Business Park, Hampton Hill (hereafter referred to as the 'Site').

This letter should be read in conjunction with the following supporting documents:

- Critique of Draft Allocation prepared by CBRE
- Preliminary Comparison of Traffic Issues prepared by Alan Lipscombe

1. BACKGROUND – SITE ALLOCATION DPD

The Site Allocation DPD has reached 'pre-publication' stage. Initial consultation on a pre-publication document took place in October/November 2013, further consultation on additional sites in June/July 2014 and a further round of consultation on sites for educational use in August/September/October 2014.

The latest round of consultation includes a draft allocation at the St. Clare Business Park in Hampton Hill for 'redevelopment to provide high quality business space and education', justified on the basis that:

"The redevelopment of the site provides the opportunity to provide high quality business space and education. Additional school places are required in this area and the site is in an excellent location to provide new primary school places.

'High quality business space' is not defined, but we assume the Council intends that it would be a B class use.

Previously, the pre-publication documents simply identified the site as a 'Key Employment Site', one of a number of sites which, the pre-publication documents explain, the Council considers:

"Particularly valuable for employment and important to retain, given the importance of retaining the quantum of employment space within the Borough to support the local economy."

The initial pre-publication document explains that:

"[Key Employment Sites] are the larger employment areas, generally industrial estates or areas of mixed employment[,] which are particularly suitable for retention and possible improvement for employment uses. It is envisaged [by the Council] that these areas will be retained in employment use, and would either remain as they are, remain with some improvements, or be redeveloped for improved employment use where there is scope."

2. SITE DETAILS

i. Site Description

The Site comprises two separate areas with the main one being 2.12 acres (0.85 hectares) that is predominantly rectangular in shape with the main access being from Holly Road to the south. The Windmill Road frontage provides access to No. 7/11, a rectangular shaped plot to the north, as expanded upon below.

The smaller site of 0.22 acres (0.08 hectares) is located off Holly Road, a short distance to the south of the main site, and is of an irregular shape currently used for car parking (approximately 30 spaces delineated across the site).

A selection of photographs showing the entrances, parts of the main site, and separate car parking site together with each building on-site are attached.

A number of separate industrial and office buildings are located on the main site each sharing communal concreted and part tarmaced and landscaped courtyard areas. No. 7/11 Windmill Road comprises of a single-storey industrial unit (car maintenance workshop with ancillary offices and motor cycle sales and car sales forecourt). We note that the upper floor of the offices appear to have been sub-let although we have not had sight of any documentation to confirm this.

Site Location Plan



The boundaries of the main site are made of a mix of brick walls, wire mesh fencing to the railway embankment, and timber fencing to the boundaries of the commercial premises and residential premises to the eastern side.

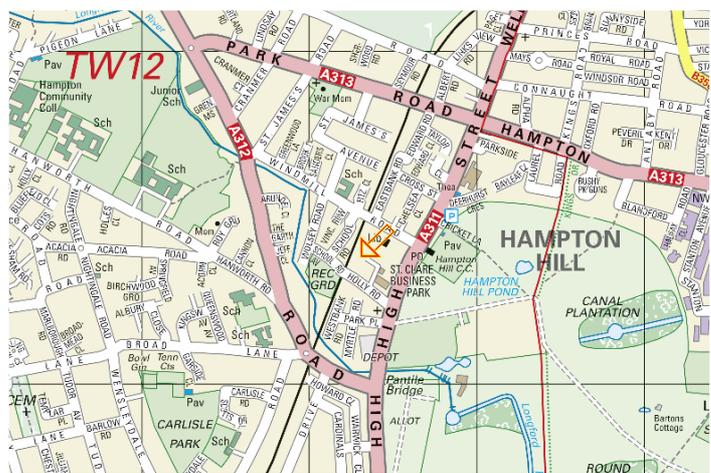
Until the mid 1990s the Site was occupied by local building contractors 'Gostlings' who developed the estate on a piecemeal basis between the 1950s and the early 1980s for their own requirements.

ii. Context

The Site is located within the residential district of Hampton Hill between the small town of Hampton within 0.5 miles to the south and Teddington within 0.5 miles to the east, and Hanworth within 0.5 miles to the west.

Hampton Hill is located approximately 8 miles to the west of Central London. The A313 Hampton Road is located a short distance to the north of the Site and provides access to the main A316, at its junction with Country Way and the Great Chertsey Road approximately 1 mile to the west. The A316 provides direct access to Junction 1 of the M3 Motorway, 2 miles to the south west. Junction 2 of the M25 Motorway is a further 4 miles to the west, via the M3. Central London is within 8 miles to the east.

Street Map



Source: Street Map (March 2013)

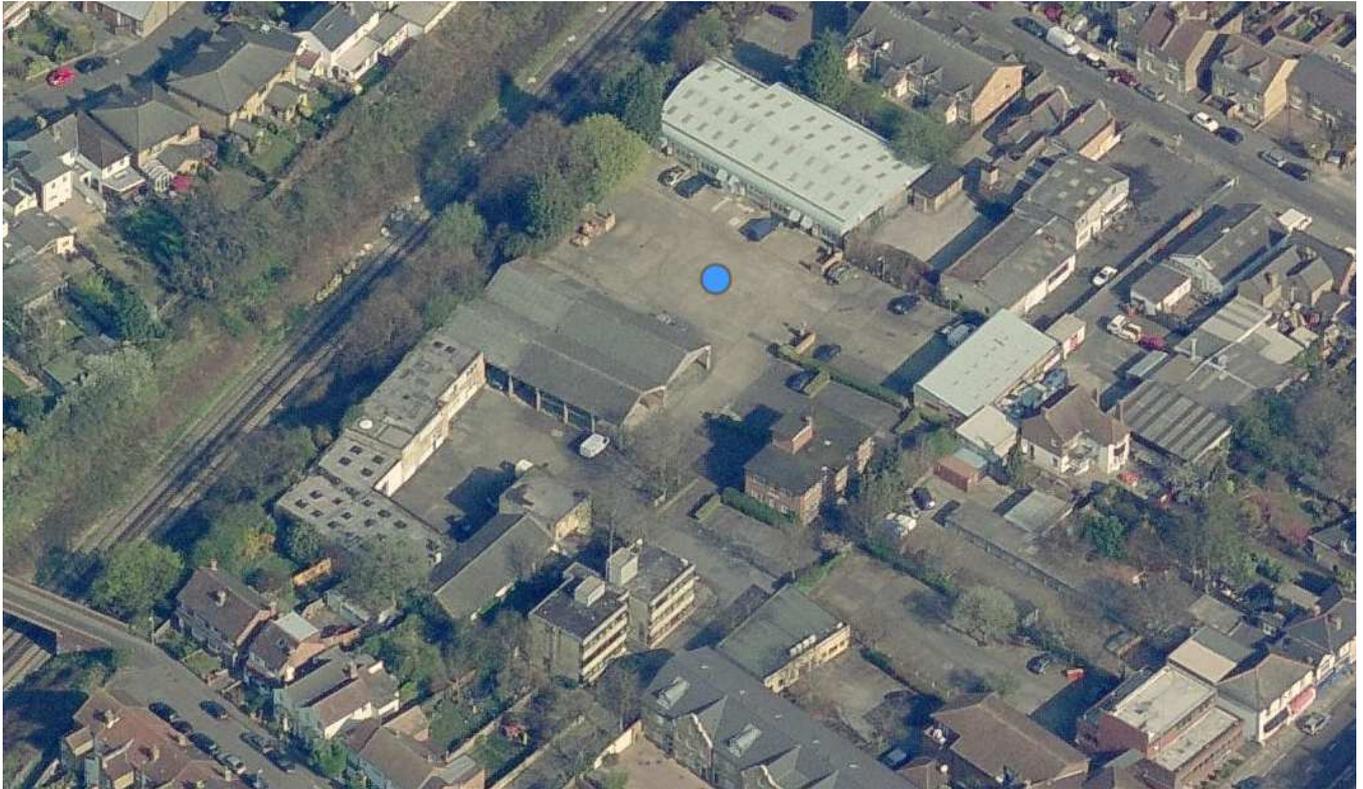
The nearest mainline rail connections are at Fulwell, within 0.5 miles to the north, or alternatively at Hampton Station within 1 mile to the south west. Each station provides a direct and regular service to London Waterloo.

Hampton Hill is an established and relatively affluent residential suburb located immediately to the west of Bushy Park. Kingston and the River Thames are 2 miles distant to the east. The area continues to prove popular with both commercial and residential occupiers due to its relative close proximity and relatively road connections to the road network.

Users in the immediate area comprise in the main of a mix of residential, light industrial, and offices with units located along Hampton Hill High Street.

The Site is surrounded by established residential premises, accessed of the A311 Hampton Hill High Street via Holly Road to the south. Alternatively, part of the Site is accessed via Windmill Road to the north linking the A312 Uxbridge Road to the west with the A311 Hampton Hill High Street to the east. The mainline railway station runs immediately to the west of the Site via a below ground cutting.

Aerial Photographs of the Site & Surrounding Area ('Blue Dot' Marks the Site)



Source: Bing Maps (October 2014)

Heritage Assets

The Site is not designated within a Conservation Area, although lies on the boundary of High Street Hampton Hill Conservation Area (Number 38). None of the buildings are statutorily or locally listed.

Flood Risk

The Site is not located in area at risk of flooding nor situated within a Critical Drainage Area.

Transport & Accessibility

The Site has a Public Transport Accessibility Level rating of 2, which is poor (TfL Planning Information Database).

Public Transport Accessibility Level Map



TfL (October 2014)

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Weight	Walk time (mins)	SWT (mins)	TAT (mins)	EDF	AI
BUS	HAMPTON HILL THE STAR	285	243.11	6.0	1.0	3.04	7.0	10.04	2.99	2.99
BUS	HAMPTON HILL THE STAR	R70	243.11	6.0	0.5	3.04	7.0	10.04	2.99	1.49
BUS	HAMPTON HILL THE STAR	R68	243.11	4.0	0.5	3.04	9.5	12.54	2.39	1.2

LT SAP Points Not Found

NR SAP Points Not Found

Total AI for this POI is 5.68.

PTAL Rating is 2.

iii. Planning History

A review of the Council’s online register has revealed that the Site has an extensive, complicated planning history. An understanding of these records provides a useful context to the proposed scheme now being sought.

St. Clare Works, St Clare Business Park, Holly Road, Hampton Hill

- Planning Application Number : 97/1079 Status : withdrawn by the applicant 23/06/1997 Proposal : Use As Offices Falling Within B1 Use Class With No Hours Condition.
- Planning Application Number : 92/0995/FUL Status : granted permission 09/07/1992 Proposal : Removal Of Conditions (b), (c) & (d) Attached To Planning Consent 72/1293 Under Section 73 Of The 1...

- Planning Application Number : 88/2469 Status : granted permission 23/12/1988 Proposal : Erection of 6 No. 2 bedroom houses with garages; erection of a single storey building of 7075 sq ft...
- Planning Application Number : 88/1897/ADV Status : granted permission 27/09/1988 Proposal : Wall mounted name board (non-illuminated). (Amended Plan received on 21st September 1988).

Unit 4, St Clare Business Park, Holly Road, Hampton Hill

- Planning Application Number : 94/2187/FUL Status : granted permission 11/10/1994 Proposal : Installation Of An Additional Window At Rear Of Industrial Unit

Unit 6, St Clare Business Park, Holly Road, Hampton Hill

- Planning Application Number : 99/2846 Status : granted permission 29/12/1999 Proposal : Installation Of Two 1st Floor Windows To Flank Wall.
- Planning Application Number : 97/1699 Status : withdrawn by the applicant 21/08/1997 Proposal : Extension Of Work Hours To Monday To Friday 0600 - 2200 And Saturday To Sunday 0730 - 1700.

St Clare Business Park, Holly Road

- Planning Application Number : 00/3077 Status : withdrawn by the applicant 14/06/2001 Proposal : Demolition Of Existing Buildings And Construction Of 2 And 3 Storey Business Units And Offices (b1).
- Planning Application Number : 00/3078 Status : withdrawn by the applicant 14/06/2001 Proposal : Proposed Demolition.
- Planning Application Number : 99/3230 Status : decided as no further action be taken 10/02/2000 Proposal : Demolition Of Existing Buildings And Construction Of Two And Three Storey Business Units (b1).
- Planning Application Number : 98/0786 Status : granted permission 23/04/1999 Proposal : Redevelopment Of Part Of The Site To Provide Three Buildings For B1 Use And Demolition Of Nos. 9-11...
- Planning Application Number : 96/3994/DD02 Status : decided as no further action be taken 03/04/1998 Proposal : Details Pursuant To Landscaping Condition Of Doe Inspectors Decision Dated 7/10/97.
- Planning Application Number : 96/3995/DD02 Status : decided as no further action be taken 03/04/1998 Proposal : Details Pursuant To Landscaping Condition Of Doe Inspectors Decision Dated 7/10/97.
- Planning Application Number : 96/3995/DD01 Status : granted permission 07/01/1998 Proposal : Details Of Materials Pursuant Condition 2 Of Doe Inspectors Decision Dated 7 October, 1997.
- Planning Application Number : 96/3994/DD01 Status : granted permission 07/01/1998 Proposal : Details Of Materials Pursuant To Doe Inspectors Decision Dated 7/10/97.
- Planning Application Number : 96/3995 Status : refused permission 10/04/1997. Appeal allowed on 07/10/1997 Proposal : Alterations And Improvements To Access Road Entrance In Holly Road And Vehicular Entrance To No.24 ...
- Planning Application Number : 96/3994 Status : refused permission 10/04/1997. Appeal allowed on 07/10/1997 Proposal : Alterations And Improvements To Access Road Entrance In Holly Road And Also Vehicular Entrance To N...

- Planning Application Number : 96/2437/FUL Status : refused permission 10/10/1996
Proposal : Change Of Use Of Part Of Curtilage Of 24 Holly Road To Provide Wider Vehicular Access To Existing B...
- Planning Application Number : 96/1322/FUL Status : withdrawn by the applicant 02/07/1996
Proposal : Change Of Use Of Part Of Curtilage Of 24 Holly Road To Facilitate Improvement Of Access To Existing...

The original use of the Site appeared to have been a nursery. Thereafter, it is believe that the Site was used as a builder's yard and more recently light industrial / office units.

3. COMMENTS

i. Critique of Site Allocation DPD

Please refer to the supporting Critique of the Draft Allocation DPD prepared by CBRE.

Education Use

We are concerned that no evidence, or at best inadequate evidence, has been presented to demonstrate that there is a need for a new primary school facility in this area and, even if there is, that the site is available or suitable or that alternative sites have been considered.

More fundamentally, we have not seen any analysis of the suitability of the Site in terms of land take. Moreover, the Council has not stated their preferred requirement for the Site either in terms of provision (i.e. infant, junior or primary) nor forms of entry. In spite of the insufficient information regarding the preferred requirement for the Site, we have undertaken initial footprint analysis based on two scenarios – a 2FE Primary School. The land take requirement for this scenario is between 15,708 sq.m and 19,530 sq.m. Given the Site is only 8,500 sq m, the Site is much too small to comfortably accommodate a 2FE primary school.

Business Use

Whilst we recognise that there may be a need for employment floorspace in this area, it is impossible to tell whether there is a need for the 'high quality business space' proposed in the draft allocation, largely because it has not been defined.

Notwithstanding, the only logical conclusion to draw about the proposed allocation is that the Council accepts that either:

- The entire Site is not required to meet the need (so far as it exists) for 'high quality business space'; or
- Whilst the Site is required to meet the identified need there are more pressing requirements for other uses

Either way it is evident that the Council recognises that there is a case for at least partial redevelopment of the site for non-B uses.

If the latter of the two circumstances applies, the logical extension of the position is that a very substantial need for an alternative use – whether education or another use – may justify the entire Site being developed for that use.

Turning to the Site's suitability for employment uses in the future, it is clear to us that the Site's appeal for redevelopment for new employment floorspace is likely to be limited. The Site's accessibility by road and by public transport is poor, access points to the Site are poor, the external environment is constrained by sensitive uses including residential, it falls within a Conservation Area and parts of the Site may be contaminated.

The Site is in a state of dereliction. The buildings are of approximately 50 years of age and the offices were bespoke designs with small compartments. They have been of decreasing attraction to the market and difficult to let.

Even leaving aside these constraints, it is far from clear as to what commercial benefit there would be to a developer in redeveloping the Site for employment uses, with or without a new school.

Unless, therefore, more robust evidence is presented we recommend that the proposed allocation is deleted.

ii. Transport Implications

Please refer to the supporting Preliminary Comparison of Traffic Issues prepared by Alan Lipscombe. This note compares, at a broad level, the potential traffic impact of various land uses being considered for the site.

Education Use

Trip patterns associated with schools tend to be concentrated around the 15 minute period before the start of the school day, and the 15 minute period immediately after the end of the day. Car trips will be generated by both staff members driving to/from the school and by parents/guardians dropping off and picking up pupils at the start and end of the day. Traffic volumes generated by schools tend to have a greater impact on the surrounding road network during the arrival time, which is uniform for all pupils and generally coincides with the AM peak hour for background traffic on the network. After the school day the pick-up time is generally before background traffic peaks in the evening, and departures tend to be more dispersed as some pupils take part in after school activities.

The key traffic issues that would require resolving for a school on the site would be:

1. The potential for significant volumes of traffic generated by the school
2. Provision for a significant number of drop-off and pick-up trips, both within the school, and on the surrounding road network

The magnitude of these issues will be dependent on both the size of the school and the proportion of the staff and pupil trips that are undertaken by car. If it is assumed that the site could accommodate a school of 800 pupils with 25% arriving by car, it would be possible to have more than 200 cars arriving to the site within a 15 minute period. This level of traffic would require significant provision for parking and on-street set down areas to minimise the impact on the surrounding road network.

Employment Use

The Site is currently occupied by light industry and generates peak hour car trips by employees, and light and heavy goods vehicle trips throughout the day. The 100 or so employees that access the site do so without difficulty. The HGV's that access the existing Site are required to do so via Holly Road. The vehicle sizes together with the constrained geometry on Holly Road, results in frequent traffic jams. It is understood that the site is operating at 40% so any further expansion of the industrial operation at this location would clearly exacerbate the impact on the surrounding road network.

iii. Local Opposition (Holly Road Residents)

There is a history of Holly Road residents' dissatisfaction with the existing use. This has been evidenced continuously over the last 15 years in complaints, Councillor involvement and press coverage.

The access and servicing arrangements for the Site amount to severe restrictions; and that while this Site is reasonably accessible by public transport, it is clearly less accessible than a town centre site. Furthermore, the buildings that currently stands on the Site are dated and somewhat careworn, set in unkempt grounds within a residential area.

There have been various press articles (The Richmond and Twickenham Informer – No. 39, Week Ending 27 September 2002) highlighting the concerns of residents along Holly Road including MP Vince Cable regarding lorry movements and heavy traffic and pedestrian and vehicular safety.



There have also been numerous resident meetings and a letter from the Fulwell and Hampton Hill Liberal Democrats (including North West Teddington) dated 16 September 2002 voiced concern over the volume and speed of traffic.

A letter from Richmond Council dated 21 February 2003 (Lisa Fenn – Senior Engineer) stated that the Council was aware that there have been several instances of conflict between local residents and delivery lorry drivers and was in the process of formulating solutions to combat this. It is important to note that there is a 40 foot maximum lorry length limit along Holly Road.

On 14 July 2010 the Council serviced a Planning Contravention Notice, which concluded there was no breach of planning control relating to unauthorised extension of operational house against the until occupied by Roman Scaffolding and vehicle movements.

To date, no solution has been found.

4. CONCLUSIONS

On the basis of the above, we recommend that **the proposed allocation is deleted.**

I trust this letter and supporting documents is satisfactory and I look forward to receiving an acknowledgement shortly. However, please let me know should you require any additional information or have any queries.

Yours faithfully,



James Lloyd B.Sc (Hons) M.Sc TCP MRTPI
Managing Director

ST CLARE BUSINESS PARK

Tyton Properties Limited

Critique of draft allocation

2 October 2014

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1.0 Introduction

PURPOSE OF REPORT

- 1.1 CBRE Planning is instructed to provide advice on whether the St Clare Business Park in Hampton Hill is required and/or suitable and/or available for redevelopment for 'education' and 'high quality business space', that being the proposed allocation by London Borough of Richmond upon Thames in its emerging Site Allocations Plan.

THE SITE

- 1.2 St Clare Business Park provides a variety of office, warehouse and light industrial units with onsite parking. St Clare House, which is located on the business park, is an office building providing flexible accommodation that is largely open plan.

THE DRAFT ALLOCATION

- 1.3 London Borough of Richmond upon Thames' emerging Site Allocations Plan has reached 'pre-publication' stage. Initial consultation on a pre-publication document took place in October/November 2013, further consultation on additional sites in June/July 2014 and a further round of consultation on sites for educational use in August/September/October 2014.
- 1.4 The latest round of consultation¹ includes a draft allocation at the St Clare Business Park in Hampton Hill for 'redevelopment to provide high quality business space and education', justified on the basis that:

The redevelopment of the site provides the opportunity to provide high quality business space and education. Additional school places are required in this area and the site is in an excellent location to provide new primary school places.

- 1.5 'High quality business space' is not defined, but we assume the Council intends that it would be a B class use.
- 1.6 Previously, the pre-publication documents simply identified the site as a 'Key Employment Site', one of a number of sites which, the pre-publication documents explain, the Council considers:

Particularly valuable for employment and important to retain, given the importance of retaining the quantum of employment space within the Borough to support the local economy.

- 1.7 The initial pre-publication document explains that:
[Key Employment Sites] are the larger employment areas, generally industrial estates or areas of mixed employment[,] which are particularly suitable for retention and possible improvement for employment uses. It is envisaged [by the Council] that these areas will be retained in employment use, and would either remain as they are, remain with some improvements, or be redeveloped for improved employment use where there is scope.

STRUCTURE OF REPORT

- 1.8 Our report is structured as follows:

¹ See http://www.richmond.gov.uk/pre-publication_site_allocations_plan_-_new_educational_sites_-_aug-oct_2014.pdf (site allocation HH 2) Access date: 5 September 2014

1.0 Introduction

- Section 2 addresses the need for a new primary school facility in this area, whether the site is suitable or available or that alternative sites have been considered
- Section 3 addresses the need for 'high quality business space', whether the site is required to meet the identified need (if any) and whether the site is suitable and likely to be made available for redevelopment
- Section 4 draws conclusions.

2.0 Education use

CONTEXT

- 2.1 As we note in section 1, the proposed allocation is for redevelopment for ‘high quality business space’ alongside ‘education’ uses.
- 2.2 The allocation of sites in Greater London should be guided by policy in the National Planning Policy Framework (NPPF) and the London Plan, as well as by the Government’s Planning Practice Guidance and guidance in supplementary planning guidance (SPG) which supports the implementation of policies in the London Plan.
- 2.3 We review relevant policy and guidance below before turning to address the issues they raise, in order to reach a view as to whether the ‘education’ element of the draft allocation is robust.

PLANNING POLICY AND GUIDANCE

National Planning Policy Framework

- 2.4 The NPPF says at paragraph 70 that:
To deliver the social, recreational and cultural facilities and services the community needs, planning policies ... should ... plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments...
- 2.5 Paragraph 72 further notes that:
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.

The London Plan

- 2.6 Policy 3.18 of the London Plan says that:
LDFs and related borough strategies should provide the framework:
 - *For the regular assessment of the need for pre-school, school, higher and further education institutions and community learning facilities at the local and sub-regional levels; and*
 - *To secure sites for future provision recognising local needs and the particular requirements of the education sector.*

KEY ISSUES

- 2.7 Our review of policy and guidance raises the following issues:
 - Is there a genuine ‘need’ for a new facility providing primary school places?
 - If so:

2.0 Education use

- Is the site available?
- Is the site suitable?
- Have other sites been considered

IS THERE A NEED FOR A NEW PRIMARY SCHOOL FACILITY?

Background

- 2.8 We have reviewed the evidence base relating to primary education provision in the borough. The key documents are:
- Choice and diversity: a policy paper for Education and Children’s Services (December 2010)
 - Choice and diversity: putting policy into practice (December 2010)
 - Infrastructure Delivery Plan (April 2012)
 - Education Background Paper - Needs Assessment (September 2013)
 - Individual Site Assessments – Hampton Hill (2013)
 - Cabinet Meeting Paper – School Place Planning Strategy (March 2014)

Choice and diversity: a policy paper for Education and Children’s Services (December 2010)

- 2.9 In 2010, the Council approved a 10-year education strategy. The key points relating to the provision of primary school places are:
- There has been increased demand for reception age places for several years. The Council has attributed this increase in demand to: significantly increased birth rates; more parents opting for the state sector; many small housing developments and conversions of large houses into flats; and the economic downturn that has affected admissions patterns since the 2009 intake
 - That the factors listed above would lead to a predicted borough-wide shortfall of at least 300 pupil places by 2018, based on birth rates alone. This shortfall is predicted to increase substantially if major residential development on key sites were taken into consideration
 - A commitment to expansion in the primary sector and to develop additional shared forms of entry in selected schools and invest in future expansion work.

Choice and diversity: putting policy into practice (December 2010)²

- 2.10 This document assessed the latent capacity and projected demand for school places, along with options to address projected shortfalls. The borough was divided into five local groupings, known as quindrats. The St Clare Business Park site falls within the Hampton and Hampton Hill quindrat. To meet forecast demand in the foreseeable future, the Council has stated that:

² Available: <http://cabnet.richmond.gov.uk/mgConvert2PDF.aspx?ID=23720> Access date: 28 August 2014

2.0 Education use

- Up to two forms of entry will be required, although the expansion of the Stanley schools will meet some of that demand
 - The least difficult and cost-effective option in the area is to expand Buckingham School.
- 2.11 We understand that the expansion of Buckingham School by a single form of entry has been completed.

Infrastructure Delivery Plan (April 2012)

- 2.12 The Infrastructure Delivery Plan (IDP) analyses and assesses the existing infrastructure provision, including any current shortfalls, and identifies the existing and future needs and demands for the borough to support new development.
- 2.13 With regard to primary school places, the IDP states that:

*In the medium to long-term, it is possible that there will be a need to consider additional provision in the East Sheen, Ham/Petersham, **Hampton/Hampton Hill** (our emphasis), Heathfield/Whitton and Richmond areas. Feasibility of options for expansion will need to be undertaken. If demand were to be exacerbated by variable factors – e.g. continuing economic difficulties altering the proportion of children in private school, large ‘pupil yields’ from housing developments at Twickenham Station, the Royal Mail site, Stag Brewery, etc., and further improvements in standards across the borough’s primary and secondary schools – then the projections of pupil numbers could be higher than anticipated.*

Education Background Paper – Needs Assessment (September 2013)

- 2.14 The Council has produced background papers for different categories of development to inform their Site Allocations Plan. The Education Background Paper reiterates the need for additional primary school provision in the borough as stated in the IDP.
- 2.15 The document explains that the general approach to increasing primary provision will be –
- To expand existing schools where possible (although the number of opportunities are diminishing, as a large number of primary schools have already been expanded in recent years). This will include continuing to encourage the expansion of private primaries where there is on site capacity
 - To seek new provision on larger development sites, such as the Stag Brewery, to be provided as part of the redevelopment
 - To seek new state-funded provision, i.e. free schools, on other sites as and when they become available.

Individual Site Assessments – Hampton Hill (2013)

- 2.16 The individual site assessment for St Clare Business Park sets out the site history, designations/allocations, and assesses the site’s accessibility to facilities.
- 2.17 The summary of the assessment states that:
- This site contributes to the local economy and provides jobs and land for employment development; it can also accommodate much needed primary school places that are required in the local area.*
- 2.18 The justification for the proposed use of ‘high quality business space’ and education is stated as:

2.0 Education use

The redevelopment of the site provides the opportunity to provide high quality business space and education. Additional school places are required in this area and the site is in an excellent location to provide new primary school places.

Cabinet Meeting Paper – School Place Planning Strategy (March 2014)

- 2.19 The School Place Planning Strategy presents the Council’s latest forecasts of demand for places. With regard to forecast demand for primary school places in the short to medium term, i.e. 2020, the Strategy document explains that it is difficult to determine accurately how many places will be needed because:
- There remains no reliable data source for establishing the ages of children who move into, or out of, the borough in the four years between a cohort of children being born and then becoming of Reception age (para 3.13).*
- 2.20 It goes on to state that:
- Nevertheless, available data and recent admission trends indicate that up to six forms of entry will be required in each half of the borough by 2020 (para 3.14).*
- 2.21 In relation to the Middlesex side of the Thames (the location of St Clare Business Park) it says that:
- It is likely that four forms of entry will be needed in Twickenham, where the Post Office and Railway Station developments, plus the uncontrolled conversion of office buildings like Bridge House and Queen’s House into residential properties, will add to birth-driven demand; and that two will be needed in Teddington (para 3.15).*
- 2.22 In relation to the Richmond side of the Thames it says that:
- It is likely that four forms of entry will be needed in East Sheen/Barnes and two will be needed in Richmond (para 3.16).*
- 2.23 At paragraph 3.17, the Council identified four options to address the forecast demand:
- Considering the few remaining existing single-site school expansion options
 - Considering the expansion of existing schools onto additional sites
 - Assisting the establishment of free schools; and/or
 - Agreeing the downward expansion in age-range of existing secondary schools.
- 2.24 The Council expressed its preference for the first three options.
- 2.25 With regard to option one, the Council identified at paragraph 3.21, a number of further primary school expansion options, including:
- Expanding The Russell Primary or providing a shared form of entry between Meadlands Primary, St Richard’s Church of England Primary and The Russell Primary;
 - Expanding East Sheen Primary, most probably onto a second site;
 - Expanding Collis Primary.
- 2.26 Aside from Collis Primary which is on the Middlesex side of the Thames, the rest of the schools are located on the Richmond side of the Thames.

2.0 Education use

Commentary

- 2.27 We believe that London Borough of Richmond upon Thames has not presented sufficient evidence to justify their position that the shortfall in primary school provision represents objectively assessed infrastructure requirements.
- 2.28 Key assumptions behind forecasts of pupil demand for primary spaces beyond the short term have not been presented in detail in any of the published evidence base documents. Notably, as explained in paragraph 3.13 of the School Place Planning Strategy paper, the Council acknowledge the increasing difficulty in determining accurately the number of primary places required in the short to medium term, i.e. up to 2020. The reason given is that there remains no reliable data source to estimate the total reception cohort. Consequently, the Council's assumptions raise a number of concerns relating to the robustness of forecasts.
- 2.29 Even leaving aside our concerns relating to the assumptions upon which the school places deficit have been derived, the School Place Planning Strategy does not expressly state that a primary school is required in the Hampton/Hampton Hill area. Whilst the IDP (2012) does allude to the need to consider additional provision in the Hampton/Hampton Hill area, the School Place Planning Strategy (2014) provides an update on the Council's position on forecast demand for school places in the borough. Crucially, there is no mention of a projected shortfall in the Hampton or Hampton Hill area.
- 2.30 Moreover, the School Place Planning Strategy does not suggest the development of a new school on the St Clare Business Park – it suggests various other options, as we explain above (and see paragraph 3.17 and 3.21 of the School Place Planning Strategy). Therefore, we consider that the allocation of St Clare Business Park for a school is unnecessary as it is not justified.

IS THE SITE AVAILABLE?

- 2.31 The successful allocation of land for a school is dependent on a willing landowner making the site available for those purposes. No evidence has been presented by the Council to demonstrate that the site would be made available for a school by the landowner.

IS THE SITE SUITABLE?

Background

- 2.32 Aside from the individual site assessments, which contain a limited level of detail, no work has been done to demonstrate that the site is suitable for a school.
- 2.33 We have not seen any studies to assess the suitability of the site, or indeed any of the other sites with proposed allocations for schools. At the very least, we consider that further consideration needs to be given to:
- Highways and access
 - Land take
- 2.34 We consider each of these issues below.

Highways and access

- 2.35 In relation to the first bullet point, we believe that the likely difficulty in providing a suitable access will be a considerable barrier at the St Clare Business Park site. The existing access

2.0 Education use

from Holly Road is very narrow and we believe that it will not be capable of accommodating the level of traffic generated by an education use.

- 2.36 Even if an access can be created from Windmill Road, we expect that the development of a school at the St Clare site will have a significant cumulative traffic impact, especially during peak times, due to the site’s proximity to Hampton Hill Junior School (200m away).
- 2.37 Furthermore, the stretch of Windmill Road to the north of the site is fairly narrow, owing to a chicane system. We suspect that the development of a school at the site will require extensive remodelling of the road, which may or may not be feasible.

Land take

- 2.38 More fundamentally, we have not seen any analysis of the suitability of the site in terms of land take. Moreover, the Council has not stated their preferred requirement for the site either in terms of provision (i.e. infant, junior or primary) nor forms of entry. In spite of the insufficient information regarding the preferred requirement for the site, we have undertaken initial footprint analysis based on two scenarios – a 2FE Primary School (Table 1) and 1FE Primary School (Table 2).
- 2.39 This analysis was carried out in line with ‘Building Bulletin 103: Area guidelines for mainstream schools’ (June 2014) produced by the Department for Education. The Building Bulletin series sets out simple, non-statutory area guidelines for mainstream school buildings and grounds.
- 2.40 Building Bulletin 103 provides minimum and maximum gross areas for buildings and grounds (site area). These are based on the area required per pupil place.
- 2.41 The minimum and maximum gross land take is calculated using the formula below:

$$(\text{Number of pupils (N)} \times \text{Min/Max Site Area}) + (\text{N} \times \text{Min/Max Building Area}) = \text{Min/Max Land Take}$$

Scenario 1 - 2FE Primary School

- 2.42 This scenario assesses the ability of the site to accommodate a 2FE primary school.

Table 1 – Land Take Analysis 2FE Primary School

Pupils (N)	Form Entry	GROSS SITE AREA (SQ M) PER PUPIL		GROSS BUILDING AREA (SQ M) PER PUPIL		GROSS LAND TAKE (SQ M) PER PUPIL	
		Min	Max	Min	Max	Min	Max
420	2 FE	33.3	42.0	4.1	4.5		
Total	2 FE	13,986	17,640	1,722	1,890	15,708	19,530

Source: Minimum and maximum figures taken from Building Bulletin 103

- 2.43 The land take requirement for this scenario is between 15,708 sq m and 19,530 sq m. Given the site is only 8,500 sq m, the site is much too small to comfortably accommodate a 2FE primary school.

2.0 Education use

Scenario 2 - 1 FE Primary School

2.44 This scenario assesses the ability of the site to accommodate a 1 FE primary school.

Table 2 – Land Take Analysis 1 FE Primary School

Pupils (N)	Form Entry	GROSS SITE AREA (SQ M) PER PUPIL		GROSS BUILDING AREA (SQ M) PER PUPIL		GROSS LAND TAKE (SQ M) PER PUPIL	
		Min	Max	Min	Max	Min	Max
210	1 FE	33.0	42.0	4.1	4.5		
Total	1 FE	6,930	8,820	861	945	7,791	9,765

Source: Minimum and maximum figures taken from Building Bulletin 103

2.45 The land take requirement for this scenario is between 7,791 sq m and 9,765 sq m. Whilst a 1 FE school could theoretically be accommodated on the site, it would leave little or no land for employment uses.

HAVE ALTERNATIVE SITES BEEN CONSIDERED?

2.46 London Borough of Richmond upon Thames has not demonstrated the proposed school allocation at St Clare Business Park represents the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence. We have not seen any evidence of a site selection process by way of a site scoring exercise or equivalent; and by extension, no justification which supports St Clare Business Park as a preferred location.

CONCLUSIONS ON EDUCATION USES

2.47 We are concerned that no evidence, or at best inadequate evidence, has been presented to demonstrate that there is a need for a new primary school facility in this area and, even if there is, that the site is available or suitable or that alternative sites have been considered.

3.0 Business use

CONTEXT

- 3.1 As we note in section 1, the site currently provides a variety of office, warehouse and light industrial units with onsite parking.
- 3.2 We also note that the proposed allocation is for redevelopment for 'high quality business space' alongside 'education' uses. 'High quality business space' is not defined, but we assume the Council intends that it would be a B class use.
- 3.3 The allocation of sites in Greater London should be guided by policy in the National Planning Policy Framework (NPPF) and the London Plan, as well as by the Government's Planning Practice Guidance and guidance in supplementary planning guidance (SPG) which supports the implementation of policies in the London Plan.
- 3.4 We review relevant policy and guidance below before turning to address the issues they raise, in order to reach a view as to whether the 'high quality business space' element of the draft allocation is robust.

PLANNING POLICY AND GUIDANCE

National Planning Policy Framework

- 3.5 The NPPF says at paragraph 21 that:
In drawing up Local Plans, local planning authorities should:
 - Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth
 - Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period
 - Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances
 - Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries
 - Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
 - Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

Planning Practice Guidance

- 3.6 Paragraph 031 (reference ID: 2a-031-20140306) of the Government's Planning Practice Guidance says that:
Analysing supply and demand will allow plan makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.
- 3.7 Paragraph 032 (reference ID: 2a-032-20140306) continues:

3.0 Business use

The available stock of land should be compared with the particular requirements of the area so that 'gaps' in local employment land provision can be identified.

- 3.8 The Guidance also provides information on techniques that should be employed in identifying the need for and supply of employment land.

The London Plan

- 3.9 Policy 4.4 of the London Plan says that:

LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations ... , locally significant industrial sites and other industrial sites will be planned and managed in local circumstances ... , taking account of:

- a. *The need to identify and protect locally significant industrial sites where justified by evidence of demand*
- b. *Strategic and local criteria to manage these and other industrial sites*
- c. *The borough level groupings for transfer of industrial land to other uses ... and strategic monitoring benchmarks for industrial land release in supplementary planning guidance*
- d. *The need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation*
- e. *Quality and fitness for purpose of sites*
- f. *Accessibility to the strategic road network and potential for transport of goods by rail and/or water transport*
- g. *Accessibility to the local workforce by public transport, walking and cycling*
- h. *Integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land*
- i. *The potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.*

KEY ISSUES

- 3.10 Our review of policy and guidance raises the following issues:

- Is there a 'need' for 'high quality business space'?
- If so:
 - Is the St Clare Business Park site required to meet that need?
 - Will the St Clare Business Park be suitable for redevelopment for 'high quality business space' and will it appeal to investors?

3.0 Business use

IS THERE A NEED FOR THE PROPOSED 'BUSINESS SPACE'?

- 3.11 Our review of policy suggests that the first issue is whether a need has been identified for 'high quality business space' in the area. The simple response to that question is that it is impossible to say, as there is no definition of 'high quality business space' in policy, and no evidence has been prepared by or for the Council which deals specifically with that sector.
- 3.12 We assume, however, that the Council is seeking 'clean' B uses, i.e. those which are better suited to being located alongside residential development, such as:
- B1(a) office
 - B1(b) research and development; studios
 - B1(c) light industrial
- 3.13 Having reviewed the Richmond Employment Sites and Premises study undertaken for London Borough of Richmond upon Thames we recognise that there may be a requirement for some new floorspace, albeit it is impossible to draw firm conclusions without a clear definition of 'high quality business space'.

IS THE SITE REQUIRED TO MEET THAT NEED?

- 3.14 Given that the draft allocation proposes that part of the site should be used for education facilities, it is clear that the Council accepts that either:
- The entire site is not required to meet the need (so far as it exists) for 'high quality business space'; or
 - Whilst the site is required to meet the identified need there are more pressing requirements for other uses.
- 3.15 London Borough of Richmond upon Thames has not explained which of the circumstances applies here, but either way it is evident that the Council recognises that there is a case for at least partial redevelopment of the site for non-B uses.
- 3.16 If the latter of the two circumstances applies, the logical extension of the position is that a very substantial need for an alternative use – whether education or another use – may justify the entire site being developed for that use.

IS THE SITE SUITABLE FOR 'BUSINESS SPACE' AND WILL IT APPEAL TO INVESTORS?

Background

- 3.17 We have considered five criteria which are often used in assessments of the supply of employment land:
- Accessibility by road
 - Accessibility by public transport
 - External environment
 - Internal environment
 - Market appeal
- 3.18 We address each of these below.

3.0 Business use

Accessibility by road

- 3.19 Connectivity by road is an important consideration, as it bears heavily on a site's accessibility to labour markets and the ease with which goods can be distributed. In this case, access is poor, with any vehicles visiting the site forced to navigate a narrow residential road with cars parked either side. Coupled with the narrow entrance to the site itself, this means that articulated goods vehicles cannot enter the site.
- 3.20 Moreover, the road network in the immediate area is not designed for large vehicles accessing commercial sites; instead it is designed to provide access to the numerous residential dwellings in the area. Indeed, two of the roads which provide access to west of the A312, a primary road which forms part of the Transport for London Road Network (TLRN), are restricted – Holly Road is single track as it crosses the railway line and Windmill Road includes a chicane.
- 3.21 A large proportion of visitors and deliveries to the business park are, therefore, forced to travel via the High Street in order to reach the TLRN. This is also a far from ideal route for goods vehicles.

Accessibility by public transport

- 3.22 Officers rightly recognised that the site has a poor level of accessibility in their appraisal of the site³. It has a Public Transport Accessibility Level (PTAL) of 2, which Transport for London (TfL) classify as 'poor' on a scale running from 1(a) (very poor) to 6(b) (excellent)⁴, with no rail or Underground services within a 12 minute walk – the default maximum walk time assumed by TfL⁵. The site will, therefore, be of limited appeal to businesses which have a workforce based across a wide area.

External environment

- 3.23 The site lies adjacent to offices, residential and commercial uses. The proximity of residential uses means that any future redevelopment should be restricted to 'clean' employment uses which generate low levels of noise.
- 3.24 As paragraph 9.8 of the London Plan Land for Industry and Transport SPG notes:
- Despite moves towards 'cleaner' industry, geographical separation of uses will still be required by many of London's industrial enterprises if they are to remain competitive. Many do not need and cannot afford a high quality environment and would not benefit from being mixed with other activities. Lower density, single use areas with good 24-hour vehicle access offer these activities the greatest scope for viability in London.*
- 3.25 The restricted range of B uses for which a site can be put will limit the redevelopment appeal of the site, particularly given the site's poor accessibility (see above), reducing the prospects of a viable B use redevelopment scheme coming forward.

³ See http://www.richmond.gov.uk/hampton_hill_aug_2014.pdf Access date: 30 September 2014

⁴ See <http://data.london.gov.uk/documents/PTAL-methodology.pdf> (Table 3) Access date: 30 September 2014

⁵ Ibid

3.0 Business use

Internal environment

- 3.26 Given the site’s history it may, as officers recognised in their appraisal of the site⁶, be contaminated. This is likely to limit its appeal for redevelopment for lower value uses, including employment.
- 3.27 Moreover, the site lies within a conservation area. Any redevelopment proposals will need to take account of this, with a high quality of design which respects the characteristics of the conservation area. This will also reduce the prospects of a viable B use redevelopment scheme coming forward.

Market appeal

- 3.28 It is difficult to see why the redevelopment of the site for employment uses – whether standalone or alongside a new school – is likely to be of interest to a developer. In the case of a standalone development of new employment floorspace, the value achieved is unlikely to be significantly greater than that currently offered by the existing floorspace, particularly given the constraints of possible contamination and the conservation area.
- 3.29 In the case of new employment floorspace alongside a school, this looks to be an even less likely prospect, as a developer would be forced to forego a large part of the site for a use which has no value to him. It is far more likely that he would retain the existing employment uses.

CONCLUSIONS ON BUSINESS USE

- 3.30 Whilst we recognise that there may be a need for employment floorspace in this area, it is impossible to tell whether there is a need for the ‘high quality business space’ proposed in the draft allocation, largely because it has not been defined.
- 3.31 Notwithstanding, the only logical conclusion to draw about the proposed allocation is that the Council accepts that either:
 - The entire site is not required to meet the need (so far as it exists) for ‘high quality business space’; or
 - Whilst the site is required to meet the identified need there are more pressing requirements for other uses.
- 3.32 Either way it is evident that the Council recognises that there is a case for at least partial redevelopment of the site for non-B uses.
- 3.33 If the latter of the two circumstances applies, the logical extension of the position is that a very substantial need for an alternative use – whether education or another use – may justify the entire site being developed for that use.
- 3.34 Turning to the site’s suitability for employment uses in the future, it is clear to us that the site’s appeal for redevelopment for new employment floorspace is likely to be limited. The site’s accessibility by road and by public transport is poor, access points to the site are poor, the external environment is constrained by sensitive uses including residential, it falls within a conservation area and parts of the site may be contaminated.

⁶ See http://www.richmond.gov.uk/hampton_hill_aug_2014.pdf Access date: 30 September 2014

3.0 Business use

- 3.35 Even leaving aside these constraints, it is far from clear as to what commercial benefit there would be to a developer in redeveloping the site for employment uses, with or without a new school.

4.0 Summary and conclusions

- 4.1 CBRE Planning is instructed to provide advice on whether the St Clare Business Park in Hampton Hill is required and/or suitable for 'education' and 'high quality business space', that being the proposed allocation by London Borough of Richmond upon Thames in its emerging Site Allocations Plan.
- 4.2 We are concerned that no evidence, or at best inadequate evidence, has been presented to demonstrate that there is a need for a new primary school facility in this area and, even if there is, that the site is available or suitable or that alternative sites have been considered.
- 4.3 We are also concerned that insufficient evidence has been provided to demonstrate that the site is required for business use and/or that it would be suitable for redevelopment for business use, with or without education use.
- 4.4 Unless, therefore, more robust evidence is presented we recommend that the proposed allocation is deleted.

ST CLARE BUSINESS PARK PROPOSED REDEVELOPMENT

Preliminary comparison of traffic issues for alternative land- uses

Hampton Hill, Richmond upon Thames

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Client: Tyton Properties Ltd

3rd October 2014

Project No: 3630

1 INTRODUCTION

It is proposed to re-develop the St Clare land holding located to the west of Hampton Hill High Street, between Windmill Road and Holly Road, in Hampton Hill, Richmond upon Thames. Prior to the preparation of a Traffic and Transport Assessment, this note compares, at a broad level, the potential traffic impact of various land uses being considered for the site. The options discussed are as follows;

Option A – Employment use,
Option B – Educational Use

Option A – Employment Use

The site is currently occupied by light industry and generates peak hour car trips by employees, and light and heavy goods vehicle trips throughout the day. The 100 or so employees that access the site do so without difficulty. The HGV's that access the existing industrial site are required to do so via Holly Road. The vehicle sizes together with the constrained geometry on Holly Road, results in frequent traffic jams. It is understood that the site is operating at 40% so any further expansion of the industrial operation at this location would clearly exacerbate the impact on the surrounding road network.

Option B – Educational Use

Trip patterns associated with schools tend to be concentrated around the 15 minute period before the start of the school day, and the 15 minute period immediately after the end of the day. Car trips will be generated by both staff members driving to/from the school and by parents/guardians dropping off and picking up pupils at the start and end of the day. Traffic volumes generated by schools tend to have a greater impact on the surrounding road network during the arrival time, which is uniform for all pupils and generally coincides with the AM peak hour for background traffic on the network. After the school day the pick- up time is generally before background traffic peaks in the evening, and departures tend to be more dispersed as some pupils take part in after school activities.

The key traffic issues that would require resolving for a school on the site would be;

- 1) The potential for significant volumes of traffic generated by the school, and,

- 2) Provision for a significant number of drop-off and pick-up trips, both within the school, and on the surrounding road network.

The magnitude of these issues will be dependent on both the size of the school and the proportion of the staff and pupil trips that are undertaken by car. If it is assumed that the site could accommodate a school of 800 pupils with 25% arriving by car, it would be possible to have more than 200 cars arriving to the site within a 15 minute period. This level of traffic would require significant provision for parking and on-street set down areas to minimise the impact on the surrounding road network.



GERALDEVE

**Formal objection to HP4 St Michael's Convent, Ham
Common**

**Against the London Borough of Richmond upon Thames,
Local Plan Pre-Publication Site Allocations Plan- new
education sites consultation**

On behalf of the Trustees of the Church Extension Association

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Appendix 1 Proposed draft policy

Prepared by Peter Dines BATP, DipSurv, Cert TP, MRTPI, MRICS

Partner Gerald Eve

PGWD/J7397

1 Executive summary

- 1.1 We act on behalf of the Trustees of the Church Extension Association to consider the proposed Local Plan policy HP4; St Michael's Convent, Ham Common of the emerging London Borough of Richmond upon Thames, Site Allocations Plan- new education sites consultation.
- 1.2 We consider that this policy is unsound and should be deleted from the emerging document and not taken forward.
- 1.3 We have considered the proposed policy under a number of planning themes and have concluded the following:

Designation of the grounds to St Michael's Convent as "Other Open Land of Townscape Importance"

The site was not identified for designation in the Borough wide landscape appraisal which forms the evidence base to the local plan.

The Site does not comply with the criteria for designation.

The Site is not appropriate to be designated as Other Open Land of Townscape Importance.

Heritage restrictions

There is no detailed assessment of the Site in heritage terms upon which to base an excessively restrictive policy constraint to development.

There are parts of the building complex and Site where redevelopment would materially enhance or not harm the heritage asset.

The justification of educational use on the site

The evidence base does not explicitly identify a current, medium or long term need in this area for this site to be in education use.

The provision of education sites is unclear and uncertain.

The listed building would be inappropriate in practical and heritage terms for educational use.

The Consultation process

The owner and occupier of the Site has not been directly consulted on this new policy, which would significantly affect the Site. This is contrary to the principles of proper plan making.

- 1.4 In these ways the draft policy is not consistent with national policy; it is not justified and has not been positively prepared and, as a result, is unsound and should be not be included in the draft plan.
- 1.5 Should it be considered that a policy for the Site were appropriate, we would be willing to consider a policy along the lines of that contained in the conclusions to this report.

2 Introduction

- 2.1 We have been instructed by the Trustees of the Church Extension Association to consider the proposed policy HP4 St Michael's Convent, Ham Common of the London Borough of Richmond upon Thames, Local Plan Pre-Publication Site Allocations Plan- new education sites consultation, and if appropriate, submit representations in response to the consultation process.
- 2.2 The Trustees of the Church Extension Association are the freehold owners and occupiers of St Michaels Convent (the Site).
- 2.3 The proposed policy is set out in full in appendix 1.
- 2.4 Our conclusion to considering the proposed policy is that it is fundamentally flawed and therefore, should not be included within a "Sound" local plan document.
- 2.5 We justify this conclusion in this document, considering the relevant matters in the following sections:
 3. The background and the requirements of a sound local plan
 4. Proposed designation of the grounds to St Michael's Convent as "Other Open Land of Townscape Importance"
 5. Heritage restrictions
 6. The justification of the proposed educational use on the site
 7. The Consultation process
 8. Conclusions

3 The background and the requirements of a sound local plan

- 3.1 We have considered the policy having regard to the National Planning Policy Framework (the Framework) and the Government’s Planning Practice Guidance (Guidance), The London Plan and other material considerations. The following are the key points relating to this objection.
- 3.2 Paragraphs 14 and 15 of the Framework indicate that Local Plans should be based upon and reflect the presumption in favour of sustainable development. This should be done by positively seeking opportunities to meet the development needs of their area, identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally.
- 3.3 Guidance also sets out that
“Appropriate and proportionate evidence is essential for producing a sound Local Plan. Evidence must be adequate, up-to-date and relevant evidence¹. Evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan. Evidence of cooperation and considering different options for meeting development needs will be key for this process.
The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date. For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage).
Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests consider the issues and engage with the authority at an early stage in developing the Local Plan. It will also help communities bringing forward neighbourhood plans, who may be able to use this evidence to inform the development of their own plans.”
- 3.4 The Framework sets a number of tests which draft development plan policy must meet in order to be found “sound” namely that it is:
“**Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

¹ Paragraph 158 of the Framework

3.5 Regarding the historic environment, the Framework sets out:²

“Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record.

Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.”

² Paragraph 169-170

4 Proposed designation of the grounds to St Michaels Convent as “Other Open Land of Townscape Importance”

4.1 In 2007 Allen Pyke & Associates carried out a review of open land designations in the Borough to assess whether they were appropriately designated. They then reviewed a further 100 other open areas. The consultants suggested that 35 areas be designated as Other Open Land of Townscape Interest (OOLTI), and a further 65 should be put forward for consideration. St Michael’s Convent was not identified in this comprehensive study which forms the basis of formal designations through the 2011 Development Management Development Plan Document (DM DPD). This is clear evidence that the site is not of sufficient value in planning terms to be designated OOLTI.

4.2 Given the comprehensive nature of the work on the review, it was the DM DPD which should have introduced the OOLTI designation if this was justified. The current Site Allocations DPD is not the appropriate document to amend the provisions of the DM DPD or the local Plan proposals map. The way the Council has sought to do this gives the impression of a “knee jerk” approach to the consideration of sites, seeking to put in place unjustified and unnecessary development plan policy restrictions on development

4.3 In this way the policy is not justified and is therefore unsound.

4.4 The following is a definition of OOLTI:

4.1.8 OOLTI should be predominantly open or natural in character. The following criteria are taken into account in defining OOLTI:³

Contribution to the local character and/or street scene, by virtue of its size, position and quality; Value to local people for its presence and openness; Immediate or longer views into and out of the site, including from surrounding properties; Value for biodiversity and nature conservation.

4.5 If it is considered that the Site Allocations DPD can introduce additional sites, not included in the Development Management DPD, there is no evidence available as to how the Council evaluated the site against the criteria set out above.

4.6 The proposed OOLTI designation covers the majority of the garden area to the rear of the convent. This area is part of the domestic amenities of the main building. It is very well screened on its boundary, to the point where it is very difficult to get general views into the site. This is not surprising given the domestic nature of the area. The boundary planting provides some general amenity and it is protected by virtue of its location within a conservation area. In this way the value of the site to its surrounding will be maintained into the future. The site is relatively small and is not visible in general views from Ham Common and it fronts onto a cul-de-sac comprising 19 dwellings, built in the late 1960’s on land similar to the proposed OOLTI land once owned by the convent and the adjoining neighbour.

³ Adopted Development Management Plan November 2011

- 4.1 The proposed OOLTI land does not therefore meet the criteria of the OOLTI designation due to its lack of contribution to local character and therefor the policy is unjustified. This makes the policy unsound. In these circumstances, and in the light of our conclusions on other relevant matters in this representation, Policy HP4 as a whole should be deleted. If it is considered that the policy should remain, the proposed OOLTI designation should be removed.

5 Heritage restrictions

- 5.1 The draft policy sets out that the listed buildings are to be converted. The conversion would need to protect and enhance the listed buildings and conservation area including their settings, as well as taking account of the adjoining Ham Common.
- 5.2 This part of the policy would restrict the removal of parts of the building complex which negatively affect its special character and therefore is not consistent with national policy/legislation and is unjustified.
- 5.3 There is no up to date evidence in the public domain from the Council about this heritage asset to support the policy. The Council should have undertaken a clear heritage assessment of the Site with which to justify the proposed additional policy restrictions limiting development to only conversion.
- 5.4 The Framework identifies that new development can make a positive contribution to heritage assets:

In determining planning applications, local planning authorities should take account of⁴:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

- 5.5 Paragraph 004 of the Guidance sets out that appropriate new development within the setting of heritage assets can be acceptable and that conservation should not be a passive exercise;

“In line with the National Planning Policy Framework, local authorities should set out (in? sic) their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. Such as (sic) a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.”

- 5.1 As a starting point for the assessment of the potential for the building, the description of the building on the statutory list of buildings of special architectural or historic interest serves as a good indicator for identifying the potential for enhancement, this states:

Grade: II Date first listed: 10-Jan-1950

⁴ Paragraph 131

Early C18. Main Block: 3-storeys; 5 windows; brown brick, red dressings. Later Wings: to left C18. Three storeys and to right early C19. Two storeys. To right of this large C20 wing, **of no interest**. (Our emphasis)

5.2 The history of the development of the convent complex is as follows:

1730-34 – The original building (Orford House) was constructed

1893-94 – glass entrance porch added to the south west side;

1911 – Small eastern extension;

1933 – Small addition to the North West side;

(Building listed 1950)

1956 – Two large wings (east) and the chapel (west) added;

5.3 The 20th century additions have very little historic architectural relationship with the original building and have interrupted the original symmetry of the building, and although Orford Hall's original form retains a presence from Ham Common Road, the rear of the complex is a jumble of forms and architecturally unsympathetic additions.

5.4 The chapel to the west is the least sympathetic of the additions in terms of its design, although the materials and colouring are in-keeping.

5.5 The 1950's additions do not contribute to the special character of the site or the conservation area.



East wing from Martingales Close



Rear of the complex



Picture of chapel

- 5.6 The poor quality 1956 additions and the unattractive western chapel extension detract from the quality of the listed building and the clear and practical fact is that to only allow conversion of the structures would prevent improvements to the building which could redress the mistakes of the 1950's and enhance the Site's heritage value. As drafted the policy would prevent this and it is therefore not consistent with national policy; unjustified; ineffective and not positively prepared. This therefore makes the policy unsound. In these circumstances and in the light of our conclusions on other relevant matters in this representation, draft policy HP4 as a whole should be deleted.

6 The justification of educational use on the site

- 6.1 The proposed policy requires the conversion of buildings to residential (including affordable units) and education and/or community uses. The draft policy identifies that the education provision would need to take into account any provision on the Cassel Hospital (HP 3) site if this is brought forward earlier.
- 6.2 The policy has not been justified by evidence and in any event does not provide a clear indication of how decisions should be made
- 6.3 The evidence base referred to by the local authority was produced in September 2013 This identified the following⁵:

“As at present, in the medium- to long-term it is likely that there will be a need to consider additional provision in the Barnes/East Sheen/ Mortlake; Richmond; Teddington; and Twickenham areas. If demand were to be exacerbated by variable factors – e.g. continuing economic difficulties altering the proportion of children whose parents opt for private schools; large ‘pupil yields’ from housing developments at Twickenham Station, the Royal Mail site, Stag Brewery, etc.; and further improvements in standards across the borough’s primary and secondary schools – then the projections of pupil numbers could be higher than anticipated.”

- 6.4 The Ham area and St Michael’s Convent specifically is not identified through this needs assessment as being required for educational purposes.
- 6.5 The reported justification for education use on St Michael’s Convent can be traced through a number of documents.
- 6.6 On the 20th March 2014 the London Borough of Richmond upon Thames Cabinet considered a report of the cabinet member for schools and under 5s’ education on school place planning strategy.
- 6.7 In respect of the need for additional school places the report concludes that:

“On the Richmond side of the Thames, it is likely that four forms of entry will be needed in East Sheen/Barnes and two will be needed in Richmond.”

The Council identified the following options:

“The Council has identified a number of further primary school expansion options, including:

- Expanding The Russell Primary or providing a shared form of entry between Meadlands Primary, St Richard’s Church of England Primary and The Russell Primary;
- Expanding East Sheen Primary, most probably onto a second site;
- Expanding Collis Primary.

⁵ LBR Background paper Needs Assessment Education 13 September 2013

6.8 At its cabinet meeting on the 21st July 2014 the Council considered the need to allocate further sites for education use and Council identified the following solutions:

“Currently the Site Allocation Plan (October 2013) as agreed by Cabinet includes the possibility of education provision at the following sites:

Primary school provision

- TW 11 West Twickenham cluster (including Greggs, the bakers)
- TW 13 Mereway Day Centre (but not sufficient size for a new primary school)
- BA 2 Barnes Hospital
- EM 1 Stag Brewery
- EM 5 172-176 Upper Richmond Road

Secondary school provision

- TW 10 Richmond upon Thames College

Special needs education

- TW 10 Richmond upon Thames College

Further, adult and higher education

- TW 10 Richmond upon Thames College

3.5 There is continued pressure for school places to meet short-medium term and longer-term needs. A complication is that most of the above sites listed under para 3.4 are in private ownership and timescales for delivery will be depend on owners' decisions in relation to redevelopment e.g. Stag Brewery. As well as the need to provide short-medium term sites for schools to meet the need up to 2020, there is the need to provide longer-term sites as the Site Allocations Plan looks ahead for 15 years.

3.6 Therefore, officers have reviewed all agreed sites from the Publication Site Allocations Plan (June 2014) to identify if any sites could meet some educational needs. It is suggested that educational provision is included within the following proposal sites:

- E HH 2 St Clare Business Park, Hampton Hill: include a proposal for quality business space / education
- HP 3 Cassel Hospital, Ham Common (already subject to public consultation until 21 July): amend the wording to include also educational uses

3.7 In addition, officers have also identified two new sites to be included within the Site Allocations Plan to provide for educational needs:

- Ryde House, East Twickenham
- St. Michael's Convent, Ham Common

3.8 The amended proposal sites and justifications for St Clare Business Park and Cassel Hospital as well as the new proposals for St Michael's Convent and Ryde House are included at Appendix 1."

6.9 The Council has justified the new policy for this site as follows:

"New proposal site:

HP 4 St Michael's Convent, Ham Common

Proposal: Conversion of buildings to Residential (including affordable units)/education/community uses

Justification

If the Convent is declared surplus the listed building is to be converted to residential and Education/community use with an appropriate level of affordable units. The conversion 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 Conservation Importance. The education provision would need to take into account any provision on the Cassell Hospital site if this is brought forward earlier. To provide for education needs⁶."

- 6.10 This Site has not been identified as being required to meet an identified need which has been specifically justified in the evidence base for the policy. It is not within East Sheen/Barnes or Richmond areas and is not well located having regard to public transport⁷. The 1st October 2013 Site Allocations Plan draft claimed to be able to meet Educational needs through the allocation of sites. This was followed by an increase in sites identified in the DPD and then again further sites have been allocated including the objection site. This gradual creeping allocation has not been justified with any site or area specific evidence to provide a clear justification for the draft education allocation on the objection Site.
- 6.11 It is also inconsistent to identify as a problem "private ownership and timescales for delivery" and allocate St Michael's Convent which is in private ownership with no timescale for delivery.
- 6.12 In these circumstances the policy for the objection Site to be an education use is not "Justified" nor positively prepared and it fails these tests of "soundness"⁸
- 6.13 Furthermore the policy fails to provide a clear indication of how a decision maker should react to a development proposal. This is a requirement of the Framework⁹. This is

⁶ Cabinet date: 21 July 2014 report of: cabinet member for community, planning and voluntary sector title of decision Site allocations plan: Education Sites

⁷ See section 3 of the Sustainability Appraisal Jul 2014

⁸ Paragraph 182 The Framework

because the requirement to provide “residential and education and/or community uses with an appropriate level of affordable units”, where “The education provision would need to take into account any provision on the Cassel Hospital (HP 3) site if this is brought forward earlier”, is confused and uncertain. It could lead to the refusal of development proposals until such time as an unrelated 3rd party site (Cassel Hospital) is redeveloped.

- 6.14 It is also relevant that the use of the site and more particularly the main listed building, for education purposes is likely to lead to pressure for alterations, which could undermine the heritage value of the building. The Sustainability Appraisal claims that education use is likely to contribute to the preservation of the conservation area and listed buildings. This assertion seems unlikely, particularly given that the most appropriate use of a listed building is generally its original use, in this case residential use.
- 6.15 The education use with its significant activity: drop-offs, pick-ups, catering, deliveries, play and sports areas is significantly different in terms of its character than the existing use or a residential use and is not likely to preserve heritage assets.
- 6.16 This therefore makes the policy unsound. In these circumstances, and in the light of our conclusions on other relevant matters in this representation, Policy HP4 as a whole should be deleted.

⁹ Paragraph 154

7 The Consultation process

7.1 The Framework sets out that

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area¹⁰”

7.2 To date no direct approach has been made to consult with the owner and occupier of St Michael’s Convent. The owners are only aware of the policy change due to a site notice posted on the adjacent highway. This has meant the policy has evolved in a vacuum, without the benefit of any consultation input from the landowner.

7.3 When the proposed policy is site specific, and particularly dealing with timing, it is wholly against the principles of modern planning policy formulation to ignore the landowner. In doing so the policy is flawed.

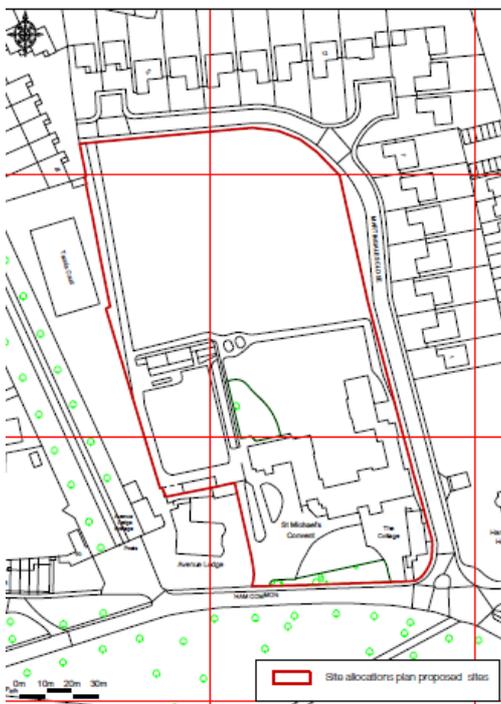
¹⁰ Paragraph 155

8 Conclusions

- 8.1 In conclusion, having regard to the above matters, the draft policy is not consistent with national policy; it is not justified and has not been positively prepared and as a result is unsound and should be deleted from the draft plan.
- 8.2 However, if it is considered that it is appropriate to have a site specific policy in these circumstances, the following wording and amended site plan is suggested:

Objector's proposed policy: HP4 St Michael's Convent, Ham Common

Use of the property for residential or other appropriate uses



Justification

Should the Convent become surplus to requirements, consideration will be given to appropriate alternative uses on the site, including residential use. Any new building work must pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In addition any new building work should preserve or enhance the special character or appearance of the conservation area, as well as taking account of the adjoining Ham Common.

Appendix A – Draft Proposed policy

Pre-Publication Site Allocations Plan – new educational sites consultation August 2014

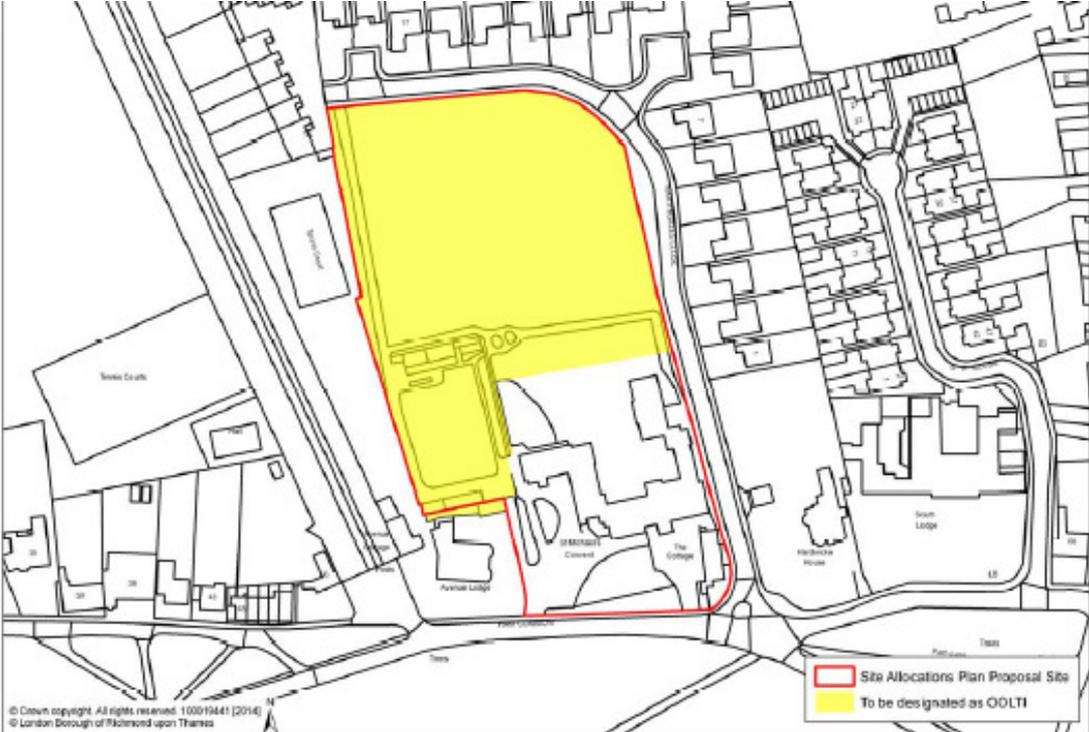
HP 4 St Michael's Convent, Ham Common

Proposal

Conversion of buildings to residential (including affordable units) and education and/or community uses

Justification

Should the Convent become surplus to requirement, the listed buildings are to be converted to residential and education and/or community uses with an appropriate level of affordable units. The grounds to the rear are designated as Other Open Land of Townscape Importance and development on this area would not be acceptable. The conversion would need to protect and enhance the listed buildings and conservation area including their settings, as well as taking account of the adjoining Ham Common, which is both Metropolitan Open Land and also an Other Site of Nature Importance. The education provision would need to take into account any provision on the Cassel Hospital (HP 3) site if this is brought forward earlier.



Proposal Site HP 4 St Michael's Convent, Ham Common