

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA101219-8775

10 January 2020

Dear [REDACTED]

Thank you for your request for information which the GLA received on 10 December 2019. Your request has been dealt with under the Environmental Information Regulations.

You asked for;

*...copies of all the emails, letters, reports sent by the London Borough of Richmond upon Thames - in relation to the Turing House School planning application between 01 May 2018 and 10<sup>th</sup> December 2019 (other than copies of the information that is readily available on Richmonds own planning database). Along with any minutes of meeting you may have had with councillors or officers from Richmond Council where this application was discussed.*

*Please ask the (1) GLA planning team and (2) Mayor's private office and the (3) Deputy Mayor office to check their records.*

*Please can you supply a copies of all planning comments for, against and neutral that have been submitted to the GLA for the Turing House School planning application 18/3561/FUL. Including those from both members of the public, councillors, MPs, Assembly Members.*

Our response to your request is as follows:

Please find attached the information we hold within scope of your request. Please note that some names of members of staff and personal information relating to members of the public is exempt from disclosure Regulation 13 (Personal information) of the EIR.

This information could potentially identify individuals and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

Please note that I have not included files which are already available via

[http://www2.richmond.gov.uk/PlanData2/Planning\\_CaseNo.aspx?strCASENO=18/3561/FUL](http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=18/3561/FUL)

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

  
**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 26 July 2019 12:36  
**To:** Mayor  
**Cc:** [REDACTED]  
**Subject:** Turing House free school

Hello,

EIR - Turing House free school

Request reference number: MGLA201118-8564

I strongly object to the building of a new school on the Hospital Bridge Road site in Whitton (in the London Borough of Richmond) and I believe the local council, the Mayor of London and the London Assembly is undermining the views of the residents if this project is progressed.

The suggested site is Metropolitan Open Land, which makes it an important part of London's open space network, recreation and biodiversity system. The Mayor of London has consistently supported the protection of these spaces and stated that they should not be adversely impacted by new developments.

Wildlife in the local area needs to be protected and its natural habitat should not be put at risk for the sake of a project that can go elsewhere. As a local resident, I am often amazed at the beauty of the local surroundings and we get a large variety of plants and animals in our garden and the field behind. This all contributes to the local ecosystem and ensures that Whitton is green and healthy. Richmond Council refer to Whitton as the "garden market", due to its "village feel". A huge development like a school would undermine the "village feel" and ruin the charm of the place.

The council has stated in its own Transport consultation document that Hospital Bridge Road is a traffic hot spot and lacks decent transport links (110 and H22 are only every 22 minutes and the 481 runs only twice an hour). How do the school and council intend to reduce traffic problems and improve transport when an extra 1000 students, plus school staff, will be frequenting the site daily?

Weekdays, as well as weekends, the site will be busy, as schools use their property all year around, from early in the morning to late at night. If the council is truly committed to the Mayor's Transport Strategy (LIP), and believes it will achieve the target of 80% of all journeys being made on foot, by cycle or using public transport by 2041, then the council need to scrap this project immediately. The daily volume of people in the area will increase 10-fold. There are no direct buses or trains from Teddington to Whitton and the roads are very dangerous, especially for young cyclists.

The number of children, staff and traffic will affect noise, air and light pollution in the area, which has a direct impact on the residents and their quality of life. The fact that the council is willing to let thousands of residents suffer for the sake of a new school, which is not required, is disgusting. Building anything on the site would have an impact on residents' health due to the increasing lack of green spaces in the borough and an increased volume of traffic, which would create further air pollution in an area, which already has many schools. If the Mayor of London is serious about reducing the impact of pollution on children and local residents (who are already feeling the impact of Heathrow and its expansion) then building a school in a highly populated area is wrong. Several alternative locations for the school have been suggested to the council, which would be more appropriate, but have fallen on deaf ears. Former deputy leader of the council stated at a full council meeting that the site was moved from Fulwell to Hospital Bridge Road because the people who live in Fulwell are richer (than Whitton residents) and more likely to take the council to court. This issue has now become a very toxic class war, between the rich and poor. When it is money versus nothing, we know who will win. The Labour Party has consistently stated that it is a party for the many, not the few, when will London's Labour Mayor step in and protect its most vulnerable citizens?

Richmond's Liberal Democrat-led council has been campaigning to prevent the closure of Kneller Hall; herein lies the perfect solution to their problem. Kneller Hall is a school and is no longer in use. It is a large building with grounds and has a prestigious history. If Turing House School were to move into Kneller Hall, it resolve many issues and prevent the building of an unnecessary school on Metropolitan Open Land.

The project directly affects myself and my family, as the new school field would back directly onto our property. This will impact on our lives in an unfair manner, affecting our right to a private family life, as our property would be visible from the field. Also, the noise would impact on our daily lives; we can already clearly hear the primary school on Powder Mill Lane. The noise is constant and having a school even closer to our property would have a deleterious impact on our physical, mental and emotional well-being.

I kindly request that the council, London Assembly and London Mayor considers the needs and feelings of the residents, who overwhelmingly do not want this school built. Privacy, congestion, air pollution and noise issues clearly make this project detrimental to residents, wildlife and potential students/staff. I request that the council, Mayor and Assembly fully debate and considers the issues I have raised and responds in due course.

Many thanks.

Kind regards,





[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2019 21:53  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Turing House School 18/3561/FUL (GLA Reference GLA/4739/01)

Dear Sadiq

**I am writing to ask you to support a permanent home for Turing House School on the Whitton site.**

We have all been incredibly patient to the extent that [REDACTED] will have completed all five years of his state secondary school education in temporary accommodation. Please end the painful uncertainty for our young people, teachers and school leaders who all deserve our full support.

**Turing House School provides a fantastic state education in Richmond borough**

[REDACTED]

Back in 2015, we took a leap of faith by sending [REDACTED] to Turing House School as a founding student, committed as we were to the vision and commitment of the steering committee and the school leadership team. Even at the stage of making our choice, there was a lack of certainty over the temporary location never mind the permanent site.

We are delighted to say our son is receiving a fabulous secondary school education. His development and curiosity around learning is more than we hoped for; he is happy, settled and thriving educationally and emotionally.

The young people at Turing House School are great ambassadors. we continue to be amazed at what the school, the leadership team, the teachers and the young people manage to achieve:

**a great education is the foundation we would hope for from any school - Turing House exceeds our expectations.**

The quality of the teaching and the high levels of commitment and engagement of the teaching staff is unparalleled; each and every one gives freely and enthusiastically of their time within the school day and beyond.

**an active extra-curricular timetable that nourishes breadth of learning is highly desirable - Turing House exceeds our expectations.**

[REDACTED] and has had the opportunity to 'try' a range of activities that he would rarely have had the opportunity to experience elsewhere. The teaching staff go above and beyond what is expected of them to offer a fabulous and flexible programme of enrichment.

**a sense of community is something surely every school aspires to create - Turing House exceeds our expectations**

there are few schools which could muster strong numbers of parents, students, staff and their partners on a number of cold, wet Saturday mornings to dig school grounds, move soil and then plant a brilliant 'Jurassic' garden - ably led and managed by the school caretaker no less (himself giving freely of his time).

**a social conscience is a rare and precious thing - Turing House exceeds our expectations**

since the school opened the students in the choir have been regular weekly attendees at Elleray Hall in Teddington. They rehearse in front of the elderly members and then spend time sitting, chatting and building friendships with them; is this not inter-generational community as its absolute best?

**Turing House School has been challenged by having to operate over two sites.**

As you will imagine, the additional 'stretch' required for the leadership team and staff to operate across two sites has put considerable additional stress on all; at a time when our educators need all the support they can get. In spite of this the team has worked above and beyond what is required of them to minimise the impact on our young people and their education.

**Sustainable responsibility is a strong value for all at Turing House School**

[REDACTED]

I would please ask that you actively support providing a permanent home for the school in Whitton; you will be acutely aware of the major challenge that has faced Turing House school since its creation in 2015. The constant uncertainty over the future permanent site for our school has been stressful and 'progress' has been painfully slow; it is now time to provide a clear permanent solution for the school and its community.

I look forward to hearing your considered decision.

With thanks

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 02 August 2019 21:17  
**To:** Mayor  
**Subject:** Turing house school 18/3561/FUL GLA/4739/01

Dear Mayor,

We would like you to support opening Turing House school in Whitton on permanent location: Hospital Bridge Road/site.

[REDACTED]

The school means a lot to us. It is science/Maths school, and there is a lack of school like this around in the borough. It is very hard for a boy especially to get to a good school.

[REDACTED] This school feels good and welcoming. Teachers are great, and you feel positive vibe (And we have been in many other schools!).

[REDACTED] opposite park where according to the plans there will be additional gate for the students to enter school safely through the park.

I think personally this is where majority of students will choose to enter the school. It is safe. They will cycle or walk from the nearest bus stop being 111 from Kingston direction or 110 from elsewhere. Too many people is focusing on the main gate only.

I understand the people are arguing, and disputing the school location as they think Hospital Bridge Road entrance is not safe. It may be true, but it is enough to make it better, wider, add the roundabout, light, whatever it takes. It is not also safe for the other students to walk back from Nelson School or St Edmund School currently (no crossing on Montrose Avenue), but no one is arguing this now. How strange.

School will be located on the fields which are not used since we live here. There is nothing, nothing. Not even trees. It would be fantastic for the whole area to have access to sport field and more green spaces as per the school plans, right?

[REDACTED] There is simple not enough places. We need this great school in our borough. We need this school in that location as there is simple nothing happening there. This is sad and empty space between graveyard and rail tracks. It would be great to have a bit of 'live area', after school activities and access to school for locals.

[REDACTED] I live here and I know it is safe, and it will help locals (even they don't know it yet).

From My Son: I really hope to get a new and amazing school in a year and I think that it would be a great use of community space as nothing is currently there and Turing house promises to add some public space into the school for people in Whitton to use.

I would love to have school so close to my house, so please say YES!!!

thank you so much.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 25 July 2019 10:37  
**To:** Mayor  
**Subject:** 18/3561/ FUL

Dear Sir/ madam,

I write in reference to to this planning application for Turing House school relocation. As a point of principle, I think it's wrong that a relocated Teddington school should only take 20% of its intake from the local Whitton area. It sets a dangerous precedent, whereby wealthy areas of London can effectively 'sub out' vital pieces of infrastructure such as schools, hospitals etc to seemingly poorer parts of London. Teddington parents want to benefit from new infrastructure whilst not having to put up with the consequences of noise, pollution and traffic that will inevitably follow, exacerbating existing Twickenham school traffic disruption to the Whitton road network.

The Mayor has also made much of the need for improvement to air quality, and this can be assisted by reducing the amount of journeys undertaken. More children walking to school also brings health benefits which is not possible with this school relocation. Excepting the local 20% Whitton intake, I'd be amazed if the GLA can grant stage 2 planning permission for this development, as all the Teddington children must surely be arriving by motorised transport ? How will you enforce a planning condition requiring pupils to travel by bus? I think the Mayor would find just the proposed travel plan alone unacceptable. The travel plan has to be believable, as well as sustainable.

The Mayor of London has built much of his mandate on the need for equality and inclusivity. If stage 2 planning permission for the 'subbing out' of infrastructure such as this from richer to poorer areas of London is given, then I would certainly question whether he holds to his mantra. I would also question his commitment to reducing air quality.

I have no problem with Teddington children needing a better school building, but they should look for one in their local area. I would only accept its presence if the percentage and catchment of Whitton students attending was significantly increased to say at least 50%, to ensure sustainability.

Regards [REDACTED]  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 July 2019 08:09  
**To:** Mayor  
**Subject:** 18/3561/FUL

GLA/4739/01

Dear Mayor

With regard to the development of a new site for Turing House school in Hospital Bridge Road, I am fully in favour of this proposal [REDACTED]

[REDACTED] Turing House is a wonderful school and its leadership and teaching ethos are truly inspirational. It needs to be housed under a single united roof and this site provides the best solution.

I understand the frustrations of some of my fellow residents. Many have lived in the area for several years and are eager to avoid change, but in my view, a new school in Hospital Bridge Road will be a galvanizing and positive thing.

Kind Regards

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 July 2019 17:31  
**To:** Mayor  
**Subject:** Planning application ref: 18/3561/FUL

Dear Sir,

With reference to the above planning application which was cleared recently by Richmond Council planning committee, we would request you to reject the said application. We have written to the council opposing this development however they do not seem to be taking residents views into account and hence we urge you to act to protect the shrinking green space in our area which is already the lowest in the Richmond borough.

We believe that the site proposed for the school is not right for the following reasons.

1. The school was set up due to lack of secondary school places in Teddington and surrounding areas. The proposed site is quite further from where the school should be and will involve a bus/car journey for a majority of the students. I am not sure why this site was even considered.
2. Traffic - The traffic on Hospital Bridge Road is a nightmare especially in the mornings and afternoon/evenings with long queues towards the A316 roundabout and also on the other side due to the bus lane. With the number of students in this proposed school along with teachers, auxiliary staff and other deliveries it will make the current bad situation even worse and there will be a gridlock.  
  
The bus service 481 will be inadequate with its current frequency won't be able to support the school and will need to be increased. This, in turn, will increase the stress on the traffic as also the rail over bridge which has been already been deemed weak for heavy traffic conditions.
3. Parking – There is a massive parking issue on Hospital Bridge Road and surrounding streets. If the school is built this will make it even worse with people parking dangerously on pavements increasing the chances of children getting hurt.
4. Safety of children - Sharing the site with the garden centre will make the safety conditions for the children attending Bishop Perrin and other schools worse as most of these children walk and the walkways on the current bridge are already so narrow that you need to walk in a single file to navigate almost the entire stretch towards Nelson Road. We use the nursery on a regular basis and it is quite dangerous when exiting.
5. Pollution - This area already has highest levels of people suffering from Asthma (me included) and the increased levels of pollution will make this even worse. Also, there is a lack of open spaces in the area the school proposes to build over a large part of this which is unacceptable. Already Whitton has the lowest amount of available green spaces and this will reduce it even further.
6. Impact on Twickenham and Richmond upon Thames School - This school will have a significant impact on the already improving Twickenham School which is currently undersubscribed and also the newly setup Richmond upon Thames school. This area does not need another secondary school as this will impact all the good work done at Twickenham School.

For the reasons stated above, we object to the proposed siting of Turing House School.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 July 2019 20:35  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Re Turing House school

Dear Mr Khan,

I am writing to support the application for planning permission for the Turing House school in Twickenham. My son has just finished his first year at the school which he has really enjoyed. The school has earned a reputation locally as being both academically good as well as nurturing and we have certainly found this to be the case.

However, currently the school operates on two sites which has led to a loss of sporting/ extra curricular activities as well as meaning that the school does not have the opportunity to meet together as a whole. It is also a logistical challenge to the staff.

The uncertainty over the permanent site for the school has lasted for four years now and it is time that the children were given a futureproof home.

Yours sincerely

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 July 2019 19:27  
**To:** Mayor  
**Subject:** Planning permission 18/3561/FUL

Dear Sir

I strongly object to this application for building the new Turin House school on this land that won't even serve the community where it is being built but the neighbouring ward of Teddington. There is a newly referbished under subscribed school(Twickenham Academy) less than 400m away that could absorb the current Turin House intake. A new site should be found in Teddington. Please reject this application for the sake of our community.

Regards

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 20:56  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Turing House School - 18/3561/FUL - GLA/4739/01

Dear Sadiq

Thank you for all you do to champion London. It is a wonderful city to live in.

The reason for writing however is in regards to the application to build a permanent site for Turing House School, on the Hospital Bridge Road site in Richmond. We understand that as Mayor, because the site is Metropolitan Open Land, that the final decision is yours. As you will be aware, Councillors in Richmond have approved the plans.

[REDACTED]. We are delighted - from our own visits and speaking to parents of children at the school, it will offer a fantastic and nurturing environment for him to grow and learn. With a shortage of school places in the Borough, we're so pleased to have found him somewhere where he will thrive.

We know however that the current position, of the school being based on two sites, is not ideal. I'm not sure how the staff at the school have done so well to make it work. A single permanent site is needed. Whilst we acknowledge building on Open Land is always going to be controversial, there are few if any other options locally that offer a suitable solution.

We live in North Teddington and are committed to ensuring that [REDACTED] will travel to the school on public transport - indeed as a keen environmentalist himself, he will insist on catching the bus or walking!

Thank you in anticipation of your support of the application. We realise that balancing opposing views is difficult and there will be many people in the immediate vicinity to the new site who would rather the school be placed elsewhere; but for the sake of the future generations of London we'd ask you to give your approval at the earliest opportunity.

Kind regards

[REDACTED]

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**Turing House Free School****Bus Impact Analysis**

1. Following the submission of the planning application for the Turing House School (THS), Transport for London (TfL) has requested a financial contribution towards bus enhancement. This was followed with a meeting on 25 April 2019 when it was agreed that the bus trips estimate provided would be reviewed with the most recent students' home postcode data. The revised analysis will also take into consideration student trips that are currently taking place to and from the two temporary school sites (Teddington site and Hampton site) and that the bus contributions will be estimated based on the net new trips.
2. The bus trips estimate, that was produced for the planning application submission (as of September 2018), consisted of four academic years including: three academic years at the Teddington Site and one academic year of prospective students at the Hampton Site.
3. The THS currently has three academic years at Teddington site, one academic year at Hampton site with the following occupancy:
  - i. Teddington site will operate Years 8, 9 and 10 with 328 students; and
  - ii. Hampton site will operate Year 7 with 125 students.
4. The mode share data survey collected by the school (as per Table 5.4 in the Transport Assessment 4185/002/02C) indicates that:
  - i. 60.5% of students at Teddington site travel by bus (328 students \* 60.5%) amounting to 198 bus trips
  - ii. 42.4% of students at Hampton site travel by bus (125 students \* 42.4%) amounting to 53 bus trips
  - iii. As of September 2019, 123 students are expected to join the school at Hampton site. It is expected that these students will follow the same mode of travel (ie 42.4%) and generate further 52 bus trips. Although these trips were not considered to align with the current TfL' bus loading data.
5. As such, currently, a total of 251 students generate trips on the existing bus routes.
6. Further analysis was undertaken to understand demand for the current bus routes in the vicinity of the temporary sites and to have a better understanding how this demand will change when the school is

relocated to the new permanent site.

#### Teddington school site

7. The mode share data collected by the school indicates that 60.1% of students currently travel by bus amounting to 198 bus trips as presented in Table 1.

Bus Routes	Direction	Demand per bus route [%]	Demand per bus route [students trips]
33	East of site	2.6%	5
	West of site	3.5%	7
281	South of site	0.7%	1
	North of site	21.9%	43
285	North-west of site	27.6%	55
	South-east of site	0.7%	1
481	North of site	23.9%	47
	South of site	0.3%	1
R68	South-west of site	9.6%	19
	North-east of site	1.3%	3
X26	North-west of site	7.8%	15
	South-east of site	0.3%	1
Total		100%*	198

**Table 1: Student demand on buses at Teddington Site**

8. Table 1 showed that the majority of students travel by routes 285, 481 and 281. A total of 48 students currently use bus route 481.

#### Hampton school site

9. The mode share data collected by the school indicates that 42.4% of students travel by bus amounting to 53 bus trips. Table 2 presents the results of the analysis with the percentage split per route applied

to the bus users (ie from September 2019).

Bus Routes	Direction	Demand per bus route [%]	Demand per bus route [students trips]
285	North-west of site	5.1%	3
	South-east of site	25.1%	13
R68	North of site	16.2%	9
	South of site	1.0%	1
R70	North of site	19.6%	10
	South of site	33.0%	17
Total		100%	53

**Table 2: Student demand on buses at Hampton site**

10. Table 2 showed that the majority of students would use route R70.

### The permanent site

- The postcode data were analysed to understand future demand for buses once the school is relocated to the permanent site.
- The school undertook a pilot survey amongst students to understand how they would travel once the school is relocated to the permanent site. The survey has shown that 48.8% would travel by buses in the future years. This would amount to 512 bus trips.

Bus Routes	Direction	Demand per bus route [%]	Demand per bus route [students trips]
481	East of site	4.8%	25
	South of site	33.6%	172
H22	North of site	1.8%	9
	East of site	12.3%	63
110	East of site	6.9%	35

	West of site	0.0%	0
111	North of site	0.0%	0
	South of site	40.2%	206
H28	North-east of site	0.0%	0
	North-west of site	0.3%	2
<b>Total</b>		<b>100%</b>	<b>512</b>

**Table 3: Predicted demand on buses at the permanent site**

13. Table 3 shows that the majority of students would use routes 481 and 111 at the full occupation of the school at the permanent site.

#### **Reduction in demand for buses at temporary sites**

14. The analysis showed that the school currently generates 251 bus trips at both of the temporary sites. Once the school is relocated to the permanent site and would operate at full occupancy, this will be increased to 512 trips. As such, the net increase in demand for public buses will be 261 trips.
15. It is understood that due to the relocation of the school, students will seek to use different bus routes and the current demand, occurring on routes 285, 281, R68 and R70, will be relocated to different bus routes such as 481 and 111. The predicted reduction in the current demand is presented in Table 4.

<b>Bus Routes</b>	<b>Demand per bus route [student trips]</b>
281	44
285	72
R68	32
Other buses (33, X26, R70)	55
481	48
<b>Total</b>	<b>251</b>

**Table 4: Predicted reduction in demand on buses following re-location of the school**



#### Increase in demand for buses at the permanent site

16. The predicted impacts on buses for the morning and afternoon school peak hour are presented in Table 5.
17. The revised analysis considers students that already use bus route 481 as well as after-school clubs that are expected to be attended by circa 20% of students. As such demand for buses in the school afternoon peak hour will be lower than in the morning peak and is expected to amount to 390 bus trips.

Bus routes	Direction	Total Impact on Buses in the Morning Peak Hour (07:30-08:30)	Total Impact on Buses in the Afternoon Hours (15:00-16:00)
481	Towards Cromwell Road Bus Station	0	138
	Towards West London Mental Health Trust	172	0
H22	Towards Manor Road	9	50
	Towards Bell Road / Bell Corner	63	7
110	Towards Hounslow Bus Station	35	0
	Towards West Middlesex Hospital	0	28
111	Towards Heathrow Central Bus Station	0	165
	Towards Cromwell Road Bus Station	206	0
H28	Towards Bulls Bridge Tesco	0	1
	Towards Tesco Osterley	2	0
Total		488	390

**Table 4: Predicted reduction in demand on buses following the school relocation**

#### Conclusions

18. The relocation of the school to the permanent site would result in an increased demand on routes 481 and 111 which would amount to the following:

- Route 111 - 206 passengers in northbound direction in the morning peak (07:30-08:30) and 165 passengers in southbound direction in the afternoon peak (15:00-16:00).
- Route 481 - 172 passengers in northbound direction in the morning peak (07:30-08:30) and 138 passengers in southbound direction in the afternoon peak (15:00-16:00).

19. It should be recognised that the re-location of the school will result in a reduction in demand on route 285 (circa 72 passengers). This demand is equivalent to one bus journey. To address the future changes in demand for local buses, consideration should be given to re-locating funding from Route 285 to Route 111 or 481 to provide a continuous service to existing students.

### **Funding proposal**

20. Based on the above findings, it is proposed that the following funding will be put in place to address the local increase in demand for buses.

- Route 481 – To replace the single deck bus to double deck bus for the existing two return journeys. TfL has confirmed that this is a cost of £20k per annum per journey. The funding will be sought for 5 years, equating to a total of **£200k**.
- Route 481 – An additional return journey £75k per annum. The funding will be sought for 5 years, equating to a total of **£375k**.
- Route 111 – An additional return journey £75k per annum. The funding will be sought for 5 years, equating to a total of **£375k**.
- Route 111 – A second additional return journey should be provided as part of TfL's on-going changes to address the future changes in demand for local buses. Consideration should be given to re-locating funding from Route 285 to Route 111 to provide continuous a service to existing students.

21. The total bus contribution is therefore proposed to be **£950k**.

## Distribution of Additional Bus Passengers Trips Generated by Turing House School

Morning Peak

2020							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	12	108	0	119
H22	Towards Manor Road	5	0	1	6	0	6
	Towards Bell Road / Bell Corner	5	0	4	39	0	44
110	Towards Hounslow Bus Station	3	0	2	22	0	25
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	14	129	0	143
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	1
TOTAL			0	34	304	0	338

2021							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	14	130	0	144
H22	Towards Manor Road	5	0	1	7	0	8
	Towards Bell Road / Bell Corner	5	0	5	47	0	53
110	Towards Hounslow Bus Station	3	0	3	27	0	30
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	17	155	0	172
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	1
TOTAL			0	41	367	0	408

2022							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	15	137	0	152
H22	Towards Manor Road	5	0	1	7	0	8
	Towards Bell Road / Bell Corner	5	0	6	50	0	56
110	Towards Hounslow Bus Station	3	0	3	28	0	31
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	18	163	0	182
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	1
TOTAL			0	43	387	0	430

2023							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	16	140	0	156
H22	Towards Manor Road	5	0	1	8	0	8
	Towards Bell Road / Bell Corner	5	0	6	51	0	57
110	Towards Hounslow Bus Station	3	0	3	29	0	32
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	19	168	0	187
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	1
TOTAL			0	44	397	0	441



2024							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	16	148	0	164
H22	Towards Manor Road	5	0	1	8	0	9
	Towards Bell Road / Bell Corner	5	0	6	54	0	60
110	Towards Hounslow Bus Station	3	0	3	30	0	34
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	20	177	0	196
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	1
TOTAL			0	46	418	0	465

2025							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	0	0	0	0
	Towards West London Mental Health Trust	2	0	17	151	0	168
H22	Towards Manor Road	5	0	1	8	0	9
	Towards Bell Road / Bell Corner	5	0	6	55	0	62
110	Towards Hounslow Bus Station	3	0	3	31	0	35
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	20	181	0	201
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	2
TOTAL			0	48	429	0	476

2026							
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School				Total Impact on Buses in the Morning Peak Hour (07:30-08:30)
			07:00:00 - 07:30	07:30:00 - 08:00	08:00:00 - 08:30	08:30:00 - 09:00	
481	Towards Cromwell Road Bus Station	2	0	2	22	0	25
	Towards West London Mental Health Trust	2	0	17	155	0	172
H22	Towards Manor Road	5	0	1	8	0	9
	Towards Bell Road / Bell Corner	5	0	6	57	0	63
110	Towards Hounslow Bus Station	3	0	4	32	0	35
	Towards West Middlesex Hospital	3	0	0	0	0	0
111	Towards Heathrow Central Bus Station	6.5	0	0	0	0	0
	Towards Cromwell Road Bus Station	6.5	0	21	186	0	206
H28	Towards Bulls Bridge Tesco	3	0	0	0	0	0
	Towards Tesco Osterley	3	0	0	1	0	2
TOTAL			0	51	461	0	512

## Distribution of Additional Bus Passengers Trips Generated by Turing House School

Afternoon Peak

2020									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	76	19	12	12	0	96
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	28	7	4	4	0	35
	Towards Bell Road / Bell Corner	5	0	4	1	1	1	0	5
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	16	4	2	2	0	20
111	Towards Heathrow Central Bus Station	6.5	0	91	23	14	14	0	114
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	216	54	34	34	0	271

2021									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	92	23	14	14	0	115
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	34	8	5	5	0	42
	Towards Bell Road / Bell Corner	5	0	5	1	1	1	0	6
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	19	5	3	3	0	24
111	Towards Heathrow Central Bus Station	6.5	0	110	28	17	17	0	138
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	9	0
TOTAL			0	261	65	41	41	9	326

2022									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	97	24	15	15	0	121
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	36	9	6	6	0	44
	Towards Bell Road / Bell Corner	5	0	5	1	1	1	0	7
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	20	5	3	3	0	25
111	Towards Heathrow Central Bus Station	6.5	0	116	29	18	18	0	145
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	275	69	43	43	0	344

2023									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	100	25	16	16	0	125
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	37	9	6	6	0	46
	Towards Bell Road / Bell Corner	5	0	5	1	1	1	0	7
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	20	5	3	3	0	26
111	Towards Heathrow Central Bus Station	6.5	0	119	30	19	19	0	149
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	282	71	44	44	0	353

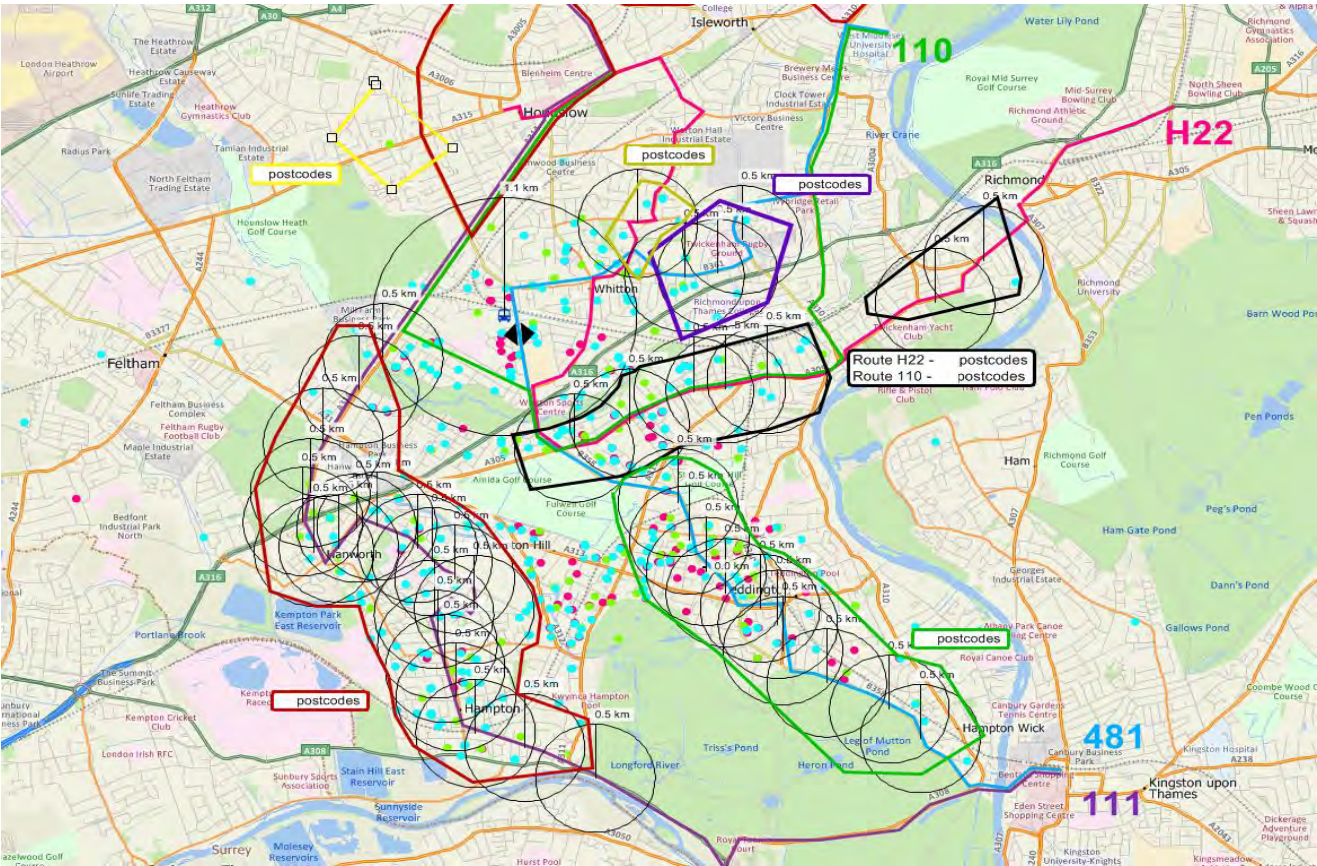
2024									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	105	26	16	16	0	131
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	38	10	6	6	0	48
	Towards Bell Road / Bell Corner	5	0	6	1	1	1	0	7
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	22	5	3	3	0	27
111	Towards Heathrow Central Bus Station	6.5	0	126	31	20	20	0	157
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	297	74	46	46	0	372

2025									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	108	27	17	17	0	135
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	39	10	6	6	0	49
	Towards Bell Road / Bell Corner	5	0	6	1	1	1	0	7
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	22	6	3	3	0	28
111	Towards Heathrow Central Bus Station	6.5	0	129	32	20	20	0	161
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	305	76	48	48	0	381

2026									
Bus routes	Direction	Current Bus Frequency (Buses per Hour)	Additional Bus Passengers Associated With Turing House School						Total Impact on Buses in the Afternoon Hours (15:00-16:00)
			14:30 - 15:00	15:00 - 15:30	15:30 - 16:00	16:00 - 16:30	16:30 - 17:00	17:00 - 17:30	
481	Towards Cromwell Road Bus Station	2	0	110	28	17	17	0	138
	Towards West London Mental Health Trust	2	0	0	0	0	0	0	0
H22	Towards Manor Road	5	0	40	10	6	6	0	50
	Towards Bell Road / Bell Corner	5	0	6	1	1	1	0	7
110	Towards Hounslow Bus Station	3	0	0	0	0	0	0	0
	Towards West Middlesex Hospital	3	0	23	6	4	4	0	28
111	Towards Heathrow Central Bus Station	6.5	0	132	33	21	21	0	165
	Towards Cromwell Road Bus Station	6.5	0	0	0	0	0	0	0
H28	Towards Bulls Bridge Tesco	3	0	1	0	0	0	0	1
	Towards Tesco Osterley	3	0	0	0	0	0	0	0
TOTAL			0	312	78	49	49	0	390







Bus Route	Direction	Postcodes assigned to bus routes	%
481	East of site	16	4.80%
	South of site	112	33.63%
H22	North of site	6	1.80%
	East of site	41	12.31%
110	East of site	23	6.91%
	West of site	0	0.00%
111	North of site	0	0.00%
	South of site	134	40.24%
H28	North-east of site	0	0.00%
	North-west of site	1	0.30%
Total		333	100.00%

Trips were reduced to account for the existing trips to and from Teddington site

The following assumptions were made in the analysis:

.Postcode data of the existing students attending the temporary site and the prospective students that intend to attend the Hampton School site have been analysed to estimate the usage of individual bus routes that directly serve the proposed school site

i .Postcode data for students located within the circa 1km distance from the site was excluded as students from this area will be expected to walk or cycle to the site.

ii .For the purpose of this analysis a 500m radius area (as the crow flies) was used to estimate the bus stops walking catchment area. This is the distance measured in a straight line, which is assumed to be comparable to a bus stop walking distance of 680m that is typically considered in the PTAL assessment.

iv.The bus routes, bus stops and postcode data of the existing students were mapped and where a bus stop serves more than one bus route that provides the same service they were proportionally split across these bus routes according to the frequency of service for each of the routes



Table 1 - Students Mode Share

Mode of travel	Full occupation (2026)	
	%	Students
Car/Motorcycle	0.0%	0
Car Share	1.0%	10
Park and Stride	3.8%	40
Rail	1.3%	13
Public Bus	60.5%	635
Cycle	9.9%	104
Scooter	0.6%	7
Walking	22.9%	241
<b>Total</b>	<b>100.0%</b>	<b>1050</b>

Pilot Survey indicated that 48.8% would use buses once relocated to the permanent site

Public Bus	48.8%	512
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Figure 1 - Additional Pupils Per Bus Route

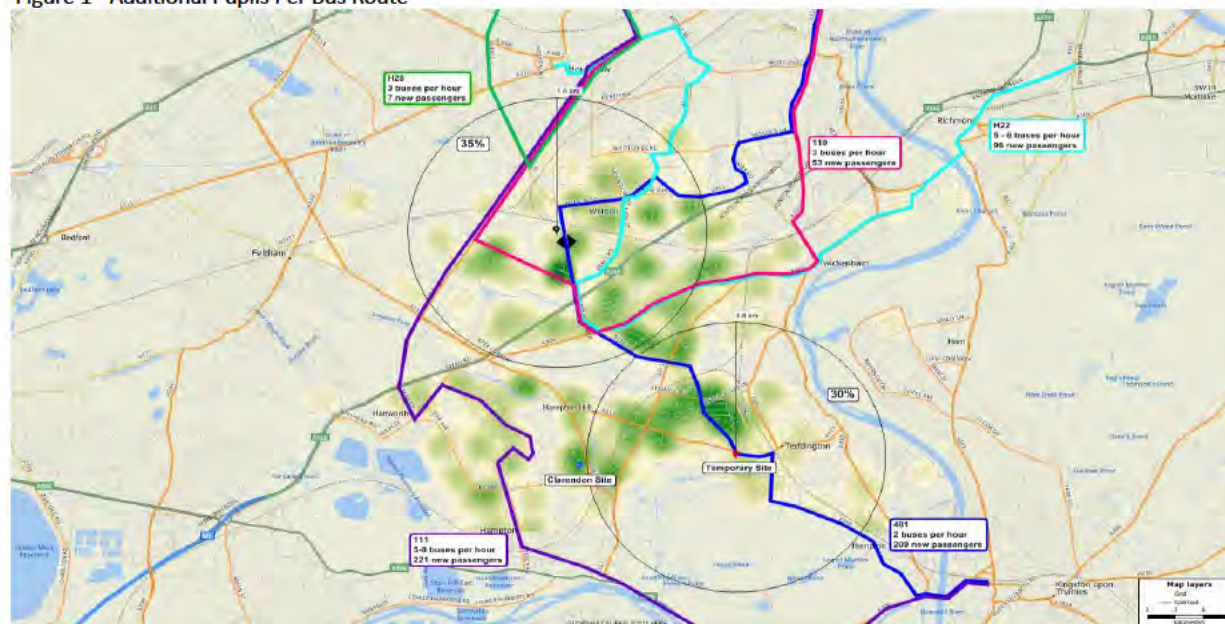


Table 3 - Students Numbers

Year	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Total
2020	150	125	125	100	125	103		728
2021	150	150	125	125	100	125	103	878
2022	150	150	150	125	125	100	125	925
2023	150	150	150	150	125	125	100	950
2024	150	150	150	150	150	125	125	1000
2025	150	150	150	150	150	150	125	1025
2026	150	150	150	150	150	150	150	1050

Table 4 - Students Impact on Bus Routes

Morning Peak

Bus Route	Direction	%	Students impact on bus routes						
			2020	2021	2022	2023	2024	2025	2026
481	East of site	4.8%							25
	South of site	33.6%	119	144	152	156	164	168	172
H22	North of site	1.8%	6	8	8	8	9	9	9
	East of site	12.3%	44	53	56	57	60	62	63
110	East of site	6.9%	25	30	31	32	34	35	35

	West of site	0.0%	0	0	0	0	0	0	0
111	North of site	0.0%	0	0	0	0	0	0	0
	South of site	40.2%	143	172	182	187	196	201	206
H28	North-east of site	0.0%	0	0	0	0	0	0	0
	North-west of site	0.3%	1	1	1	1	1	2	2
Total		100.0%	338	408	430	441	465	476	512

Table 5 - Students Impact on Bus Routes

Afternoon peak

Bus Route	Direction	%	Students impact on bus routes						
			2020	2021	2022	2023	2024	2025	2026
481	East of site	33.6%	96	115	121	125	131	135	138
	South of site	4.8%							
H22	North of site	12.3%	35	42	44	46	48	49	50
	East of site	1.8%	5	6	7	7	7	7	7
110	East of site	0.0%	0	0	0	0	0	0	0
	West of site	6.9%	20	24	25	26	27	28	28
111	North of site	40.2%	114	138	145	149	157	161	165
	South of site	0.0%	0	0	0	0	0	0	0
H28	North-east of site	0.3%	1	1	1	1	1	1	1
	North-west of site	0.0%	0	0	0	0	0	0	0
Total		100.0%	271	326	344	353	372	381	390

Table 6 - Students Impact on Bus Routes

After-school Clubs peak

Bus Route	Direction	%	Students impact on bus routes						
			2020	2021	2022	2023	2024	2025	2026
481	East of site	33.6%	24	29	30	31	33	34	34
	South of site	4.8%							
H22	North of site	12.3%	9	11	11	11	12	12	13
	East of site	1.8%	1	2	2	2	2	2	2
110	East of site	0.0%	0	0	0	0	0	0	0
	West of site	6.9%	5	6	6	6	7	7	7
111	North of site	40.2%	29	34	36	37	39	40	41
	South of site	0.0%	0	0	0	0	0	0	0
H28	North-east of site	0.3%	0	0	0	0	0	0	0
	North-west of site	0.0%	0	0	0	0	0	0	0
Total		100.0%	68	82	86	88	93	95	98



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 May 2019 14:10  
**To:** [REDACTED]  
**Subject:** FW: Turing House School- Bus Contributions Update  
**Attachments:** 4185\_002\_T04\_ Bus Impact Analysis.pdf; Bus Impact Analysis.xlsx

Hi [REDACTED]

Just in case you didn't get sent this.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 May 2019 14:07  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Turing House School- Bus Contributions Update

Dear [REDACTED]

Following the meeting we had on 25 April 2019 when we have discussed the financial contribution towards bus enhancement for Turing House. We have agreed that the next step will be review bus trips estimate with the most recent students' home postcode data. The revised analysis also took into consideration student trips that are currently taking place to and from the two temporary school sites (Teddington site and Hampton site) and that the bus contributions should be estimated based on the net new trips by future students.

We believe that a figure of **£950k** for bus contributions would be more appropriate. We have provided the reasons for this in the attached documents. I would be grateful if you could review and respond accordingly.

Regards  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [REDACTED] <[\[REDACTED\]@richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)>  
**Sent:** 15 May 2019 10:52  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Turing House School- Bus Contributions Update

Thanks [REDACTED],

[REDACTED] – if you could please discuss with the applicant and ask DPP to confirm whether this contribution is agreed.

Thanks,

[REDACTED]

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**From:** [REDACTED]

**Sent:** 15 May 2019 10:49

**To:** [REDACTED] [\[REDACTED\]@richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk) [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** Turing House School- Bus Contributions Update

Dear all,

My colleagues in Buses have got back to me in regards to a updated contribution figure.

When the school is fully occupied, the numbers provided show that we will need to run the following additional services;

Route 111 – run two additional northbound journeys in the morning and two southbound journeys in the afternoon.  
Route 481 – convert service to double deck vehicles and run an additional northbound journey in the morning and southbound in the afternoon.

An additional return journey costs approximately £75k per annum and converting route 481 to double deck operation will cost around £80k per annum. This gives a total annual cost of £305k. We will seek a total of **£1.525 million** over five years.

Our loadings data shows that on route 111 northbound, 240 to 300 people arrive at the bus stop nearest to the school in the 07:30 – 08:00 period (the time the applicant has stated the majority of students will arrive at the school). The increased demand due to the school is 138 – 199 at the same time during this period giving a total of 378 to 499 people. With the additional journeys we would have 6 buses in this period going northbound and so there would be between 63 and 83 people per bus. Without the journeys, there would be between 94 and 124 which is unacceptable.

Route 481 currently has loads of around 35 people travelling north from Hospital Bridge Road in the morning across the 07:20 and 07:50 departures from Kingston. If converted to double deck vehicles, this increases planning capacity from 80 to 150. 130 – 188 new trips are forecast for route 481 in this direction so we propose to run 1 northbound journey in the AM peak, returning south in the afternoon. There would be 55 - 74 passengers per bus, which is acceptable. Without the journey, there would be 82 – 94 per bus which would be unacceptable considering the low frequency of the service. Travelling southbound in the morning and northbound in the afternoon, the uplift in capacity from introducing double decks will be sufficient to handle the forecast demand.

Assuming the network remains as is, routes 110, H22 and H28 should cope with current levels of capacity.

Also, I have received your response to our initial comments. I am on leave from this afternoon but will respond accordingly, early let next week.

Please let me know if you have any further questions.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 July 2019 13:16  
**To:** Mayor  
**Subject:** Turin House School

Good Afternoon,

I strongly object to the ridiculous decision to build this school in Hospital Bridge Road. This Road is gridlocked morning and night already and the massive amount of additional traffic this school will cause would make it impossible to move in the area. They talk of traffic calming schemes, but you only have to look at the area around every other school to see that parents ignore the alternatives and drive their children to school.

This school is specifically for the Teddington catchment area, but proposed to be built in Whitton, when there are better sites available closer to where it's needed.

I suspect it's already a done deal, with cash changing hands, but you have the opportunity to do the right thing, and reject this site.

*Regards*

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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<http://www.youtube.com/user/chrisstock100>

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 29 December 2018 16:08  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor: [REDACTED]; Cllr.MElengorn@richmond.gov.uk  
**Subject:** Object to plan Richmond borough Turing House School 18/3561/FUL

Dear Sadiq Khan, Councillor Martin Elengorn and Richmond planning committee

I wish to register my objections to the planning application for Turing House School 18/3561/FUL within Richmond borough.

I live and work within the borough of Richmond and feel that the location of this school in Hospital Bridge Road will seriously affect the quality of my life and that of other residents within the Whitton area. I will have lived within the borough for 30 years in April 2019 and this is the first time I have felt strongly enough that I have had to write to object to a planning application.

[REDACTED].  
The council and school governors have consistently not listened to the opinions of local residents and I consider that they have also deliberately conducted narrow consultations, especially the traffic reviews at times that are not consistent with school traffic. As I do not live adjacent to the actual property concerned I do not receive details of the planning process or details of how to object and have had to rely on the local residents group and the funding that they have acquired to support our protest.

My main objections are related to the highway safety due to narrow bridge, traffic generation and dangerous access to the area as listed below.

- . The location of the school building on Hospital Bridge Rd adjoining the garden nursery and sharing the road access will place the children in danger at the beginning and end of every school day due to the motor vehicles including lorries making deliveries to both locations.
- . The current access to the garden centre is poor. If you wish to leave the centre and turn left you have to wait for both lanes of traffic to be clear to enable you to swing out around the sharp corner. It is also difficult to see traffic coming over the brow of the hump back bridge.
- . The proposed siting of a pedestrian crossing at the lower rise of the blind hump back bridge at the end of Montrose avenue is ridiculous as this will hamper the vehicle exit from the garden centre even more. Even if cars travel over this bridge at the proposed 20mph they will have little time to assess the situation and safely stop for pedestrians.
- . There is no possibility of widening the bridge over the railway due to the electrical substation, gas pipe line and the properties on the far side of the bridge. Therefore the bridge cannot take a cycle lane as proposed in the plans. The current width of the bridge is such that wider vehicles such as large cars, buses or lorries cannot pass in both directions at the same time.
- . (Does no one within the council have a memory of the previous death of a young cyclist in this area. The bridge on the Nelson Rd part of the railway line is wider with a fenced off pathway due to the death of a young boy cyclist approximately 15 years ago. By trying to make the cyclists use the Hospital Bridge Road bridge as a cycle route you are putting lives at risk again.)
- . The most recent version of plans includes a cycle path through the recreation ground but those traveling from Whitton or Hounslow area will still have to travel over the bridge on Hospital Bridge Road.
- . Traffic on Hospital Bridge Road during the rush hour is already heavy. It can take 20 minutes or more to travel the distance from the bridge to the traffic lights on the A316 between 07.45 and 09.00 during school term times. If you add another school with the need for more buses and parents who will drop off the children this will increase the congestion on this road. At the exhibition held in the Baptist Church all of those in attendance as representatives of the building contractors involved did not live within the borough and when questioned admitted that they had never driven down this road during the rush hour.

This shows how biased the consultation has been up to now, let's hope further traffic reviews will be undertaken during actual school times.

- . Despite this being a secondary school and the consultation stating that children will use public transport we know the current bus links are not sufficient therefore parents will drive children and there is nowhere for them to stop and drop off children without causing a hazard for both other road users and the children.
- . The location of a third secondary school within a distance of 2 miles from each other within the boundaries of Whitton will just deplete numbers at the other schools putting them at risk. The borough population is such that this school is needed in Teddington / Twickenham NOT Whitton / Heathfield area therefore it should be located there.
- . The land is currently designated as Metropolitan Open Land and there are no significant special circumstances that justify over ruling and altering this designation. Changing the use of this land will lead to the loss of openness to adjacent sites.

Maybe the school should be looking for other sites within the borough that are less hazardous due to the traffic risks, there is now the possibility of using the site of the old Greggs bakery in Twickenham as well as previous ones mentioned.




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30 December 2018

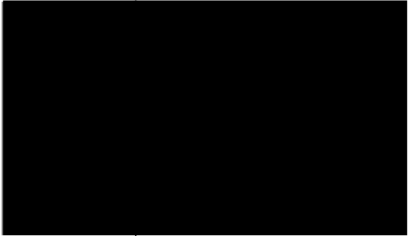
Mr S Khan  
Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Dear Mr Khan,

Please find my response to a request for a Neighbourhood consultation on a proposed new school in the Borough of Richmond upon Thames. I have noted that you are concerned about traffic pollution and was hoping you could intervene in the planning consent. The primary issue is that a new school is being built many miles away from the catchment area it is supporting. This will result in more traffic miles being generated, resulting in more pollution. Children will also be getting less exercise than they would if they walked to a school near their homes which in today's environment is also a major health concern. I understand that the school were offered land nearer the catchment area they support but have refused it. I would also point out that the school and catchment area are on either side of a main arterial route into London (A316) which connects the M3 corridor with Richmond and Hammersmith.

Thank you for taking the time to read this and my response to the planning consent and look forward to hearing that the school will be built closer to the catchment zone it is supporting.

Yours sincerely





30 December 2018

Dear Sir/ Madam,

NEIGHBOUR CONSULTATION Application 18/3561/FUL

Please find my following observations and as a result my concerns over the planning application above. I note that the letter was dated 12 December 2018 with a request for me to respond by 11 January 2019. I have no access to the internet and therefore my access has been via my son's mobile data. Trying to access multiple very long documents on a mobile phone screen has been difficult and stressful. This Christmas, instead of spending quality family time together we have spent the time huddled around a 5inch screen.

Too many of the documents repeat the same data and therefore I believe it has been an attempt to hide pertinent facts in the detail and given my age I believe that this has been a wilful attempt to hope people will give up.

I am primarily objecting to the planning application on five counts. Using your guidance on the notification these are

adequacy of parking/ loading/ turning  
highway safety  
traffic generation  
noise and disturbance from use  
and road access

In summary the decision for the school's location given the catchment area is so far away from the schools location is absolutely ludicrous. Given the distances involved and the size of the school (1050 students and 90 staff) the impact on the local neighbourhood will be severe. There is already a school, Twickenham School, on Percy Road (years 7-11, annual intake 180, which had over 360 applications in 2016). This already stops local residents using the bus services at school opening and closing times despite most of the students living locally.

With respect to traffic I am extremely surprised that the traffic surveys showed the results that they do but I do note that these were cynically done during the summer school holidays when it is known that road traffic is lower. Every weekday morning, I look out onto Hospital Bridge Road between 0715 and 0930 to see standing and queueing traffic. The same occurs every weekday afternoon and evening between 1530 and 1900. I therefore question the validity of the survey data and would welcome an independent survey conducted on behalf of the planning authority at the applicant's expense.



I note in section 4.19 of the Transport assessment that the report writers believe there has been a decline in accidents over the period. I would suggest that given if you took a four year study period that the number of accidents have increased and if over the last three years the number of serious accidents have increased. I therefore conclude that the data set is statistically insignificant with an annual average of 13.2 accidents per year and 14 in 2017.

Section 4.33 v states "no accidents were involved due to speeding" further supporting my assertion that the traffic is slow flowing along the road.

In section 4.34 the report writers highlight the current dangers of pedestrians not using existing facilities to navigate across dangerous roads where traffic moves slowly and motorists are distracted. Motorists are not expecting pedestrians and cyclists to be in the road in inappropriate places. I expect that putting more students in these conditions will cause the accident toll to rise. Further in the section the off-road facilities described are two under road river paths where it is impossible for pedestrians and cyclists to pass, at least the last time I was there. My son who is a cyclist who remembers the river path stated that he would not use it and would stay on Hospital Bridge Road. He also commented that he would expect most cyclists to do the same.

In section 4.36 the report writers refer to two dates which I have already commented upon. However, they also mention the availability of on street parking. I was not with them but that is different to my observations when I walk to Whitton. I suggest that the planning committee take the time to visit the proposed site at the opening and closing times of the site to view the free flowing, empty streets where on street parking is readily available. I think that the planning committee might be surprised at what they see.

I have looked at sections 4.42 to 4.58 and wish that the data was actually presented in a format that a pensioner could actually understand.

I note in Sections 6.32 and 6.33 that the report writers have discounted a controlled crossing because of excessive numbers of students queuing on the pavement and the temptation to cross the road whilst on a red crossing symbol. The alternative of a zebra crossing will mean that for long periods of time there will be no traffic flow because the students will be crossing in dribs and drabs resulting in possible incidents as students sprint across the zebra crossing to catch up with their mates. I expect there to be significant issues with a zebra crossing and vehicles. I note that at Twickenham school that the students use the traffic light controlled crossing at the junction of Percy Road, Powder Mill Lane and Hospital Bridge Road and the report recognises that this is not an issue from an accident perspective. My conclusion is that the applicant does not want to fund the provision of a safe crossing for their students.

I would also like to cross refer table 7.13 with table 5.14 and note that despite saying that the schools are representative you are expecting bus usage to increase from 32% (representative schools) to 50% Turing and cycling to go from 10 to 20%. In reality you have taken circa three to five thousand students and expect to change behaviour in your one thousand students to double cycle usage and increase bus usage by 50%. I am afraid that I



do not believe it and expect those who cannot walk (80%) to mainly use cars in one form or another.

I note the optimism in the school transport plan that half the students will use the bus, however I am already aware that the buses are already unusable for local residents due to the existing bus usage for Twickenham School.

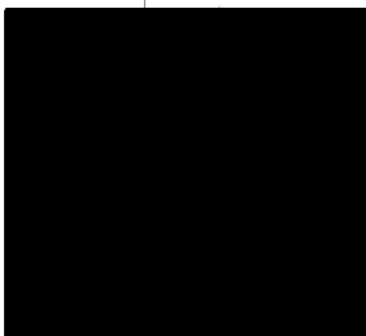
In section 5.2 of that plan I note that twenty per cent of the existing pupils, who also want a new school, indicated that they would be prepared to cycle. I am surprised therefore that the school is only proposing to have four showers available, two each for pupils and teachers, although you are expecting 200 children to arrive by bicycle, if you extrapolate the data presented. I therefore conclude that you do not believe your own data or are therefore expecting children to arrive and stay in the clothes that they cycled to school in. I would respectfully suggest that it is unlikely that they will be properly attired for the journey, this will result in yet more accidents as they will not be as visible as they should be. I would also look at the current island refuges along Hospital Bridge Road as I expect that these will cause additional choke points along the cycle route creating more opportunities for collisions between cars and students.

I also note that the intention for Turing school to exit within 5 minutes of Twickenham School leaving meaning that there is likely to be around two thousand students exiting in the local area at approximately the same time.

Finally in a time where local government is trying to reduce the impact of traffic on the environment I am surprised that the school location and catchment area are so far apart. I already have issues with traffic pollution on my property and I cannot see how the approval of Turing school in it's current proposed location is going to improve that situation

Thank you for taking the time to read this response to the planning consent and look forward to hearing that the school will be built closer to the catchment zone it is supporting.

Yours faithfully



FAO: Mayor Sadiq Khan

Land at Hospital Bridge Road, Twickenham TW2 6LH: 18/3561/FUL

We want to draw your attention to our concerns about the proposed development on Hospital Bridge Road. If approved, this development will cause unnecessary and permanent harm to MOL and our community.

We ask for your support in implementing GLA planning policies and rejecting this proposal.

**Permanent and catastrophic impact on the environment**

1. Our community will lose Metropolitan Open Land and the benefits this brings; biodiversity, better air quality and a slice of rural environment to promote health and well-being for local residents.
2. There are alternative sites the school can use, such as Clarendon site the school currently occupies.
3. The plans will have an overbearing visual impact; a huge, factory-like mass, out of keeping with the area and visible from all directions replacing the current open vista.

**Increased pollution and dangerous roads**

1. Turing House School on HBR will be a long way from the point of identified need which will increase traffic movements and pollution. This is in conflict with LBRuT Local Plan Sustainability Objectives as set out in Appendix 1, numbers 2, 3, 6, 7, 8 and 11, as well as GLA policies on sustainability
2. The increase in pollution in an area of poor air quality will further damage the health and well-being of residents of Heathfield Ward further, particularly the young, elderly and the vulnerable.
3. The increased traffic will lead to further problems in a heavily congested area at school run times with six schools in close proximity to the site; Bishop Perrin, Heathfield, Twickenham, Heathland, St Edmunds and Nelson.
4. The access point is highly dangerous, in close proximity to a narrow, hump-backed railway bridge.
5. Richmond Cycling Campaign has commented in detail that the cycle route is unsafe for adolescents.
6. Cost of transport is high; approximately eighteen extra buses needed to carry pupils to and from school.

**Unnecessary public expenditure**

1. There is evidence that primary school rolls in Richmond are starting to fall with local schools reducing capacity. Local senior schools Twickenham and Springwest have 500 vacancies each. The headteacher of The Heathland school states in his objection that there are sufficient secondary school places in this area to meet demand for the next ten years.
2. The plan proposes a large sixth form capacity of 300, whilst Teddington School sixth form is currently undersubscribed and Twickenham School sixth form is closed.
3. The 'Very Special Circumstances' to permit building on MOL are not proven. There is sufficient capacity in local schools, and the sequential site search conducted by the developer demonstrates neither due diligence nor an exhaustive search in seeking alternative sites.

**Community facilities are not needed**

1. Within 1km of the proposed development there are: Whitton Sports Centre, Whitton Community Centre, Whitton Youth Zone, 2<sup>nd</sup> and 3<sup>rd</sup> Whitton scout huts, 4 school halls, 3 church halls, Homelink all providing high quality community facilities. The community facilities the school would provide are not needed and do not represent the very special circumstances needed to justify the permanent loss of MOL.

You will see from the very large numbers of local residents who have submitted detailed objections to this development that there is a groundswell of very strong feeling about building this school in our community.

We recognise the children of Turing House School need a suitable school on the right site. However, a school needs to be part of its community; Turing House community is far away from Heathfield.



## WHAT IS THIS CAMPAIGN ABOUT?

To **stop Turing House School** being built on our Metropolitan Open Land (MOL) at Hospital Bridge Road.

Many residents are in strong opposition to this plan.

A group of us have come together to encourage the Government and the school to build nearer the admissions point in Teddington for reasons on the right.

### WHY?

"It is MOL"

"Dangerous access"

"More traffic congestion"

"Increased pollution"

"Questionable demand"

"Impact on existing habitat"

### VALID PLANNING OBJECTIONS

No 'very special circumstances' to justify the loss of MOL

Loss of trees

Highway safety

Bridge too narrow

Impact on parking

Traffic generation

Dangerous access

Adequacy of parking/loading/turning

Noise and disturbance from use

Overlooking/loss of privacy

Loss of light or overshadowing

Layout and density of building

Design quality

Impact on biodiversity

Impact on recreation ground



**Deadline**  
**11th Jan 2019**



facebook.com/hbragg



hbrresidentsactiongroup@gmail.com



@hbragg

### YES! I oppose this planning application WHAT DO I NEED TO DO?

**1. DISPLAY** this window poster

**2. VIEW** the plans at  
richmond.gov.uk/planning using reference  
no **18/3561/FUL**

**3. OBJECT** to the plans, stating valid  
reasons (listed on the left)

#### Email:

planning@richmond.gov.uk

#### Write to:

LBRUT, Planning Department, Civic Centre  
44 York Street, Twickenham, TW1 3BZ

**Make sure you quote ref number:**  
**18/3561/FUL and your address!**

#### Write/Email the Mayor:

Mayor of London  
Planning department  
City Hall, The Queen's Walk  
London SE1 2AA  
mayor@london.gov.uk



22 JULY 19

KC

HOUSE OF COMMONS

LONDON SW1A 0AA

Rt Hon Sadiq Khan  
Mayor of London  
GLA  
City Hall  
The Queen's Walk  
LONDON SE1 2AA

19<sup>th</sup> July 2019

Dear

*Sadiq*

**Land West of Hospital Bridge Road, Whitton, GLA 4739, LPA 18/3561/FUL**

I have been approached by councillors in my constituency, who are very concerned about a planning application to build on Metropolitan Open Land (MOL) in their wards which is about to be referred back to you for a Stage 2 decision. They believe that there are some serious flaws with this application that were not adequately addressed by Richmond Council officers, both in their report and at last week's planning meeting. I would be grateful if you could give careful consideration to - what seem to me - serious concerns.

To put this in context, the wards in question, Whitton and Heathfield, have significant areas of social deprivation, with some of the lowest amount of green space and highest levels of air pollution in the Borough, so to lose this valuable piece of MOL would be detrimental to the area.

The Very Special Circumstances (VSC) that have been presented as justification for this loss of MOL is the need for secondary school places in Richmond. Turing House School, which would be relocating to this site, is an excellent and much needed school, whose development I have strongly supported, and this is not a debate about its merits. However, it is of vital importance to find the right site and there have been serious misgivings for some years now that the MOL on Hospital Bridge Road is simply not suitable and there are other potential sites which, while not free of planning protections, have not been adequately explored. The subsequent application and officers' report have not assuaged those concerns or, it is being suggested, considered the alternatives properly.

It is being put to me that the apparent urgent need for school places may have led to officers and Members under-estimating the serious objections being raised by residents and councillors, and what appear to be other options being dismissed. I am told that currently Turing House is more than adequately providing the needed places albeit with some logistical challenges at their current temporary sites. If this is the case it seems reasonable to believe that they can continue to manage whilst other options are considered in more depth.

Again, I am told much was made at the meeting of the argument that, despite this site being unsuitable for the School, the application must be approved as there are simply no other sites. However, I too share the concerns raised in your Stage 1 response, that the case put forward

Please respond to:

Rt Hon Sir Vince Cable MP  
49 Church Lane | Teddington | TW11 8PA  
Telephone: 020 8977 0606  
Email: vince.cable.mp@parliament.uk

Continued Over/...





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Rt Hon Sadiq Khan  
19<sup>th</sup> July 2019

by the applicant does not sufficiently demonstrate VSC to outweigh harm, specifically in regard to alternative sites and community use.

A suggestion was raised at the planning meeting about the removal of the yet unopened sixth form as a way of possibly bringing other sites back into play. Unfortunately, planning officers did not agree even though they admitted that a new application for a smaller 750 pupil (11-16yrs only) school would require the sequential testing to be re-done. This could result in one of the previously rejected sites becoming sequentially preferable and, therefore, should be properly investigated before permission to build on this site is given.

However, even if new sequential testing for a smaller school concluded that this is still the only site, the new plans would not only significantly reduce the impact on the environment and infrastructure but could help reduce the MOL footprint, including making possible the moving of the MUGA (Multi Use Games Area) as detailed in the Stage 1 response.

I am aware that the School was approved as an 11-19 years school, but there is no clear demand in the Borough for more post-16 places and there has been a change in DfE policy towards the approval of school sixth forms. I understand planning officers told the meeting that this reducing of the age range was not an option as it was not something the School wanted to do. Whether an applicant's desire to have the space needed to house these additional 300 students should override legitimate planning concerns is at the heart of the ongoing concerns as to whether the development should proceed.

In fact, I wrote to the School back in February suggesting they should look at some sort of complementary relationship with Twickenham School which is a few hundred yards from the site in question. In particular it would make sense for the two schools to merge their sixth forms and locate it at Twickenham School whose current post-16 capacity is mothballed due to a lack of students. Recently two other schools in this borough have successfully done this and this sensible compromise could allay many of the concerns this application raises.

There are some further misgivings. One is the possibility that the specific location of this particular site would, due to shrinking catchments in the long term, not even meet the need in the wards for whom the School was originally opened thus weakening the Very Special Circumstances that are required to justify the loss of this particular MOL.

There are also the Stage 1 concerns that were raised with regards to the details of community use which is important in order to outweigh harm to the MOL. For example, details of the Community Use agreement, despite the Stage 1 requests for them to be advised, are still only indicative and are not secured by a legal agreement. However, the limited information available would not indicate the significant additional public benefits referred to in the report. The limited weekday hours offered by the School on land that cannot have floodlights, renders 97% of the sporting square footage offered unusable for approximately 10 months of the year and school holiday hours are only suitable for those who don't work. The only time being offered for these outdoor facilities, that is suitable for all residents throughout the year, is 4 hours on a Saturday.

Continued Over/...



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19<sup>th</sup> July 2019

The Council report believes that VSC has been demonstrated through: robust sequential assessment; minimising of impact on the MOL; 1050 essential school places; and significant public benefits. Again, it is being put to me, based on the above evidence, that there are question marks about each of these.

The application appears to also raise additional concerns including:

- Safety issues at the school entrance not addressed, including a lack of details with regards to the required changes to the highway layout. Of particular concern are the HGV movements in and out of the neighbouring horticultural nursery. An apparent wholly inadequate officer suggestion that should a mutually suitable agreement not be reached with this 3rd party, the mitigation would be school staff standing outside directing traffic.
- Mostly unaddressed safety concerns regarding the hump back bridge on the approach to the School. Further compounded by what appear to be unrealistically low numbers of students projected to use this route. A lack of recognition of the financial costs and time it would take to make this bridge fit for purpose, including clarity on who would pay for this.
- Necessary increase in public transport not finalised and a concerning drop in provision being proposed compared to the TFL recommendations dated January 2019. In addition, questionable reliance on the 111 bus route which, based on current intake, may not be used as much as projected.
- Concerns regarding the suitability of the cycle routes for teenagers that were raised by specialist organisations not fully addressed.
- Willingness to accept that reduced government funding is a reason for allowing a BREEAM (Building Research Establishment Environmental Assessment Method) very good standard, despite funding being made available for new school builds in other parts of the country to be built to excellent or higher.
- Lack of insistence for the development to be carbon neutral.

Finally, given the complexity of this issue and the ward councillors' considerable knowledge of the area and its residents, I wondered if it might be beneficial to all concerned for them to be able to meet with the GLA to discuss this application prior to a decision being made? If this is a possibility, I would be grateful if you could let me know and I will arrange for one of them to contact your office promptly.

Please do not hesitate to contact me should you require any further information.

Yours sincerely

**RT HON SIR VINCE CABLE MP**  
**MP for Twickenham**

cc Heathfield and Whitton Councillors

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 04 January 2019 14:30  
**To:** Mayor  
**Subject:** PROPOSED TURING HOUSE SCHOOL

We would like to object to the proposed building of Turing House School on Metropolitan Open Land, access being from Hospital Bridge Road, Whitton, Borough of Richmond upon Thames.

There are several reasons to justify the objection:

Bridge too narrow

Dangerous access

Parking problems in an already crowded area

Increased pollution

There are already 5 large schools in the nearby vicinity. The traffic congestion on narrow roads as parents take/collect children to/from school morning and afternoon is already a problem and another school will simply compound the issue. The whole scheme is just not viable, and it is a great worry to nearby residents.

We look forward to hearing from you.

Yours, [REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 28 December 2018 15:29  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor  
**Subject:** Ref. 18/3561/FUL - Plans to build Turing House School, Hospital Bridge Road, Twickenham TW2

Dear Sir / Madam,

As a resident, I strongly object to the plans and I state the reasons here below:

Loss of trees  
Highway safety  
Bridge too narrow  
Impact on parking  
Traffic generation  
Dangerous access  
Adequacy of parking /loading/turning  
Noise and disturbance from use  
Overlooking / loss of privacy  
Loss of light or overshadowing  
Layout and density of building  
Design quality  
Impact on biodiversity  
Impact on recreation ground

Also, as you know, this area gets particularly congested during rugby matches as it is. Why make things worse for us residents?

Hope you reconsider.

Many thanks and regards,

[REDACTED]

Sent from my iPad

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 January 2019 21:25  
**To:** Mayor  
**Subject:** Planning application 18/3561/FUL

Dear Sadiq Khan

Re Planning application -18/3561/FUL

I object strongly to this application.

LBRUT wish to build a secondary school  
for Teddington school children on an open  
green field (MOL) in Whitton.

Whitton is several miles from Teddington.

Traffic congestion on to the 316 at rush hour  
is already very bad. It would just become a nightmare.

Hospital Bridge Road has a very narrow  
railway bridge on it just near where the  
school be.

If there has to be a new school in Whitton (for Whitton children) why not  
buy ready-made Kneller Hall - which the  
army is selling off!

[REDACTED]

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(for and on behalf of Hospital Bridge Road Resident Action Group)

Ref: LAND AT HOSPITAL BRIDGE ROAD, TWICKENHAM TW2 6LH - PLANNING APPLICATION 18/3561/FUL:

To: Sadiq Khan, Cllr Gareth Roberts, Cllr John Coombs, Cllr Michael Wilson, Cllr Lesley Pollesche, Cllr Jo Humphreys, Cllr Liz Jaeger, Cllr Rob O'Carroll,

We note on reading the GLA stage 1 report for the above planning application you have stated the site is accessible for cyclists which is the case from Heathfield Recreation Ground. No cycling routes to the school or the safety of the school entrance seem to have been examined which may be normal for a stage 1 report. Could you confirm if this is the case and if not, then when the routes and entrance safety will be examined.

We ask this question as residents and Richmond Cycling Campaign are very worried about the developers CERS, suggested cycle routes and school entrance.

Richmond Cycling Campaign (RCC) has declared much of the cycling route totally inappropriate for adolescents. The community and RCC are shocked at the school and developer's suggestion that adolescents are safe to cycle up roads with more than 500vph, and use of underpasses that are only 1metre wide.

The reason the developer may have suggested the cycle routes are safe may be based on their CERS, strangely enough conducted during school holidays on 9<sup>th</sup> August 2018. As mentioned, the schools were on holiday and so traffic was far from normal during school runs. The date the developer's chose to conduct the CERS doesn't make sense especially as the developer's planning application is for a school. We agree with the developer that during school holidays the roads are comfortable and safe to cycle on, but we disagree that the roads will be 'safe' for children to use during school hours and illustrate our reasons with images below of Hospital Bridge Road during a normal school day.



Image 1: Hospital Bridge Road north of Whitton Corner at 08:15am.

Image 1 demonstrates queues southwards trailing over 450m long. Cars are parked all along the road and over 470vph traveling northwards. Over 800vph in total on the road. The vph count is taken from the developer's measurements just at the proposed school entrance. There are more vehicles on the road which turn off before getting to the proposed school entrance.



Image 2 - Hospital Bridge Road south of Whitton corner at 08:15am

The Mayors Cycling Action Plan states:

*The design of new cycle routes should only mix people cycling with motorised traffic where there are fewer than 500 motor vehicles per hour (vph) at peak times, and preferably fewer.*

Hospital Bridge Road is totally inappropriate for cyclists when they are actually expected to use this route.



Image 3: Crane Park Underpass

The school and developer suggest that the children should use the off-road underpasses in Crane Park. The underpasses are only 1m wide so can only be used one way. The school suggest at least 50 children will cycle along the underpasses which mean one every 36 seconds during the 30-minute school opening time. This will cause a significant impact to the current users of the park.

The developer has offered no improvements to cycle routes in contradiction to the London plan policy 6.9.



If the school goes ahead then we would like to suggest that a safe cycle route to the school is implemented as outlined below.

The narrowness of the underpasses needs to be solved by a wider track suspended over the river Crane.

Hospital Bridge Road could be avoided by creating an off-road cycle path on the corner of Crane Park Road connecting to Wood Lawn Crescent. There is plenty of room for this route. Cycle signage needs installing in the Wood Lawn Estate to direct cyclists up the quieter Waverley, Ellerman and Lyndhurst avenues and so avoiding Powdermill Lane (which is also heavily congested at school run time). These cyclists can then avoid the dangerous school entrance on Hospital Bridge Road and enter the school via Heathfield recreation ground.

See below room to create an off-road cycle route from Crane Park Road to Woodlawn Crescent.



There are other issues with the suggested cycle routes which are outlined in community objections. We have only highlighted two of the issues. Could we ask for your help in ensuring the cycle routes and school entrances are made safe for these young cyclists if the development goes ahead.

Yours Sincerely

██████████ for and behalf of HBR-RAG

**From:** HBR-RAG [REDACTED]  
**Sent:** 26 July 2019 16:46  
**To:** [REDACTED]  
**Cc:** Mayor  
**Subject:** Fwd: GLA/4739/01 - LPA 18/3561/FUL  
**Attachments:** Mayor flyer .pdf; Mayor letters.pdf

Hi [REDACTED]

In addition to this email can you please let us know what the process is for the Mayor to review this application. So which officials provide advice and what the timescales are.

We are very concerned that the Council's decision is flawed and want to make sure that all the officers who review this application are aware of the reasons upon which we believe this to be. Here is a list of what the officers did not consider:

**Points the officers should have covered but did not:**

**GLA Requested**

- Why sites in Hounslow can't be used. Officers stated that there was no response from Hounslow Council regarding sites and this was used as a reason to reject all sites in that borough
- Verified images of the building. Request was for an image of the four storey school
- Community use. This is severely limited as floodlights can't be installed as it would impact on the 'dark corridor'
- MUGA needs to be moved out of wider area of MOL
- Use of render not acceptable
- Fire evacuation lift must be provided
- Needs to meet Breem 'excellent' rather than very good
- Parking reduced to London Plan levels. Parking is being provided for 50% of the staff

**TFL Requested**

- Traffic island altered at a key junction opposite the school to stop it becoming a drop off zone. (paragraph 160 of officers report).

**LBRUT Pre Planning**

- Need for sixth form places needs to be proven
- Required net ecological gains not demonstrated so far
- Requested Great Crested Newt survey, but the one carried out did not follow Natural England's standard advice
- Natural Vegetation Classification Survey
- Requested staggered start times / registration for pupils - this was refused by the applicant.
- No use of Heathfield Rec access point during hours of darkness - this has been rejected and it will be in used between 7am and 5pm.
- Requested information on why split sites are not feasible - AfC supplied a very generic answer that does not explain why many schools in the UK operate as lower and upper schools.

**Council Ecologist**

- Concerns about close boarded fence in front of hedge (paragraph 218)
- Concerns over car-park lighting intruding into SINC

**Other reasons why this application needs to be closely scrutinised**

1. **Pre-Determined site search** <https://images.richmond.gov.uk/iam/IAMCache/2878752/2878752.pdf>

Planning officers adopted an overly technical approach looking at MOL sites with the least designations knowing that MOL on Hospital Bridge Road (HBR) would be chosen. No balancing/scoring exercise carried out.

1a. Robustness in discounting the following sites:



Waldegrave Rd, Udney Park, Cassel Hospital

1b. There is no demand for the large 6<sup>th</sup> form the school have planned. In the local area two schools have closed their 6<sup>th</sup> form due to lack of demand and of the rest only one is full. The lack of demand is recognised by LBRuT, Heathland's school (1km from HBR location) and SWLEN. A smaller site can be found if the school did not include a 6<sup>th</sup> form.

2. **Pupil Safety:** uncontrolled crossing is to be sited on a blind humped back bridge 58 m from the summit. HGVs in low visibility or wet conditions do not have enough stopping distance at 20-30mph, similarly cars having to suddenly stop before the crossing. Access to the school will be shared with HGVs with no controls. Site access and road safety are being dealt with by condition  
*(the width of the extended entrance will mean that 10 meter long trucks (ie bin lorries) are still likely to mount the pavement. The long HGVs that will share the same access are up to 18 meters long and will continue to mount pavements).*

3. **Cycle Safety:** teenage cyclists expected to use a road which has 800+vph. Richmond cycling campaign's stated the cycle route is not safe for adults let alone kids. Developers have refused to pay for cycle tracks. Richmond Cycling Campaign deem is unfit for adolescents.

<https://images.richmond.gov.uk/iam/IAMCache/2878747/2878747.pdf>

<https://images.richmond.gov.uk/iam/IAMCache/2871110/2871110.pdf>

4. **Poor public transport links:** school location is over 2km from the school's 80% catchment point they estimate 61% of pupils will need to be transported by bus (650 approx). TFL wanted £2.2m from the school for bus routes and this was negotiated down without comment resulting in a shortfall of just over £1mill.<https://images.richmond.gov.uk/iam/IAMCache/2968069/2968069.pdf>

5. **High NO2 levels:** EU limits for Nitrogen Dioxide are being exceeded and have been for the past 6 years at the roadside, at the nearest monitoring station. (Paragraph 243 of officers report)

6. **Over development of MOL:** this represents an over development of MOL and permanent loss of green space. Removing or reducing the 6<sup>th</sup> form will mean the school can be located on other non-MOL sites within their catchment area.

7. **Policy 7.23 of the London Plan, burial spaces not addressed:** the Bridge Farm Nursery is part of Borough Cemetery which was Hounslow's largest cemetery. It will shrink from 32 acres to 9 acres if this development goes ahead (as they are also removing the burial designation from the remaining landscapers / garden centre / land added to Heathfield Recreation Ground).

Hounslow borough planning department

<https://images.richmond.gov.uk/iam/IAMCache/2971356/2971356.pdf>

8. **EQUALITY IMPACT:** not looked at - predominately white middle class school in less affluent racially mixed area. Unfair admissions.

Look forward to hearing back from you in due course,

██████████ on behalf of

HBR-RAG

Hospital Bridge Road Resident Action Group

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----- Forwarded message -----

From: **HBR-RAG** <[hbr-rag@hbr.org](mailto:hbr-rag@hbr.org)>

Date: Mon, Jul 22, 2019 at 7:40 PM

Subject: GLA/4739/01 - LPA 18/3561/FUL

To: [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk), Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)>

Dear [REDACTED]

The Mayor's office will have received all the documents for this controversial planning application today.

The Mayor needs to look at this application very carefully for the reasons below (not exhaustive):

- Questionable VSC demonstrated to build on MOL.
- Serious concerns about the robustness of the sequential site search
- No environmental impact assessment done, despite the authority declining its first application
- Child safety due to the proposed dangerous school access which is to be shared with HGVs! Safety concerns further compounded by the proposal to place a pedestrian crossing at the base of and unsafe, blind hump backed bridge
- Inadequate transport links to the site, transportation plan is not sufficient
- School is primarily for pupils in a wealthier part of the borough (a cursory 20% admissions has been offered for children local to the site) who are currently doing very well at their temporary sites, and the council want to site it in one of the poorest wards of Richmond Borough. The loss of MOL will further exacerbate the already high incidence of respiratory disease (highest in the borough) that exists in the ward where the proposed site it

**Attached**

1. 50 letters from residents, collected over a period of 1.5 hours
2. Summary of key reasons why the Mayor needs to look at this controversial planning application very carefully.

Kind Regards

HBR-RAG

Hospital Bridge Road Resident Action Group

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 January 2019 14:03  
**To:** Mayor  
**Subject:** Planning for new school at Twickenham.

**Planning application 18/3561/FUL Richmond Council.**

Mayor of London.

The above planning application is for the building of Turing House academy school for 1100 pupils at Hospital Bridge Road, Whitton, Twickenham. The academy is a Teddington school with 80% intake from Teddington area. There is apparently no suitable site in Teddington. If the application is successful this would mean about 800 children travelling over 3 miles each way on already overcrowded roads with other issues of road safety and parking issues for staff. This would be a most unsuitable site. There would be little benefits for local people who would have a large school located in a high density residential area. **The whole scheme would generate much pollution with 800 children travelling 3 miles each way.**

Regards [REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 29 December 2018 14:27  
**To:** Mayor  
**Subject:** Objections to Stop Turing House School being built

Ref: 18/3561/FUL

Dear Mr Mayor,

I have lived in the area for 51years,  
I object to the building of the school because of the impact it will have on the community and residents, highway safety, causing more traffic congestion which is already extremely busy due to three other schools already in the area. It will also cause parking problems.

I feel the sensible and logical thing to do would be to build the school nearer to Teddington as the layout of the building will impact on the recreation ground and cemetery including dangerous access to the building.

[REDACTED]

Sent from my iPhone  
Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 03 January 2019 11:13  
**To:** Mayor  
**Subject:** Ref. number 18/3561/FUL - TURING HOIUSE SCHOOL

Please note that I object to the Turing House School being built on our Metropolitan Open Land because: -

- Increased Pollution: from an already polluted area surrounding Heathrow Airport.
- Traffic Generation: not only adding to pollution but to increased traffic on our already overused roads.
- Highway Safety:
- Impact on biodiversity:
- Adequacy of parking/loading/turning.

Regards

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 10 January 2019 12:33  
**To:** Mayor  
**Subject:** Richmond Borough resident - Objection to planning application 18/3561/FUL Turing House School

Good Afternoon,

I am writing to object to the planning application relating to Turing House School, under the above application reference being considered by Richmond Council.

I am objecting to this application on a number of grounds, as follows:

**Infrastructure** - I am fearful that the increase in traffic (from students coming from a different town) will have a significant impact on local residents, the increase in traffic will be dangerous for the students; especially due to the narrow bridge next to the proposed site and unsafe access to the site. I am also concerned at the impact on residents in relation to parking during school run times.

**Environment** - I am concerned that the loss of MOL is not justified and the impact on the environment in relation to the loss of trees; increased traffic and, therefore, pollution; increased noise; impact on the local recreation ground and the biodiversity of these green spaces, will be great.

**Local residents have repeatedly raised their objections to this application and, it appears, our legitimate concerns are being ignored.**

This matter is reminiscent of the travesty that was the planning application for the development of Twickenham Station that was conducted against the local residents wishes.

I request that my views are taken into consideration by the Mayor's Planning Department and relevant action taken with reference to the numerous resident's objections .

My details are below:

[REDACTED]

Regards,

[REDACTED]

---

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**From:** [REDACTED]  
**Sent:** 10 January 2019 13:57  
**To:** planning@richmond.gov.uk; Mayor  
**Cc:** hbrresidentactiongroup@gmail.com  
**Subject:** Planning Objection - Turing School(18/3561/FUL) Hospital Bridge Road

To whom it may concern,

I am writing to object to the building of Turing House School on metropolitan open land off Hospital Bridge Road. I am objecting for the following reasons;

Increased Traffic Generation

There is currently only one bus that runs to this location (the 481), given the catchment area (for the school) is not in the local area it means that students will have to commute generating extra traffic especially 7.30 – 9am & 3.00pm – 5pm. This will be on top of the traffic already generated by the 5 schools within half a mile (Twickenham Academy, Heathlands, Nelson, St Edmunds & Bishop Perrin). Traffic is regularly backed up at both ends of Hospital Bridge Road and this causes problems for residents trying to exit adjoining roads. My own road Vincam Close is affected by this and by people parking illegally / badly on the corners (reducing visibility) and this will likely increase with the proximity of the school and parents using Vincam Close as a drop off point. This will also increase the air pollution caused by traffic.

There is also the concern over the very narrow bridge at the Nelson Road end of Hospital Bridge Road. Currently the pedestrian pathway is just wide enough for a single buggy or wheelchair and given the additional pedestrian pressure this could mean people (especially young people) walking the wrong side of the safety barrier.

The bridge roadway is also very narrow which means that there is not enough room to pass cyclists when there is oncoming traffic, cyclists can be hidden by the brow of the bridge and are at risk from, particularly, speeding drivers. There is a likelihood the school will bring an increase in the number of cyclists and these will be of particular risk on this bridge.

The entrance to the school will be at the bottom of the bridge and opposite the junction of Montrose Avenue, it will not be visible to drivers approaching from the Nelson Road end until they are on top of the hill. There will be the potential for road casualties as students enter and leave the school (particularly as those wanting to use the bridge will need to cross the road to access the pedestrian route).

The school will undoubtedly bring more issues with regards to the limited parking in the area (exasperated by a school opposite).

The construction of the school will increase congestion and will cause problems with large vehicles only able to access the site from one way (avoiding the narrow bridge).

Loss of Metropolitan Open Land

Once this has gone it can never be replaced. The borough is known for its green open spaces which contribute to the wellbeing of its residents and to that of the environment. It provides home for wildlife and the trees help combat pollution (a particular problem in this area particularly given the proximity of the airport). The borough has a number of brown field sites that could and should be developed rather than this open land.

Height / Size of the building

This will not be similar to other buildings in the surrounding area and will mean a loss of sunlight and outlook for some residents as well as negatively changing the character of the local area.

Yours sincerely,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 January 2019 15:09  
**To:** Mayor  
**Subject:** FW: FW: Objection to Planning application Proposed Turing School.  
**Attachments:** FW: Objection to Planning application Proposed Turing School.

---

**From:** postmaster@outlook.com <postmaster@outlook.com>

**Sent:** 04 January 2019 15:02

**To:** mayor@london.co.uk

**Subject:** Undeliverable: FW: Objection to Planning application Proposed Turing School.

**Delivery has failed to these recipients or groups:**

[mayor@london.co.uk](mailto:mayor@london.co.uk) ([mayor@london.co.uk](mailto:mayor@london.co.uk))

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Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that it appears that their domain isn't properly registered at their domain registrar. Give them the error details shown below. It's likely that the recipient's email admin is the only one who can fix this problem.

For more information and tips to fix this issue see this article:

<https://go.microsoft.com/fwlink/?LinkId=389361>.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 10:44  
**To:** Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk; Mayor;  
info@vincentcable.org.uk; contactholmember@parliament.uk;  
admin@russelleducationtrust.org.uk; Cllr.GElliot@richmond.gov.uk;  
Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk; Cllr.AButler@richmond.gov.uk  
**Subject:** FW: Objection to Turing House School building plans in Whitton rather than Teddington - REF 18/3561/FUL

Sent from Samsung tablet.

**To:** Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk; mayor@london.gov.uk;  
info@vincentcable.org.uk; contactholmember@parliament.uk; admin@russelleducationtrust.org.uk;  
Cllr.GElliot@richmond.gov.uk; Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk;  
Cllr.AButler@richmond.gov.uk

**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF 18/3561/FUL

Hello there,

My family and I live in Whitton and are **strongly opposed to Turing House School being built on an MOL site in Whitton**. The community is in disbelief that a school should be built in Whitton for children predominately in the Teddington catchment area (80% places to Teddington, 20% to Whitton) and for all the reasons stated below.

We very much hope that you listen to the people and stop this ill-thought out idea.

Yours sincerely,

[REDACTED]

Below are some pointers of what to include in your objection. Some maybe new to you as people have contributed them recently.

#### DESIGN

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

#### ROAD SAFETY

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact

- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

#### ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport
- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it
- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens

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[REDACTED]

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**From:** HBR-RAG <hbrresidentactiongroup@gmail.com>  
**Sent:** 28 January 2019 22:11  
**To:** Mayor  
**Subject:** Re: MGLA121118-7484 Re: MGLA011018-4053 Re: MGLA070818-9592 - Response from the City Hall

Dear Sadiq Khan,

We are writing to ask if you would like to meet with the Hospital Road Action Resident Action Group who have been fighting to protect their MOL from a school for children not in our local area being built on this green land.

A potted history about how we evolved:

In the local elections of 2018, Labour stood three councillors in Heathfield. Their listening campaign revealed that the number one concern for residents in the local area was the proposal to build Turing House School on protected green land on Hospital Bridge Road. Residents were worried about the rise in pollution that increased traffic to the area will bring, the impact of that pollution to their health (Heathfield has the highest number of asthma admissions amongst the whole borough), concern for the safety of the children as there is a very narrow bridge right outside where the school is proposed, loss of green land (Heathfield ranks 16th/18th for green land across the borough).

Labour held a public meeting, where [REDACTED] (from NEU) came down to speak, from whence a group of three formed a resident action group (two were members of the LP). They led a petition to get a debate to be held in council and garnered over 1,500 signatures. After the local election, the core group has increased to six and they lead the local activities. We feel that there have been many inadequacies around the process thus far including the lack of robust consultation with local residents, the far from comprehensive development of the plans (despite the pre-planning advice the developers have received). Heathfield ward is one of the poorest and neglected wards within rich and affluent London Borough of Richmond and we really feel that a lot of social injustice is being done by forcing this school to be build on our MOL. The school claim that that this is the most suitable land (but we feel that they have not done a proper sequential site search) and there are many other sites that can be considered for multi-use, the school's admission favours children in the more affluent parts of the borough and only 20% for children for Whitton and Heathfield (it is not a school for us) besides there is a local school about 100 yards away from the proposed location (Twickenham School) which has recently grown in its improvement and is half full. You can read more about our campaign on our FB page: <https://www.facebook.com/HBRRAG/>

We look forward to hearing back from you in due course regards our request for a meeting with you,

Kind Regards  
HBR-RAG  
Hospital Bridge Road Action Group

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On Mon, Nov 12, 2018 at 1:59 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear Hospital Bridge Road Action Group

The correct email address to send Fol requests to is this one; [mayor@london.gov.uk](mailto:mayor@london.gov.uk). Our records are that the ESFA/Bowmer & Kirkland are the applicants.

Kind Regards

[REDACTED]  
Planning Support Manager

---

Dear [REDACTED]

Following on from your email response to us, please can you advise where we submit the Fol to and would you mind clarifying that the applicant is Turing House School or ESFA so we can be specific in our Rol request.

Kind Regards  
HBR-RAG

Hospital Bridge Road Action Group

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On Thu, Oct 4, 2018 at 8:43 AM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear HBR-RAG

We have held pre-application discussions, however, we do not currently hold any information because the customary pre-application note has not yet been issued to the applicant. We anticipate this will be issued later this month.

Therefore,

I'd suggest submitting an Fol request later this month.

Kind Regards  
[REDACTED]

Planning Support Manager

Greater London Authority | Planning

Dear [REDACTED]

REFERENCE MGLA070818-9592 - TURING HOUSE SCHOOL AND METROPOLITAN OPEN LAND

Thank you for your email of 3 September replying to our concern about development on metropolitan open land.

We continue to be in touch with Richmond council and once the planning application has been submitted we will forward

further comments to you.

We know that in previous cases there have been pre-application discussions with the developer, for example,

<https://www.london.gov.uk/sites/default/files/4593-2.pdf>

Are you able to say whether these have taken place and will you let us see your pre-application advice?

Kind Regards

HBR-RAG

Hospital Bridge Road Action Group

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future.

On Mon, Sep 3, 2018 at 2:10 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear Hospital Bridge Road Residents' Action Group,

Thank you for taking the time to write to the Mayor with regards to the proposals for Turing House School. As I'm sure you can appreciate, the Mayor receives a large amount of correspondence and asked me to reply on his behalf.

Having looked into this, it appears that a formal planning application has yet to be submitted. Once the application has been submitted, it looks likely that the application would be referred to the Mayor under category 3D of the

Mayor of London Order (2008). More information on this process and the Mayor's powers can be found on the following link:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning>.

As such, the Mayor is not able to comment on this application as it will fetter any future decision he will make. However, the Mayor has stated his strong intention to protect London's Green Belt/MOL and has previously directed refusal

on schemes if deemed to be inappropriate development on Green Belt:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/direction-refuse-applications-0>.

This shouldn't be seen as an indication of his likely decision but all schemes sent to the Mayor are robustly interrogated against the relevant

planning policies.

For now, I would advise that you continue to engage with the local authority. All comments sent to the local authority are also passed onto the Mayor should the application be referable to him. You are also welcome to send any further comments

to the Mayor; [mayor@london.gov.uk](mailto:mayor@london.gov.uk).

Kind Regards,



Planning Support Manager

Greater London Authority | Planning

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# Hospital Bridge Road Residents Action Group

## Pollution Evidence

January 2019





## **Introduction**

The following is our evidence to backup our objection to the emissions report for Turing House School. We have used “snips” of the developer’s emissions report and other relevant documents to make this document more easily readable.

## **Executive Summary**

We are extremely concerned that building a school on the proposed site at HBR will have a serious impact on the health of residents and their children because of the pollution that will result from the increased volume of traffic to the area. Heathfield is the ward with the highest numbers of hospital admissions for asthma and increased car exhaust emissions will further exacerbate this. Children are particularly vulnerable to air pollution: Alison Cook, Director of Policy at the British Lung Foundation has said “Damage to the lungs in early age is irreversible and children breathing in dirty air is linked to chronic chest problems later in life.” There are several schools (Bishop Perrin, Heathfield, Twickenham, Nelson, St Edmunds) located within 1km of this site (3000 pupils). Every day, these children would face an increased danger to their health. And pupils of Turing House School would also be exposed to this polluted environment.

The Mayor’s Sustainable Design and Construction SPG (2014) requires ‘air quality neutral’ developments, and exposure to poor air quality should be minimised and mitigated. The development fails to minimise exposure to poor air quality by encouraging pupils to travel up HBR.

The Mayor’s Air Quality Strategy (2010) states that new developments should contribute to achievement of air quality objectives, minimise increased exposure to existing poor air quality, ensure air quality benefits are realised through developer contributions and mitigation measures are secured through planning condition. The development fails to offer contributions and mitigation measures.

LBRuT’s Local Plan states: there is a need to manage traffic impacts that could lead to congestion and pollution, particularly as the whole of the borough is a designated Air Quality Management Area (AQMA), with a number of areas with particularly high levels of pollutants including in main centres and along key transport corridors. The development offers nothing to manage traffic impacts in an area which already suffers from congestion and limit exceedences.

## **The evidence for our conclusions follows.**

Estimating the pollution effect of a development is complex so our explanation is lengthy as we have to explain the concepts which we found were not well explained making them very difficult to follow in the consultants document.

Currently the site is green open space and is a pollution sink that removes pollution (CO<sub>2</sub>) and gives out oxygen in return. The development will remove some of this and replace it with buildings that will add pollution into the environment.

The air quality neutral finding for the site itself is very artificial as it's based upon comparing the proposed school with the average readings of a typical school which is located in the centre of its admissions point – rather than making a direct comparison between a green field site and the proposed building.

However, we understand that this is admissible in the 2010 Mayor's Air Quality Strategy, but would like to make the observation that the development proposal could go the extra step towards air quality and global warming by employing such ideas as using electric boilers supplied by renewable energy, rain water harvesting, green roofs etc.

More importantly the air quality neutral rating applies to the transport the development creates. With focus on NO<sub>x</sub> and PM<sub>10</sub> emissions as defined in the 2017 GLA Air Quality Neutral Planning Support Update:

2.3 It is therefore proposed that the air quality neutral policy should focus on NO<sub>x</sub> and PM<sub>10</sub> emissions, recognising that, by definition, this will control emissions of PM<sub>2.5</sub> to a large extent

As this is a green field site and achieving a rating of air quality neutral is impossible as any activity on or for a green field site will produce more pollution than currently exists. As a compromise the GLA have produced benchmarks for common developments that the developer needs to prove the development will not exceed. The proposed development at HBR is classed as D1 (schools, libraries etc.) and we would expect the buildings on site not to exceed the benchmark.

- **OPTION 1:** establish a benchmark for different land-use classes, expressed, for example, as kg pollutant/m<sup>2</sup>/annum or vehicle trips/m<sup>2</sup>. To achieve compliance with the air quality neutral policy, the development would need to demonstrate that the building and transport emissions would achieve the benchmark. If the benchmark cannot be achieved, then off-site offsetting could be used;

Transport is treated separately by GLA and the developer must prove the development can reach this benchmark separately.

2.21 It has been concluded that, in the first instance, emissions from buildings and transport should be treated separately, with the intent for each to attain "air quality neutral".

The GLA expect the developer to prove the development is pollution neutral by using a Transport Emissions Benchmark to prove transport is neutral compared to other developments of schools. Please note this must be produced both for NO<sub>2</sub> and PM<sub>10</sub>.

## Transport Emissions Benchmarks

- 3.19 Two Transport Emissions Benchmarks (TEBs) have been defined, one for NO<sub>x</sub> and one for PM<sub>10</sub>, for a series of land-use classes. For those land use types where a TEB has not been derived, it will be for the developer to select one of the TEBs derived for the nearest comparable category and

provide convincing evidence to justify the choice, or to suggest an alternative approach. Where a TEB has not been derived, it will be possible to demonstrate that a development would meet the benchmark if the scheme-generated trip rate for a particular land-use class is below the benchmark trip rate, but if it is above the benchmark trip rate it is not possible to calculate the excess emissions at this stage (see Section 4).

The consultant has suggested the area around the development does not suffer from poor air quality.

- 10.5 The proposed development will have no adverse effects on local air quality conditions, and does not introduce new exposure within an area of poor air quality, thus no additional mitigation has been proposed for the operational impacts. The proposed development is consistent with the NPPF. Furthermore, the proposed development does not conflict with the requirements of Policy LP10 of the Local Plan, nor does it conflict with, or render unworkable, any elements of the Air Quality Action Plan. The proposed development is also air quality neutral and is thus compliant with Policy 7.14 of the London Plan.

This is an astonishing conclusion since Hospital Bridge Road, Powdermill Lane, Percy Road, Lincoln Avenue and Hanworth Road are all in LBRuT Air Quality Management Area (AQMA) and as measured by LBRUT has exceedances of Nitrogen Dioxide (NO<sub>2</sub>). This means the area experiences poor air quality. These high levels are shown by the road side monitoring for Percy Road (11), Hanworth Road (12) and Lincoln Avenue (57). These are LBRUT's figures 2011-2017 from LBRUT's 2018 air quality status report. Bold is exceeding safe levels.

11	Kerbside	100	100	<b>46</b>	<b>54</b>	<b>49</b>	<b>48</b>	<b>44</b>	<b>48</b>	<b>47</b>
12	Kerbside	100	100	<b>41</b>	<b>45</b>	<b>49</b>	<b>46</b>	<b>41</b>	<b>45</b>	<b>41</b>
57	Kerbside	100	100	24	38	39	36	33	<b>44</b>	<b>42</b>

It is reasonable to assume with the same levels and types of traffic, Hospital Bridge Road and Powdermill Lane will have similar NO<sub>2</sub> levels to the roads next to them (Percy and Hanworth Road).

Even the developer agrees Hospital Bridge Road and Powdermill Lane will exceed safe levels (page 30) but appears to be suggesting that this is only at the road side and not in the surrounding area and presumably suggesting people are not affected by road side pollution.

4.5 There are no clear trends in monitoring results for the past five years. This contrasts with the expected decline due to the progressive introduction of new vehicles operating to more stringent standards (the implications of this are discussed in Section 3 of this report). During this period, concentrations have been continuously exceeded at all monitoring locations, except for site 57 in 2013, 2014 and 2015, and site 63 in 2015 and 2017. The monitoring results show that concentrations are above or close to the annual mean nitrogen dioxide objective and indicate that the objective is likely to be exceeded at kerbside locations within the study area.

We agree the expected improvements in air quality during this period due to improvements in vehicle emissions have failed to be delivered, with the exception that Lincoln Avenue shows a clear worsening trend.

The main conclusion we can draw from this is increases in traffic and congestion have either negated expected improvements or reduced air quality in our area as indicated in LBRuT air quality report 2018. The alternative explanation, which is more difficult to fix, is we have to be aware that as car manufacturers found it easier to cheat the emissions tests, reducing the emissions from diesel and petrol engines any further is difficult.

This is what LBRUT do to ensure they have accurate data from their road side air quality monitoring.

#### **Non-Automatic Monitoring Sites**

Table C lists the details of the NO2 diffusion tube monitoring locations in the LBRuT. The tubes are a relatively cheap way of monitoring, which therefore allows samples to be taken across the whole LBRuT and gives a Borough-wide view. The results provide monthly averages and so provide an indication of NO2 pollution levels. The accuracy of the diffusion tube readings can be increased when their results are compared, and the bias adjusted, with data from the more accurate continuous monitors. The Council had a network of 64 diffusion tube sites across the Borough in 2017. Three of the diffusion tubes sites are triplicate and collocated with all 3 Council automatic monitoring sites.



LBRUT perform bias adjustment with data from the more accurate continuous monitors AURNs.

The total number of sites where monitoring was undertaken was 64; 3 of these were triplicates, co-located next to real time analysers. The results from the 2017 monitoring show that the objective of 40 µg m<sup>-3</sup> was exceeded at 40 sites. Six of these sites also exceeded an annual mean of 60 µg m<sup>-3</sup> which indicates that the 1 hour-mean objective may also have been exceeded at these locations. This represents a slight decrease compared to the 2016 data, the highest exceedance at any site has also decreased ( 96 ug/m<sup>3</sup> in 2016; 89 ug/m<sup>3</sup> in 2017) . This is encouraging. However it is too early to be sure of a downward trend in levels of NO<sub>2</sub>. There has been very little change in levels of NO<sub>2</sub> over the last seven years in the London Borough of Richmond Upon Thames. 2011, 2015 and 2017 saw slightly lower levels but overall at most sites across the borough there is no significant trend either upwards or downwards; levels of NO<sub>2</sub> have remained fairly static. As is well known, Euro VI/6 standards have failed to deliver the forecast reductions in NO<sub>2</sub> levels in real world driving conditions that were predicted. The sale of diesel cars has seen a significant reduction over the last 18 months but the rental market for diesels remains buoyant and the number of vehicles on the road has continued to increase; this has hindered reductions in NO<sub>2</sub>. The LEZ, which has

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encouraged the use of Euro 4 or better for commercial vehicles , applicable along the A316, does seem to have resulted in some benefits indicated by slightly lower trend data at site 18 and site 31 and also slight reductions since 2016 at sites 56 and 57 (NO<sub>2</sub> diffusion tubes at both sites were moved slightly nearer the A316 on 2/1/16).. George Street Richmond, which has recorded the highest exceedance each year since the site began, has shown a

The emissions document is very confusing to read since without any explanation the developer then announces on page 29 that Hanworth Road does not exceed limit value.

4.7 There are several AURN monitoring sites within the Greater London Urban Area that have measured exceedances of the annual mean nitrogen dioxide limit value. Furthermore, Defra's roadside annual mean nitrogen dioxide concentrations (Defra, 2017b), which are used to report exceedances of the limit value to the EU, and which have been updated to support the 2017 Air Quality Plan, identify exceedances of this limit value in 2015 along many roads in London, including the A316 Great Chertsey Road and A316 Chertsey Road near to the proposed development. The Greater London Urban Area has thus been reported to the EU as exceeding the limit value for annual mean nitrogen dioxide concentrations. Defra's predicted concentrations for 2020, presented for three scenarios ('baseline', 'with CAZs' and 'with CAZs and additional actions' – the latter two taking account of the measures contained in its 2017 Air Quality Plan (Defra, 2017a)), also identify continued exceedances of the limit value along the A316 Great Chertsey Road and A316 Chertsey Road. It is worth noting, however, that these roads carry significantly more traffic than Hospital Bridge Road adjacent to the development site. Whilst

predicted concentrations along Hospital Bridge Road are unavailable due to this road link not being included within Defra's mapped network, it is anticipated that concentrations will be similar to those along Hanworth Road which is to the west of the development site. Concentrations along Hanworth Road are below the limit value in all three scenarios. As such, there is considered to be no risk of a limit value exceedance in the vicinity of the proposed development by the time that it is operational.

This announcement that "concentrations along Hanworth Road are below limit value in all three scenarios" is made after the consultant has said there are no air quality monitors AURNs deployed in close proximity of development (see following paragraph) and has actually acknowledged that LBRuT road side monitoring shows Hanworth Road as exceeding limits for NO2.

## Local Air Quality Monitoring

- 4.4 The LB of Richmond upon Thames operates four automatic monitoring stations within its area, including one mobile air quality monitoring unit, however, none of these are in close proximity to the proposed development. The Council also operates a number of nitrogen dioxide monitoring sites using diffusion tubes prepared and analysed by Gradko International Ltd (using the 50% TEA in acetone method). These include several deployed within a 1 km radius of the proposed development. Results for 2013 to 2017 are summarised in Table 3 and the monitoring locations are shown in Figure 3.

All the evidence points to Hanworth Road exceeding limits. Just as LBRuT bias adjusted data confirms and which the consultant would have had access to (see diagrams fig A and fig B following). After much head scratching, we think that the consultant had decided to use Defra pollution maps to make the judgement that Hanworth road area experiences no exceedances, rather than the more local and therefore accurate LBRuT monitoring data. Defra maps suggest that most of Richmond upon Thames experience no exceedances. Clearly LBRuT disagree as LBRuT has declared an AQMA for all of Richmond.

The consultation has also not included any actual evidence to back up their judgement that Hanworth Road is below limit value.

So why use Defra's pollution maps as opposed to LBRuT's monitoring data.?

Defra's web site states:

### **About the Background Maps and User Guide**

Air pollution background concentration maps are published by Defra and the Devolved Administrations to assist local authorities in carrying out Review and Assessment of local air quality as part of their duties under the Environmental Act 1995.

The main purpose of the background maps is to provide estimates of background concentrations for specific pollutants. These can then be used in air quality assessments to better understand the contribution of local sources to total pollutant concentrations. They provide information on how pollutant concentrations change over time and across a wide area; they also provide an estimated breakdown of the relative sources of pollution. The maps allow for the assessment of new pollutant sources that are introduced into an area and the impact they may have upon local air quality.

Defra confirm their maps are guidance and estimates to help local authorities focus on their own air quality assessments. The consultant should have used LBRuTs local, detailed and bias adjusted data when assessing the pollution levels around the proposed development on HBR. The LBRuT data was available to the consultant. Could the consultant justify why they used Defra pollution maps instead?

LBRuT's air quality report 2018 shows the following:

Fig. A

Figure 1: Nitrogen Dioxide Bias Adjusted Annual Average Concentrations for all sites for 2017 (split over 2 graphs)

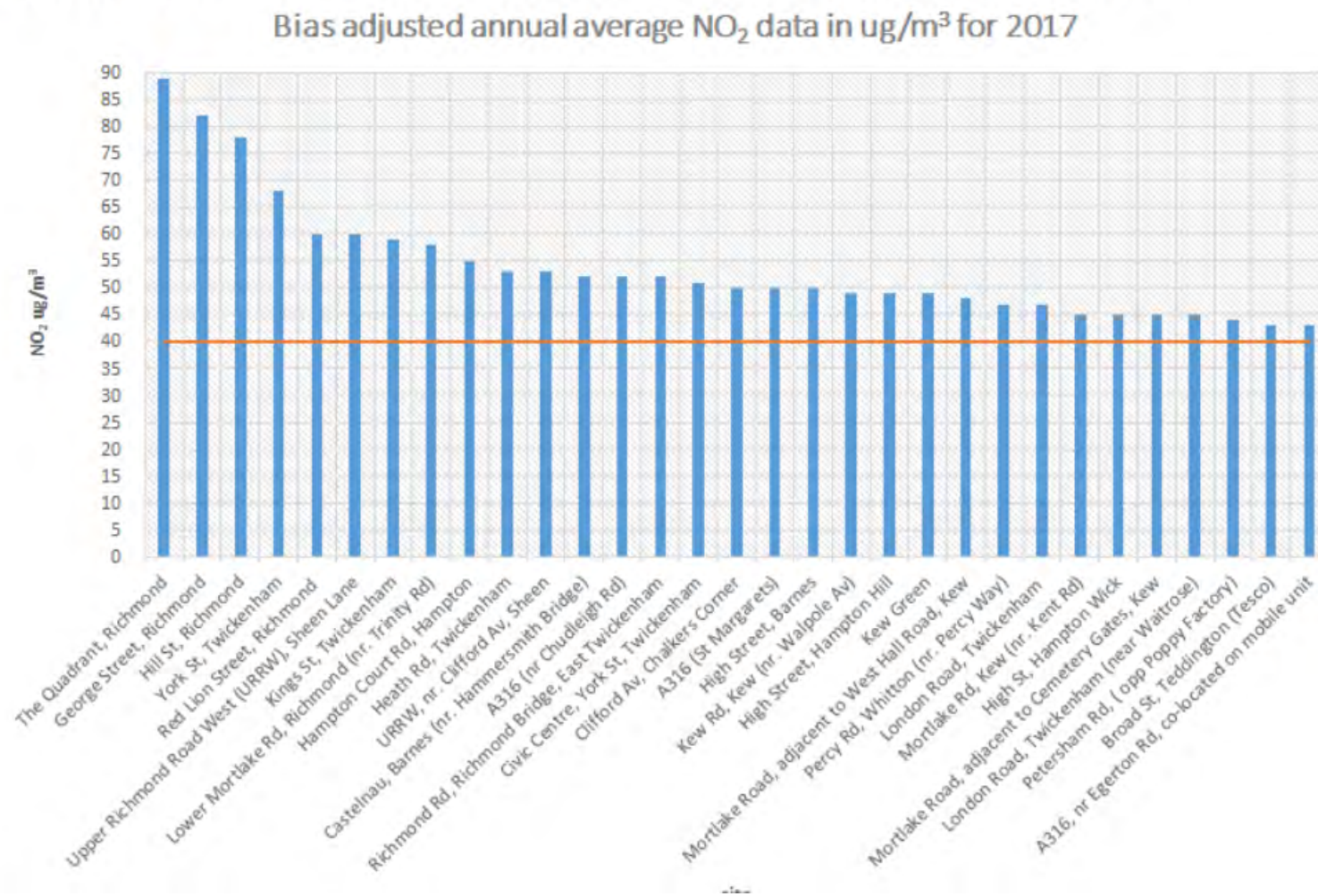
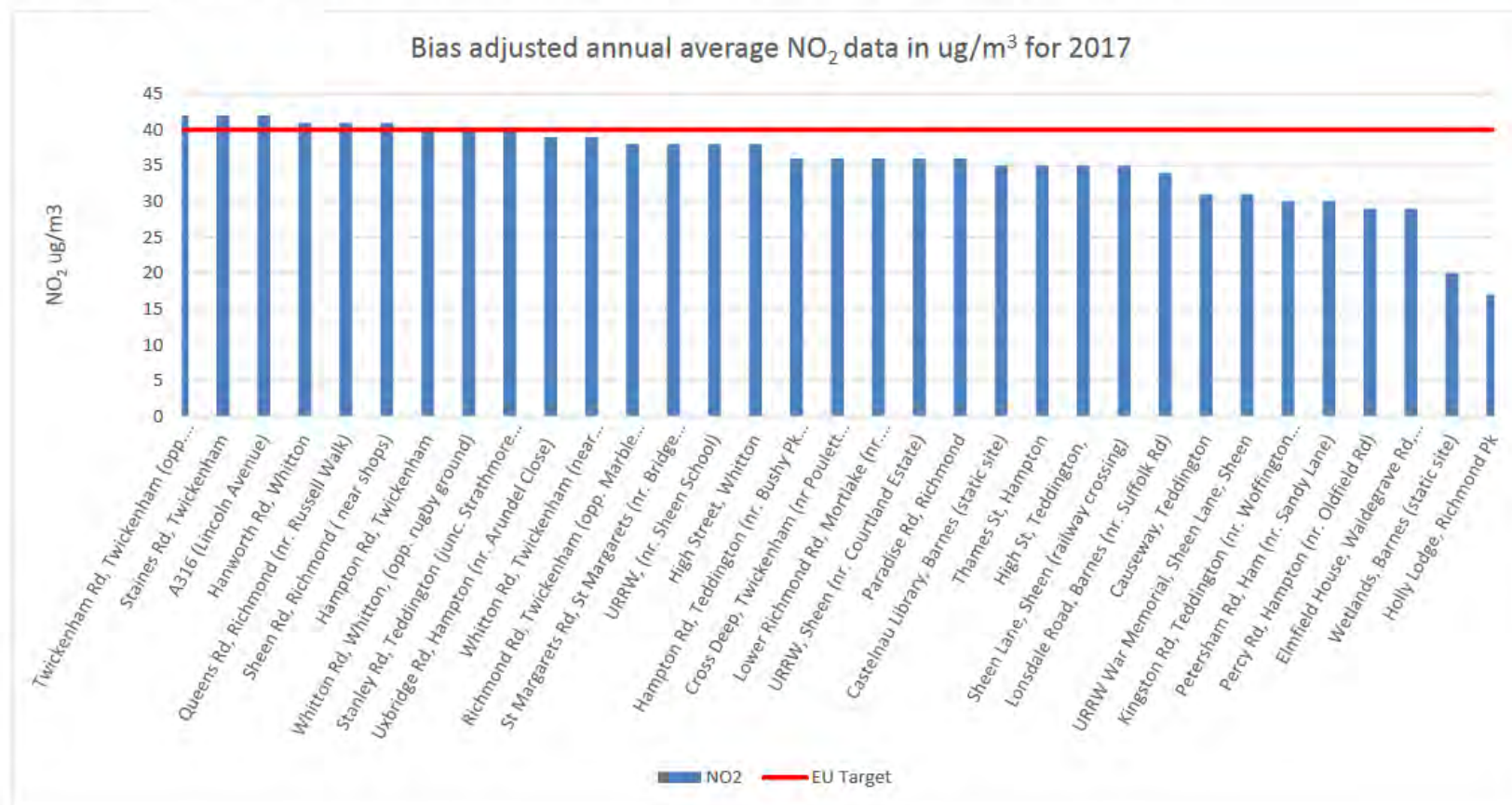




Fig. B

Figure 1: Nitrogen Dioxide Bias Adjusted Annual Average Concentrations for all sites for 2017 (split over 2 graphs)



Conclusion is that with the surrounding area showing higher than safe levels of No2 both Hospital Bridge Road and Powdermill Lane will have exceedances for the annual average NO<sub>2</sub> levels especially as they experience similar levels of congestion.



The consultant is clearly wrong in their analysis that there is considered no risk of a limit value exceedance in the vicinity of the proposed development by the time that it is operation (1 year) as they have not used the LBRuT local data showing the area already exceeds limits.

Instead the consultant estimates that local pollutant concentrations will be half of what LBRuT report (see following table) by trying to suggest road side monitoring will not reflect local conditions (makes you wonder why councils spend so much money on monitoring if this is really the case). This estimate must be rejected.

### Background Concentrations

- 4.9 In addition to these locally measured concentrations, estimated background concentrations in the study area have been determined for 2017 and the opening year 2020 using Defra's background maps (Defra, 2018d). The background concentrations are set out in Table 4 and have been derived as described in Appendix A5. The background concentrations are all well below the objectives.

**Table 4: Estimated Annual Mean Background Pollutant Concentrations in 2017 and 2020 ( $\mu\text{g}/\text{m}^3$ )**

Year	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	21.9 - 23.1	14.9 – 15.4	9.7 – 10.0
2020 <sup>a</sup>	19.5 – 20.4	14.5 – 15.0	9.4 – 9.6
<b>2020 Worst-case Sensitivity Test <sup>b</sup></b>	19.6 – 20.6	N/A	N/A
<b>Objectives</b>	<b>40</b>	<b>40</b>	<b>25 <sup>c</sup></b>

N/A = not applicable. The range of values is for the different 1x1 km grid squares covering the study area.

<sup>a</sup> In line with Defra's forecasts.

<sup>b</sup> Assuming higher emissions from future diesel cars and vans as described in Paragraph A5.5 in Appendix A5.

Later in the document (see paragraph below) the consultant suggests they have verified these predictions for the road traffic model by comparing them with measured conditions. The consultant needs to explain which monitoring they have verified levels of NO<sub>2</sub> at 21-23 with, as LBRUTs monitoring (which they quoted then apparently ignored) shows NO<sub>2</sub> levels as 41-48 in 2017.

3.13 An important stage in the process is model verification, which involves comparing the model output with measured concentrations (see Appendix A5). This can only be done for the road traffic model. Because the model has been verified and adjusted, there can be reasonable confidence in the prediction of base year (2017) concentrations.

The developer goes on to say

4.8 Defra's Air Quality Plan requires the GLA to prepare an action plan that will "*deliver compliance in the shortest time possible*", and the 2015 Plan assumed that a CAZ was required. The GLA has already implemented an LEZ and an emissions surcharge, and a ULEZ comes into force in April 2019, thus the authority will have effectively implemented the required CAZ in 2019. These have been implemented as part of a package of measures including 12 Low Emission Bus Zones, Low Emission Neighbourhoods, the phasing out of diesel buses and taxis and other measures within the Mayors Transport Strategy.

This implies Richmond will be part of the LEZ, and ULEZ by 2019, but there are no plans to include our area of Richmond in the published GLA plan and this goes up to October 2021. Richmond has been part of the LEZ since approximately 2006, but LBRUT monitoring has shown no downwards effect of the measure in this area. This probably as stated earlier due to the increase in congestion and road journeys.

Whitton is also not part of the 12 Low Emission Bus Zones or Low Emissions Neighbourhoods.

See <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/ulez-where-and-when>

**These assumptions make the developers modelled emissions levels wrong for the following reasons:**

- 1) **They are not using LBRuT accurate monitoring data and so have inaccurately stated the area has no exceedances.**
- 2) **They assume our area is part of the ULEZ, and various Low emission zones and so will feel the full impact of GLA funding and focus which is not the case.**

- 3) Improvements in the bus fleet have been referenced, but Hospital Bridge road only has 2 buses and hour, and Powdermill Lane 4 buses and hour. This will have minimal impact which would be negated by the increased bus numbers the development needs.

The consultant has based all their justifications for not only impact of extra traffic, but boiler emissions and construction pollution effects on NO<sub>2</sub> levels for the area which they have calculated and are clearly wrong and far below the exceedances which actually exist.

The consultant then goes on to assume particulate concentrations (PM<sub>10</sub>) are and will be below safe levels and mainly justify this by saying they are not measured locally. This probably will not be the case as high NO<sub>2</sub> levels and congestion often indicate high particulate levels since the science around these pollutants mean one often generates the other and cars using their brakes a lot generate more particulates – such as in congestion.

See information from <https://www.greenfacts.org/en/nitrogen-dioxide-no2/level-2/01-presentation.htm#0>



## 1. What is Nitrogen Dioxide (NO<sub>2</sub>)?

Nitrogen dioxide (NO<sub>2</sub>) is one of the nitrogen oxides (NO<sub>x</sub>), a group of air pollutants produced from combustion processes.

In urban outdoor air, the presence of NO<sub>2</sub> is mainly due to traffic. Nitric oxide (NO), which is emitted by motor vehicles or other combustion processes, combines with oxygen in the atmosphere, producing NO<sub>2</sub>. Indoor NO<sub>2</sub> is produced mainly by unvented heaters and gas stoves.

NO<sub>2</sub> and other nitrogen oxides are also precursors for a number of harmful secondary air pollutants such as ozone and particulate matter, and play a role in the formation of acid rain. Exposure to NO<sub>2</sub> may affect health independently of any effects of other pollutants. However, because its presence is closely linked to the formation or presence of other air pollutants, it is difficult to establish the health effects attributable to NO<sub>2</sub> alone. [More...](#)

As this development is proposed in an area which exceeds safe levels of NO<sub>2</sub> and is congested, we can assume particulates will be high and specific particulate monitoring should have been undertaken by the developer as it is their responsibility to prove the development is pollution neutral for both NO<sub>2</sub> and particulate levels.

The consultants modelling of pollution levels should be rejected since they inaccurately start from a position that Hospital Bridge Road does not exceed pollution limits. The models are wrong.

The developer has also failed to assess the impact on health of the landscaper Kingston Landscape Group sorting aggregates on the Bridge Farm site next to where the school location proposal. <http://www.klguk.com/>

Now we have established that the consultants starting point that the area around the development is below exceedances is wrong. That area as shown by LBRuT bias adjusted monitoring data exceeds limits for NO2 and probably PM10, we can move on to why the development will increase pollution levels in an area which exceeds limits and will render unworkable elements of the Air Quality Action plan.

**It is all about transport and road conditions. Road conditions which are already causing exceedances.**

Here is some information from Greener Journeys about issues with congestion leading to pollution.

<https://greenerjourneys.com/wp-content/uploads/2017/06/TACKLING-POLLUTION-AND-CONGESTION-15-JUNE-2017-FINAL.pdf>

**Urban traffic speeds are falling by on average 2% every year<sup>5</sup>, causing NOx emissions to rise**

Traffic congestion in the UK's largest cities is 14% worse than it was five years ago, and in the last year alone has deteriorated by 4%<sup>6</sup>. Falling traffic speeds drastically worsen air quality. Morning peak traffic average speeds in central London have fallen from 16 kmph in 2006 to 12 kmph in 2016<sup>7</sup>, causing a 10% increase in NOx from diesel cars and vans, and a 25% and 27% increase for buses and trucks.

Government has recognised the need to tackle congestion, but its proposed strategies of removing speed humps and traffic light sequencing will not address the root of the problem. 75% of traffic congestion is caused by excess traffic<sup>8</sup>. Congestion will only be solved by reducing the number of vehicles on the road, which will require demand management and some measure of car restraint.

Improving traffic flow can lead to dramatic reductions in NOx emissions across all vehicle types. Huge reductions in emissions can be achieved by improving city bus speeds. For Euro VI diesel buses, which will be compliant in CAZs, NOx emissions are more than halved by increasing average speeds from 6 kmph to just 8 kmph.

**Diesel cars are the single biggest contributor to NOx levels, responsible for 41% of all NOx emissions from road transport<sup>9</sup>**

As the biggest contributor to NOx levels diesel cars should comply with CAZ standards. However, Government's CAZ hierarchy<sup>10</sup> identifies buses and taxis as priority vehicles to target, followed by HGVs then vans and only then (possibly) cars. This is actually in the reverse order of NOx contribution.

Yet Government's new Air Quality Plan says that without further action, over 70% (31 out of all 43) of the UK zones will still not be compliant in 2020, largely because "real world" emissions from Euro 6 cars, and Euro 5 and Euro 6 light goods vehicles, are all higher than expected.

LBRuT agrees that congestion is a key cause of pollution exceedances and particularly highlights HBR / Powdermill Lane as an area of significant congestion in their air quality plan 2018.

2.c	Integrated transport and air quality, including by improving traffic flows on borough roads to reduce stop/start conditions	Y	The borough works with TfL to identify junctions where traffic signal timings can be improved to help smooth traffic flows. As part of any wider transport schemes, opportunities are also taken to review signal timings and junction layouts where congestion is an issue, for instance at Hospital Bridge Road / Powdermill Lane, along Kingston Road and through the application of the 'SCOOT' system in Twickenham Town Centre. Chalkers Corner is being reviewed as part of the Stag Brewery planning application in 2018. The borough has also implemented a range of schemes to help encourage sustainable transport, which in turn will help reduce reliance on the private car helping to ease congestion.
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LBRuT then goes on to highlight average bus speeds on Hospital Bridge road and Powdermill Lane as below 5mph in their LIP 2018.

Figure 13 shows the average bus speeds across the network within the borough.

Junctions where bus speeds are below 5mph include:

- Church Street/A308
- A311/Sixth Cross Road/South Road
- Hospital Bridge Road/Powder Mill Lane
- A205/Rocks Lane
- Whitton Road/Rugby Road

LBRuT's Local Plan states: there is a need to manage traffic impacts that could lead to congestion and pollution, particularly as the whole of the borough is a designated Air Quality Management Area (AQMA), with a number of areas with particularly high levels of pollutants including in main centres and along key transport corridors.

This is indicative of how congested both Hospital Bridge Road and Powdermill Lane are. There are daily queues of 250m-500m+ on Hospital Bridge Road, Powdermill Lane and Percy Road which take several traffic light sequences to cross. Local residents say it takes 20 minutes to travel 1.1km at this time. The



local roads are beyond their capacity at school run time. The full evidence for the excessive congestion is included in our HBR-RAG Transport Evidence document.

It is worth noting that the developers monitoring showed 7% of the vehicles on HBR are HGVs, about 600 a day. We can find nothing that indicates if this level of HGV would cause the exceedances we see in the area, but what is clear from research our highly congested roads are the key contributor to high No2 levels.

Congestion means traffic spends more time in the area and increases idling time. Idling vehicles produce more pollution.

Greener Journeys report:

# Government Air Quality Plan under threat from Congestion Crisis



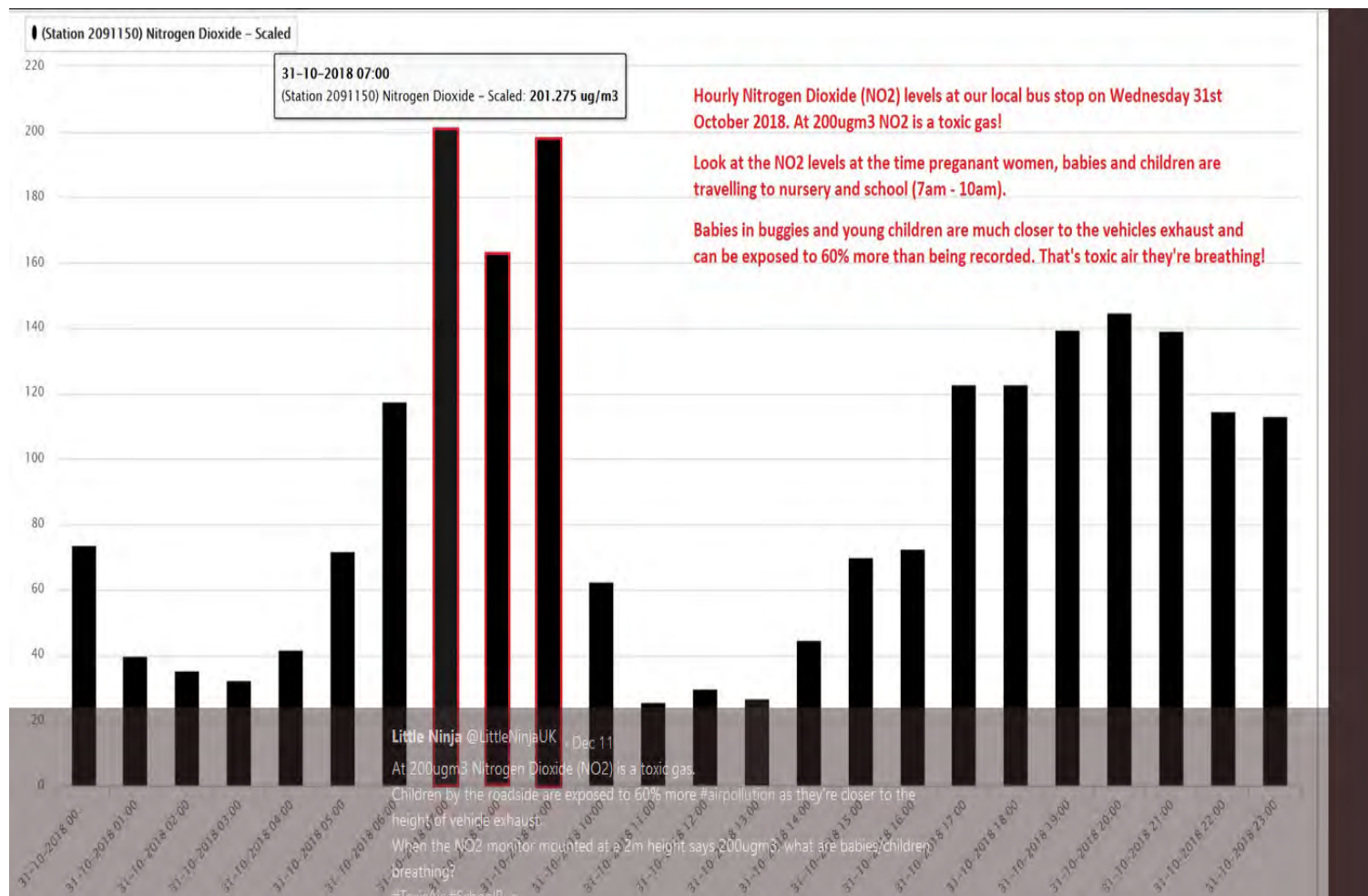
Posted on: 15th June 2017 by Greener Journeys

- *Average traffic speeds in UK's busiest cities will fall from 17mph to 12mph by 2030 as road delays double*
- *Halving average city traffic speed equal to 50% increase in emissions from larger vehicles*
- *Diesel cars are responsible for the largest share (41%) of NOx emissions from road transport*

The Government's plan to improve air quality will fail because it ignores the growing impact of congestion on pollution in city centres, transport experts warn today.

New analysis of transport data reveals the direct impact of rising congestion on harmful NOx emissions, with a halving of average city traffic speeds leading to a 50% increase in emissions from larger vehicles as they crawl along busy urban roads. In nose-to-tail traffic, NOx emissions are four times greater than they are in free flow traffic.

What is clear from these documents is traffic congestion causes exceedences in pollution levels, and at the time of high congestion pollution levels rise. The following diagram from the Shene Mum's for Lungs group shows how road side pollution changes over the day from a study in London. Pollution levels rise during morning rush hour and school run, and afternoon school run then rush hour.



This diagram shows what the morning and afternoon school run and rush hour does to NO2 levels. Taking this graph, children being much closer to the source of pollution than the monitors and LBRuTs data into account it is likely that the levels school children are exposed to, due to the excessive congestion in the area when they are walking, cycling and driving to school, are much higher than the annual mean (since an annual mean is an average).

What road side pollution looks like to a primary school child.



There are lots of reasons THS expectation of only 45 extra car journeys generated by their school is wrong, (dealt with in the HBR-RAG Transport Evidence), however even 45 cars will have a significant impact on Hospital Bridge Road and Powdermill Lane due to the current levels of congestion. 45 cars would add at least 194m (one way) to the queues of traffic. This would reduce traffic speed further and raise the level of NO<sub>2</sub> pollution and particulates generated by each and every vehicle on the road. Slower vehicles stuck in congestion results in cars producing more emissions, just in time for the most vulnerable 4000+ school children to travel, along the roads with the exceedences, to or from school.

Twickenham School is only 55% full. Once this school fills it too will add car journeys of at least 25 (assuming THS view of 5%).

75 extra cars at a time of significant congestion means queues increase by at least 375m (one way) and a significant slowing of average speed on the highways that are over capacity at school run time.

The proposal is to locate this school over 2km from its admissions point. As stated by the school this will result in 54% of the pupils living over 2km from the site. These pupils will either be transported by bus or what is more likely a fairly high percentage of cars since meandering bus routes (111) and high congestion will mean over 20% of pupils will have a journey of at least an hour to get to school.

100 car trips (10% of pupils) will increase queues of traffic in the area by at least 440m (one way).

The extra buses needed for the development (9-11 in a half an hour period, if they want to reach their targets of 4.8% car journeys) will add to pollution both from emissions and increase in congestion.

To assess if the transport generated by a development is pollution neutral the developer needs to use the GLA Transport Emissions Benchmarks for schools (D1). Note the consultant states in the following paragraph that to produce a Transport Emissions Benchmark for the development they need include trip lengths and emissions rates but as there is not an off the shelf TEB they must produce one themselves and prove it is correct.

### ***Road Transport Emissions***

- 7.6 The Transport Emissions Benchmarks (TEBs) are based on the number of car trips generated by different land-use classes, together with the associated trip lengths and vehicle emission rates. However, the guidance (AQC, 2014) only provides trip lengths and emission rates for A1, B1 and C3 uses, thus a TEB cannot be calculated for the proposed school development. The guidance does provide an alternative methodology, based on trip rates only, and this has been followed in considering the air quality neutrality of the proposed development in terms of transport emissions.

- 7.7 Table A8.6 in Appendix A8 provides default trip rates for different development categories. This information has been used to calculate a benchmark trip rate for the proposed development in Table 16. This has then been compared with the actual trip rate of the development.

**Table 16: Calculation of Transport Benchmark Trip Rates for the Development**

Description		Value	Reference
<b>School (D1)</b>			
<b>A</b>	<b>Gross Internal Floor Area (m<sup>2</sup>)</b>	8,225	Bowmer and Kirkland Ltd
<b>B</b>	<b>Benchmark Trip Rate (trips/m<sup>2</sup>/annum)</b>	46.1	Table A8.6
<b>C</b>	<b>Benchmark Trip Rate (trips/annum)</b>	<b>379,173</b>	A x B

- 7.8 Robert West has advised that the total development trip rate in the opening year of 2020 will be 102,800 vehicles per annum. The total development trip rate is expected to decrease with time, thus the worst-case value has been taken; the Total Transport Trip Rate is less than the Total Transport Trip Rate Benchmark and thus the proposed development is better than air quality neutral in terms of transport emissions.

We are pleased the consultant has used the hypothesis for the first year of operation that the developer has produced, but suggest due to 54% of pupils living over 2km from the school, meandering bus routes and congestion causing journeys of over 1 hour to school for many of the pupils that car use will remain high (and possibly higher than used in this model)



## ***Road Traffic***

- 8.6 The assessment has demonstrated that the proposed development will not cause any exceedances of the air quality objectives and that the overall effect of the proposed development will be 'not significant'. It is, therefore, not considered appropriate to propose further mitigation measures for this development.
- 8.7 Measures to reduce pollutant emissions from road traffic are principally being delivered in the longer term by the introduction of more stringent emissions standards, largely via European legislation (which is written into UK law). The local air quality plan that the GLA is required to produce in order to address limit value exceedances in its area will also help to improve air quality. The Council's Air Quality Action Plan will also be helping to deliver improved air quality.

However, when calculating benchmark trip rates GLA states you must:

- 3.22 To derive the TEBs for cars the following information is required:
- Number of car trips associated with different types and sizes of development (i.e. trips/dwelling/annum or trips/m<sup>2</sup>/annum);
  - The typical distance travelled for each type of trip (i.e. km/trip); and
  - The average emission per vehicle kilometre (i.e. g/km/annum).

The consultants's calculation although using car trips that will reflect the higher and more likely scenario is wrong as they have:

Assumed the school is located at the center of their admissions point and so most pupils live close to the school. This means they have not included trip lengths appropriate to this development in their calculations.

Assumed the area is congestion free, since the developers transport document incorrectly states traffic is moderate and free flowing. This means the high emissions figures for vehicles sitting in congestion for a significant amount of time is not included in the calculation.

The affects of the extra 9-11 buses the development needs is not factored in as the developer has not bothered to calculate this in the transport report.

They have ignored LBRuTs NO2 monitoring and declared the area has no exceedences.

They have failed to prove particulate matter will not exceed limits.

The Heathfield ward already has high hospital admissions for respiratory disorders, this development will make it worse.

The qualifications of the emissions reviewers: Joan Gibson HND Chemistry, Richard Whitlock MSc SEng, BSc Electronics, MIEE.

Further information about the effects of pollutants.

**Nitrogen dioxide (NO<sub>2</sub>):** At high concentrations NO<sub>2</sub> causes inflammation of the airways and long-term exposure can affect lung function and respiratory symptoms. It can also increase asthma symptoms. The health impacts of NO<sub>2</sub> are less well understood than those of PM<sub>10</sub> as less research has been undertaken in this area.

**Particulate matter (PM)** PM aggravates respiratory and cardiovascular conditions. The smaller the particle, the deeper it will deposit within the respiratory tract. The health impacts of PM<sub>2.5</sub> are especially significant. The Mayor commissioned a study in 2010, which suggested that around 4,300 deaths per year in London are partly caused by long-term exposure to PM<sub>2.5</sub> (which is widely acknowledged as being the pollutant which has the greatest effect on human health)<sup>11</sup>. Above and beyond this figure the Committee on the Medical Effects of Air Pollutants (COMEAP) speculate that air pollution acts as a contributory factor in early deaths from cardiovascular disease. Its impacts are most severely felt by vulnerable people such as children, older people and those with existing heart and lung conditions.

## 4.2 Vulnerable groups

Studies show that the greatest burden of air pollution usually falls on the most vulnerable in the population, in particular the young and elderly. The link between health inequalities and pollution is complex.<sup>13</sup>

Individuals particularly at risk also include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease (COPD). There are approximately 690,000 asthma sufferers in London and 230,000 individuals suffering from COPD<sup>14</sup>.

The Health Effects Institute (HEI) panel concluded that the evidence is sufficient to support a causal relationship between exposure to traffic-related air pollution and exacerbation of asthma. It also found suggestive evidence of a causal relationship with onset of childhood asthma, non asthma respiratory symptoms, impaired lung function, total and cardiovascular mortality, and cardiovascular morbidity, although the data are not sufficient to fully support causality.<sup>15</sup>

There is a growing body of evidence, presented by the British Medical Association, 2012, showing that prenatal exposure to air pollution is associated with a number of adverse outcomes in pregnancy. These include low birth weight, intrauterine growth retardation, and an increased risk of chronic diseases in later life. Emerging evidence also suggests that long-term exposure to particulate matter, at levels such as those seen in major cities, can alter emotional responses and impair cognition.

## **Hospital Bridge Road - Residents Action Group**

### **Report on the Developers Sequential Search**

#### **1 Introduction**

- 1.1 The council have asked the applicant to provide a sequential site search document, however, the authorities Local Development Framework does not have detailed guidance on how they should be carried out. The methodology used for flood risk assessments are similar and give an approximate framework on how to carry one out the expectations these types of tests as the first stage.

#### **2 What is the Sequential Test?**

- 2.1 The developer should consider reasonable available alternative sites that meet the functional needs of the school, whilst having a lower impact on planning objectives in the local development framework such as impact on the environment, biodiversity and Metropolitan Open Land.
- 2.2 We note that councils in general expect applicants to consider alternative sites that are capable of accommodating the proposed use of equivalent mix uses, and that sites should not be dismissed because they are larger or that they are smaller (as a series of smaller sites accommodating an equivalent quantum). Reasonable means avoiding abnormal development costs (e.g. the provision of extra infrastructure to mitigate significant impacts), or/and land prices that would make the development unviable.
- 2.3 In relation to ownership: the fact the applicant has brought a site does not affect this requirement to look at the available options at the time of the planning application otherwise the sequential test would just be a compilation of site observations and not amount to a test.
- 2.4 To identify alternative sites applicants are generally expected to carry out a systematic and detailed search and look at the Local Plan Allocations document, unimplemented planning permissions, brown field registers and approach owners of large site that may be suitable.

#### **3 Very Special Circumstances**

- 3.1 If the sequential test demonstrated that there are reasonably available sites with fewer planning restrictions, the proposal would be contrary to national and local planning policy and the application is likely to be refused. In these cases, the very special circumstances test (VSC) would not be applied. Paragraph 88 of the current NPPF states:

*“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless any potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”*

#### **4 Commentary on the Sequential Site Search Document**

- 3.2 The sequential site search document is therefore the key first stage in establishing if there are Very Special Circumstances. Unless the quality of the information is sufficient, contains no significant gaps, accurate and not misleading; you cannot proceed to the next stage of looking to see if there are very special circumstances.
- 3.3 The Hospital Bridge Road – Residents Action Group believe **the developer has not carried out a genuine sequential site search process** and that they have merely written down a potted history of what sites they looked at and puffed it out with sites they never actually seriously considered or wanted to occupy.
- 3.4 We note that the ESFA identified HBR in March 2015, and the report they submitted suggests that they stopped looking at alternatives at this point. We note that the ‘test’ has to be carried out at the time the application is considered and that land in ownership already is not a consideration – if there is a more sequentially more preferable site, they could reasonably acquire then they cannot pass the VSC test.
- 3.5 We note that Paul Chadwick the Director of Environment and Community Services at Richmond Council stated at a Scrutiny committee meeting the one of the reasons the council steered the school away from the Twickenham golf site, was to save the Government millions of pounds. Whilst the site may have been more expensive to acquire, we do not feel it was prohibitively expensive or would have been above market levels and the Education and Skills Agency regularly purchases. We also note the Liberal Democrats cabinet maintained it may be more sequentially preferable to Hospital Bridge Road due to it being closer to the main catchment area and that the site of importance to nature conservation could equally apply to the Bridge Farm Nursery site. This is not to say that HBR RAG would like to see another piece of MOL developed for the school – but to point out the faults in the sequential site search process.
- 3.6 The criterion they used is unreasonable; one of the most striking ones is the site must be ready by 2020 and this effectively rules out all brownfield sites and was probably deliberate as we know the school were lobbying to be allowed to build on Twickenham golf course behind David Lloyd – such as when the chair of Governors sent a press release



to the local newspaper in retaliation for the Leader of the Council criticising the schools admission policy<sup>1</sup>.

3.7 On page 31 of the DPP Planning Statement it states that the GLA Pre Application Advice confirmed the draft sequential assessment has been “**thorough**” whilst the actual GLA Pre Application Report GLA/4739/AP/01 had the all important qualifier “**appears to be thorough**” which is somewhat different.

3.8 We note that some of the council officers dealing with this application were at scrutiny report where there was criticism how the site search was conducted – and now they will be assessing the same sequential site search as part of the application. We therefore request that the planning committee pay special attention to this document so that local community can have confidence in it.

3.9 Sites are rejected for reasons that on examination are unreasonable; Such as offsite playing fields being a safeguarding risk.

3.10 None of the sites have a clear reasoning to their respective strengths and weakness or an attempt to weigh and balance them out. For example, the Bridge Farm site has a primary school close to both of the proposed entrances.

3.11 We are aware that in Mortlake there is site earmarked for a free school and Turing House could be relocated there. Subsequently, a second free school could be established in the western half of the borough once a site can be found (maybe also run by the Russel Education Trust). We query why this option hasn’t been explored considering the amount of harm building on Bridge Farm Nursery would cause.

3.12 We have contacted landowners of large sites that are sequentially more preferable in term of fewer planning policy designations and as a result of these discussions we believe they cannot pass the sequential test. We feel the council needs to ask LocatED to recommence the site search and contact landlords to see if they can acquire a more suitable site and note this can be done within three months<sup>2</sup>. We note they boast they operate at pace and can exchange in 14 days<sup>3</sup>.

#### **4 Site Search Methodology**

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<sup>1</sup> Letter to Lord True – cached copy due to school removing original recently  
<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=19&cad=rja&uact=8&ved=2ahUKEwjm1c6w2ePfAhUHRxUIHVNuBII4ChAWMAh6BAGAEAI&url=https%3A%2F%2Fwww.turinghouseschool.org.uk%2Fdocuments%2FLord%2520True%2520Letter%2520-%2520July%25202016.pdf&usg=AOvVaw31zmYj9m-u5S7FoVyA4Sdq> Accessed 10 January 2019

<sup>2</sup> New Schools Network – Sites & Buildings,  
<https://www.newschoolsnetwork.org/sites/default/files/Site%20Overview%20Guide%20FINAL.pdf> accessed 10 January 2019

<sup>3</sup> LocatED Homepage <https://located.co.uk> Accessed 10 January 2019

4.1 The report sets out the criteria of the site which you can see below:-

1. **Search Criteria Summary**
2. 4.23 In summary, the purpose of the exercise is to identify potential sites on which the permanent home for Turing House School could be accommodated. As such, based on the aforementioned, the following criteria is applied:

Criteria	Requirements
Search Area	The western portion of the London Borough of Richmond Upon Thames (also known as Middlesex area)
Minimum site area requirement (m <sup>2</sup> )	9,440sq.m (circa 1ha)
Topography and physical constraints - all sites	Sites are to be flat or gently sloping to facilitate schools, facilities and sports pitches.
Planning policy and suitability	Consistency with planning policy or justifiable departure from policy
Flood Risks	Site is not to be constrained by unacceptable or un-mitigatable flood risks
Highways and accessibility	Access to sites are to be safe and sites are to be accessibly and well located
Availability – all sites	To facilitate occupation by September 2020
Affordability – availability	Value for money must be assured using public funds
Opportunities for co-location with other sites	Is an allocated or windfall site coming forward which is potentially capable of accommodating the school as part of a <u>mixed use</u> development

Table 6: Site assessment criteria

4.2 We believe the search area was too restrictive and should have been relaxed, after the initial difficulties in finding a site had become known. All suitable sites in Richmond should have been considered and sites in Hounslow close to the borough borders should have been considered, especially due to many communities in the area straddling two local authorities such as Hampton and Whitton.

4.3 National guidance (NPPF, para38) states that high transport generating developments should be in sustainable locations. The London Plan (Policy 6.1) encourages patterns and nodes of development that reduce the need to travel, especially by car, and supports development that generates high levels of trips at locations with high PTAL. This means the sequential search methodology may fail planning rules.

4.4 We note one of the criteria is capability with adjoining land uses. The Bridge Farm Nursery site is adjacent to a railway junction that has restricted geometry on the curve that links the Windsor Line to the Hounslow loop. This means trains make a lot of noise as they pass – and there is exceptional levels of squealing and groaning. This makes the site less suitable for a school as the noise is disruptive, and acoustic barriers etc are unlikely to have much of an impact. The acoustic barriers don't appear to work on the other side of

the railway on Vanquish Close when we visited on 9th January 2019 we had to pause conversations as the trains passed.

4.5 The report does not address the conflict with Kingston Landscape group who will remain in the retained nursery areas. Their main economic activity is carrying out landscaping works and supplying aggregates, an activity that will have many clashes with adjacent educational use. There is noise from tipper trucks emptying out soil from building sites, soil and dust from the sieving machines, machinery used to cut lumber before use on projects, HGV lorries using the main entrance, the mustering of work crews in the morning before leaving for projects on building sites across London, and customers entering the site to visit the small retail garden centre all present. The London Plan has D12 introduced the 'Agent of Change Principle' yet there are no measures to protect the interests of the nursery. Please see this extract from their document:

Notes

8. Once sites were identified via the above searches, this Sequential Test applied various site suitability criteria such as:
  - o • Size;
  - o • Location;
  - o • Physical constraints;
  - o • Current site use and ownership of the building or site;
  - o • **Compatibility of a school with adjoining land uses;**
  - o • Planning policy and suitability;
  - o • Flood risks;
  - o • Opportunities for co-location with other uses;
  - o • Availability and timeframes to acquire / develop to meet educational need; and

4.6 The document states they were looking at sites of around 1 hectare yet the existing Clarendon site discounted despite (point 4.21) being 1.23 hectares and being adjacent to the Collis Infant School. If Collis was redeveloped at the same time – the site could have accommodated both schools. We do not agree with the statement that it's a 'back land site'. The council did explore consolidating the site at Clarendon but it appears the school rejected it. This need exploring as the building could reasonably be accommodated at the Clarendon site and the VSC test will fail.

4.7 The developer uses the justification that Sports England would object to building on the playing fields. This is not the case since when Richard Reynolds School was set up the playing fields were built up as the sports hall. This was deemed to compensate in part for their loss. With this in mind – you can see that many sites were rejected without due cause.

4.8 The option of co locating schools has clearly not been explored and looks like it has been dismissed before talking to any potential partners. We get the impression that maintaining complete independence for the Governing body is being placed above the need to protect Metropolitan Open Land and the environment.

4.9 Mixed Use developments with flats above is one of the options that the ESFA promote as it allows the cost of building the school to be defrayed and provides new homes – and new homes is a national priority.

#### GET IN TOUCH WITH POTENTIAL SITES

[sites@LocatED.co.uk](mailto:sites@LocatED.co.uk)

#### WHAT IS A SCHOOL SITE?

LocatED thinks differently – education and residential (circa 110 units)



Ark Soane Academy, former Acton College Campus

Education and residential (19 units)



4.10 Looking various monthly Land and Building Requirement List<sup>4</sup>. documents produced by LocatED, Turing House is pursuing the Rolls-Royce option in terms of site requirements

## 5 Examples of Options Not Considered

5.1 The stay put option hasn't been explored, they can stay where they are if they defer opening the sixth form, this will allow them to find a site that is not MOL land.

5.2 The Governments preferred option is for new schools to be located on existing educational land as this is often the easiest and cheapest solution and encourages land swaps and decanting free up sites.

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<sup>4</sup> [https://located.co.uk/wp-content/uploads/2019/01/Requirements\\_List\\_January\\_2019.pdf](https://located.co.uk/wp-content/uploads/2019/01/Requirements_List_January_2019.pdf) accessed 10 January 2019



5.3 The school decided to reject co location with Buckingham Primary school but no mention is made of the opportunity to move the primary school to the Clarendon site and build THS where the primary school is located.

5.4 There are a number of out of town retail sites that are available to high quality tenants because the owners are looking to replace tenants with questionable credit worthiness, or tenants are looking to exit. There is no record of owners of these sites being approached and we feel there is naivety in their approach that the only land available that being actively marketed by an agent.

5.5 Twickenham Stadium RFU requested to have a residential or mix use development<sup>5</sup> on North car park at the recent local plan review, and this is the type of development ESFA prefer.

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<sup>5</sup> Richmond Council and RFU Statement of Common Ground  
[https://www.richmond.gov.uk/media/15013/lbr\\_lp\\_029\\_statement\\_of\\_common\\_ground\\_rfu.pdf](https://www.richmond.gov.uk/media/15013/lbr_lp_029_statement_of_common_ground_rfu.pdf)  
 Accessed 10 January 2019



5.6 The Campaign to Protect Rural England (CPRE) proposed various options including mixed used redevelopment at Sainsbury's St Clare's with pupils crossing a bridge to use the sport pitches marked out behind David Lloyd (where the Thamesians RFC played until 1992. With some of the current Sainsbury's carpark – that is all MOL land – regreened.

5.7 CPRE Also proposed a mixed use redevelopment of Tesco's St Claire's would be another option as these large stores are increasingly being redeveloped to make a more responsible use of their footprint.

## 6 Sites That are Not Suitable, Available or Viable

6.1 The use of the Craneford Way depot is ruled out on a number of grounds that do not seem justifiable, 'Sharing site with waste facility would raise significant health and safety concerns' and this opportunity can be dismissed.

6.2 It is obvious that if part of the site was used for a school the area would be segregated and there would be no linkage with the rest of the depot. Crane Way is not used for dustcarts and is only used as a staff entrance with all 'council' traffic using Longhorn Drive. We also note the area of proposed housing was next to the Crane Way playing fields and it is likely the owner, Richmond Upon Thames Collage would let them use them.



6.3

## 7 Detailed comments on rejected sites

7.1 In this section we have pasted the text from the document and added responses and solutions to justify our claims that only very superficial examinations has taken place and that there is lack of local knowledge.

Report	HRBRAG Response	Solutions
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Craneford Way 3.3 ha	High PTAL and in schools catchment area	Immediately adjacent to the Craneford Way Playing Fields and sports hall used by RuTT Collage and RUT School. So only land for the building and playground needed.
Not available	Deemed under occupied by the council: LBRuT Site Allocations DPD <sup>6</sup>	Ask the council.
allocated for council depot facilities and residential use	If allocated for residential use the issue of waste processing does not exist	
Dual use of the site for both education and waste services would obviously raise significant health and safety concerns and this opportunity can be dismissed.	Only if access was shared. The main entrance for the council trucks is via Langhorn Drive. There is a second entrance for car only via Cranford Way.  Depot and Richmond upon Thames Collage have coexisted for years without problems.	None needed as there is already segregated access arrangements.
Note also that the site adjoins the Richmond College site discussed later and development of a major secondary school in this location is likely to lead to infrastructure capacity issues	No more pupils here than HBR. 3000+ pupils around HBR. This site 1,200 pupils + college students who come and go throughout the day.  Ample room to improve links though Kneller Park and Greggs Bakery site redevelopment	Start times could be staggered as THS believes this works at HBR  The PTAL of this site is higher than HBR so this site would have less impact on infrastructure.
Important points not covered	Council's preferred use under the Local Plan site assessment was "Use of part of the site for, sports hall/leisure or other ancillary education facilities or limited residential, including affordable units or small business units"  THS are proposing an academic only sixth form with a significant number of students to transfer to RUT Collage for vocational courses	Council has established that the site is suitable for educational use.  Considering the number of pupils who will need to transfer it would be beneficial for the school to be close to the collage.

<sup>6</sup> [https://www.richmond.gov.uk/media/11639/twickenham\\_site\\_forms\\_march\\_2014.pdf](https://www.richmond.gov.uk/media/11639/twickenham_site_forms_march_2014.pdf)

Report	HRBRAG Response	Solutions
<b>Richmond Upon Thames College Site</b> <b>8.6 ha</b>		
Whilst the site is allocated for higher education development, detailed proposals have come forward to also incorporate a new	4.8 hectares has been allocated for housing and redevelopment work has not commenced.  The 4.8 hectares has been purchased by Clarion Housing	Approach Clarendon and seek a mixed-use development with the school on the lower floors and the housing on top.

<p>secondary school and this site is now occupied by the new Richmond upon Thames School (another of the new schools required to meet the secondary educational needs of the western half of the Borough) in combination with the SEN Clarendon School's secondary centre who relocated to this site over summer 2018.</p> <p>Therefore, the site can be discounted as a location to accommodate the permanent home for Turing House School.</p>	<p>Association<sup>7</sup> for affordable housing.</p> <p>The housing is only deliverable because of subsidies being provided by the council.</p> <p>This option is available, why is it discounted.</p>	<p>This mixed-use approach is the Governments preferred option</p> <p>If the school was located on this site it would not need to have its own sixth form. Facilities can be shared with RUTc and RuT school.</p> <p>The site has a better PTAL then HBR and is in the schools catchment area.</p>
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Report	HRBRAG Response	Solutions
<p><b>Hampton Square, Hampton 2.8 ha</b></p> <p>The site is approximately 2.8ha in size and comprises the Local Centre for Hampton Hill north. The site is allocated for partial redevelopment and improvement for community, retail and local services, employment and</p>	<p>Education is part of community use</p>	<p>Site would benefit from comprehensive redevelopment</p>

<sup>7</sup> Press release by Clarion announcing the completion of the sale: <http://www.clarionhg.com/news-research/2018/march/clarion-purchases-land-from-richmond-upon-thames-college-for-major-residential-development/>

residential uses, including affordable units and car parking.		
Although the built areas of the site are not constrained by planning allocations, the loss of the various land uses and their civic and social role would be counter to the Council's strategy for the area. At present, the only undeveloped area of the site would be the green open space to the south of the site, which is designated Public Open Space and Other Open Land of Townscape Importance. In any event, this area alone is insufficient to accommodate a major secondary school.	New schools have been constructed on very small sites, in some cases under 0.7 ha such as the Harris Academy in Wimbledon	Mixed use development could easily develop a new school and provide a better town centre for the nursery lands without reducing the public open space
Important points not covered	Site is immediately adjacent to Buckingham School and could share playing fields	

Report	HRBRAG Response	Solutions
<b>West Twickenham Cluster</b> <b>2.2 hectares</b>		
The site is approximately 2.2ha in size and comprises offices and residential units. The north-western part of the site falls in Flood Zone 2. The site was allocated for mixed residential, start	The council hasn't agreed to change of use to residential.  The council has sought to have part of the site reserved for educational use	

up and small-scale hybrid business spaces and/or a primary school.		
<p>At the time of acquisition of the HBR site, the Twickenham Cluster site was not available for purchase.</p> <p>Since then, Greggs Bakery has announced that this site is to close at the end of 2018 and a Financial Viability Assessment undertaken by Colliers International, which is now in the public domain, values the site at approximately £18.7million based on a residential-led development. Therefore, any purchase of the site would need to compete with the housing market and at such an initial value, the purchase of the site for education</p>	<p>This is not the case site closure announcement was made in 2016. HBR Lease signed in Jan 2018. The site was available at the time of acquisition.</p> <p>The government has paid more money than this for other sites.</p> <p>The government also set up LocatED to enable them to buy sites like this and develop them a mixed-use development</p>	Ask LocatED to buy the site.
Turning now to practical planning matters, the likely complex nature of development on an irregular site in multiple ownership, which also includes the Twickenham grid sub-station and office buildings, may prove difficult to redevelop and would be highly constrained.	<p>2.1 hectares is in single ownership (Greggs) so wrong to suggest multiple ownership would be a problem</p> <p>Schools have been provided on much smaller sites across London some under 0.7 hectares</p>	Pedestrian Bridge over the River Crane would improve access and provide link with Craneford Way playing fields
<p>Whilst the site has been partly allocated for a primary school, the close proximity to residential dwellings and gardens on multiple sides would constrain the scale and extent of a new secondary school building and it would prove difficult to design and build a school block at the required size.</p> <p>This is constrained further by the requirement for associated recreation space and parking spaces, which has proved to be contentious matter for local residents.</p> <p>Even so, the surrounding road network of Crane Road, Gould Road and May Road is highly constrained,</p>	<p>Large part of the site adjoins River crane and parkland.</p> <p>Stepping the building would reduce the perceived scale of the building</p> <p>Schools have been built on sites under 0.7 so there is three times the amount of land to play with here</p> <p>Larger percentage of primary pupils driven to school. Mayor of London wants very few place allocated to staff car parking, Harris Academy in Wimbledon has no staff parking at all.</p> <p>HGVs are able to negotiate the space. If bridge was provided over into crane the coach pick up and set down could be done via the Meadway.</p>	

<p>not only for cars but also for coaches and larger servicing vehicles.</p> <p>There are also likely to be matters of land contamination and remediation and its designation in Flood Zone 2 is likely to further inhibit layout and costs associated with the development of a school, especially as a school is classed as a 'more vulnerable' use class.</p>	<p>Stress on road network lifted due to Controlled Parking Zone introduction.</p> <p>Extra costs have not been assessed and are likely to be less than the £2,700,000 needed to provide the buses needed for HBR.</p>	
<p>Looking further afield, it may prove difficult to secure off-site playing pitches that are easily accessible. Whilst there is Kneller Gardens and Twickenham Green in close proximity, these are public facilities and cannot be hired exclusively for school use for a defined period.</p> <p>Physical education classes in conjunction with public use would raise safeguarding issues.</p> <p>Alternatively, the nearest school facilities that could be shared would be St Catherine's Independent Girl's School (with a small sports field, with the school likely to be averse to leasing its facilities) and Waldegrave School (requiring a renegotiation of the lease) and these facilities are located some distance from the site.</p>	<p>Other schools use public parks such as the Harris Academy.</p> <p>LBRUT allow to book pitches for exclusive use</p> <p>Ofsted warns about safeguarding overkill and this is a prime example of it.</p> <p>Turing House has been using public parks for a number of years.</p> <p>Number of private sport grounds that would welcome a block booking such as Whitton Park Sports Ground.</p> <p>LBRUT is the landowner so unlikely to refuse</p>	

Report	HRBRAG Response	Solutions
Former Imperial College Private Ground, Udney Park Road		



5.05 ha		
<p>Quantum Group are both the site owner and appellant, the site will clearly not be available in the short to medium term until the appeal is concluded.</p> <p>This may take an indefinite amount of time and any future transaction with the DfE would not meet the pressing need for a new school in the west of the Borough in the immediate term.</p>	<p>Has any approach been made to ask them about mixed land use?</p> <p>The school is already operating from 2 sites. It can continue to do so.</p>	<p>Instruct LocatED to try and purchase the site or lease part of the site from Quantum.</p> <p>Instruct LocatED to find a temporary site for the school that can accommodate all 7-year groups in one building such as an office block</p>
<p>5.70 An application (ref. 18/0151/FUL) for the following development has been submitted:</p> <p><i>“Erection of a new extra-care community, with new public open space and improved sports facilities, comprising: 107 extra-care apartments (Class C2 Use), visitor suites, and associated car parking; 12 GP surgery (Class D1 use) and associated car parking; new public open space including a public park, and a community orchard; improved sports facilities (Class D2 use) comprising a 3G pitch, turf pitch, MUGA, playground, pavilion and community space, and associated parking (68 spaces); paddock for horses; and a new pedestrian crossing at Cromwell Road; and all other associated works.”</i></p>	<p>Housing unlikely to be granted permission.</p> <p>the site is sequentially preferable as a site for the school as its not MOL and is close to the main admission point and would therefore be more sustainable</p>	
5.71 The above application has garnered significant level attention and objections from the public due	HBR also has a significant level of objections from the public	Could relocate the sports ground to HBR as a land swap.

<p>to the perceived overdevelopment of the site and reduction in sports and recreational facilities.</p> <p>The owner and applicant (Quantum Group) has recently appealed against non-determination of the application and a decision will likely be made via public Inquiry in the coming months.</p>	<p>The local resident's preference (as reported by THS) was for a school. A mixed development including THS may well reduce local resident's concerns.</p>	
<p>5.73 The site can therefore be dismissed on grounds that it is not currently available.</p>	<p>That is an assumption, need to see proof they have refused reasonable offers.</p>	

<b>Report</b>	<b>HRBRAG Response</b>	<b>Solutions</b>
<p><b>Old Latymerians Sports Ground, Wills Crescent</b></p> <p><b>3.07ha</b></p>		

5.74 The site is approximately 3.07ha and comprises playing pitches, tennis courts and a pavilion. The site is located to the south of Wills Crescent. It is designated Other Open Land of Townscape Importance.	Also adjacent to Nelson School so pedestrian access from Nelson School possible	
5.75 The site is not presently available	<p>When we spoke to the Latymer Foundation at Hammersmith they are willing to sell.</p> <p>Only has a short-term tenant paying a very low level of rent.</p>	
and the development of the above site for a new school would incur an objection from Sport England due to the development on active England due to the development on active sports pitches.	<p>Large part of site is tennis courts and pavilion and not covered by playing field Sport England Objections. The school would only develop on a small amount of the sports fields</p> <p>Richard Reynolds were able to overcome objections of building on playing fields due to new sports hall.</p>	<p>Ask locateEd to buy site, considerer access via Nelson School.</p> <p>This site ensures the school could provide the community facilities this area needs by leasing their sports fields to the rugby, tennis and cricket clubs who already lease the facilities.</p>
In addition, the site has restricted access	<p>Pupil access could be via Runnymede Close if path was formed at the edge of Nelson School playing fields.</p> <p>Alternatively, access could be via Whitton Waye if a house was demolished.</p>	

Report	HRBRAG Response	Solutions
<b>Normansfield 12.7ha</b>		
5.79 The site is partially designated as MOL, Other Open Land of Townscape Importance	Teddington School is located on the same flood zone 2	

and an Other Site of Nature Importance. Northern parts of the site are located in Flood Zone 2 which will pose a further constraint in respect of any application for a proposed school given its vulnerable categorisation.	HBR Site is also MOL  Some parts are public open space but very lightly used similar situation as David Lloyd which the new administration feel is suitable	
5.80 Development on the site would be further constrained given that it comprises the Grade II listed Former Mortuary and Former Artisans Workshop and the Grade II* Normansfield Hospital.  It is also located within a conservation area. As such, any development on the site would essentially be limited to the adaptation of the current buildings, which are not well suited to a modern educational use.	The Grade II Listed building is some distance away from potential development sites and would be completely shielded by trees  Conservation areas do not bar you from building new buildings. The football pitch to the rear of the site seems an arbitrary area that has been included within Conservation area a school here would be close to Teddington school so wouldn't change the character of the area	Many schools operate successfully from listed buildings and these days are seen as inspirational places
	Looks like this site was not seriously considered.	

Report	HRBRAG Response	Solutions
Meadway, Twickenham – 1.2 ha		

<p>5.82 The site is approximately 1.2ha and is occupied by Crane Community Centre and Trafalgar Day Nursery and Pre-School.</p> <p>The site is partially designated MOL and an Other Site of Nature Importance and is located in the River Crane Area of Opportunity. The northern part of the site is located in Flood Zone 2.</p>	<p>Crane Community centre could stay in place</p> <p>MOL only covers the football pitch could stay</p> <p>OSNI site already built on - building of the same footprint would not be a problem and could even enhance site</p>	<p>Trafalgar nursery and pre-school could be decanted</p>
<p>83 Part of the site is located in MOL and subject to nature conservation constraints, which would limit the site's built footprint.</p> <p>Although in theory the Turing House School building could be located on the non-MOL area, this would involve removal of the current community uses which the current policy seeks to protect.</p> <p>Flood risk and ecology are likely to further constrain the site and it can therefore be discounted as a suitable alternative.</p>	<p>Current Community use area is very small and could be re-provided in main school building or in an annex</p> <p>Ecology boundary looks out of date and predates the 2002 planning permission to build the school buildings. If updates, the school buildings would fall outside the OSNI. Another example of this is David Lloyd in Hampton where the OSNI goes over the main sport club buildings and is also clearly out of date.</p>	
	<p>Apart from the decanting costs this site is highly suitable</p> <p>Note this is an established education site.</p>	

Report	HRBRAG Response	Solutions
<p>Kneller Hall, Twickenham</p> <p>9.74ha</p>		

<p>5.87 The site covers an area of approximately 9.74ha and comprises Kneller Hall and army barracks buildings on the west of the site and open fields on the east of the site.</p> <p>Most of the site is designated MOL. Both Kneller Hall and the gate piers are Grade II listed.</p> <p>The site is allocated for residential (including affordable housing), employment (B uses) and employment generating uses as well as social infrastructure uses, such as health and community facilities.</p>	<p>Large number of educational buildings behind Kneller Hall as the core activity of Kneller Hall is the education of army musicians to University standards</p> <p>Around 25% of the land it not MOL such as the barrack blocks on Duke of Clarence Close are not in the MOL area, adjacent to Chase Bridge School</p> <p>The site has NOT been allocated for housing. The inspectors report of the Local plan shows the site allocation brief exercise is still to take place<sup>89 0</sup></p> <p>Planned exit date is 2020</p>	<p>Use the rear classroom blocks for the school</p> <p>Another option is to build the school on the footprint of the barrack blocks. Use a sports pitch on the new public park for PE</p>
	<p>Council has secured funding of £130,000 from the government to create a supplementary planning guidance document for the site .</p> <p>We feel a school could be housed on the site of the former barrack blocks on Duke of Cambridge Road at the rear of the site, enabling most of the playing fields to convert to a public park.</p>	<p>Approach MOD to buy portion of site for school. Does not need to be for immediate occupation either.</p>

<sup>8</sup> [https://www.richmond.gov.uk/media/15774/lp\\_inspectors\\_report\\_and\\_main\\_modifications.pdf](https://www.richmond.gov.uk/media/15774/lp_inspectors_report_and_main_modifications.pdf)

<sup>9</sup> Statement of Common Ground LBRUT & Defence Infrastructure Organisation  
<https://www.richmond.gov.uk/media/14778/lbr-lp-025-statement-of-common-ground-dio-22-09-2017.pdf>

<sup>10</sup> Local Plan Examination in Public Hearing Statement prepared on behalf of Defence Infrastructure Organisation <https://www.richmond.gov.uk/media/14738/rep-059-001-defence-infrastructure-organisation-hearing-3-plus-4-statement.pdf>

<sup>11</sup> [https://www.richmond.gov.uk/planning\\_brief\\_to\\_help\\_shape\\_future\\_of\\_kneller\\_hall](https://www.richmond.gov.uk/planning_brief_to_help_shape_future_of_kneller_hall)



	The school need less than 1/12 of the site for a main building.	
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## 8 Conclusion

8.1 The sequential site search is not sound and cannot be used as a basis for proceeding onto the Very Special Circumstances test. Therefore, we request that planning permission is refused.

Development Control  
Planning Department  
London Borough of Richmond upon Thames  
Civic Centre  
York Street  
Twickenham TW1 3BZ  
Submitted by e-mail to: envprotection@richmond.gov.uk

11 January 2019

Dear Sir/Madam

**LAND AT HOSPITAL BRIDGE ROAD, TWICKENHAM TW2 6LH – PLANNING APPLICATION  
18/3561/FUL: LETTER OF OBJECTION**

1. This letter sets out the objection of the Hospital Bridge Road Residents' Action Group (HBR-RAG), as well as my own personal objection, to the above planning application. The HBR-RAG is a group of local residents who believe that the Hospital Bridge Road (HBR) site is the wrong place for the permanent location of Turing House School (THS). Our objections to the planning application are on the grounds of the inappropriate site proposed for THS, not against the school itself. Our reasons for objection are set out below and focus on what we see as material planning considerations as the grounds for refusal of the planning application.

**Summary**

2. In summary, our objections to the application are on the grounds of the following:
  - a. The proposed development represents inappropriate development on Metropolitan Open Land (MOL), and is contrary to the policies relating to the Green Belt/MOL at national, London and local levels (paragraphs 3-6);
  - b. The 'very special circumstances' regarding school place need, as well as the quality of school places, which might justify such development, do not exist in relation to this planning application (paragraphs 7-20);
  - c. The 'very special circumstances' regarding the lack of an alternative site, which might justify such development, also do not exist in relation to this planning application. The Sequential Assessment Report submitted as part of the planning application does not, in our view, represent a robust analysis of other potential sites, for the most part dismissing them in a very superficial and dismissive way (paragraphs 21-23);
  - d. The proposed development will lead to increased levels of pollution and a deterioration in air quality. We refute the assertions that air quality will be "acceptable" and air quality impacts "negligible" (paragraphs 24-30);
  - e. The Transport Assessment and School Travel Plans are not "robust", as claimed in the planning application. The vehicular access proposals are inadequate and unsafe. The proposals will exacerbate parking problems and traffic congestion in the area.

The assumptions for travel by public transport, cycling and by car are unrealistic (paragraphs 31-57)

- f. The biodiversity aspects need to be better considered. In particular, a fuller Great Crested Newt (GCN) survey needs to be carried out in accordance with Natural England's standing advice for such surveys (paragraphs 58-65);
- g. The design and layout of the buildings on the proposed site do not, in our view, meet planning policy requirements (paragraphs 66-69); and
- h. The impact of the proposals on Heathfield Recreation Ground need to be considered (paragraphs 70-72).

### **Green Belt/MOL planning policies**

- 3. The Planning Statement submitted as part of the planning application makes clear that the HBR site is MOL and the applicant acknowledges that the proposed development would be seen as 'inappropriate development'. In the Planning Statement (paragraphs 6.10 to 6.21), the applicant seeks to argue that 'very special circumstances' exist in the case of the THS application to justify such an inappropriate development. Our view is different, as set out in the paragraphs below.

### ***Planning policy frameworks***

- 4. The planning frameworks as they relate to Green Belt/MOL are very clear. Development on such land is inappropriate, by definition, and should not be approved, except in very special circumstances. This is evidenced from the National Planning Policy Framework (NPPF) (paragraphs 143-145) and the London Plan, where the Mayor of London has stated formally that the "strongest protection" should be given to MOL from inappropriate development (policy 7.17.B of the London Plan). The NPPF (paragraph 145) does **not** list building an entire new school as one of the specific exceptions that building on MOL is inappropriate development. The London Plan (paragraph 7.56) also refers to "appropriate development" of MOL, which "should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL". It is difficult to see how the construction of a school to house more than 1,000 pupils, with the main building three storeys in height (according to the Planning Statement, paragraph 6.23) can be said to be limited as described in the London Plan.
- 5. As set out in the objection from one of our members (David Loweth, 246 Nelson Road), the current Mayor has exercised his power to direct a local planning authority to refuse a planning scheme a number of times since May 2016, five of which related to inappropriate development on Green Belt/MOL, which is relevant to the current THS application. One of them (the Hasmorean High School, Mill Hill) is of particular relevance to the current planning application, as it relates to the development of a new school building. In this case, the Mayor concluded that the application represented inappropriate development on Green Belt land and that 'very special circumstances' did not exist to justify the development. The Mayor's conclusion overruled the view of GLA officers that "the level of educational need and demand identified is sufficiently compelling to justify 'very special circumstances' that would outweigh the extent of harm to Green Belt proposed in this case" (paragraph 18 of the GLA report on the case). The Mayor also referred to the lack of sustainable transport measures to support the development. In his conclusions, the Mayor referred to the lack of a robust transport assessment, the absence of mitigation (particularly with regards to bus

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<sup>1</sup> As reported on the Mayor of London's website at: <https://www.london.gov.uk/about-us/governance-and-spending/sharing-information/freedom-information/disclosure-our-records-the-designated-metropolitan-open-and>

capacity and/or provision of safe crossing points) which would be likely to have an adverse impact on the transport network, which would likely be further exacerbated by the provision of offsite pupil drop-off and pick-up. All these are also highly relevant transport factors in this application (see paragraphs 44-57 below).

6. Richmond Council's policies are set out in the Local Plan, as adopted on 3 July 2018<sup>2</sup> (policy LP13). Policy LP13.B notes that: "It will be recognised that there may be exceptional cases where inappropriate development...may be acceptable". However, the specific example of such inappropriate development being acceptable is that of "small scale structures for essential utility infrastructure". The THS application is neither small in scale nor essential for utility infrastructure. Paragraph 5.2.4 of the Local Plan states that: "New uses (for MOL) will only be considered if they are by their nature open or depend upon open uses for their enjoyment and if they conserve and enhance the open nature, character and biodiversity interest of MOL". The THS application fails on this requirement.

***'Very special circumstances' do not exist: school place need***

7. The Planning Statement (in paragraph 6.10) refers to an appeal case heard by the Secretary of State (Henley Road, Maidenhead) in support of the applicant's view that school place need can represent 'very special circumstances'. However, we do not believe that school place need would pass the high hurdle of 'very special circumstances' in relation to the HBR Site, for the following reasons.
8. Richmond Council periodically makes estimates of the forecast demand for both primary and secondary school places. The latest report was one made to the Richmond Council Schools' Forum in June 2018<sup>3</sup>, which examined school capacity and place planning in the borough, the comments made included reference to the reduction in coming years to forecast demand for primary school places (which will feed through in later years to a reduction in demand for secondary school places) and the fact that the pressure for secondary school places is more in the Eastern half of the borough than the Western half (as reported in the accompanying report (*School Place Planning Strategy*, SPPS, February 2018)).
9. That said, we know that there is an issue as to the accuracy of the forecasts made by Richmond Council, which have been inaccurate in the past. For example, in its 2012 original application to the Department for Education (DfE)<sup>4</sup>, THS's parent organisation, the Russell Education Trust stated the following: "Richmond Council's most recent forecasts (dated Nov 2011) showed that borough secondary schools were likely to be full by 2016. It is generally acknowledged that secondary school places could run out as soon as 2014, particularly in the areas of South West Twickenham, Fulwell and North Teddington" (Application Section C1, page 12). As we demonstrate below, those predictions have not come to pass.
10. Indeed, the validity of the forecasts made in the latest SPPS report referred to above have been questioned in the context of the another planning application for a new school being considered by Richmond Council (The Stag Brewery, Application B, reference 18/0548/FUL). In an objection to that application, the Mortlake Brewery Community Group (MBCG) commissioned a report by Academy Advisory to review the evidence on which the decision

<sup>2</sup> The Local Plan is available at: [https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf)

<sup>3</sup> Report of the Associate Director for Schools Place Planning, Achieving for Children *School Places*, available at: <https://cabinet.richmond.gov.uk/documents/s73619/tem%209%20School%20capacity%20and%20pace%20p%20ann%20002.pdf>

<sup>4</sup> The THS 2012 application can be accessed at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439148/Wave\\_4\\_Turning\\_House\\_School.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439148/Wave_4_Turning_House_School.pdf)

to provide a new secondary school on the Stag Brewery site was based<sup>5</sup>. While focused on predictions for the eastern part of the borough in the Mortlake area, the MBCG comments and consultants' report highlight a number of general concerns with the forecasts for the borough as a whole. For example, the MBCG demonstrates that "not only are the predictions of demand in the immediate neighbourhood ludicrously high but also the predictions of shortfall across the borough as a whole are suspect" (page 6 of the MBCG comments). The MBCG also argues that the SPPS report "is not fit for purpose".

11. As a group, HBR-RAG does not have the resources to commission a report as MBCG has done, but our review of available evidence with regard to demand in the western part of the borough would back up the comments made by MBCG and Academy Advisory. THS has been open for 4 years and during this time none of the student places THS has created have been needed to meet additional capacity. In 2018 for example there were over 130 vacant senior school places in secondary schools in the western part of the borough when THS took in 125 students. The demand for school places from South-West Twickenham, Fulwell and North Teddington that THS used as their reason to open has not materialised and despite THS only offering up to 125 places a year (below its target 150) the school has been unable to fill these places with children living in their chosen catchment area or with children making THS their first choice. For example, THS applications for September 2016 revealed that only 43% of applications came from the school's targeted areas (West Twickenham 15%, Fulwell and Hampton Hill 10%, Teddington 9% and South Twickenham 9%)<sup>6</sup>.
12. It is the also case that Twickenham School, which is very close to the HBR site, has spare capacity (50% per cent). The close proximity of Heathlands secondary school, across the border in Hounslow, is another factor to take into account in determining school place capacity, with further relatively local choices available at Richmond-upon-Thames School, Waldegrave (for girls), Richard Reynolds (for Catholic pupils), Hampton High and Spring West Academy (also in Hounslow). Heathlands School, among other schools, has objected to the application, making the point (among others) that in the boundary area of Hounslow/Richmond "there are currently more than enough Secondary places for the next 10 years and beyond"<sup>7</sup>.
13. As referred to above, in its 2012 original application the Russell Education Trust highlighted on a number of occasions that the school's target area, where the need was argued to be the greatest, was South West Twickenham, Fulwell and North Teddington (see, for examples, references on pages 12, 18 and 33 of the application), not Heathfield and Whitton. THS's admissions policy has been, and will continue to be for 2019<sup>8</sup>, geared towards pupils outside of Heathfield and Whitton, with an 80% allocation to those closest to the school's Admissions Point (Somerset Gardens in Teddington) and only a 20% allocation to the "permanent site" (HBR). For 2018, the wards with the highest numbers of pupils at THS are: Fulwell and Hampton Hill, West Twickenham and Hampton North (around 45% in total), with around 20% from Whitton and Heathfield.
14. Primary school demand in Richmond is down for 2018 and 2019 with many local schools removing nursery classes and running smaller reception classes. For example, Trafalgar

<sup>5</sup> MBCG's comments and the Academy Advisory report can be accessed at:

<https://mages.rchmond.gov.uk/am/AMCache/2694797/2694797.pdf>

<sup>6</sup> See THS Admissions Consultation for September 2017 Evaluation & Outcome, Appendix B: Turing House Applications for September 2016, accessed at: <https://mages.rchmond.gov.uk/am/AMCache/2694797/2694797.pdf>

<sup>7</sup> The Heathlands School objection is at: <https://mages.rchmond.gov.uk/am/AMCache/2777283/2777283.pdf>

<sup>8</sup> The THS Admissions Policy for 2019 can be accessed at: <https://www.tur nghouseschool.org.uk/documents/policies/THS%20Determined%202019%20Policy.pdf>

School is 20 students short and Heathfield Nursery has reduced its nursery size by 50% by closing the afternoon sessions. We have been informed that Stanley School has also had issues with numbers, with its reception/nursery classes not full for the last two years, and the school last year reducing its Year 6 down to three classes. Richmond Council recognises this and has asked primary schools to consider reducing by a class. From 2020, it looks as if there will be a short-term bulge in primary school pupils moving on to secondary schools, but these higher numbers (if they happen) will be for a short-time only and will not remain. Putting aside the accuracy of Richmond Council's forecasts, the June 2018 School Places report referred to above highlights a reduction in the demand for primary school places.

15. This over supply of school places reduces the quality of provision in general as it hits school budgets particularly for senior schools as they cannot reduce teacher numbers due to the broad curriculum they need to provide. This adds to the underfunding schools are already suffering from. Small schools tend to become unviable when they have a lot of student vacancies and it is often the most vulnerable students who suffer as budgets for Special Educational Needs (SEN) provision are often cut first. Over supply of school places also makes the recruitment of scarce teaching staff more difficult particularly for subjects such as Maths and Physics.
16. Taking all of this into account we do not think the school has demonstrated the long-term demand for the school places they are providing either in their preferred catchment area or the wider area. This means as the demand is questionable, they have not demonstrated the "very special circumstances" needed to build on MOL.
17. Before committing to the significant cost of building another new free school in an area which has seen two new free schools open in the last 5 years and is experiencing a significant over supply of secondary school places, we think that Richmond Council, the GLA and the ESFA should review the need for this particular school and how to manage the coming student bulge in a way which does not reduce the quality of local school places.
18. In our view, a better way to deal with bulges of students to guarantee the supply of quality school places, is to expand current schools as they will then have the student numbers to expand and contract and remain viable without having to impose cutbacks due to issues with their budget when student numbers fall. This would be in line with the recommendations made by the MBCG as referred to above.
19. The schools which cover the catchment area THS was planned to service are: Twickenham School, Richmond-upon-Thames and Hampton High. All these schools have room to expand. Any new buildings for expansion will be on brown field sites (which will be in line with a Strategic Objective in Richmond Council's Local Plan<sup>9</sup>). The locations are nearer the students they will serve and so will remove the impact on MOL, public transport, road congestion and pollution whilst guaranteeing school budgets and so the supply of quality school places.

***Very special circumstances do not exist: quality of local school places***

20. In reviewing a number of the comments made in support of the planning application, we have seen as one theme a call for a need for 'quality' school places in the Heathfield and Whitton areas. In our view, one factor in such calls is the legacy of Twickenham School

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<sup>9</sup> See page 13 of the Richmond Council Local Plan, section 2.3 Strategic Objectives, A Sustainable Future, number 3 ("Optimise the use of land and resources by ensuring that new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land")



receiving an ‘inadequate’ rating in an Ofsted inspection over 2.5 years ago. The situation has changed. In its latest Ofsted inspection, undertaken in May 2018<sup>10</sup>, while the overall judgement of the school was Requires Improvement, the inspectors recognised that “Twickenham School has improved significantly over the past few years. As a result, the school has strong foundations for further improvement. This shows clearly that the capacity for growth is substantial”<sup>11</sup>. The progress made by the school is all the more impressive given the high proportions of pupils with pupil premium funding, Special Educational Needs (SEN) statements or support, and pupils whose first language is not English. Twickenham School is providing quality school places to all pupils.

***‘Very special circumstances’ do not exist: the lack of any alternative site***

21. The Planning Statement (paragraphs 6.16-6.21) makes much of the assertion that there are “no alternative, sequentially preferable sites which are realistically available within the area to be served by the school”. The Sequential Assessment Report submitted as part of the planning application refers to a large number of other potential sites, but to our reading - for the most part in a very superficial and dismissive way. We therefore dispute the assertion made in the Planning Statement and the comment made in the GLA’s pre-planning assessment letter of 19 October 2018<sup>12</sup> that “the Sequential Assessment appears to be thorough in demonstrating that the identified site is the only one suitable available” (paragraph 18).
22. Specific examples of the flaws in the Sequential Assessment Report are set out in the separate objections submitted by HBR-RAG members (David Loweth and Joan Gibson, 60 Waverley Avenue). Further details are given in the HBR-RAG Sequential Assessment Evidence document. We also note that one of the aspects of the Sequential Assessment Report was to emphasise the availability of alternative sites within the short-term, which is not a planning consideration. The urgency with which this planning application is being sought is not a valid reason for Richmond, as the local planning authority, to considering granting consent for building on MOL.
23. In addition, we are deeply concerned at the blanket dismissal of any other sites that are on Green Belt/MOL for the simple reason that they are on Green Belt/MOL and a sweeping statement that all other potential sites “are additionally subject to other important constraints which in practice lead to them being very much inferior potential development sites” (paragraph 5.164 of the report). How can such a statement possibly be made without examining each of those sites in more detail? In this context, we note that Richmond Council’s own Cabinet, when considering a consultant’s report (the Griffin report) on the David Lloyd site at its 15 November 2018 meeting, concluded that it would be “irresponsible” to rule out the site at this stage<sup>13</sup>. Richmond Council’s Local Plan (Policy LP 29 Education and Training) states that the Council will work with partners to, among other things, identify new sites for educational uses and securing sites for secondary schools.

<sup>10</sup> As a comparison, THS received a rating of Good in its latest Ofsted inspection (May 2018), see:

<https://reports.ofsted.gov.uk/provider/23/141963>

<sup>11</sup> See the Twickenham School Ofsted page at: <https://www.twickenhamschool.org.uk/327/ofsted>

<sup>12</sup> The GLA Turning House School pre-planning assessment letter can be accessed at:

[https://www.london.gov.uk/sites/default/files/mga201118\\_8564\\_eir\\_response\\_pdf\\_redacted.pdf](https://www.london.gov.uk/sites/default/files/mga201118_8564_eir_response_pdf_redacted.pdf)

<sup>13</sup> Minutes of the Cabinet meeting of 15 November 2018 can be accessed at:

<https://cabinet.richmond.gov.uk/documents/g4418/Printed%20minutes%20Thursday%2015%20Nov%202018%201900%20Cabinet.pdf?T=1>

## **Air quality/increased pollution**

24. The Planning Statement (paragraphs 6.57-6.59) asserts that future users of the site will “experience acceptable levels of air quality...and the impacts will be negligible”, and that the proposed development is “better than air quality neutral”. This is based on the Air Quality Assessment prepared by Air Quality Consultants as part of the application. We dispute the consultant’s findings that the school will have no impact on air quality and be air quality neutral, as they have used incorrect data supplied by the developer from the transport study and ignored Richmond Council’s own monitoring data.

## **Planning policy frameworks**

25. The draft new London Plan (Policy SI1 – Improving Air Quality) states that “London’s air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced”. It goes on to note that development proposals should not, for example, lead to further deterioration of air quality, nor create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. This follows the Mayor’s London Environment Strategy, published in May 2018<sup>14</sup>, Chapter 4 of which deals with air quality and which states that one of the requirements of improving air quality in London to reduce the exposure of Londoners to harmful pollution across London “especially at priority locations like schools” (page 41). Proposal 4.1.1.c of the Strategy (page 67) states that the London Plan will encourage new developments to take into account local air quality so they are suitable for their use and location.
26. Richmond Council’s Local Plan (Policy LP10 – Local Environmental Impacts, Pollution and Land Contamination) states that the Council “will seek to ensure that local environmental impacts (which we note include air pollution) do not lead to detrimental effects on the health, safety and amenity of existing and new users or occupiers of the development site, or the surrounding land”.

## ***Our view: the planning application will fail the air quality requirements of those frameworks***

27. We are extremely concerned that building a school on the proposed site at HBR will have a serious impact on the health of residents and their children because of the increased pollution that will result from the increased volume of traffic to the area. Heathfield is one of the most deprived wards in the borough and the ward with the highest numbers of hospital admissions for asthma<sup>15</sup> and increased car exhaust emissions will further exacerbate this. Children are particularly vulnerable to air pollution: Alison Cook, Director of Policy at the British Lung Foundation has said “Damage to the lungs in early age is irreversible and children breathing in dirty air is linked to chronic chest problems later in life”. There are several schools (Bishop Perrin, Heathfield, Twickenham, Nelson, St Edmunds and Heathlands) located within 1km of this site (with over 3000 pupils). Every day, these children would face an increased danger to their health. Pupils of THS would also be exposed to this polluted environment.

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<sup>14</sup> The Mayor’s London Environment Strategy (May 2018) can be accessed at: [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

<sup>15</sup> We have reviewed data from DataRch, which describes itself as a one stop shop for all data and intelligence related to the borough of Richmond upon Thames, at: <https://www.datarch.info/>

28. In our judgment, the planning application fails to provide any contributions and mitigation measures to improve air quality. We believe that the consultant's conclusion that transport emissions will not be higher than general benchmarks for schools is wrong for the following reasons:

- a) The consultant has assumed the school is located at the centre of its admissions point and so most pupils live close to the school. This means that the consultant has not included trip lengths appropriate to the proposed location of this development in its calculations.
- b) The consultant has assumed the area is congestion free since the developers transport document incorrectly states traffic is moderate and free flowing (on which more below in the section on Transport). This means the high emissions figures for vehicles sitting in the congestion this area experiences, for a significant amount of time, is not factored into the emissions calculation.
- c) The consultant has assumed the development will generate a small number of trips by car due to the over-optimistic assumptions in the Transport Plan.
- d) The effects of the extra 9-11 buses we estimate that the development will need if public transport capacity is increased is not included in the emissions calculation.
- e) The consultant has made reference to improvements in the bus fleet, but HBR and Powder Mill Lane currently have only six buses an hour. Any environmental upgrade to the buses using the route would be negated by the additional buses the development would need.
- f) The consultant has ignored Richmond Council's Nitrogen Dioxide (NO<sub>2</sub>) monitoring and declared the area has no exceedences. This appears to be a direct contradiction to the comment made in the Council's Environmental Impact Assessment (EIA) Negative Screening Opinion of 2 January 2019 <sup>6</sup> which acknowledges that: "The entire Borough is designated as an Air Quality Management Area (AQMA) for both nitrogen dioxide and PM<sub>10</sub> and the site fronts a road where existing levels of pollutants are **likely to be at or above EU limit values of 40µg/m<sup>3</sup> for nitrogen dioxide (based on NO<sub>2</sub> diffusion tube results in the surrounding area)**" (our emphasis) (page 12 of the Opinion).
- g) The consultant has failed to prove particulate matter will not exceed limits.
- h) Much has been made of measures the GLA is making to reduce pollution, including the Ultra Low Emission Zone (ULEZ) (much of which is not being rolled out to Whitton) in the area with the conclusion the developer does not need to take any action. This development will negate any work that the GLA and Richmond Council undertake to reduce congestion and therefore pollution, as it will add at least 250m to the traffic queues experienced on HBR and Powder Mill Lane and reduce traffic speed even more so increasing the pollutants emitted by each vehicle already using the roads.
- i) The consultant appears to assert that no-one will be affected by road-side pollution. For example, during the construction phase, the Air Quality Assessment report (paragraph 5.11) claims that "the areas surrounding the onsite works, and the road along which material may be tracked from the site are of 'low' sensitivity to human health effects". We do not understand how the consultant can reach such a conclusion when there are already in excess of 3,000 school pupils using these roads, all of an age that is more vulnerable to air pollution, are closer to the source of pollution than the monitors and travelling at times of peak NO<sub>2</sub> emissions.

29. Our evidence in support of our conclusions in paragraph 28 above is set out in the document HBR-RAG Pollution Evidence.

<sup>16</sup> The Negative Screening Opinion letter can be accessed at:  
[https://www.richmond.gov.uk/media/16651/hospital\\_bridge\\_road\\_eia\\_screening\\_opinion.pdf](https://www.richmond.gov.uk/media/16651/hospital_bridge_road_eia_screening_opinion.pdf)

30. In summary, this proposed development outside of main pupil catchment area will not only fail to be pollution neutral, but will slow traffic speed, increase congestion and raise pollution levels in an area which already has exceedances. This will have effects on the health and wellbeing of all 3000+ local school pupils, particularly as they use the roads at the same time as the pollution levels will peak. The consultant's modelling has ignored the Council's monitoring and failed to include local traffic conditions and travel distances. On this basis, the Air Quality Assessment report should be rejected.

## **Transport**

31. The Planning Statement (paragraph 6.39) notes that vehicular access will be provided in the form of a "new priority junction" shared with the Sempervirens Nursery from HBR. The site will house a 45-space car park, plus 156 cycle spaces. Pedestrian access will be provided to the north of the main entrance on HBR, with secondary pedestrian access across the Heathfield Recreation Ground.
32. In the Planning Statement (paragraph 7.4), the developers assert that the proposed school can be accommodated on the site "without significant highways impact, although capacity enhancements for bus services may be required". The Community Engagement Plan submitted as part of the planning application asserts (on page 6) that the Travel Assessment Plan is "robust". Our view is that it is anything but "robust".

## ***Policy planning frameworks***

33. The draft new London Plan (Policy T4 Assessing and mitigating Transport Impacts) states that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Transport assessments should focus on embedding the Healthy Streets Approach<sup>7</sup> within, and in the vicinity of, new development. In addition, development proposals should not increase road danger.
34. Richmond Council's Local Plan (LP 44 Sustainable Travel Choices) states that the Council will:
- a. Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility;
  - b. Maximise the provision of safe walking and cycling routes;
  - c. Maximise opportunities to provide safe and convenient access to public transport services; and
  - d. Ensure that new development does not have a severe impact on the operation, safety, or accessibility to the local or strategic highway networks (including in relation to on-street parking).

## ***Our view: the vehicular access proposals are inadequate and unsafe***

35. Road access to the site is extremely limited, being restricted to one access point. Anyone observing the site of the proposed entrance to the school on Hospital Bridge Road can quickly see the inadequacies of locating a school to house around 1,000 pupils and 90 staff on the site with such limited access. The entrance, which would be shared with

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<sup>17</sup>

As set out in the Mayor's London Environment Strategy (May 2018), see page 36 for a summary of 10 Healthy Street indicators

Sempervirens Nursery, is at the bottom of a blind hump-back bridge on a narrow part of a busy main road. On the bridge, there is only a narrow footpath on the eastern side.

36. A core economic activity of Sempervirens Nursery is the provision of landscaping services and plants to large developments in London. The nursery has a store of plants on site waiting to be used in such developments and which are delivered using heavy goods vehicles (see the next paragraph for details of numbers). The Mayor of London has been trying to introduce controls on the use of such vehicles, with their lack of clear sight lines, through a Direct Vision Standard (DVS) <sup>8</sup>. But one questions whether the DVS can remove all the risks, which will result in heavy goods vehicles sharing access to the HBR site with hundreds of pupils.
37. The planning application proposes to retain only one road access point to the site, but to expand it to a total width of 14.5 metres from the current width of 7.5 metres. The application also proposes that a new zebra crossing should be installed to the north of that site access, to be designed in the form of a raised platform, with a further raised platform uncontrolled crossing facility across the site access. The application asserts that this will be an improvement to the geometry of the site access and represents “safe” access. But the fact remains that both the access (with its uncontrolled crossing facility) and the proposed zebra crossing will be at the bottom of the blind hump-back bridge and it is difficult to see how “safe” access can be assured, even if the Council presses ahead with its proposal to impose a 20mph limit across the borough. The crossing would still be unsafe even if controls, such as traffic lights, were introduced. The Bridge narrows at the peak and the pupils will be standing at an angle to the line of sight of those driving over the bridge. There will be very little time to spot hazards such as pupils crossing between getting over the humped back bridge and arriving at the crossing. On dark mornings and evenings or days of low visibility the ability to see children dressed in dark uniforms who are shorter than adults and out of a driver’s line of sight will be compromised. Lorries are unable to do an emergency stop if they spot the pupils at the last minute.
38. The access will continue to be shared with the nursery, which receives 21 heavy vehicles daily <sup>9</sup> and the arrival and departure times of those vehicles cannot be guaranteed to be outside the morning and afternoon peak hours. The proposed zebra crossing to the north of the site will involve large numbers of pupils and others crowding onto very narrow footpaths at the bottom end of the bridge and potentially spilling over in to the also narrow roadway.

*The risk of accidents will increase*

39. The vehicular access to the school is, in our view, unsafe and the risk of accidents occurring will increase. More generally, we are astonished by the analysis of accidents in the Transport Assessment Plan (paragraphs 4.19-4.35) which concludes that accidents occurred due to behavioural issues, rather than the highway layout or the lack of or insufficient provision of dedicated facilities for pedestrians and cyclists. The HBR-RAG Transport Evidence document highlights the risk of accidents and, in particular, refers to the problems that have occurred with the highway layout at Whitton Corner.

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<sup>18</sup> Details of which can be accessed at: <https://tfgov.uk/info-for/development-london/developing-safely/direct-vision-heavy-goods-vehicles>

<sup>19</sup> As estimated in the Transport Assessment, paragraph 4.64, page 38

### ***Our view: the proposals will exacerbate parking problems in the area***

40. The planning application proposes that a car park with 45 spaces will be provided on-site for staff. The School Travel Plan (paragraph 5.11, page 24) notes that, in September 2018, over 71% of staff travelled by car to the current THS site, and estimates that 64 staff will do so to the HBR site. That means that there will be insufficient spaces for staff, and parking issues for local roads, even before taking into account pupil travel behaviour. It is also the case that part of the site is used by staff at Sempervirens Nursery for their parking, an amenity which will be removed should the site be developed.
41. The planning application asserts that on-street parking is predominantly unrestricted and that residual parking capacity exists during the school peak periods. To us, there is a disconnect between that assertion and the Council's consultation in September 2018<sup>20</sup> on introducing a new Controlled Parking Zone (CPZ) on the roads around Whitton Station, including Hospital Bridge Road and surrounding roads. The issues raised in that consultation, including the difficulties of finding parking spaces, dangerous parking at road junctions, as well as obstruction of driveways and issues with traffic flow, would all be exacerbated if the planning application is granted.
42. THS proposes to have a staff supervision regime in place to prevent drop-off and pick-up on site, which means that this will take place on-street. Given the parking restrictions this will result in further traffic congestion in the area. The fact that THS intends to have staff supervision in regard to parking, drop-off and pick-up demonstrates an acknowledgement that car travel to and from the school will be a significant issue.
43. The THS HBR Community Engagement Report (page 22) asserts that "additional parking demand generated by students can be accommodated in the area". Putting aside the feasibility of the estimates of the number of students arriving by car, if the whole area becomes a CPZ, that assertion falls.

### ***Our view: the Transport Plan is anything but robust***

*The overall figures for the way in which pupils will travel to and from the school do not add up*

44. The HBR site is over 2km from THS's Admissions Point in Teddington. Using the HBR location will result in over 54% of THS pupils living over 2km from the school. These 54% of pupils who will be unable to walk due to the time it will take will cause an excessive burden on public transport in an area with a very poor Public Transport Accessibility Level (PTAL) (see below) and will cause a modal shift to car. The comparison is made in the Transport Assessment (page 59) with a number of other secondary schools as to the mode of transport employed by pupils attending those schools. Our view on this exercise is that attempting to compare THS to schools in completely different situations and suggesting the school can achieve the same sort of sustainable travel is completely unrealistic. The three identified comparators: Orleans, Teddington and Grey Court are popular schools (over-subscribed with first choice pupils) centred on their admissions point. This results in 90%+ of pupils located within 2km of the school.

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Consultation on questionnaires received available at: [https://www.richmond.gov.uk/media/16253/wspc\\_paper\\_letter.pdf](https://www.richmond.gov.uk/media/16253/wspc_paper_letter.pdf)

*The figures for travel by public transport to the site are unrealistic*

45. The School Travel Plan assumes that 56.3% of students (410) will travel to the site by public bus, rising to over 60% (635) by 2026. The School Travel Plan (paragraph 2.15, page 7) acknowledges that the PTAL at the HBR access point is rated at 1b (very poor), with only the bus route 481 passing the main entrance. But the Plan then seeks to argue (in paragraph 2.24) that there are a further four bus routes (H22, 110, 111, H28) located within 13 minutes' walk of the site "providing good level of services during the school peak periods". We think this is clutching at straws. The H28 route does not pass through any of the wards in which the majority of pupils live, and route 111 only skirts them through Hampton. The suggestion that the majority of pupils can instead use the 111 (paragraph 8.16 of the Transport Assessment) would mean over 20% of pupils would have a journey time of over 1 hour to get to school. The 111 takes over 30 minutes to get from the Hamptons at peak time and the pupils will have a 15 minute or more walk at both ends.
46. As far as routes H22 and 110 are concerned, Transport for London (TfL) has been consulting on changes to both routes<sup>2</sup>, which will impact the frequency of the H22 (which already has to cope with pupils from Twickenham School) and a change to the route of the 110 such that it will no longer travel to and from Twickenham via Staines Road and HBR. That leaves just the 481 route, with a half-hourly service on a small, single-decker bus, which also like the H22 deals with travel by pupils from Twickenham School. It is also the case that the bus stops on HBR are designed for a relatively lightly-used service and not for coping with hundreds of secondary school pupils, raising further issues about capacity and safety. The Community Engagement Plan (page 6) asserts that transport advisors are consulting with TfL on public transport services and capacity, but given TfL's well-publicised financial difficulties, it is hard to see how bus capacity on HBR can be increased.
47. Using table 8.1 in the Transport Assessment which lists the proposed numbers of pupils for each bus route, and assuming an 80% occupancy of current buses, TfL would have to provide 9-11 extra buses to transport this number of pupils to HBR. We understand the cost of a single journey for each additional bus is approximately £60,000 per annum. TfL would charge ESFA £2,700,000 to provide 9 extra buses for the first 5 years of operation. Clearly transporting this many pupils by bus to the HBR site is cost prohibitive. The cost to the public transport authorities is, in our view, simply too high.

*The assumptions for travelling by bicycle to the site are also unrealistic*

48. The Transport Assessment (paragraph 8.31) predicts that 9.9% (104 students) will arrive by bicycle in the morning and afternoon peak periods, using the existing cycle network in the area of the school. The consultant asserts (in paragraph 3.32 of the Transport Assessment) that the local cycle network is "comprehensive" and "provides a good cycle connectivity to the residential neighbourhoods in the wider area". The Transport Assessment (paragraphs 3.22-3.23) also notes that a Cycle Environment Review System (CERS) audit was undertaken and that all roads audited achieved at least a 'Good' score, such that they provide "safe and comfortable routes" (including HBR). We take a different view and would draw your attention to the objections lodged both by HBR-RAG member Joan Gibson and the Richmond Cycling Campaign. The fact that the CERS audit was conducted during the school holidays (9 August) is, to us, unacceptable.

<sup>21</sup>

See TfL consultation at: <https://consultations.tfl.gov.uk/buses/bus-changes-richmond/>



49. The Mayor's Cycling Action Plan<sup>22</sup> states that: "The design of new cycle routes should only mix people cycling with motorised traffic where there are fewer than 500 motor vehicles per hour (vph) at peak times, and preferably fewer". The consultant's traffic count just for the limited area around the proposed school entrance shows there are well over 500vph on HBR (Transport Assessment, figure 4.2) and this does not include vehicles that turn off before they reach the school entrance or the extra buses and vehicles the school will generate. HBR and Powder Mill Lane (with similar levels of traffic) are not safe acceptable cycle routes.
50. The London plan (Policy 6.9 Cycling) states that a development must contribute positively to an integrated cycling network through infrastructure provision. The consultant has performed the cycle review at an inappropriate time (August), so making cycling conditions appear much safer than the pupils will actually experience. By doing this the impression is given that the planning application does not need to offer any improvements to the surrounding cycling network. The planning application fails on this point as infrastructure improvements are needed to make cycling to the HBR site safe and viable. As examples of where improvements are needed we would highlight: (i) the cyclist entrance on HBR is shared with other vehicles and is not sectioned off; (ii) cyclists would have to turn right against the flow of traffic on HBR when leaving the school; (iii) the crossing point on Powder Mill Lane (for cyclists coming from Crane Park) is via a traffic island which is not wide enough to accommodate a bike; (iv) the Crane Park underpass is too narrow for the number of cyclists anticipated; and (v) the narrow portion of the HBR shared footpath is unsuitable. More details can be found in the HBR-RAG Transport Evidence document.

*The assumptions for travelling by car to the site are equally unrealistic*

51. The School Travel Plan (paragraph 5.6-5.10, pages 23-24) asserts that some 15% of students (110) will travel by car in 2020, falling to 4.8% (50) by 2026. We disagree with the school's suggestion that only 4.8% of school journeys will be completed by car because:
- a. Of the number of pupils that will need to travel to the school over relatively large distances (54%);
  - b. Severe congestion on HBR, Powder Mill Lane, Percy Road and Hanworth road slowing average bus speed to 5mph and lower, and so causing buses to be unreliable and at times absent;
  - c. Accidents often closing roads and stopping buses, with an accident hotspot nearby;
  - d. Long journey times for pupils (over an hour for 20%+ of pupils);
  - e. Shortage of buses (as noted above, HBR has a PTAL of 1b);
  - f. In winter months or when it is raining there is also an increase in car use;
  - g. Inappropriate and unsafe cycle routes, combined with no proposed improvements to cycle routes (as set out above).
  - h. Cumulative impact of 4000+ pupils (including those from THS) trying to use the same paths and buses;
  - i. A dangerous entrance for vehicular access.
52. In our view, these issues will cause a modal shift to car and the target of 45 car journeys will not be met.

*Our view: traffic congestion will increase*

53. The planning application argues that traffic flows on HBR are "moderate". That claim is contradicted by other reports that have been issued by Richmond Council. For example, in

<sup>22</sup>

The Mayor's Cycling Action Plan is available at: <http://content.tf.gov.uk/cycling-action-plan.pdf>

the draft of the Council's *Third Local Implementation Plan*, issued in November 2018<sup>23</sup>, Figure 13 and the accompanying text (see pages 30 and 31 of draft Local Implementation Plan, LIP) shows that the junction of HBR and Powder Mill Lane is one of five identified junctions in the borough where average bus speeds are less than 5 mph. In addition, the Council's *Air Quality Annual Status Report for 2017*<sup>24</sup>, published in May 2018, includes a need to take action to improve traffic flows on borough roads to reduce start/stop conditions, including taking opportunities to "review signal timings and junction layouts **where congestion is an issue, for instance at Hospital Bridge Road/Powdermill Lane**" (our emphasis). (See line item 2c in the table on page 33 of the report).

54. The objection from HBR-RAG member Joan Gibson sets out the results of a traffic survey HBR-RAG undertook on HBR, Powder Mill Lane and Percy Road during September and October, which highlighted the following: queues of traffic on Hospital Bridge Road regularly stretched over 450m, Powder Mill Lane 250m and Percy Road over 500m. The stretch of HBR from Whitton Corner to the A316 roundabout is often completely full causing a bottle neck. The roads are totally over capacity.
55. The planning application assumes a very small increase in traffic, with average daily traffic flows in 2020 with the HBR site estimated to be only 283 higher on HBR between Montrose Avenue and Powder Mill Lane/Percy Road than without the scheme. But, as set out in the objection from HBR-RAG member David Loweth, we would question the basis on which this estimate has been made. Given the estimates for staff and student car trips in the School Travel Plan for 2020 (referred to in paragraph 51 above), the minimum average daily increase would be 648, even before taking into account delivery service vehicles, mini-buses for outings, etc. This is based on the premise that parents dropping off and picking up their children from the school will drive up and down HBR to and from the proposed site twice a day. The HBR-RAG Transport Evidence document also highlights the extra traffic that will be generated at drop-off/pick-up times.
56. There is also the issue of where the cars will turn once pick-up/drop-off has taken place. Drivers might seek to turn into Montrose Avenue and drive around the traffic island before returning south on HBR. That will increase congestion at that junction. Alternatively, drivers might head north over the bridge and use Nelson Road and Percy Road before returning to HBR at Whitton Corner, which will increase congestion on roads that are congested already at peak times.
57. Taking all the above into account, we believe that the Transport Plan is unrealistic and that the assumptions in it should be challenged.

## Biodiversity

58. The Planning Statement outlines a number of proposed measures to be taken in respect of the arboricultural impacts (paragraphs 6.48-6.51) and ecological aspects of the site and the proposed development (paragraphs 6.52-6.56).

<sup>23</sup> The LIP consultation draft can be accessed at: <https://haveyoursay.ctzenspace.com/rchmondccs/p18/suppo t ng documents/Rchmond%20L P3%20DRAFT%20FOR%20CONSULTAT ON%20F NAL pdf>

<sup>24</sup> The Air Quality Annual Status Report for 2017 can be accessed at: <https://www.rchmond.gov.uk/med a/15932/a r qua ty annua status report 2018 pdf>

### ***Planning policy frameworks***

59. The London Plan (Policy 7.19 Biodiversity) states that development proposals should, wherever possible, make a positive contribution to the “protection, enhancement, creation and management of biodiversity”.
60. Richmond Council’s Local Plan (Policy LP 15) specifies that the Council will “protect and enhance the Borough’s diversity” by (among other things):
- (1) Protecting biodiversity in, and adjacent to, the borough’s designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value.
  - (2) Supporting enhancements to biodiversity.
  - (3) Incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible.

### ***Our view: there are biodiversity aspects that need to be considered***

61. It is true that the HBR site is not a designated biodiversity site. That said, we believe that the site has considerable biodiversity interest and potential, although we acknowledge that records of species present on the site are currently limited as it has not been open to the public. The site is close to Hounslow Heath and the River Crane corridor and adjacent to the railway and gardens which form a wildlife corridor from Hounslow Heath to the site. Given that a Site of Importance for Nature Conservation (SINC) is located along the northern border of the site, we think it is important that the Council makes an assessment of how the proposed development fits with the Local Plan Policy LP 15(1) referred to above, testing the assumptions made in the Biodiversity Enhancement and Landscape Management Plan. In this respect, we are concerned at the comments attributed to Richmond Council’s Ecologist in the Council’s Negative Screening Opinion of 2 January 2019 referred to in paragraph 26(d) above that appear to accept without question the comments made by the applicant, in particular (on page 11 of the Opinion):
- a. “The site is acknowledged as having some local importance as a grassland resource due to its size and moderate diversity of common and widespread grasses/flora, but on the basis of information provided by the applicant, there are no notable features upon which the development would have a significant ecological impact”; and
  - b. “Air Quality With regard to the ecological impacts on the SINC, given the conclusions of the air quality report, and the limited connection of the site to a small part of the linear site, a significant impact is not expected”. Given our conclusions on the Air Quality Report made above, we would expect some due diligence to be undertaken to assess the validity or otherwise of those conclusions.
62. The Preliminary Ecological Survey (PES) submitted as part of the planning application notes (in paragraph 4.3) that, given that Hounslow Heath and the River Crane offer suitable habitats for bat species: “It may be possible that bats forage along the trees that line the borders of the site”. In their conclusions, the consultants conducting the PES recommended that the trees on the site be retained if possible and that, if the proposals require the removal of trees, then a Preliminary Bat Tree Roost Inspection should be carried out to determine the bat roosting potential within the existing trees. Given that the Planning Statement (paragraph 6.51) proposals the removal of three trees and three groups of trees, we believe that a Preliminary Bat Tree Roost Inspection should be undertaken as

recommended in the PES. We note that this is acknowledged in the Planning Statement (paragraph 6.54).

63. It is the responsibility of the Local Planning Authority, to ensure that protected species issues are fully considered by planning and that ecological surveys have been carried out where appropriate. In our view, the necessary surveys in respect of Great Crested Newts (GCN) being present on the site have not been undertaken. The PES indicates that a Phase 1 Habitat Survey was undertaken in May 2017 (and reviewed in September 2017 and June 2018) in support of this application. A reptile survey was undertaken on site between 13 June 2018 and 13 July 2018. Paragraph 1.3.3 of the Phase 1 Habitat Survey states that “A dry ditch is located to the north of the site, there are no water bodies within the Site boundary”. Paragraph 3.6.5 goes on to states that “Due to the lack of surrounding water bodies, sub-optimum habitat on site and dry ditch noted on the Phase 1 Habitat Survey, GCN were not considered further within this appraisal”.
64. In our view, this is not in accordance with Natural England’s GCN standing advice<sup>25</sup>, which states that surveys for this species should be carried out if there is “a pond within 500 metres of the development, even if it only holds water some of the year”. The standing advice states that it is best not to rely alone on the refuse search technique (which is what the surveyors have done). The HBR site has an open drain/pool, which is connected via a pipe to a series of ditches along the rear of Montrose Avenue. This forms a series of important still water bodies which can into being when the railway line was built in 1850. Today they are a haven for wildlife and have reed beds, still clear water and an interesting mix of marginal plants. Residents have reported spotting great crested newts many times along Montrose Avenue and HBR, which is within 500m of the development.
65. The above, plus the fact that Richmond Council’s pre-planning advice is to build the school next to the open land drain and by the railway bridge (ie the most environmentally sensitive area of the site), indicates to us that a fuller GCN survey needs to be carried out in line with Natural England’s standing advice. In our view, it is not good enough to rely on the comment in Richmond Council’s Negative Screening Opinion referred to above that: “If felt necessary, the LPA can secure the provision of exclusion fencing on the appropriate boundary of the application site could (sic) address any potential for GCN access” (page 10 of the Opinion).

## **Design and layout**

66. The Planning Statement argues that the building reflects the site’s MOL setting (paragraph 6.25), that the “proposed materials comprise a high quality palette of brickwork and metal cladding” (paragraph 6.26). The developers go on to assert (in paragraph 6.29) that the proposals accord “fully” with the above proposals. We question that assertion.

## **Planning policy frameworks**

67. The London Plan (Policy 7.6) states that building and structures should (among other things):
- a. Be of the highest architectural quality;
  - b. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
  - c. Comprise details that complement, not necessarily replicate, the local architectural character; and

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<sup>25</sup> Natural England (2015) Great crested newts: surveys and mitigation for development projects, available at: <https://www.gov.uk/guidance/great-crested-newts-surveys-and-mitigation-for-development-projects>

- d. Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

68. Richmond Council's Local Plan Policy LP1 (Local Character and Design Quality) requires all development to be of "high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area". Local Plan Policy LP2 (Building Heights) requires building heights to be "appropriate" and "make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity".

***Our view: the design does not meet planning requirements***

69. We do not agree with the assertion by the developers that the proposals accord "fully" with the above planning frameworks. How can the construction of a three storey main school building on MOL in a predominantly residential, low building height area be said to (i) appropriately define the public realm complement, (ii) maintain and enhance the character and heritage of the area and (iii) make a "positive contribution" towards that local character by reflecting prevailing building heights? The size and massing of the main building is out of all proportion to the surrounding area, as is the style of the building, which appears to us to be a standard design 'superblock' rather than one designed to minimise impact on the area. The visual impact on the surrounding area will be significant. We are also concerned that aspects of the development, such as the provision of metal cladding, is not suitable for a proposed site on MOL.

**Impact on Heathfield Recreation Ground**

70. As noted in paragraph 31 above, the proposal contains provision for a separate pedestrian access to the school via the Heathfield Recreation Ground. The Community Engagement Plan submitted with the planning application states that: "As a direct response to early community concerns about the HBR access point the project team introduced a second pedestrian and cycle access point from Heathfield Recreation Ground. This was shared with the community at the exhibition and remains a popular suggestion for parents and local residents" (page 19 of the report). While the proposal does provide an alternative to what we see as an unsafe access on HBR, the impact on Heathfield Recreation Ground needs to be considered.

***Planning policy framework***

71. Richmond Council's Local Plan places an emphasis on protecting local character as part of the Council's strategic objectives (page 13 of the Local Plan) by seeking to, among other things:
- a. Maintain and enhance the unique, distinctive and recognisable local characters of the different village areas and their sub-areas;
  - b. Ensure new development and public spaces are of high quality design;

- c. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation; and
- d. Protect and enhance the borough's network of green infrastructure.

***Our view: a potential detrimental effect on Heathfield Recreation Ground***

72. The impact on Heathfield Recreation Ground of opening a pedestrian entrance leading across the park to the proposed site for THS needs to be considered carefully in the context of the above Local Plan provisions. It is true that there is already an access point from Heathfield School onto the Recreation Ground, but the different impacts of primary school children, often accompanied by their parents, as compared to the potential impact of potentially hundreds of secondary school pupils needs to be assessed. The increased wear and tear and activity on the Recreation Ground also needs to be thought through. Heathfield has been upgraded recently to make it a "friendly park" where the elderly, particularly those with dementia, and those with mental health problems, can feel safe. We would be concerned if the facility for "quiet enjoyment" of the Recreation Ground is lost.

**Conclusion**

73. In the light of all the above, our conclusion is that the Council should refuse the planning application.

Yours faithfully



**For and on behalf of HBR-RAG**

## Comment on a planning application

### Application Details

**Application:** 18/3561/FUL

**Address:** Land At Hospita Bridge Road Twickenham TW2 6LH

**Proposal:** Change of use of part of the open grass and adjacent horticultural nursery for the development of a 5FE Secondary School and Sixth Form (Class D1) for 1,050 pupils (750 secondary school places and 300 sixth form places). Development is to include the formation of a new north boundary line associated to the horticultural nursery, and the erection of a main teaching block and adjoining sports block, up to three storeys in height, and associated plant and mechanical equipment, 3 court MUGA, playing pitches, on-site car park, cycle parking spaces, hard and soft landscaping; amendments to existing access road to provide dual access to Nursery and Turf House School; and associated public highway works. Addition of provision of an area of land to be dedicated as Public Open Space as an extension to Heathfield Recreation Ground; and the school will be subject to a Community Use Agreement.

### Comments Made By

**Name:** [REDACTED]

**Address:** [REDACTED]

### Comments

**Type of comment:** Object to the proposal

**Comment:** The infrastructure in the area proposed for the school is already inadequate and traffic congestion is a serious problem. This will increase the problem massively. Why has a brownfield site not been selected to redevelop other areas of the borough?

My objections include the following:

- the loss of metropolitan open land
- the loss of trees and the impact on local wildlife
- Highway safety
- Increased traffic congestion in an already stretched road system.
- The negative impact on air quality from the additional traffic from parents dropping off and collecting children by car, plus staff travelling to/from work.
- Dangerous access - the bridge over the railway tracks is already too narrow and dangerous and additional vehicle traffic will only create a higher risk of a serious accident.
- The loss of greenfield and recreational grounds for the local community.
- In addition, there are schools in the area which need investment and improvement within half a mile of this school. Another school is not needed. Investment in the existing school system is what is required.

If Turf House is desperate to have a school in the area they should take over an existing school and improve on it and expand it for local residents not residents from another area of the borough.

An investigation needs to be made into how this has even gotten this far given the lack of benefit for the local tax paying population in Whiston.



**From:** [REDACTED]  
**To:** [Mayor](#)  
**Subject:** FW: Planning Report GLA/4739/01 RE: MGLA080119-2497 Metropolitan Open Land at Hospital Bridge Road, Whitton, Middlesex. LBRUT Planning application reference 18/3561/FUL  
**Date:** 15 July 2019 09:11:46  
**Attachments:** [Speech to LBRUT Planning 10 July.pdf](#)  
[IMG\\_6891.jpg](#)

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Dear Mayor,

## **Stage 2 Decision**

Extracts from [REDACTED] acknowledgement of my previous communication at Stage 1 of this subject in January of this year is below this email.

Despite over one thousand objections to the development of the MOL, at the London Borough of Richmond Planning committee meeting on Wednesday 10<sup>th</sup> July, permission was granted to build Turing House Secondary School for a total of 1,050 pupils, made up of 750 Secondary school pupils and 300 Sixth Form pupils. We understand that this will now be referred to the Mayor for your approval and urge you to refuse the development of a school of this size for 1,050 pupils.

Many objections were made at the meeting by the Hospital Bridge Road Residents Action Group, the Local Liberal Democrat Councillors and as one of two of the most affected neighbours, by my husband, [REDACTED]. I urge you to read the attached speech which was mainly ignored but explains our objections. Furthermore, I attach a photo taken from the roof of our living area so that you can see how close this development will be to our back doors. The School building and sports hall will run the length of our garden and the MUGA will be parallel to our Patio and Living Room, parallel to the garden sheds in the picture.

In GLA's planning report of the 25<sup>th</sup> February 2019, in the section "Urban design" it is stated that "the MUGA needs to be moved onto the area of land currently proposed for the new school buildings in order to reduce overall development footprint and impact on the MOL". **The plans approved by the Committee do not comply with this request.** A number of alternatives to the scheme approved for 1050 pupil school with 3 court MUGA were explored before the scheme was brought to the planning committee and for different reasons none were deemed suitable. During the meeting the size of the school and the inclusion of the Sixth Form was variably discussed by the objectors and also by the committee. Whilst the Committee accepted that there was a duty to provide school places for pupils up to the age of 16, it accepted that there was no such duty to provide places above that age. However it was explained by a committee member that the decision to be made by the committee that evening was solely on the basis of the plans put before the Planning committee which included the Sixth Form. No alternative plan could be considered, as no alternative plan had been laid before the committee.

It is because of the preference for the school to have a 300 pupil sixth form, in addition to the 750 pupil secondary school, that the overall development footprint has to be the size it is. If the school was developed as a secondary school for 750 pupils only, the school and the MUGA could be condensed into the development footprint of the proposed 1,050 pupil school.

In addition to this, we strongly dispute the opinion of the Chairman's assistant Ms Thatcher, who dismissed ours and others MUGA noise concerns, by stating that the MUGA has been moved 2 metres south and that the 3 metre high solid timber fence would contain any noise. Neither of these will contain the extent of the unneighbourly noise which will emanate from the MUGA during school hours and during Community use. DPP Policy D12 Agent of Change 4.83 (E) and (F) will not be satisfied.

**We urge the London Mayor to refuse planning permission for the size of school as proposed. Is it within his power to request that the school size is reduced to a 750 pupil Secondary**

school? If this is not possible can he insist that adequate controls are implemented and monitored to ensure that acceptable noise levels from the MUGA and associated areas are maintained.

Yours sincerely,

[Redacted signature block]

“Dear [Redacted]

Thank you for taking the time to write to the Mayor with regards to the proposals for Turing House School.

I can confirm that this is a referable application to the Mayor. The council referred the application with all the correct documentation on the 11 January 2019. The Mayor therefore has 6 weeks to provide his initial comments on the application, assessing it against the relevant London Plan policies. This is known as a stage 1 application and the deadline for the stage 1 report and letter is 21 February 2019. The report will be available online on the following link by searching '4739' under the GLA case number search box:

Following this, once the council has resolved to either grant or refuse the application at committee, they will be required to refer it back to the Mayor for his stage 2 decision. He will have 14 days to determine the case. More details on this process can be found on our website:

At this point in time, it is not possible for the Mayor to comment on the application as it may fetter the future decision he will make on the application. However, please be rest assured that I have passed on your comments to the case officer for this application and they will be taken into consideration as a part of the decision making process.

Yours Sincerely

[Redacted name]

Planning Support Manager  
Greater London Authority | Planning “

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 July 2019 15:43  
**To:** Mayor  
**Cc:** [REDACTED]  
**Subject:** Planning Ref 18/3561/FUL (GLA case number 4739)

Dear mayor,

**Planning Ref 18/3561/FUL (GLA case number 4739)**

I am writing from CPRE London in relation to the proposed development at Whitton as per the above case number. As you know this site is Metropolitan Open Land which is protected from development. However Richmond council has now given permission for the development of a school on the site, subject to your consent. We have objected strongly to this not just on the basis that it is protected land but also because it does not meet local need. There was never a strong case for Very Special Circumstances and our understanding is that this has weakened further now that the need for school places has not increased as expected. Furthermore, we do not believe that the conditions set by you in your Stage 1 report have been met. I would strongly urge you to adhere to your commitment to preserve London's protected land and refuse to give your consent to this development.

Yours sincerely

[REDACTED]  
Head of Green Space Campaigns  
CPRE London

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 12 January 2019 10:46  
**To:** Mayor  
**Subject:** Planning Application for Turing House School

Dear Mr Kahn

I would like to draw to your attention a Planning application currently underway in the Richmond borough for the building of the new Turing House School.

This school is being built to enable the expansion of the existing Turing house school which is considered too small for demand. The current site is in Teddington, and the proposal is that the majority of the new schools pupils will come from a catchment area centered on the existing site.

The proposed site for the new school is on one of two major commuter routes out of Whitton on to the busy A316. This route is already over capacity in the morning, with local residents regularly queuing for 15 - 20 minutes each morning to gain access to the main road.

Whatever provisions are put in place to transport children, the reality is parents will drive their children to school. No measures are going to be effective at stopping this behavior sufficiently well to negate a negative impact on traffic and congestion in this area.

If this plan goes ahead, local residents will find commuting to places of work at best significantly more painful, and at worst impractical. This will have a negative impact on the lives of those effected, and on the local economy. Many people may be forced to move out of the area.

There are many environmental reasons why this development should not go ahead, the merits of which some will sympathize with and others will not. The negative impact on local residents however is indisputable and cannot be allowed to manifest.

Significant objections have been raised, and protests are planned.

I would appreciate you taking the time to review this case, and put your support behind the campaign to ensure this poorly conceived plan does not proceed.

Yours faithfully,

[REDACTED]

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[REDACTED]

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**From:** HBR-RAG <hbrresidentactiongroup@gmail.com>  
**Sent:** 25 February 2019 18:10  
**To:** Mayor  
**Subject:** Re: MGLA300119-4362 Re: MGLA121118-7484 Re: MGLA011018-4053 Re: MGLA070818-9592 - Response from the City Hall  
**Attachments:** Environment report 12 Feb copy.pdf; HBR-RAG Transport Evidence 11.11.19.pdf

Email number two (see prior email for context).

Kind Regards  
HBR-RAG  
Hospital Bridge Road Action Group

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On Mon, Feb 25, 2019 at 6:08 PM HBR-RAG <[hbrresidentactiongroup@gmail.com](mailto:hbrresidentactiongroup@gmail.com)> wrote:

Dear [REDACTED]

Thank you for letting me know.

To be sure that the Mayor has the resident group's objections would you mind passing on the attached documents please? This is one of two email due to size of the documents.

Thank you so much

[REDACTED] on behalf of

HBR-RAG  
Hospital Bridge Road Action Group

*The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.*

On Mon, Feb 25, 2019 at 5:32 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Hi HBR-RAG

Thank you for your email which was passed to me for response.

As this application is referable to the Mayor, he is unable to meet you as he is not able to comment on the application as it would fetter the future decision he would have to take. However, please be assured that all comments to the Mayor are passed to the case officer and are taken account of in the decision making process.

I'd also like to point out that the stage 1 letter and report will be available online from tomorrow. You will be able to view these on the following link: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/planning-application-search>.

Kind Regards  
[REDACTED]

Dear Sadiq Khan,

We are writing to ask if you would like to meet with the Hospital Road Action Resident Action Group who have been fighting to protect their MOL from a school for children not in our local area being built on this green land.

A potted history about how we evolved:

In the local elections of 2018, Labour stood three councillors in Heathfield. Their listening campaign revealed that the number one concern for residents in the local area was the proposal to build Turing House School on protected green land on Hospital

Bridge Road. Residents were worried about the rise in pollution that increased traffic to the area will bring, the impact of that pollution to their health (Heathfield has the highest number of asthma admissions amongst the whole borough), concern for the

safety of the children as there is a very narrow bridge right outside where the school is proposed, loss of green land (Heathfield ranks 16th/18th for green land across the borough).

Labour held a public meeting, where Lousie Reagan

(from NEU) came down to speak, from whence a group of three formed a resident action group (two were members of the LP). They led a petition to get a debate to be held in council and garnered over 1,500

signatures. After the local election, the core group has increased to six and they lead the local activities. We feel that there have been many inadequacies around the process thus far including the lack of robust consultation with local residents, the far

from comprehensive development of the plans (despite the pre-planning advice the developers have received).

Heathfield ward is one of the poorest and neglected wards within rich and affluent London Borough of Richmond and we really feel that a lot of social

injustice is being done by forcing this school to be build on our MOL. The school claim that that this is the most suitable land (but we feel that they have not done a proper sequential site search) and there are many other sites that can be considered for

multi-use, the school's admission favours children in the more affluent parts of the borough and only 20% for children for Whitton and Heathfield (it is not a school for us) besides there is a local school about 100 yards away from the proposed location (Twickenham

School) which has recently grown in its improvement and is half full. You can read more about our campaign on our FB page:

<https://www.facebook.com/HBRRAG/>

We look forward to hearing back from you in due course regards our request for a meeting with you,

Kind Regards  
HBR-RAG

Hospital Bridge Road Action Group

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to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

On Mon, Nov 12, 2018 at 1:59 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear Hospital Bridge Road Action Group

The correct email address to send Fol requests to is this one;

[mayor@london.gov.uk](mailto:mayor@london.gov.uk). Our records are that the ESFA/Bowmer & Kirkland are the applicants.

Kind Regards



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 09:06  
**To:** planning@richmond.gov.uk; Mayor; info@vincentcable.org.uk;  
contactholm@parliament.uk; admin@russelleducationtrust.org.uk;  
Cllr.GElliott@richmond.gov.uk; Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk;  
Cllr.AButler@richmond.gov.uk; Cllr.AHambidge@richmond.gov.uk  
**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF  
18/3561/FUL

Hello there,

My family and I live in Whitton [REDACTED] and are **strongly opposed to Turing House School being built on an MOL site in Whitton**. The community is in disbelief that a school should be built in Whitton for children predominately in the Teddington catchment area (80% places to Teddington, 20% to Whitton) and for all the reasons stated below.

We very much hope that you listen to the people and stop this ill-thought out idea.

Yours sincerely,  
[REDACTED]

Below are some pointers of what to include in your objection. Some maybe new to you as people have contributed them recently.

#### DESIGN

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

#### ROAD SAFETY

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact
- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

#### ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport
- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it



- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 29 December 2018 07:40  
**To:** Mayor  
**Subject:** Planning Application 18/3561/FUL - Objection from [REDACTED]

I object to the proposal from an environmental point of view as:

There are no 'very special circumstances' to justify the loss of Metropolitan Open Land There will be a loss of trees There will be a negative impact on biodiversity

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 December 2018 17:53  
**To:** Mayor  
**Subject:** Development of Turing School

Sir,

I am writing to you to ask for your support to stop the building of this school on Metropolitan Open Land. I live on the estate opposite where this would be built and feel this would be very detrimental to the local area. The access is already dangerous without the extra traffic that would be generated as there is a very narrow bridge just by it. Highway safety would be compromised , especially for cyclists, plus the pollution/noise/disturbance caused by people trying to park or deliveries.

Also I cannot see any 'very special circumstances' to justify the loss of this land and feel this school should be built nearer the admission point at Teddington. There is questionable demand for more schools in Whitton and this one would bring increased impact on the biodiversity of the existing habitat.

Yours faithfully, [REDACTED] Local resident.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 09:59  
**To:** planning@richmond.gov.uk; Mayor; info@vincentcable.org.uk;  
contactholm@parliament.uk; admin@russelleducationtrust.org.uk;  
Cllr.GElliott@richmond.gov.uk; Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk;  
Cllr.AButler@richmond.gov.uk  
**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF  
18/3561/FUL

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We very much hope that you listen to the people and stop this ill-thought out idea.

Yours sincerely,

[REDACTED]

Below are some pointers of what to include in your objection. Some maybe new to you as people have contributed them recently.

#### DESIGN

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

#### ROAD SAFETY

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact
- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

#### ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport

- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it
- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 January 2019 18:50  
**To:** Mayor  
**Subject:** Fw: Planning Reference 18/3561/FUL

Dear Sir,

Please find below, my objection to a proposed free school in the London Borough of Richmond Upon Thames. The school, Turing House School, proposes to build a permanent site in Whitton, some 4 1/2 miles from its catchment area. While its admissions policy makes space (20% representing a maximum of 25 children) for children living in and around Whitton, this aspect of the policy doesn't kick in until such time as all other places are filled and there remains availability. The admissions policy will in the first instance offer places to those

1. Looked after children;
2. Children who have an exceptional medical or social need requiring attendance at a particular school rather than any other school;
3. Children whose parents have been granted Founders' Status of the school by the Secretary of State;
4. Children who have siblings (by which is meant full, step - half-and adopted siblings living in the same household) at the school at the point of admission;
5. Children (by which is meant full, step-, half-and adopted children living in the same household) of staff directly employed by Turing House.

Only after all these admissions criteria have been exhausted does the 20% local rule kick in. It's perfectly feasible that because it has been established since 2015 siblings will make up the vast proportion of the intake and after all the other criteria have been applied, local children won't get a look-in.

I urge you strongly to call in the plans.

Yours sincerely,

[REDACTED]

[REDACTED]

----- Forwarded message -----

**From:** [REDACTED]  
**To:** planning@richmond.gov.uk <planning@richmond.gov.uk>  
**Sent:** Monday, 7 January 2019, 18:29:16 GMT  
**Subject:** Planning Reference 18/3561/FUL

Dear Sir/Madam,

I wish to raise my objections to the above proposals, viz. the building of Turing House School in Whitton. I have examined the plans and I know the site well. My address is [REDACTED]. My objections fall into three categories: the **ENVIRONMENTAL IMPACT**, the **TRAFFIC IMPACT** and **HEALTH AND SAFETY**, which are by no means exclusive categories, indeed they impact on each other with some points belonging to more than one category.

**ENVIRONMENTAL IMPACT**

The proposed site is listed as being Metropolitan Open Land and as such it currently supports the natural habitat of several wildlife species, and is therefore of great scientific interest. Besides the loss of habitat, the resultant loss of trees of any building development on the site would have a grave detrimental impact on the air quality of the area, already suffering because of its proximity to Heathrow.

Should any building proceed on the site it would mean a loss of the biodiversity that the land supports and I can see no legitimate reason to justify the loss of MOL.

## **TRAFFIC IMPACT**

The effect on traffic that these plans would generate would be an increase in the number of private cars in an area that already struggles to cope with traffic at peak times.

1. The railway bridge between Nelson Road and Montrose Avenue is very narrow and barely supports the current number of vehicles: the increase in traffic over the bridge will inevitably increase danger to pedestrians, many of whom are parents and children on their way to and from local schools (see point 1 below).
2. Turing House School's intake as stated in their 2019 Admissions Policy is that **only after** the admissions priorities are satisfied and there are still places available '20% will be allocated to those applicants whose home address is closest to the planned permanent site of the school' (i.e Whitton and its surrounds) and the other '80% will be allocated to those applicants whose home address is closest to the Admissions Point for the school'; the Admissions Point 'is defined as OS Grid Reference TQ 15356 71392 and is located in Somerset Gardens in Teddington'. This is, by no means, a guarantee that any local children will secure a place in the school. In effect, this will mean that the vast majority of the children (a minimum of 80% but could be as much as 100%) at the school will have to travel across the borough. The 481 bus service operates only 2 buses each hour and it operates at full to capacity; it will not cope with any increase in passenger numbers. This will mean that there must be an increase in cars at drop-off and pick-up times. The area cannot sustain that amount of traffic, not to mention the lack of availability for parking, which will inevitably force some drivers to park illegally, dangerously and without consideration to neighbours (blocking driveways and access).
3. The impact of the increase of traffic will, naturally enough, mean an increase in pollution levels.

## **HEALTH AND SAFETY**

1. Bishop Perrin Primary School and Twickenham Day Nursery are both located very close by and there would be a danger posed to parents and children at the busiest times from the extra traffic as drivers attempt parking, loading and turning.
2. There does not exist a safe cycling route between Teddington, Hampton and Fulwell and the proposed destination of Whitton.



Indeed, any cyclists will have to navigate their way through the roundabout at the intersection of Hospital Bridge Road and the A316, which, at peak times, is fraught and will present serious (if not fatal) problems for young cyclists. It is inevitable that parents will, for concern of their children, resort to their cars (see above points for traffic impact). This will be especially so in the winter months when the roads are more dangerous and visibility is reduced.

3. The intersection of Hospital Bridge Road, Powdermill Lane and Percy Road is a difficult intersection to negotiate at the best of times but this will be exacerbated by the impact of extra traffic at peak times. By 8:00 am on school days the traffic can sometimes be found to be backed up from that intersection up Hospital Bridge Road to the end of the cemetery; adding to the existing commuter traffic (with cars from across borough) will add to the burden rather than alleviate it.

In summary, the proposed school will have detrimental effects on the environment through the loss of natural habitats for wildlife, the loss of trees and increased pollution levels due to increased traffic flow and congestion. The dangerous access to the school poses health and safety risks especially for the very young.

That there is demand for schools in the borough is not in question; what is questionable is the wisdom of placing a school in an area not proximate to the vast majority (minimum of 80%) of its own intake. This will, in effect, create the need to drive to school resulting in pollution and highway safety issues for the residents of that area. The council should be working towards schools that serve local areas, and in so doing, encouraging walking and other more sustainable means of transport to school; it should not countenance increasing traffic flow and the concomitant higher pollution levels.

I urge you in the strongest possible terms to reject the application 18/3561/FUL outright.

Yours sincerely,

[Redacted signature]

[Redacted name]  
[Redacted address]

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**From:** [REDACTED]  
**Sent:** 08 January 2019 11:28  
**To:** Mayor  
**Subject:** Planning Proposal: 18/3561/FUL

Dear Sir / Madam,

**Planning Proposal: 18/3561/FUL**

Address: Land At

**Hospital Bridge Road Twickenham TW2 6LH**

**Object to the proposal**

Comment: Objection on the grounds of:

No 'very special circumstances' to justify the loss of MOL, loss of trees etc.

TRAFFIC GENERATION and Traffic memory, increase and reverberations throughout Whitton and beyond (e.g. A316 and the already congested access to it). DANGEROUS ACCESS (e.g. the close proximity to the end of the narrow bridge and the exit/access/egress to Montrose Avenue (and other side roads)).

Highway safety and the potential risk this could cause to pedestrians and drivers, bridge too narrow.

IMPACT ON PARKING - which would surely not remain at Hospital Bridge Road but spread throughout Whitton. Pollution which we are told must be addressed now, noise and disturbance from use. adequacy of parking/loading/turning;.

Overlooking/loss of privacy, loss of light overshadowing, layout and density of building, design quality, impact on biodiversity, impact on recreation ground.

Kind regards.

[REDACTED]

Whitton resident

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This is a **controversial** planning application to build on MOL. A school for a wealthier part of Richmond Borough will be built in the poorer ward. This requires your attention due to the **concerning factors** below.

## **BREACHES LONDON PLAN**

**PUPIL SAFETY:** uncontrolled crossing is to be sited on a blind humped back bridge 58 m from the summit. HGVs in low visibility or wet conditions do not have enough stopping distance at 20-30mph, similarly cars having to suddenly stop before the crossing. Access to the school will be shared with HGVs.

**CYCLE SAFETY:** teenage cyclists expected to use a road which has 800+vph. Richmond cycling campaign's stated the cycle route is not safe for adults let alone kids. Developers have refused to pay for cycle tracks. Richmond Cycling Campaign deem is unfit for adolescents.

**POLLUTION:** highly congested T-junction already exceeds NO2 and particulates and extra journeys to the school will increase this further.

**POOR PUBLIC TRANSPORT LINKS:** admissions point is 2 miles from the site.

**UNFAIR ADMISSIONS:** minimises out of borough pupils which is in breach of the Greenwich Agreement. 20% allocated to local area.

**MOL:** The very special circumstances argument is very weak as there is no shortage of school places in the area. No need has been demonstrated for the extra-large sixth form.

**EQUALITY IMPACT:** not looked at - predominately white middle class school in less affluent racially mixed area.

**SITE SEARCH 'PRE-DETERMINED':** planning officers adopted an overly technical approach of looking at MOL sites with the least designation knowing it would inevitably result in HBR site being chosen. No actual balancing / scoring exercise carried out.

**OVER 1,000 OBJECTIONS:** 1,500 signed a petition to get council to debate the impact of the school on the community, 1,200 submitted a written objections. 800+ signatures on [change.org](https://change.org) objecting to this development.

\*This is not a NIMBY Campaign as there are two secondary schools and four primary schools in the area\*

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 11 January 2019 09:57  
**To:** Mayor; info@vincentcable.org.uk; contactholmember@parliament.uk;  
Cllr.GElliott@richmond.gov.uk; admin@russelleducationtrust.org.uk  
**Cc:** Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk;  
Cllr.AButler@richmond.gov.uk; Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk  
**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF  
18/3561/FUL

Hello,

My Name is [REDACTED]  
My family and I live in Whitton ([REDACTED])

We are **strongly opposed to Turing House School being built on an MOL site in Whitton.**

**REF 18/3561/FUL**

*Why* is a school being built in Whitton, when the children that attend it will be predominately from the Teddington catchment area? (80% places to Teddington, 20% to Whitton). This is frankly an obscene suggestion and shows little to no respect for local Whitton residents.

Another *key* reason for opposing the school is that the traffic congestion on that road is already dreadful. There are already several schools and a nursery close by and the children that attend them **SHOULD NOT** be breathing in any more fumes from cars than they are currently already subjected to.

Whitton is already underneath the Heathrow Flight path with all the aviation fumes that generates. The last thing we need is a deliberate increase in traffic - for something that local residents and their families won't even *benefit* from.

I have also listed further reasons to oppose the school below.

We very much hope that you will put a **STOP** to this proposed school.

Yours sincerely,  
[REDACTED]

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

**ROAD SAFETY**

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous

5) No crossing provided from Hospital Bridge Road to Nelson Road

6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot

2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact

3) More pollution from extra cars & buses queuing and sitting in traffic

4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House

2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton

3) School place projections for secondary places were revised downwards in 2018

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3) HBR site currently provides a green lung removing pollution – this proposal will remove it

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5) Playing fields are excessive – especially as they are next to a large public sports ground

6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.

7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens



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[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 30 December 2018 18:54  
**To:** Mayor  
**Subject:** Turing House School

Dear Sir

The plans have been submitted to build this school on Hospital Bridge Road Whitton. I have objected to the plans for quite a few reasons.

- 1 **Use of MOL** No exceptional circumstance to justify this.
- 2 **Safety** as the entrance is very close to a Bridge so visibility is limited.
3. **Pollution Pollution Pollution.** This road is congested enough, add all of the extra traffic and local residents and children will be at risk.
- 4 **Parking** All surrounding roads will be even more congested as there are so few proposed parking places on the school site.

We need you to look very carefully at these plans, read the objections, read the supports and observations. The vast majority of the supporting people come from south of the 316. They will not be affected by the pollution etc. If necessary come and see for yourself. Vince Capel is our MP, I'm sure that he will show you around or if not I would be happy to do so. The plans to build this school in an area which is not close to where the majority of it's intake will come from seems to be not very sensible.

Thank you

[REDACTED]

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**From:** Bennett, Richard (Cllr) <Cllr.R.Bennett@richmond.gov.uk>  
**Sent:** 17 July 2019 10:11  
**To:** Mayor  
**Cc:** Caroline Russell  
**Subject:** Turing House School - Borough of Richmond upon Thames

Dear Mayor

On July 10th the Borough's Planning Committee passed by a majority vote permission for Turing House School to be built on Metropolitan Open Land (Application 18/3561/FUL).

I believe that it should be refused by the Greater London Authority on the grounds that this is an inappropriate development that will be harmful to the MOL. I understand that such development should not be approved except in very special circumstances. Such very special circumstances do not apply in this instance.

The argument for this exceptional approval was stated as the "educational need for this school". The implication is that the Borough needs its 750 secondary school places and 300 sixth form places. The facts are that the school already exists and provides 625 places. The further 125 places will also be provided before the new building is built. The school has a want, but the Borough does not have a need, for the 300 sixth form places. In Planning terms the gain to the Borough cannot be judged to be "very special".

The quality of the MOL was denigrated in the Meeting on the 10th July, along the lines of "So it wouldn't be too much of a loss". I do not believe that it is part of the Borough's Planning function to, in effect, justify its actions by re-classifying MOL in this way. I hope that you will refuse this application.

Best Regards

Richard

Cllr Richard Bennett  
South Twickenham Ward  
Leader, Green Group  
Richmond Upon Thames

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 09:45  
**To:** Mayor  
**Cc:** tonyarbour@london.gov.uk  
**Subject:** Fwd: Re: Turing House - Site

Mr Khan

I am writing with regard to your decision to allow building to go ahead for Turing House School.

The school is currently on a split site in Tedding (years 8-10) and Hampton (year 7). The school have tried their best to accommodate everyone's needs, but as you can imagine, this is very tricky indeed. As a result, the teacher's valuable time is torn by travelling between 2 sites. Lunch queues have increased as a result of the catering staff being unable to offer staggered lunches at Teddington. Each Year group has priority once every 3 weeks. On the other weeks, the children queue for ages and often don't get a chance to sit and eat their lunch and socialise with their friends. Developing social skills is also important [REDACTED] (First world problems, I know that in the greater scheme of things, this may seem unimportant.) At the end of the day, we all want what is best for our children.

Turing House is passionate about delivering the best opportunities for it's pupils. The parents and Russell Educational Trust fought incredibly hard to provide another educational establishment for many years in this area. West Twickenham and Fulwell were very much in a 'no man's land' when it came to availability of school places 4 years ago.

[REDACTED]

After being at Turing for 1 term, we realised this was exactly the place we wanted for our child and therefore declined the offered place. [REDACTED]

[REDACTED] The nurturing environment has done wonders for him and seeing the children being encouraged by teacher's who are passionate about education has been amazing.

We will continue our support of this wonderful establishment whatever your decision, but ask that you give this matter very careful consideration. It will provide not only our children, but children near the proposed site many opportunities to flourish and develop a community spirit, by combining the 2 sites and being able to accommodate more students with better facilities as well as access to outdoor space.

Many thanks for your time.

Yours sincerely  
[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 January 2019 11:52  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor  
**Subject:** 18/3561/FUL

To whom it may concern

We strongly object to the planning permission of Turing House School due to:

Loss of trees  
Highway safety  
Bridge is too narrow  
Impact on parking  
Traffic generation  
Dangerous access  
Adequacy of parking/loading/turning  
Noise and disturbance from use  
Overlooking/loss of privacy  
Loss of light/overshadowing  
Layout and density of building  
Design quality  
Impact of biodiversity  
Impact on recreation ground

Yours sincerely

[REDACTED]

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[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 09 January 2019 17:59  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor  
**Subject:** Fwd: Turing House School Ref: 18/36561/FUL

Dear Sir/Madam

We have received notification that there is a plan to build Turing House School on the Metropolitan Open Land at Hospital Bridge Rd Whitton.

We are residents at the address below and strongly object to this development, the objections being the following:

1. Loss of the MOL
2. Loss of trees
3. Highway safety
4. Bridge too narrow
5. Impact on parking
6. Traffic generation
7. Dangerous access
8. Adequacy of parking/loading/turning
9. Noise and disturbance
10. Impact on biodiversity
12. Impact on recreation ground

We feel that this school for Teddington residents would be better situated nearer to Teddington and ease the traffic flow on the the already congested roads between these two communities.

Yours Sincerely,

[REDACTED]

[REDACTED]

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My name is [REDACTED]  
[REDACTED] and I are the MOST affected by the development as acknowledged on page 4 of the report. The effect of the proposed school on our lives will mean that we go from living in a quiet residential location to the experience of living in a very noisy city.

[REDACTED] will be overlooked by the proposed school, meaning we have little or no privacy. The MUGA will be only a few metres away and parallel to my backdoor and Patio area.

Whilst I agree with ALL the objections raised as listed in the report, my personal concern, should the application be approved, is the siting and use of the MUGA.

### **FOOTPRINT OF THE MUGA:**

In the GLA Consultation London Plan, section 7a of the report, it is stated that the proposed site of the MUGA needs to be moved within the footprint of the school, to reduce the impact on the MOL.

**NOISE FROM MUGA:** The MUGA will be used before, after and at break times, not to mention formal sports sessions and weekend use.

As indicated in the report on Page 76, ref NS43 Section B & C, it is recommended that a noise assessment should be carried out before the MUGA is used, to ensure that it does not exceed 50dB(A) LAeq recommended.

Why wait until post build to accept that the noise emanating from the activities of 1,000 + free spirited students will well exceed this level?

I would refer you to DPP Policy D12 / Agent of Change/ Section E & F / Paragraph 4.83 which states that “New noise generating developments, which include schools and sporting venues, proposed close to residential and other noise -sensitive developments, should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents.”

“Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed”

Noise continued.....

Surely there is already existing data available to use as a comparison eg. the GEMS Primary Academy School in Colne Road, Twickenham opened in 2015, for 4 to 11 year olds, currently there are **approximately just 150 pupils**. Assurances were given during the planning process that sufficient controls would be put in place after a noise assessment was carried out. An independent noise assessment was carried out which indicated levels far exceeded the acceptable limits which proposed that a 5 metre Acoustic wall would be required to adequately control the noise level. 3 years on, no controls have been put in place. Now, EFSA Planning application 17/2609/VRC seeks to renegotiate the original requirement.

### **THE COMMUNITY USE OF THE MUGA:**

Eventually with Community use there will be noise and disruption emanating from the School, MUGA and Sports Fields from 8am to 8:30pm seven days a week - THIS IS UNNEIGHBOURLY and will far exceed acceptable noise levels - it will have a detrimental impact on both the physical and mental wellbeing of the residents in Redfern Avenue's cul de sac as identified on Page 4 of the report

### **The EFFECT OF FENCING ON NATURE CORRIDOR:**

The effect of the 3m high solid security fence will have a considerable shading effect on the low-lying part of the nature corridor. Also, the substantial footings required to withstand the prevailing westerly winds that whistle across from the adjoining Heathfield parkland will be damaging to the root stock.

**IN CONCLUSION** : I strongly object to the proposed development of the school on the MOL.



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 December 2018 07:30  
**To:** Mayor  
**Subject:** PROPOSAL OF TURING SCHOOL IN HOSPITAL BRIDGE ROAD

Good Morning,  
PLEASE SAVE OUR GREEN LAND  
I would like to express my objection to the building of Turing House School in Hospital Bridge Road.  
The road and bridge are too narrow. It will impact on highway safety.  
There are no special circumstances for it to be in Whitton when it is a Teddington school.  
There would be an impact on parking it would delay the only half hourly bus that passes it in that area.  
It would have an impact on the recreation ground.  
PLEASE PLEASE STOP THIS BUILDING  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 12:53  
**To:** Mayor  
**Subject:** Turing House school

Dear Mr Khan,

RE: Turing House -planning objection due to traffic generation and air pollution

I am writing to express my concern regarding the proposal for Turing House school being built on Metropolitan Open land. The level of pollution within the air over Bishop Perrin school on Hospital Bridge Road, almost opposite where it is proposed Turing House will be built is already a serious concern. The air pollution level on Hospital Bridge road is already scored at 3 out of 6, higher than the average for Richmond borough. It is likely that nitrogen dioxide levels already exceed the annual legal limit. The building of a new school opposite will undoubtedly drive the pollution up still further with additional congestion and levels of traffic. Pollution is already rife in Heathfield ward and admissions for asthma the highest in the borough.

[REDACTED] attends this school, spending more than six hours a day, five days a week in this environment, alongside the walk back and forth to school every day.

There are approximately 200 plus children attending Bishop Perrin school aged 4-11 that will be detrimentally affected by this proposal should it go ahead.

It's deplorable that we continue to expose our children to lethal levels of air pollution. Such pollution is harmful to everyone, but for children the risk to their health is even higher. Their exposure is much greater and they absorb and retain pollutants in the body for longer. I have already called upon the council to apply its moral obligation to rethink its stance on where Turing House should be positioned.

This is a prime example of 'for the few not the many' which I find so disgraceful in this government at a national and local level.

Yours faithfully  
[REDACTED]  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 31 December 2018 14:03  
**To:** Mayor  
**Subject:** Proposed Turing House School Twickenham

Dear Mayor

I am writing to you as I am against the proposed building of Turing House School on a greenfield site at Hospital Bridge Road Twickenham.

We do not need another school in this area as there is sufficient capacity at present.

80% of the places will be allocated to children from other areas and not local children so the increase in local area traffic will make an already busy area impossible.

If there is to be any building on this site I feel it should be affordable housing and not a school we do not need.

Regards

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 13:21  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Fwd: Turing House School: ref 18/3561/FUL; GLA/4739/01

Apologies- not sure this reached all intended recipients !  
Re- sending!

Best wishes  
[REDACTED]

Sent from AOL Mobile Mail  
Get the new AOL app: [mail.mobile.aol.com](mailto:mail.mobile.aol.com)

On Wednesday, 17 July [REDACTED]@london.gov.uk> wrote:

Dear All,

Last week, a decision was made by the Richmond Borough Council's planning committee to support the above application and I would be most grateful if you would endorse that decision and so the granting of permission for the building of Turing House School ('THS') on the Hospital Bridge Road site.

Though the land is MOL, it has been demonstrated that the very special circumstances in which such land can be built on have been emphatically established.

THS is a brilliant much needed school in the area and this is the only (most viable) site available as a permanent home for it. Its current split site operation is unsustainable and its future and the future of the hundreds of children (including very many from Whitton, my own being one of them) who happily study there, and those who could so greatly benefit from this fantastic school, could be in serious jeopardy if this building does not proceed.

The project will also open up access to more areas of green space generally, and will provide all the children at the school with access to outdoor spaces and PE facilities that many of them just don't have in their current location.

I therefore urge you to endorse the planning committee's decision and allow this school to be built on the land at Hospital Bridge Road.

Thanks so much in advance for your consideration and help. My details are set out below if you have any queries or would like any further information.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 December 2018 16:54  
**To:** Mayor  
**Subject:** 18/3561/FUL

Mayor.

I OBJECT to the planned school being built.

The area is already completely congested even before the school has been built.

A 3 min car journey now takes approx. 15-25 mins and makes a mockery on your stance for air pollution and air quality which you have indicated that you have a passion for.

Thank you

Local resident.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 19:42  
**To:** Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk; Mayor;  
info@vincentcable.org.uk; contactholmber@parliament.uk;  
admin@russelleducationtrust.org.uk; Cllr.GElliott@richmond.gov.uk;  
Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk; Cllr.AButler@richmond.gov.uk  
**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF  
18/3561/FUL

Hello there,

My family and I live in Whitton and are **strongly opposed to Turing House School being built on an MOL site in Whitton**. The community is in disbelief that a school should be built in Whitton for children predominately in the Teddington catchment area (80% places to Teddington, 20% to Whitton) and for all the reasons stated below.

We very much hope that you listen to the people and stop this ill-thought out idea.

Yours sincerely,

[REDACTED]

Below are some pointers of what to include in your objection. Some maybe new to you as people have contributed them recently.

#### DESIGN

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

#### ROAD SAFETY

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact
- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

## ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport
- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it
- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens

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**From:** [REDACTED]@hounslow.gov.uk>  
**Sent:** 10 January 2019 16:04  
**To:** Environmental Protection  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation for 18/3561/FUL / London Borough Of Hounslow / Land At , Hospital Bridge Road, Twickenham, TW2 6LH / LL

Dear [REDACTED]

Please could the below comments be passed onto the case officer dealing with the above application. LB Hounslow wish to comment on the application as there are likely to be impacts given the proximity to the boundary, the comments relate to transport.

The Schools team do not believe that there will be a significant number of Hounslow pupils attending this school, at least initially due to the school's admission policy which is primarily based in Teddington. It is noted however that 20% of pupil places (ie. 210 places) will be allocated to those living closest to the permanent site of the school. School admission policies do not recognise borough boundaries so this could include children living in LB Hounslow with the borough boundary less than 1km away. However, we understand the school is looking to amend this policy so more places for those living closest to the school could be made available in the future. **LBRuT must ensure that any change to admissions policy which results in a higher proportion of places being made available to children living close to the permanent site is linked to appropriate improvements to pedestrian and cycle infrastructure that ensures any pupils living in LB Hounslow can walk or cycle safely to the school. This should include the construction of additional pedestrian crossings and cycle lanes on Hospital Bridge Road and/or Percy Road as appropriate. This should be secured in a s106 Agreement.**

It is proposed to improve the access to the site including a new zebra crossing on Hospital Bridge Road between the site access and the railway bridge. This would provide a designated crossing for pedestrians approaching from the north (ie. direction of Hounslow) who would have to do so on the eastern side of the railway bridge because there is no footway on the western side. However, there are no dedicated crossing facilities on the northern side of the bridge which is likely to lead to pedestrians crossing the road in an uncontrolled manner. This is not considered to be acceptable and in order to ensure the safety of pupils travelling from LB Hounslow an additional crossing is to be provided between the railway bridge and the junction with Nelson Road. It is also noted that the footway width over the railway bridge is very narrow and a significant increase in use could lead to obstruction and/or road safety problems. **It is requested that LBRuT seek additional pedestrian crossing facilities to the north of the railway bridge on Hospital Bridge Road and improvements to the footway over the railway bridge.**

Pupils travelling from the Hounslow direction are likely to use the 481 bus. However, there is no safe dedicated crossing point between the closest bus stop and the school access. This is likely to lead to pupils crossing the road away from the zebra crossing to the north of the school access and is considered to be a safety concern. In order to ensure that any pupils travelling to the school from LB Hounslow can do so safely a second crossing is to be introduced to the south of the site access. **It is requested that LBRuT secure additional pedestrian crossing facilities to the south of the site access and the site access is redesigned to provide pedestrian priority.**

It is noted that no assessment of cycle routes to the north of the school was undertaken. If the school admission policy changes then more pupils from LB Hounslow may attend the school. Although the TA identifies cycle routes in the vicinity of the site the majority of these have no dedicated cycle infrastructure or are inadequate and not considered to be attractive or safe for children cycling to school. LBRuT and the applicant should be aware that children cycling to school are likely to take more risks and be less aware of their own and others safety. **Therefore, it is requested that LBRuT request an assessment of the suitability of cycling routes to the north of the site for pupils be undertaken by the applicant. Cycle training must be included in the School Travel Plan.**

It is noted that no assessment was undertaken of the impact of additional traffic on the Hanworth Road/Percy Road/Wellington Road South traffic signal junction which suffers from congestion at peak times. The TA predicts that only 5% of pupils will be driven to school resulting in 45 additional car borne trips. It is unlikely that this number of movements would have a significant impact on that junction but this is based on that figure being accurate. **LBRuT must ensure that the predicted modal share figures are adhered to by the applicant, that they are monitored and enforced. If future surveys (which should be annual) indicate a significantly higher proportion of car trips then remedial measures must be put into place. This should be secured in a s106 Agreement and be specific targets in the School Travel Plan. A STARS level STP is not considered to be of sufficient strength to ensure this and these targets and an action plan that included a strict requirement for mitigation measures must be secured. The mode share targets are also to include staff travel with car trips being restricted to 45 which is the number of proposed parking spaces.**

**The Construction Logistics Plan is to be secured by condition. No construction vehicles should use Hospital Bridge Road and the Hanworth Road/Percy Road/Wellington Road South junction without prior approval and an assessment of the traffic impact. Construction deliveries should be restricted to be outside of school and traffic peaks.**

I would be grateful if the above can be considered as part of the determination of the applications.

Kind regards,

**Deputy Area Planning Manager (West)**

Development Management  
Housing, Planning and Communities  
London Borough of Hounslow  
Orange Zone, Civic Centre,  
Lampton Road,  
Hounslow, TW3 4DN  
Office: [REDACTED]



LONDON PLANNING AWARDS 2017  
WINNER MAYOR'S AWARD FOR LONDON PLANNING

**From:** Environmental Protection [mailto:Planning@richmond.gov.uk]

**Sent:** 04 January 2019 11:55

**To:** K [REDACTED]@

**Cc:** [REDACTED]@

**Subject:** RE: Consultation for 18/35  
Twickenham, TW2 6LH / LL

Dear [REDACTED]

Thank you for your email which I have forwarded to [REDACTED] h

**From:** HBR-RAG <hbrresidentactiongroup@gmail.com>  
**Sent:** 19 February 2019 19:00  
**To:** Mayor  
**Subject:** Fwd: MGLA121118-7484 Re: MGLA011018-4053 Re: MGLA070818-9592 - Response from the City Hall

Dear Sadiq Khan,

Following on from our request for a meeting with you, we would like to share the below letter with you further supporting our case and how this proposal, if it went ahead, would contravene GLA planning policies.

Land at Hospital Bridge Road, Twickenham TW2 6LH  
18/3561/FUL

We want to draw your attention to our concerns about the proposed development on Hospital Bridge Road. If approved, this development will cause unnecessary and permanent harm to MOL and our community.

We ask for your support in implementing GLA planning policies and rejecting this proposal.

#### Permanent and catastrophic impact on the environment

1. Our community will lose Metropolitan Open Land and the benefits this brings; biodiversity, better air quality and a slice of rural environment to promote health and well-being for local residents.
2. There are alternative sites the school can use, such as Clarendon site the school currently occupies.
3. The plans will have an overbearing visual impact; a huge, factory-like mass, out of keeping with the area and visible from all directions replacing the current open vista.

#### Increased pollution and dangerous roads

1. Turing House School on HBR will be a long way from the point of identified need which will increase traffic movements and pollution. This is in conflict with LBRuT Local Plan Sustainability Objectives as set out in Appendix 1, numbers 2, 3, 6, 7, 8 and 11, as well as GLA policies on sustainability
2. The increase in pollution in an area of poor air quality will further damage the health and well-being of residents of Heathfield Ward further, particularly the young, elderly and the vulnerable.
3. The increased traffic will lead to further problems in a heavily congested area at school run times with six schools in close proximity to the site; Bishop Perrin, Heathfield, Twickenham, Heathland, St Edmunds and Nelson.
4. The access point is highly dangerous, in close proximity to a narrow, hump-backed railway bridge.
5. Richmond Cycling Campaign has commented in detail that the cycle route is unsafe for adolescents.
6. Cost of transport is high; approximately eighteen extra buses needed to carry pupils to and from school.

#### Unnecessary public expenditure

1. There is evidence that primary school rolls in Richmond are starting to fall with local schools reducing capacity. Local senior schools Twickenham and Springwest have 500 vacancies each. The headteacher of The Heathland school states in his objection that there are sufficient secondary school places in this area to meet demand for the next ten years.
2. The plan proposes a large sixth form capacity of 300, whilst Teddington School sixth form is currently undersubscribed and Twickenham School sixth form is closed.
3. The 'Very Special Circumstances' to permit building on MOL are not proven. There is sufficient capacity in local schools, and the sequential site search conducted by the developer demonstrates neither due diligence nor an exhaustive search in seeking alternative sites.

Community facilities are not needed

1. Within 1km of the proposed development there are: Whitton Sports Centre, Whitton Community Centre, Whitton Youth Zone, 2<sup>nd</sup> and 3<sup>rd</sup> Whitton scout huts, 4 school halls, 3 church halls, Homelink all providing high quality community facilities. The community facilities the school would provide are not needed and do not represent the very special circumstances needed to justify the permanent loss of MOL.

You will see from the very large numbers of local residents who have submitted detailed objections to this development that there is a groundswell of very strong feeling about building this school in our community.

We recognise the children of Turing House School need a suitable school on the right site. However, a school needs to be part of its community; Turing House community is far away from Heathfield.

Kind Regards  
HBR-RAG  
Hospital Bridge Road Action Group

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----- Forwarded message -----

From: **HBR-RAG** <[hbrresidentactiongroup@gmail.com](mailto:hbrresidentactiongroup@gmail.com)>

Date: Mon, Jan 28, 2019 at 10:10 PM

Subject: Re: MGLA121118-7484 Re: MGLA011018-4053 Re: MGLA070818-9592 - Response from the City Hall

To: Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)>

Dear Sadiq Khan,

We are writing to ask if you would like to meet with the Hospital Road Action Resident Action Group who have been fighting to protect their MOL from a school for children not in our local area being built on this green land.

A potted history about how we evolved:

In the local elections of 2018, Labour stood three councillors in Heathfield. Their listening campaign revealed that the number one concern for residents in the local area was the proposal to build Turing House School on protected green land on Hospital Bridge Road. Residents were worried about the rise in pollution that increased traffic to the area will bring, the impact of that pollution to their health (Heathfield has the highest number of asthma admissions amongst the whole borough), concern for the safety of the children as there is a very narrow bridge right outside where the school is proposed, loss of green land (Heathfield ranks 16th/18th for green land across the borough).

Labour held a public meeting, where Lousie Reagan (from NEU) came down to speak, from whence a group of three formed a resident action group (two were members of the LP). They led a petition to get a debate to be held in council and garnered over 1,500 signatures. After the local election, the core group has increased to six and they lead the local activities. We feel that there have been many inadequacies around the process thus far including the lack of robust consultation with local residents, the far from comprehensive development of the plans (despite the pre-planning advice the developers have received). Heathfield ward is one of the poorest and neglected wards within rich and affluent London Borough of Richmond and we really feel that a lot of social injustice is being done by forcing this school to be build on our MOL. The school claim that that this is the most suitable land (but we feel that they have not done a proper sequential site search) and there are many other sites that can be considered for multi-use, the school's admission favours children in the more affluent parts of the borough and only 20% for children for Whitton and Heathfield (it is not a school for us) besides there is a local school about 100 yards away from the

proposed location (Twickenham School) which has recently grown in its improvement and is half full. You can read more about our campaign on our FB page: <https://www.facebook.com/HBRRAG/>

We look forward to hearing back from you in due course regards our request for a meeting with you,

Kind Regards  
HBR-RAG  
Hospital Bridge Road Action Group

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On Mon, Nov 12, 2018 at 1:59 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear Hospital Bridge Road Action Group

The correct email address to send Fol requests to is this one; [mayor@london.gov.uk](mailto:mayor@london.gov.uk). Our records are that the ESFA/Bowmer & Kirkland are the applicants.

Kind Regards

██████████  
Planning Support Manager

---

Dear ██████████

Following on from your email response to us, please can you advise where we submit the Fol to and would you mind clarifying that the applicant is Turing House School or ESFA so we can be specific in our Rol request.

Kind Regards  
HBR-RAG

Hospital Bridge Road Action Group

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On Thu, Oct 4, 2018 at 8:43 AM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear HBR-RAG

We have held pre-application discussions, however, we do not currently hold any information because the customary pre-application note has not yet been issued to the applicant. We anticipate this will be issued later this month.

Therefore,

I'd suggest submitting an Fol request later this month.

Kind Regards

██████████  
Planning Support Manager

Greater London Authority | Planning

Dear ██████████

REFERENCE MGLA070818-9592 - TURING HOUSE SCHOOL AND METROPOLITAN OPEN LAND

Thank you for your email of 3 September replying to our concern about development on metropolitan open land.



We continue to be in touch with Richmond council and once the planning application has been submitted we will forward

further comments to you.

We know that in previous cases there have been pre-application discussions with the developer, for example,

<https://www.london.gov.uk/sites/default/files/4593-2.pdf>

Are you able to say whether these have taken place and will you let us see your pre-application advice?

Kind Regards

HBR-RAG

Hospital Bridge Road Action Group

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to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the

future.

On Mon, Sep 3, 2018 at 2:10 PM Mayor of London <[mayor@london.gov.uk](mailto:mayor@london.gov.uk)> wrote:

Dear Hospital Bridge Road Residents' Action Group,

Thank you for taking the time to write to the Mayor with regards to the proposals for Turing House School. As I'm sure you can appreciate, the Mayor receives a large amount of correspondence and asked me to reply on his behalf.

Having looked into this, it appears that a formal planning application has yet to be submitted. Once the application has been submitted, it looks likely that the application would be referred to the Mayor under category 3D of the Mayor

of London Order (2008). More information on this process and the Mayor's powers can be found on the following link:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning>.

As such, the Mayor is not able to comment on this application as it will fetter any future decision he will make. However, the Mayor has stated his strong intention to protect London's Green Belt/MOL and has previously directed refusal

on schemes if deemed to be inappropriate development on Green Belt:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/direction-refuse-applications-0>.

This shouldn't be seen as an indication of his likely decision but all schemes sent to the Mayor are robustly interrogated against the relevant

planning policies.

For now, I would advise that you continue to engage with the local authority. All comments sent to the local authority are also passed onto the Mayor should the application be referable to him. You are also welcome to send any further comments

to the Mayor; [mayor@london.gov.uk](mailto:mayor@london.gov.uk).

Kind Regards,



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 30 July 2019 12:18  
**To:** Mayor  
**Subject:** Planning ref: MGLA140119-3124 Richmond upon Thames planning application 18/3561/FUL

Mayor of London.

Planning Department.

City Hall.

The Queen's Walk.

London.

SE1 2AA.

[REDACTED]  
Twickenham.

Middlesex.

[REDACTED]  
30-07-2019

**Reference, Richmond upon Thames Planning Application 18/3561/FUL.**

Dear Mr. Mayor.

It was wonderful to hear that London has been given the title "National Park City". This accolade is well deserved with its many parks, Green belt, Metropolitan Open Land and school playing fields.

Sadly, Green belt, Metropolitan Open Land and school playing fields are constantly under threat from development.

These lands, parks and green spaces of London play an important part helping combat atmospheric pollution from motor vehicles.

A case in point is the proposed development on Metropolitan Open Land in Richmond (Whitton).

The proposed development of Turing School will take some of this precious land and will also increase the amount of vehicular traffic (pollution) in the local area.

With 4 infant schools in the vicinity already this will affect the quality of air and impact on the development of the lungs of these children.

The planning committee's approval of the school disregarded environmental arguments and was solely on satisfying the needs for a permanent home for the school.

For this development to go ahead will not the designation of Metropolitan Open Land need to be cancelled?



I have seen no application to cancel this designation. A judgement made in court said that all Metropolitan Open Land has to be treated as Green Belt Land.

I look forward to hearing from you.

Yours sincerely

[Redacted signature]



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 January 2019 11:42  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor  
**Subject:** Objection to Turing House

[REDACTED]  
18/3561/713574

[REDACTED]

I object to Turing house or Richmonds latest vanity project however you wish to describe it.

On the basis:

Loss trees

Highway safety

Extra traffic with not enough infrastructure added Loss of light Impact on nature

[REDACTED]

Sent from my iPad

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**From:** [REDACTED]  
**Sent:** 11 January 2019 23:56  
**To:** planning@richmond.gov.uk; Mayor  
**Subject:** Ref 18/3561/FUL

Dear Sir/ Madam

I would like to oppose the building of Turing House school on MOL in Whitton. The site is wholly unsuitable for a number of reasons.

Firstly the proposed access to the site is dangerous and will cause additional congestion on a road system that cannot cope with more buses or cars. The proposed entry point to the school is at the start of an incline onto a narrow bridge crossing the railway track. At present if buses or lorries meet another vehicle on the bridge both vehicles have to slow down to nudge past each other.

The traffic on this road (at the north end of Hospital Bridge Road) passes dangerously close to the footpath, with traffic doing 30 mph only a foot away from pedestrians walking to and from at least 4 schools (Nelson, St Edmunds, Bishop Perrin and Heathfield). At school pick up and drop off this narrow pavement becomes congested and allows only for one-way traffic especially if there are pushchairs or bikes waiting to use the path. This road and pavement can not cope with increased vehicles or footfall without dangerous consequences.

I attach a photograph of gridlocked traffic at the proposed entrance to Turing House



School:

This is a regular occurrence already especially when there is a rugby game, event at Twickenham stadium, issue on surrounding roads or congestion on the A316 etc. I would consider supporting the building of this school if the access to the site was from a road other than Hospital Bridge Road just in front of a narrow bridge.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 07 January 2019 13:05  
**To:** Mayor  
**Subject:** Richmond Planning Application 18/3561/FUL

[REDACTED]

7/1/19

I wish to object to the above application for the following reasons:

The area already has 4 schools locally and the traffic in some areas is very heavy at start and end times and an additional school will lead to increased highway safety considerations, increased pollution, parking restrictions and noise and disturbance, particularly as the majority of the school intake will be for pupils from outside the local area.

The area around Powder Mill Lane, Longford Road, Warburton Road and Hospital Bridge Road are already extremely busy with frequent waiting for traffic to clear to proceed as parents rush their children to school, often at some speed as they are running late leading to danger for children and adults alike. Also in Cobbett Road we see daily cars parked illegally with no effort to penalise them, noise from impatient parents sounding their horns as they wait to move, and unless the new development has some special status I would assume the situation will be repeated at its location, and as this will be close to Hospital Bridge, which is already too narrow, will inevitably lead to a very dangerous situation.

Clearly insufficient consideration has been given to the problems that will arise from locating this school at the proposed premises, and given that there are no 'very special circumstances' to justify the loss of Metropolitan Open Land it is surprising that the planning situation is this far advanced.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 January 2019 20:28  
**To:** Mayor  
**Subject:** 18/3561/FUL Objection to Turing House School Development

18/3561/FUL

[REDACTED]

Dear Sadiq Khan,

I am writing in regards to my objections of Turing House School.

My objections are on highways safety because the entrance is very close to a blind humpback bridge which has a lack of footpaths over the bridge and is only on one side of the bridge being the opposite side of the entrance onto the land. The impact this will have on large vehicles and coaches turning before the blind humpback bridge, we already have a large number of vehicles travelling over the bridge entering the Nursery, buses and travelling to other locations which causes enough problems, which will only increase should the building plans go ahead as lots of heavy loaded vehicals will need to travel and access this site and how this will impact the traffic that is generated during construction and all these vehicles would also be near four primary schools (Heathfield Primary, Bishop Perrin Primary, Nelsons Primary and St. Edmunds Primary) where lots of young children and parents will be using this bridge and the surrounding paths to access the primary schools and the secondary school further ahead. Buses go over the humpback bridge already which makes it difficult for both the buses and the cars to go over the bridge simultaneously, if the school was to be built there would need to be an increase in these services for the children to have access to the school which would then impede on the ability of vehicles travelling over the the bridge and create an unsafe environment for children crossing to access the school and the schools already in the area with it being a blind humpback bridge.

My next objection is to the traffic generation that will be caused. There is already a lot of congestion on the roads accessing the Nursery and the land from people travelling to work and the schools already in the local area without including any traffic that would be generated from the new school therefore this would increase the noise and air pollution within the local area that contains many young children and to the residents, there is already a large increase of Asthma and respiratory diseases and conditions in adults and children due to air pollution including myself and my own child. As it stands on a normal working day in the mornings the traffic travelling down Hospital Bridge Road to the roundabout is an average of 30 minutes to travel half a mile between the hours of 7:30am to 9:30am and 3:00pm to 7:00pm.

In regards to inadequate parking in this area of Hospital Bridge Road, this is a residential area which is already suffering from a lack of parking spaces and due to the implications of building the new school will only be allocated 60 parking spaces onsite to a site that will house over 100 in need of parking will mean that other staff members, non-staff members, parents and possible age related students will also need to park there cars to which they will use the residents parking spaces making it difficult for residents to park outside of their own homes. There is already an issue with residents having trouble parking on Hospital Bridge Road due to the parents of the children at Twickenham Day Nursery using the spaces outside of the residents homes which has caused great grievances amongst residents, owners of the nursery and the parents. There is now a threat of permit parking which will create a large financial impact of the residents lives and will Turing House be subsidising the local residents for the inconvenience of permit parking in Springfield, Longford, Montrose Avenue and Hospital Bridge Road or is this be used as a money making

scheme for Richmond council. The threat of permit parking was not given until the threat of Turing House School being built, which isn't even going to benefit any of the local children only those of the Teddington area.

[REDACTED] and have seen many changes within this community and understand that things do need to change but the building of Turing House School provides nothing to any of our local children being accepted to the school possibly being built in our area of Twickenham, and what amenities would Turing House School be able to provide to the local residents that isn't already provided by current schools and current amenities within our area?

Yours sincerely,

[REDACTED].

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[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 09 January 2019 08:19  
**To:** Mayor  
**Subject:** Fwd: Turing House School

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 9 January 2019 at 08:17:16 GMT  
**To:** [planning@richmond.gov.uk](mailto:planning@richmond.gov.uk)  
**Subject:** Turing House School

My objections to this school being built in Whitton is very strong I feel the whole manner of this school is morally wrong.

1. Questionable demand

Lots of places in Twickenham Academy if these children want to go to school in Whitton offer them places at this school.

Loss of MOL

Loss of trees

Highway safety

Bridge too narrow

Impact on parking

Traffic generation

Dangerous access

Impact on biodiversity

Impact on recreational grounds

Another strong objection I have why is a Teddington school for Teddington children only 10% of whitton children intake allowed being built in Whitton absolutely outrageous. Whitton children should have priority.

Regards

[REDACTED]  
Whitton Resident

Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 09:40  
**To:** Mayor; info@vincentcable.org.uk; contactholmec@parliament.uk;  
Cllr.GElliott@richmond.gov.uk; admin@russelleducationtrust.org.uk  
**Cc:** Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk;  
Cllr.AButler@richmond.gov.uk; Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk  
**Subject:** Re: Objection to Turing House School building plans in Whitton rather than Teddington - REF 18/3561/FUL

Hello there,

My Name is [REDACTED]  
My family and I live in Whitton ([REDACTED])

**We are strongly opposed to Turing House School being built on an MOL site in Whitton.**

#### **REF 18/3561/FUL**

Why is a school being built in Whitton, when the children that attend it will be predominately from the Teddington catchment area? (80% places to Teddington, 20% to Whitton). This is frankly an obscene suggestion and shows little to no respect for local Whitton residents.

Another *key* reason for opposing the school is that the traffic congestion on that road is already dreadful.

There are already several schools and a nursery close by and the children that attend them **SHOULD NOT** be breathing in any more fumes from cars than they are currently already subjected to.

Whitton is already underneath the Heathrow Flight path with all the aviation fumes that generates. The last thing we need is a deliberate increase in traffic - for something that local residents and their families won't even *benefit* from.

I have also listed further reasons to oppose the school below.

We very much hope that you will put a **STOP** to this proposed school.

Yours sincerely,  
[REDACTED]

- 1) The large SUPERBLOCK building will dominate area
  - 2) Standard design "Superblock" rather than one designed to minimise impact on the area
  - 3) Poor quality design in places – especially facing onto residential areas
  - 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
  - 5) There are no building dimensions on the plans
  - 6) Noise & smells from the use of development/dining room
- ROAD SAFETY**

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians

- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact
- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

#### ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport
- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it
- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 09:53  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Permanent Site for Turing House School, Ref 18/3561/FUL, GLA Ref GLA/4739/01

Dear Mr Khan

I am writing to ask for your support for the decision to build Turing House School on the Hospital Bridge Road site. I understand that as London Mayor, you must sign off any building on Metropolitan Open Land and I would appeal to you to approve this.

I cannot stress enough how fantastic it would feel, as a parent, to have the piece of mind that the school, which currently has to operate from two sites with all the challenges that brings, would move to a permanent, fully-equipped site, and how brilliant it would be to have the whole school community in one place.

Currently, the land is not accessible to the public, but much of it would be opened up and made available, creating more green space in the area which would be a bonus.

This fantastic school still manages to deliver excellent education despite its current circumstances (kudos to the staff!) but this can only get better with the full range of facilities that the new building and grounds would provide. Currently there is limited access to outdoor spaces and the children lose a chunk of time out of their PE lessons having to get to and from the nearest suitable outdoor space. To have all that on one site would make a massive difference.

I ask you to consider the benefits this building would bring not only to the pupils, their families and the staff, but to people living in the local area who would be able to use some of that MOL for the first time in years.

With your support, we could finally give Turing House a home.

Many thanks,  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 05 January 2019 11:25  
**To:** Mayor  
**Subject:** Planning Dept - re: Turing House School (18/3561/FUL)

Hello,

I would like to register my strong opposition to the proposed building of Turing House School in Whitton, Twickenham.

This school is designed for another catchment area and admissions point (i.e. Teddington) and the proposed site will have significant impact on the environment - both in terms of traffic and loss of open land. Indeed, it is preposterous to 'bus in' children from outside the area: schools should serve, and be located, in their own locality - not only for safety and environmental reasons but to lessen the impact on road and public transport use for current residents.

Please halt this potential pollution and traffic nightmare and save our green spaces!

Thanks and regards,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 10:48  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** REF: 18/3561/FUL GLA/4739/01

Dear Mr Mayor

I am writing regarding the above reference and asking for your support in the decision to build Turing House School on the proposed Hospital Bridge site.

I am a Whitton resident and [REDACTED]. I understand there have been a lot of objections from residents to not build the school on this proposed site as it is currently MOL land. However as a current resident local to the area I want to point out that we have no access to this land and never have in the 10+ years of living in the area. I am really excited by the prospect of actually being able to use it and enjoy it, as the proposed plans will extend the local park substantially and give us much needed access to the green space that is currently used as a dumping ground. The proposed plans also include sports facilities (indoor and outdoor) which we as residents will actually be able to use. This is something that is so important for us and will provide so much benefit to the area as currently the access to these types of facilities is restricted.

From a personal viewpoint I can only see a new school to the area as something that will make a huge positive impact and be of huge benefit especially for children. Turing House is an excellent state school from my experience and [REDACTED] has been especially excited about joining such a great school that offers so many opportunities in a climate of funding cuts and austerity! I would love my children to have the opportunity to be in a school that has a permanent site and not be split in 2 temporary sites. This is not something we envisioned when choosing a secondary school for them, and it is one of the reasons we chose a mixed learning environment for them, so they would be in the same learning environment. All the other schools in the area have this privilege and I believe wholeheartedly that Turing House also deserves this opportunity.

My children will be able to travel to school sustainably by walking or cycling if the plans are approved, and I know they will be able to do so safely.

Schooling is fundamental to sustainable development. Education is a dominant driver of progress and one of the strongest tools we have for reducing poverty, improving health and providing people with the chance to enjoy a better quality of life, while also contributing to the country's overall economic growth. This is all part of the ethos at Turing House School. It is an environment that enables children to be more productive and to develop their skills and learning with the aspiration that they will pursue and achieve their goals.

I do hope you support the decision to build Turing House School on the proposed site, I understand that there will be a period of disruption if it is approved however I believe the multitude of benefits that it will provide for future generations of children and the community really do outweigh 12-18 months of disruption.

Best wishes  
[REDACTED]  
  
[REDACTED]  
  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 26 July 2019 15:49  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** 18/3561/FUL GLA Reference GLA/4739/01

I am emailing to support the application to build a new site at hospital bridge road.

I live in Heathfields and believe the school will benefit locals , not least in giving access to more green space

The silent majority is in favour of allowing this school to have its own site and not be split up at unsuitable locations

I trust you will therefore approve the application

Regards

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 13 January 2019 16:29  
**To:** Mayor  
**Subject:** Richmond upon Thames planning application 18/3561/FUL  
**Attachments:** turing school mayor.docx

Please see the enclosed attachment.

[REDACTED].

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Dear [REDACTED]

We know that you have received a number of documents from us recently and we have pulled together another document that outlines a list of alternative sites for Turing House School which have been complied using the London plan criteria of:

- high PTAL
- good cycle routes
- sustainable because the majority of children can walk etc.

These alternative sites come out as sequentially superior to HBR using the London plan to rank them. All of these sites were available at the time the ESFA purchased the HBR site and are still available now.

The planning committee were very reluctant to approve the Hospital Bridge site for Turing House School and all agreed it was a site with many problems.

The main reason the application was approved is the planning committee were told there were no other sites available. It was never the case that this was the only site available in Richmond, Kingston and South of Hounslow. It is difficult to understand how it could be in boroughs the size of these.

The Richmond administration wrote to ESFA in the summer of 2018 asking them to consider these sites and work with them to get a better location. These letters are included in the document.

We hope that you find this document useful too.

Kind Regards,

[REDACTED] on behalf of

HBR-RAG

Hospital Bridge Road Resident Action Group

LAND AT HOSPITAL BRIDGE ROAD, TWICKENHAM TW2 6LH - PLANNING APPLICATION  
GLA/4739/01 LPA 18/3561/ FUL

Alternative school sites.

All committee members at the LBRuT planning hearing had huge concerns that Hospital Bridge Road (HBR) was the wrong site for the school.

This is due to the many problems with the location: distance from main catchment, lack of safe entrance, limits on the design of entrance making it unsafe, lack of buses on offer, problems with road layout, problems with air quality, problems with cycle routes, desire of parents to drive their children to school and the locations inability to cover the area of demand. The planning committee were told by the Chair of the Environment, Sustainability, Culture and Sports Services Committee Cllr Ellengorn, they would need reasons which would stand up in appeal to reject the application, and they could not group the many issues and imperfections together for this purpose. The planning committee were also told there were no other sites available, the school could not continue at the locations it currently occupies and thrives in, and the "school would have hideous prospects ahead if we do not approve" (Cllr Ellengorn), that the lack of community facilities is not a problem as it is an 'add on' (Cllr Ellengorn and Curran).

Every member of the committee expressed their concern that this is the wrong site and the majority indicated they were being forced to approve it due to lack of other sites.

In the end it was a split decision with 5 for (2 of them very reluctantly), 2 against, 1 abstaining.

The comments can be seen at time approximately 4hours 14minutes into this webcast [https://richmond.public.tv/core/portal/webcast\\_interactive/431322](https://richmond.public.tv/core/portal/webcast_interactive/431322)

We do not understand how this message of lack of sites has come about. Our objections listed more appropriate sites which were available at the time the HBR site was purchased and are still available.

The 4+ years it has taken, with the many changes / compromises and unanswered objections, to get to this stage of planning is a clear indication of the problems with this site. The school and current parents are of course distressed at the amount of time it is taking to get a permanent site. Councillors indicated at the planning meeting one of the reasons they were approving this plan was because of this distress. Building the school in what is an inappropriate location will leave the school, future pupils, TfL and residents with issues around cost, congestion and pollution for many years to come. The school is successful in its current temporary locations. The delays which would be caused by working on a more suitable site which the political wing of the council would work hard to deliver will have less impact than the costs and issues caused by the HBR site in the medium term.

The GLA stage 1 report asked the developers to extend their site search to South of Hounslow. After a very short time, and without any apparent discussions with Hounslow council the developers stated no Hounslow sites were available either. Hounslow has a list of ninety nine sites for development with many sites identified for schools. There are a list of possible Hounslow sites in appendix 2.

Concentrating on LBRuT sites it would be worth listing alternative sites using criteria which was missing from the developer's sequential search and conform to the London plan. Despite the DoFE stating they only needed a 1ha site we have used 3.5Ha for co-located playing fields.

Our criteria:

Brown Field site appropriate for a school of size 3.5Ha  
Green field site appropriate for a school of size 3.5Ha  
Walking distance from school catchment area  
High PTAL rating  
Safe entrance  
Cycling conditions  
Road conditions

Using these criteria, we have the following sites in preference order:

MOL site David Lloyd Uxbridge Road - LBRuT and School's preferred location

The current administration, Lib Dems, who run the council have this as their favourite site and wrote to ESFA before the planning application was submitted (see appendix A for letters) asking them to move the school to this site. It is also the schools preferred choice but is MOL. Uxbridge Road

There are many reasons why this is an almost perfect site.

- It is in the school catchment area so will provide all its places to the area of need
- The site is big enough for the school and sports pitches
- More children will live close to the site so can walk
- There are frequent bus routes covering the school catchment area, and as most children will be able to walk extra buses and ongoing subsidies from TFL are unlikely to be needed
- The entrance will be for the school only so will be safe
- Pollution is high here for NO2 just like HBR but as you are not adding buses or many cars the impact of the school will be less
- The roads outside the school entrance already have crossings so no cost for road changes
- Mitigation for loss of MOL can be via greening David Lloyd buildings by adding green roofs, sharing heat pumps etc.
- This is the school's favourite site
- The parents expressed a clear preference for the site in the public consultation - see <https://images.richmond.gov.uk/iam/IAMCache/2751560/2751560.pdf> where all consultation replies are detailed in a spreadsheet. Cllr Jonathan Cardy confirms future parents also prefer this site.
- The land is owned by the council and leased to David Lloyd who do not use the space
- The council own co-located Fulwell Golf club so could restructure how the land is laid out
- There are few residential houses around this site so it impacts less people
- The location gives room for the school to expand when demand grows
- There are no closely located schools to this site so the school will not have a cumulative impact on the area in terms of infrastructure and health.

- The site already has a cycle track and links to it via cycle routes.
- The council's cabinet decided (as had happened previously in Richmond) that the land designations could be resolved and the site should not be ruled out for a school. Minutes of Cabinet meeting <https://cabinet.richmond.gov.uk/documents/g4418/Printed%20minutes%20Thursday%2015-Nov-2018%2019.00%20Cabinet.pdf?T=1>

It is difficult to understand why the previous administration rejected this site as it is so suitable. It appears the former Richmond Administration refused to sell the land to ESFA because they were afraid of wealthy community objections. The HBR site is in one of only two areas of Richmond which have higher than national average poverty and is seen as an area less likely to object to any changes the council makes. See this video [https://m.facebook.com/story.php?story\\_fbid=1258788540819002&id=366024270095438](https://m.facebook.com/story.php?story_fbid=1258788540819002&id=366024270095438)

This is what the developers said about the DL site.

**Land Adjacent to David Lloyd, Hampton, Twickenham**

- 5.165 Although as highlighted above, there is no requirement to assess sites which are not sequentially preferable to the current application site, we are aware that there has been significant discussion around the above site as a potential home for Turing House School. As such, we would comment on this site in more detail.
- 5.166 The site is located on the southern side of Twickenham Road and to the north-east of Uxbridge Road. It is approximately 3ha in size and comprises undeveloped scrub land and heathland. The site is mainly designated MOL but is additionally designated as, as a Site of Nature Importance and as public open space. A Public Right of Way also runs through the site.
- 5.167 Due to the above designations, the site is clearly an inferior site to Hospital Bridge Road in planning policy terms. In addition, it is understood the site is in a number of leasehold ownerships and is also the subject of a restrictive covenant, which precludes its use for anything other than recreation. The public right of way would also need to be diverted. All of the above legal constraints would take time and be costly to overcome with no guarantee of a positive outcome.
- 5.168 In light of the above, the site is not considered viable or available in addition to being a very much inferior site in planning policy terms.

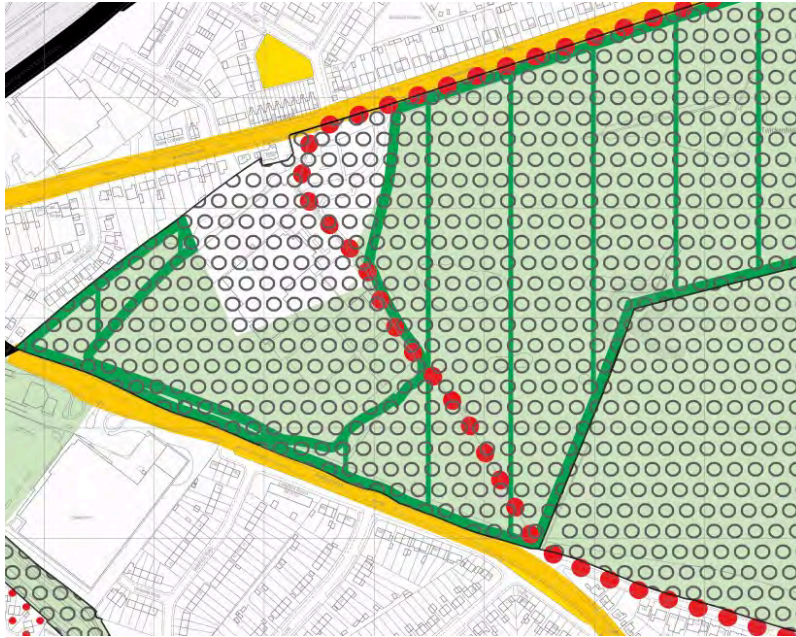
There are some land designations for this site which as Richmond Cabinet stated have been resolved before, but we have to ask do these justify the HBR site as more suitable with its problematic entrance, impact on transport, lack of good cycle routes, cumulative impact on local primary and secondary school pupils?

The developer and planning department apparently have the approach of solely finding the site with the least designations rather than scoring and ranking sites. Their approach is different from the London Plan as they are giving more protection to playing fields than to MOL and ignoring transport figures, safe cycling etc. If the sites had been ranked using the London Plan HBR would not have been the preferred choice.

**Mitigations:**

- DL site has a public footpath. The council have confirmed they would get this rerouted.
- Along with MOL it is designated as an area of natural importance. No one in the council have been able to say why it has this designation and are investigating. A full EIA taken in 1998 does not give this designation – see appendix 1.
- There are trees running along the border of the site which the school have already confirmed will not be touched.

- The council own the land so would deal with any lease holders (the same has to be done for the HBR site) and can adjust the layout of the council owned golf course next to this location to make it easier for school development.
- A MOL swap could be performed as there is a large section of land next to David Lloyd - the carpark and the practice green that is not MOL.

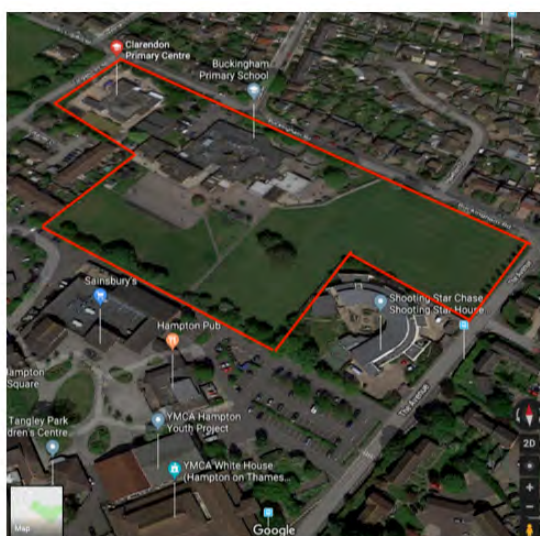


White area is not MOL and around 75% of it could be swapped to enable the school to be built with no net loss of MOL.

The current administration has already written to ESFA offering this location for the school and would work very hard to get the school built on this site. See letters in Appendix 1.

#### Buckingham Primary School Site

Buckingham Primary School could be moved to the Clarendon site which is council owned giving a non-mol site big enough for this development and its playing fields.



- 5.3 The school decided to reject co-location with Buckingham Primary school but no mention is made of the opportunity to move the primary school to the Clarendon site and build THS where the primary school is located.



Site approximately 4.5Ha.

The land around Buckingham School is not MOL and has the lower level of protection as Other Site of Township Importance. The green space used for the school could be moved to the Hampton Square development. This site has a low PTAL which is mitigated by it being in the school catchment area so does not require as many pupils to be transport by bus.

- It is in the school catchment area so will provide all its places to the area of need
- More children will live close to the site so can walk
- PTAL is low, but this has less impact than the HBR site as more children can walk to school
- The entrance will be only for the schools so is safe
- There are already road crossing facilities for the primary school so no more needed

The budget that is being offered to the HBR site for bus transport, road and entrance layout could be used to move the primary school to the Clarendon site where it could be co-located with new housing.

#### Normansfield Site

The developers dismissed it in the following manner

##### Normansfield

5.78 The site is approximately 12.7ha in area and comprises various uses including offices, a theatre and museum and lodgings. It is allocated for institutional use, hotel, training centre, open space, nature conservation and housing.

5.79 The site is partially designated as MOL, Other Open Land of Townscape Importance and an Other Site of Nature Importance. Northern parts of the site are located in Flood Zone 2 which will pose a further constraint in respect of any application for a proposed school given its vulnerable categorisation.



- It is in the school catchment area so will provide all its places to the area of need
- The site is big enough for the school and sports pitches
- There is enough room to avoid MOL, Natural sites and the flood zone as shown by the area in white.
- More children will live close to the site so can walk
- There are frequent bus routes which cover the whole school catchment area, and as most children will be able to walk extra buses are unlikely to be needed
- The entrance will be for the school only so will be safe
- The location gives room for the school to expand when demand grows
- The school can be located next to new housing so demand will grow

## Sainsbury's St. Clares Site

Sainsbury's St Clares (Hampton) is open to community infrastructure like schools being built above it or the car park. This option was never explored and was not included in the sequential search document. More children can walk to this location and it has a good supply of buses that cover the whole of THS catchment area. The cost for extra bus services would substantially reduce and could be put towards the capital cost of the build.

5.6 The Campaign to Protect Rural England (CPRE) proposed various options including mixed used redevelopment at Sainsbury's St Clare's with pupils crossing a bridge to use the sport pitches marked out behind David Lloyd (where the Thamesians RFC played until 1992. With some of the current Sainsbury's carpark – that is all MOL land – regreened.

- It is in the school catchment area so will provide all its places to the area of need
- More children will live close to the site so can walk
- There are frequent bus routes which cover the whole school catchment area, and as most children will be able to walk extra buses are unlikely to be needed - no risk of ongoing TFL subsidies
- The roads outside the school entrance already have crossings so no cost for road changes
- There are already separate pedestrian and cycle entrances
- There are less residential houses around this site so it impacts less people
- There are no closely located schools to this site so the school will not have a cumulative impact on the area in terms of infrastructure and health.
- There are public playing pitches opposite behind the David Lloyd Site

## Cassel Hospital Site

Non-MOL site outside the school catchment area (as HBR is) is Cassel Hospital which the developer has failed to justify why it was rejected.

LBRuT planning agreed that this was a viable site in their pre-advice

Some concern over the robustness of the justification of discounting the following sites:

- Greggs bakery
- Waldegrave road
- Udney Park
- Cassel Hospital.

## Developers comments:

The site predominantly comprises green space with the Grade II listed Cassel Hospital located on the north-east of the site and is approximately 4.2ha in size. It is located in a conservation area and the open space associated with the hospital is designated as Other Open Land of Townscape Importance. The Local Plan Review allocates the site for social and community infrastructure uses, though conversion or potential development for residential uses could be considered if it allows for the protection and restoration of the listed buildings.





A school provides social and community infrastructure and the developers have not contacted LBRuT to discuss this site. This is outside the school's catchment area so would have all the same issues with transport that the HBR site has.

- The site is big enough for the school and sports pitches
- The entrance will be for the school only so will be safe
- Site is partially allocated for housing so is a perfect location for a school to serve the local pupils

## Appendix 1 Information about the preferred David Lloyd site

Office



ESFA  
Chief Executive of Local ED  
8th Floor, Rodbourne House,  
273-287  
Regent Street  
London  
W1B 2HA

18<sup>th</sup> June 2018

Dear [REDACTED]

Following a change in the political administration of Richmond Borough Council I wanted to write to the Education and Skills Funding Agency in relation to Turing House School. I am aware that you are underway with plans for the permanent relocation of the School to Hospital Bridge Road. However, I have severe concerns regarding the viability of this site, not least in terms of accessibility, neighbour amenity, the catchment area in relation to the site of the school itself and the impact on other local schools. In addition to this I have concerns that there has been insufficient, rigorous consideration of other sites in the immediate vicinity.

As outlined in our manifesto, I am willing actively to explore alternative sites including the David Lloyd/Uxbridge Road as a possible home for the permanent relocation of Turing House School.

I would be grateful for an early indication as to whether this approach of exploring alternative sites would be supported by the ESFA.

Yours sincerely,



Councilor Gareth Roberts  
Leader of Richmond Council



Education and Skills Funding Agency  
Department for Education  
Fifth Floor  
Sanctuary Buildings  
20 Great Smith Street  
London  
SW1P 3BT

[www.gov.uk/esfa](http://www.gov.uk/esfa)

11<sup>th</sup> July 2018

Councilor Gareth Roberts  
Leader of the Council  
York House  
Richmond Road  
Twickenham  
TW1 3AA

**F50316 Turing House School**

Dear Councilor Gareth Roberts,

Thank you for your letter of 18 June 2018 to [REDACTED], the Chief Executive of Local ED about the proposed permanent location of Turing House School. I am responding as I oversee the delivery of free schools in London and the South East at the Education & Skills Funding Agency (ESFA).

I note your concerns about the suitability of the Hospital Bridge Road site. As you will know, there is a severe lack of suitable, deliverable sites in the South East generally and in this area of London in particular. We undertook an extensive search for a suitable permanent site for Turing House school in collaboration with the Borough and it led us to the Hospital Bridge Road site. We have also undertaken extensive planning due diligence, including pre-application meetings with Borough planning officers and Transport for London. Whilst the Hospital Bridge Road site is designated Metropolitan Open Land, we believe there is a strong case that it is the only deliverable, suitable site capable of meeting the need for secondary school places in this part of the Borough. We will of course submit a sequential site assessment as a part of the planning application for the permanent site.

The ESFA did in fact consider (with the Borough) the suitability of the David Lloyd site as a part of the site search. The site assessment shows that the planning restrictions on this site are considerable and highly likely to make a successful planning application impossible. As such, we concluded that the Hospital Bridge Road site is the most suitable, deliverable and sustainable site available to meet need for secondary school places in this part of the Borough.

We are very conscious that the Hospital Bridge Road site is not universally popular so are very keen to gather views from all sides to inform a strong planning application to the Local Planning Authority. We will soon start a programme of engagement and consultation, as a part of the planning process, so that we can hear the views of all interested parties - both

for and against. This will include a public exhibition on Friday 13th and Saturday 14th July. We have also organised a private preview of the exhibition on Thursday 12th July for stakeholders and near-neighbours, which you would be welcome to attend if free. If you cannot make that date, the project team would welcome the opportunity to meet you privately at your convenience. Please get in touch with [REDACTED] who can coordinate diaries from the team.

The ESFA looks forward to continuing to work in collaboration with the Borough on the delivery of the permanent buildings for Turing House School.

Yours sincerely,



Deputy Director, Free Schools Capital, Education and Skills Funding Agency

Councilor Gareth Roberts, Leader of the Council  
Liberal Democrat Councillor for Hampton  
York House, Richmond Road, Twickenham TW1 3AA  
Tel 020 8831 7102 Email [G.Roberts@richmond.gov.uk](mailto:G.Roberts@richmond.gov.uk) Web: [www.richmond.gov.uk](http://www.richmond.gov.uk)

Official



Deputy Director  
Free Schools Capital  
Education and Skills Funding Agency  
Department for Education  
Fifth Floor, Sandway Buildings  
20 Great Smith Street  
London  
SW1P 3BT

18<sup>th</sup> July 2018

Dear [redacted]

FS0316 Turing House School

I am in receipt of your letter dated 11th July 2018 regarding the permanent home for Turing House School.

While I take on board the various points you raise regarding the planning restrictions on the David Lloyd site, the reality is that the Hospital Bridge Road site is far, far from straightforward and may not prove successful in planning terms either at local planning authority level or in terms of the views of the GLA.

In these circumstances, might it not be wise to explore further the option of the David Lloyd site? We are certainly prepared to do so but clearly this is a fruitless exercise if the EFSA is not prepared to support such efforts.

I would be most grateful if you could address this question directly.

Yours Sincerely

[redacted signature]

Cllr Gareth Roberts  
Leader of Richmond Council

Councillor Gareth Roberts, Leader of the Council  
Liberal Democrat Councillor for Hampton  
York House, Richmond Road, Twickenham TW1 3AA  
Tel 020 8891 7102 Email Cllr.G.Roberts@richmond.gov.uk Web: www.richmond.gov.uk

Full EIA on the DL site dated 1998

*split from old parcel 2 due to discontinuity at entrance*

Site & parcel No. 24062 / 12 Grid ref TQ 130 719

Site name \* Surveyor/s [redacted]

Parcel name Belt of scrub and west of Twickenham Golf Course Borough Richmond

Location  Area 1.23 ha/ft<sup>2</sup>

Owner/manager \* Date 26/5/99

Access/view from \* Time spent 0 hrs 40 mins

Species richness: poor ☐ poor/ave. ☐ ave. ☐ ave./rich ☒ rich ☐ not known ☐ Access gained to: stl ☒ part ☐ none ☐

<u>40</u> (1) Native broadleaved woodland ___ 02 Non-native broadleaved woodland ___ 03 Coniferous woodland ___ 37 Scattered trees ___ 05 Recently killed woodland <u>60</u> (5) Scrub ___ 38 Planted Shrubbery ___ 25 Native hedge ___ 34 Non-native hedge ___ 31 Orchard ___ 36 Vegetated walls, tombstones, etc ___ 26 Bare soil and rock ___ 27 Bare artificial habitat	___ % 08 Acid grassland ___ 09 Neutral grassland (semi-improved) ___ 35 Neutral grassland (herb rich) ___ 10 Basic grassland ___ 11 Improved or reseeded agr. grassland ___ 07 Amenity grassland ___ 12 Ruderal or ephemeral ___ 33 Roughland (intimate mix of 9, 14 & 6) ___ 13 Bracken ___ 14 Tall herbs ___ 15 Heathland ___ 39 Allotments (active) ___ 28 Arable	___ % 15 Bog ___ 17 Reeds/wamp ___ 18 Wet marginal vegetation ___ 19 Fen carr (woodland or scrub over fen) ___ 20 Standing water (includes canals) ___ 21 Ditches (water filled) ___ 22 Running water (rivers & streams) ___ 23 Intertidal mud, sand, shingle, etc ___ 24 Saltmarsh ___ 30 Habitat information not available ___ 29 Other <u></u>
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treeless w/out hedge ☐ hedge w/ treeless ☐  
 even-aged plantation ☐ ancient woodland ☐  
 coppice ☐ dead wood ☒ pollarded ☐  
 flush ☐ wet ☐ wood shrub layer 30%

grazed ☐ frequently mown ☐  
 infrequently mown ☐ cuttings removed Y/N ☐  
 unmanaged grassland ☐ ridge & furrow ☐  
 flush ☐ wet ☐

floating vegetation ☐ submerged vegetation ☐  
 emergent vegetation ☐ saline ☐ tidal ☐  
 naturally formed river bank ☐ trophic status:  
 eu ☐ meso ☐ oligo ☐ dys ☐

#### NOTES/SKETCH MAP

Record dominant and notable plant species, birds, butterflies, etc

Wide belt of scrub and woodland - 10m or more wide for most of its length. Mostly hawthorn which has become leggy, gorse and semi-native oaks with the occasional sycamore and alder and on west of aspen woodland in the north near the buildings.  
No fence along roadside, lots of gaps with footpaths leading through. A popular place for local people to walk. The ground glass is

dominated by bramble in places and grassy elsewhere. Most herbs occur along the road such as perennial wall rocket, greater celandine, green alkanet, Oxford ragwort and charlock.

Wild privet a surprise find. In places line of laggard low shrubs indicate the old hedgerow.

Land use & planning status	reservoir	<input type="checkbox"/>	railway cutting	<input type="checkbox"/>	hospital	<input type="checkbox"/>	Nature reserve	<input type="checkbox"/>	Borough land	<input checked="" type="checkbox"/>
	canal	<input type="checkbox"/>	dembankment	<input type="checkbox"/>	churchyard	<input type="checkbox"/>	Pub. Open Space	<input checked="" type="checkbox"/>	TWU land	<input type="checkbox"/>
	sludge lagoon	<input type="checkbox"/>	disused railway	<input type="checkbox"/>	cemetery	<input type="checkbox"/>	Green Belt	<input type="checkbox"/>	BPA land	<input type="checkbox"/>
	filter bed	<input type="checkbox"/>	trackbed	<input type="checkbox"/>	golf course	<input checked="" type="checkbox"/>	SSSI	<input type="checkbox"/>	UAT land	<input type="checkbox"/>
	disused quarry	<input type="checkbox"/>	road verge	<input type="checkbox"/>	sports pitch	<input type="checkbox"/>	MOL	<input checked="" type="checkbox"/>	LEB land	<input type="checkbox"/>
	or gravel pit	<input type="checkbox"/>	road island	<input type="checkbox"/>	landscaping around	<input type="checkbox"/>	LNR	<input type="checkbox"/>	British Gas land	<input type="checkbox"/>
	land reclamation	<input type="checkbox"/>	town square	<input type="checkbox"/>	premises	<input type="checkbox"/>	Alotments (in use)	<input type="checkbox"/>	Other:	
	vacant land	<input type="checkbox"/>	educational	<input type="checkbox"/>			Ancient Monument	<input type="checkbox"/>		

Personal view	Nature conservation value	<u>Valuable belt of scrub acts as buffer between road + houses + grass land</u>	
		<u>Good for birds and invertebrates</u>	
Potential	Education		
	Management	<u>Coppice edges every 5-7 years</u>	
Threats & disturbances	Amenity		
	Other		
	Invading plants		
	Pollution		
	Tipping	<u>See tipping shed Uxbridge Road</u>	
	Motorcycle		
	Erosion		
	Other		
	Boundaries and security	<u>Small gaps on roadside</u>	

Change since last survey	No apparent change since last survey	<input checked="" type="checkbox"/>	Not previously surveyed: Part <input type="checkbox"/> All <input type="checkbox"/>
	Significant		
	Minor		
	Error in last survey	<u>Not surveyed separately before.</u>	

Geology, topography, aspect, drainage, soil	
Contacts / Others' information / History and succession	

Interest			
Invertebrate	<input checked="" type="checkbox"/>	Higher plant	<input checked="" type="checkbox"/>
Fish	<input type="checkbox"/>	Byophyte	<input type="checkbox"/>
Amphibian	<input type="checkbox"/>	Lichen	<input type="checkbox"/>
Reptile	<input type="checkbox"/>	Physiography	<input type="checkbox"/>
Bird	<input checked="" type="checkbox"/>	History	<input type="checkbox"/>
Mammal	<input type="checkbox"/>	Landscape	<input checked="" type="checkbox"/>
Other:			
Public access			
Free	<input checked="" type="checkbox"/>	Wheelchair	<input type="checkbox"/>
De facto	<input type="checkbox"/>	None	<input type="checkbox"/>
Restricted:	<input type="checkbox"/>		
Describe restrictions:			
Level of use			
not or hardly used	<input type="checkbox"/>	Frequent use	<input type="checkbox"/>
used by moderate numbers	<input checked="" type="checkbox"/>	by large numbers	<input type="checkbox"/>
Aerial photographs nos:			
Photographs taken			
Map sheet			

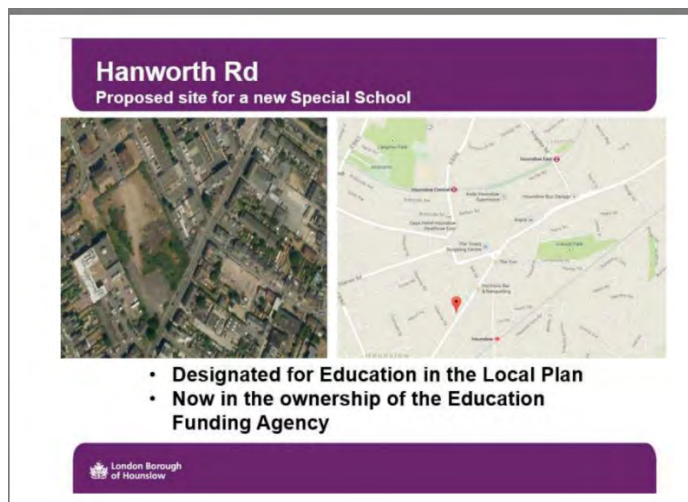
# PLANT RECORDING SHEET FOR GREATER LONDON

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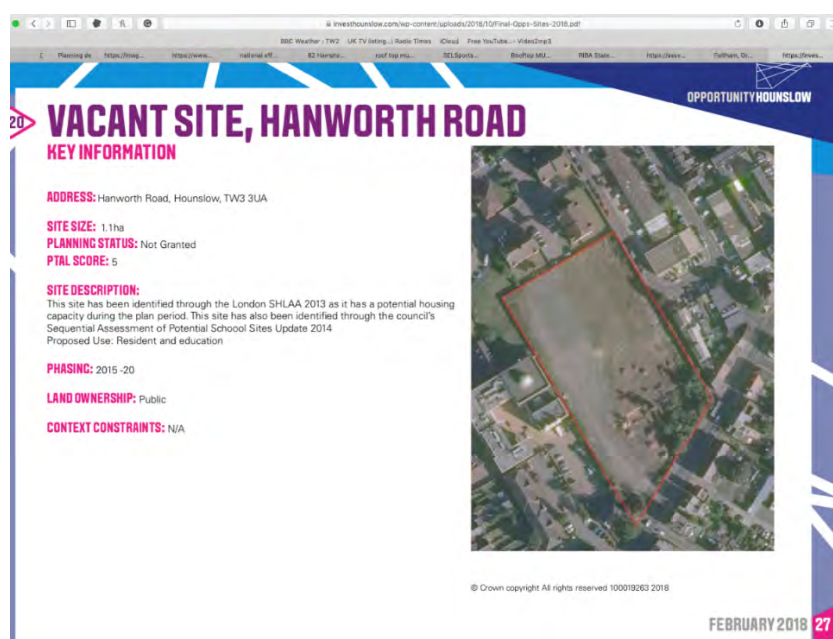


The site made it through to the top-ten sites most suitable for a new school in Hounslow. However, it has recently been decided to use the site as a special school and thus we have to question why it was not considered for Turing House?

It appears they took the decision to allocate the site for a special school after deciding against using it for Turing House, however, we feel the special school could be moved to another site to free up the land as a permanent home for Turing House.



Source: Hounslow Council, Report for Children and Young People Scrutiny Panel, 7 December 2016.<sup>1</sup>



Source: Invest in Hounslow website

<sup>1</sup> <https://democraticservices.hounslow.gov.uk/documents/s130319/Item%206%20School%20Place%20Planning%20presentation.pdf>



### **Smith House (Royal Bank of Scotland) 1.42 hectares**



Again, this is another site that has been dismissed prematurely, as they have assumed that an owner does not want to sell – but have not actually asked them; this is unacceptable.

The Local Plan documents for Hounslow envisage the site is to be development along with the adjacent 14 ha MOD depot. Hounslow has also allocated some of the land for a secondary school, and this clearly raises the possibility of Turing House School being relocated on this site.

### **MOD Feltham**



This site is covered by this planning policy document prepared by Hounslow Council, which includes reserving some land as a site for a secondary school<sup>2</sup>. We believe that part of the site could be released early if a request was made, and the MOD sports Field is a section that could be released as it operates separately from the rest of the site.

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<sup>2</sup> <https://democraticservices.hounslow.gov.uk/documents/s128721/REG423%20-%20Planning%20Principles%20for%20the%20Feltham%20MOD%20site%20-%20Appendix%201%20Planning%20Principles%20document.pdf>



### **Greenham House / Bunzl**



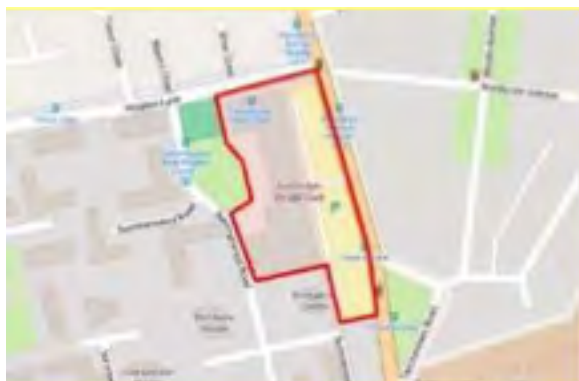
This site is along London Road Hounslow and is a short distance from Hounslow High Street, and behind the site is Thornbury (public) park.

This is another site which the applicants have discounted, in part, due to it being one of the 96 development sites that Hounslow Council has stated could house a school. However, Hounslow's approach is to ensure that as sites come up, they have some leverage to use the land as a school if needed – and it is going too far to say these sites are 'earmarked' for Hounslow's own provision.

It is clear the site is big enough for a secondary school and the adjacent park could provide sport pitches.

Whilst the site is occupied, this is no different to the situation at Bridge Farm Nursery, that had tenants when they the ESFA started to negotiate purchase.

### **Ivybridge Retail Park**



The applicant tries to state they would not be able to have pitches on this 1.75 ha site at this location, using Hounslow's Schools Assessment – but that is for a much larger 8 form of entry school (240 per year) compared to THS would have 5 forms per year (150 pupil per year).

Notwithstanding this, the site could be made bigger if the adjacent community building was relocated, and of course, many schools utilising the same superblock design have either MUGAs or playgrounds on the roof.

As discussed previously, Hounslow Council take the approach of adding all known development sites to its list of potential school sites

### **Leisure West, Air Park Way**

This is a large 5.51 hectares (13.61-acre site) and clearly an extra form of entry can be accommodated on such a site – with Hounslow's assessment using BB103 site area guidelines – which of course generate a "need" for a large traditional school site that is in practice much bigger than what is actually needed.

Again, the applicants state the site has been ‘earmarked’ for Hounslow, when in fact it’s one of the 96 sites considered and did not make it to their final shortlist of ten sites<sup>3</sup>.



---

<sup>3</sup> <http://democraticservices.hounslow.gov.uk/%28S%28czobl0450xbqi155ede3ifez%29%29/documents/s124681/16-04-13Hounslow%20Report%202016%20V4.pdf>

[REDACTED]

---

**From:** [REDACTED].uk>  
**Sent:** 19 July 2019 13:14  
**To:** Mayor  
**Subject:** 18/3561/FUL, GLA/4739/01

SUPPORT THE DECISION TO BUILD TURING ON THE HOSPITAL BRIDGE ROAD SITE.

Student

Best regards

Sent from my iPhone

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This message has been scanned for viruses by the Greater London Authority.

Click

[https://www.mailcontrol.com/sr/Mqmtseia6VDGX2PQPOMvUrx8JpNKDSOocYUO\\_I4F5p8AG16tncShXzsa hMIK6wxKsabCD9ogkljDxGYc2QXWA==](https://www.mailcontrol.com/sr/Mqmtseia6VDGX2PQPOMvUrx8JpNKDSOocYUO_I4F5p8AG16tncShXzsa hMIK6wxKsabCD9ogkljDxGYc2QXWA==) to report this email as spam.

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 July 2019 16:13  
**To:** Mayor  
**Cc:** Tony Arbour; Caroline Pidgeon; Jennette Arnold; Joanne McCartney  
**Subject:** Turing House School in Richmond Borough

Dear Sadiq

We are writing to you as the parents of [REDACTED]  
[REDACTED] After years of uncertainty about the school's permanent site, we were delighted to have planning permission approved at the council planning committee last week. We are writing to ask you to please uphold the local councillors' decision to approve the planning permission.

Turing House is a brilliant school and having been subject to years of political wrangling deserves, and needs, the security of a permanent site. The fact that the head and teaching staff have run a thriving, oversubscribed and nurturing school across two temporary sites is testament to what this school will become both as a 11-18 educational facility and an asset to the local community once it has a fully functioning permanent site.

As you will know, the Hospital Bridge Road site, though controversial has been found to be the only viable option for the school in the borough and the plans show that the building of the school will benefit the local and wider community by opening up unused and unavailable land, part of the site will be opened up as public space and the school facilities will be available for the local community to use and indeed we already have firm interest from a good number of local sports clubs. The school buildings will be positioned to cause the least possible impact on the openness of the land.

Turing House School enables parents and children in our part of Richmond Borough to have a choice about secondary school and is already playing its part in meeting the overwhelming need for secondary school places in the borough, as pointed out by the head of school admissions at the planning meeting - who said that without Turing House, there would be 85 children in the borough due to start secondary school in September without a school place.

Our children will travel to school by bus from [REDACTED] and will use the pedestrian entrance on Heathfield Rec to access the school.

If you would like to speak to other Turing House parents about this application please do let us know and we will arrange this.

Many thanks for your time.

With best wishes  
[REDACTED]  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 29 December 2018 16:12  
**To:** Mayor  
**Subject:** Turing School Plans

Hello, I am writing to voice my concerns with the proposed building of another school in our area. .That the site is quite unsuitable from the point of view of traffic congestion in an area already thick with schools has not so far been taken seriously. A very narrow bridge has to be used which is notorious for accidents. Traffic, pollution (air and noise) would add to the nearby plane noise and pollution from Heathrow. Green space and an excellent nursery would also be affected(to go?) That the school would not be populated by local children but those bussed in from another area adds to increased traffic problems and in my opinion makes this choice a poor one indeed. I appreciate that if school places are needed they have to be found but in this instance would ask that the plans are looked at again and a more suitable site found perhaps in disused office blocks!

yours sincerely, [REDACTED]

[REDACTED]  
reff. no. 18/3561/FUL

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**From:** [REDACTED]  
**Sent:** 30 July 2019 17:05  
**To:** Jules Pipe [REDACTED]@london.gov.uk>  
**Cc:** Tom Copley <Tom.Copley@london.gov.uk>; [REDACTED]@london.gov.uk>; [REDACTED]  
**Subject:** Heathfield Ward, Twickenham - Turing House Free School

Dear Jules,

Tom Copley has suggested I contact you about a planning matter. I'm currently Chair of Twickenham CLP and we are trying to prevent the re-siting of a free school (Turing House School) on a section of Metropolitan Open Land. Two weeks ago, the planning application was approved by Richmond Council notwithstanding many oral objections by residents, ward councillors and our pressure group, the Hospital Bridge Road Resident Action Group. There had previously been a petition against with over 1,000 signatures and many more written objections against compared with those for.

The application now has to be "okayed" by Sadiq and we need some help in getting our arguments, both technical and political, across to him and/or his political advisors, and/or others with influence. We know he will have to make his decision on sound planning grounds and I attach a note setting these out. But, separate from that, the decision will have implications for Labour in the coming Mayoral and Assembly elections. I can expand on that further if you wish. Can you offer any advice?

Best wishes,

[REDACTED] - Chair, Twickenham Labour Party

This is a **controversial** planning application to build on MOL. A school for a wealthier part of Richmond Borough will be built in the poorer ward. This requires your attention due to the **concerning factors** below.

## **BREACHES LONDON PLAN**

**PUPIL SAFETY:** uncontrolled crossing is to be sited on a blind humped back bridge 58 m from the summit. HGVs in low visibility or wet conditions do not have enough stopping distance at 20-30mph, similarly cars having to suddenly stop before the crossing. Access to the school will be shared with HGVs.

**CYCLE SAFETY:** teenage cyclists expected to use a road which has 800+vph. Richmond cycling campaign's stated the cycle route is not safe for adults let alone kids. Developers have refused to pay for cycle tracks. Richmond Cycling Campaign deem is unfit for adolescents.

**POLLUTION:** highly congested T-junction already exceeds NO2 and particulates and extra journeys to the school will increase this further.

**POOR PUBLIC TRANSPORT LINKS:** admissions point is 2 miles from the site.

**UNFAIR ADMISSIONS:** minimises out of borough pupils which is in breach of the Greenwich Agreement. 20% allocated to local area.

**MOL:** The very special circumstances argument is very weak as there is no shortage of school places in the area. No need has been demonstrated for the extra-large sixth form.

**EQUALITY IMPACT:** not looked at - predominately white middle class school in less affluent racially mixed area.

**SITE SEARCH 'PRE-DETERMINED':** planning officers adopted an overly technical approach of looking at MOL sites with the least designation knowing it would inevitably result in HBR site being chosen. No actual balancing / scoring exercise carried out.

**OVER 1,000 OBJECTIONS:** 1,500 signed a petition to get council to debate the impact of the school on the community, 1,200 submitted a written objections. 800+ signatures on [change.org](https://change.org) objecting to this development.

\*This is not a NIMBY Campaign as there are two secondary schools and four primary schools in the area\*



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 18 July 2019 11:30  
**To:** Mayor; Tony Arbour; Tom Noble  
**Subject:** 18/3561/FUL GLA/4739/01 TURING HOUSE SCHOOL TEDDINGTON

Dear Sadiq Khan. I am writing as a parent of a child in Turing House School in Teddington. [REDACTED] in September. My [REDACTED] has been taught in an office block since starting the school with limited outside space for PE etc. [REDACTED] will now have to start in a different campus and there is no room in the office block. Both of these situations are not ideal and my boys deserve a new school along with all the other children in Turing House. Please let this happen ASAP in the HOSPITAL BRIDGE ROAD site. Thanks for your support. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 18 July 2019 10:51  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Turing House School site- 18/3561/FUL. GLA Reference: GLA/4739/01

Dear Mr Khan,

We are writing to you on behalf of our daughter who attends Turing House School in Hampton.

Turing House school has proved itself to be an excellent school both academically and pastorally for our daughter. We chose to send our daughter to this school with the knowledge that by 2020 she would be going to school in a brand new building which would provide all the expected facilities for an excellent secondary school. At present Turing House is situated on two temporary sites, which is far from ideal. The children have very little outside space, except for a car park as a playground on one site. They have limited PE facilities and the buildings themselves are not ideal for whole school events as there is not room. The teachers have to move between the two sites that are about a mile apart which causes great timetabling issues, as you can imagine.

We were so excited when Richmond Council approved the application for a permanent site on Hospital Bridge Road and having attended the planning meeting was very impressed by the great amount of effort the school had gone to, to ensure criteria such as environmental issue, pollution both air and noise etc were met.

We feel this is the best site for our daughter to continue her education at and look forward to your decision and moving onto the next step of building the school.

Kind regards,

[REDACTED]

Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 10:16  
**To:** Mayor; Tony Arbour  
**Subject:** Turing House School Planning - 18/3561/FUL, GLA Reference GLA/4739/01

Dear Mr Khan

I'm writing to you in reference to the Planning Application for Turing House School, which I understand will pass to you shortly for review due to the use of Metropolitan Open Land. I would like to make a few statements in support of the development, as a parent of an attending student, and with another about to start next year.

My eldest son [REDACTED] started at Turing House in [REDACTED] in the second intake to the school. At that time we were realistically in the catchment area for 2 secondary schools, Turing House and another which was failing by Ofsted standards. We chose Turing, even though it was on a temporary site, to provide a good education for our son. [REDACTED] has received this in abundance. The attitude and enthusiasm of the headmaster and staff at the school is fantastic, and has contributed not just to my son's academic career, but in turning him into a rounded individual, with a healthy interest in the world and society around him.

Last year, with the temporary site now full, the newest intake were forced to locate on a second site, several miles from the original, Teddington building. I visited this site with [REDACTED]. Despite having only been on the site for a month or two, it felt like a welcoming and thriving school community, in contrast to some of the other schools we visited. It is clearly hugely disadvantageous to have a secondary school split across 2 temporary sites, but despite this we chose to send [REDACTED] there because of the support we knew he would receive from the teaching staff.

Clearly everyone's preference would be to avoid building on MOL, but the only sites available for this school were all designated as such. This particular piece of land is not actually currently accessible by the public, and consists of spoil heaps of rubble. I think any loss to the community therefore as been over-stated, and in fact with the planned extension to public parkland, and use of the sporting facilities on offer, I think the local community actually benefits.

I strongly urge you to support the decision to build Turing House on the Hospital Bridge Road site, for the sake of our children's education which will benefit hugely for a lack of uncertainty, and from the badly needed facilities it will provide. ( They are currently very restricted in access to Sports facilities, science labs etc). With the delays already incurred, [REDACTED] may not even see the new site unless he joins the sixth form, but [REDACTED] will, and [REDACTED]

Thank you for your time.

Kind Regards

[REDACTED]  
Turing House Parent

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 18 July 2019 23:08  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** 18/3561/FUL GLA/4739/01

Dear Mr Khan - London Mayor

I am contacting you to ask for your support in the building of our local school - Turing House.

I am a resident of Twickenham and my son [REDACTED]  
[REDACTED] This is a much needed school in our particular local of West Twickenham. It has been a long process to get to this stage of the planning and at the moment the school is operating on two sites which would not be possible to sustain for the long term. Like many Twickenham residents, we have welcomed and supported this school from the start.

Turing House is a brilliant school and we have been impressed with our son's engagement with secondary school life and learning. It is a vibrant and positive place to learn. They seem to have struck that balance between maintaining high expectations and consistency and providing a supportive and nurturing environment. My son has been stimulated by the learning he has completed at school and more importantly he has developed as a person because of their focus on the whole child. I say this as a parent, and [REDACTED]

So, with this in mind, I urge you, please, to support the building of our school. It is a very impressive school, thus far, and I imagine it will go from strength to strength.

Yours sincerely,  
[REDACTED]  
Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 18 July 2019 20:47  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** 18/3561/FUL

Ref: GLA Reference GLA/4739/01

Dear Mayor Khan

Please accept this correspondence as full support for the decision to build Turing House on the Hospital Bridge Road site in Whitton

5 years ago, we put our faith in the strategy of this wonderful school to provide the best education for our [REDACTED]. During this period, he has been on a temporary site in Teddington and even with the expected planning permission will never gain the benefit of the hoped for permanent site. Despite this, we believe that for the future of the school, and the education of youngsters in the borough the planned permanent site must go ahead.

The TH management and staff have provided [REDACTED] with an incredible level of education given the restrictions of the temporary Teddington site and we now face the issue of our [REDACTED] being situated on a second temporary site in Hampton for at least 2 years. This is far from ideal.

As a Whitton resident I can genuinely see both sides of this argument but the ultimate question must be – is this the best option given all other options and an exhaustive / heavily delayed process? We accept the building on Met Open Land is not the preferred option in an ideal world but an ideal world it is not. The borough needs a permanent site and the children deserve education with fully functioning science labs / music facilities / design & tech labs and most of all space to play and conduct meaningful PE lessons.

Beyond this, the plans have scope for significant community facilities that will benefit the wider community sports clubs.

The borough has no other viable site for these young people so please approve the planning permission for Turing House.

Warmest regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2019 16:08  
**To:** Mayor  
**Subject:** School in Whitton

Dear London Mayor, Please look at the Liberal councillors rational arguments concerning the proposed Turing School site in Whitton, Twickenham. Look at the much more suitable David Loyd site. Look at the very strong local opposition to the Whitton site due to traffic congestion , the already high numbers of local school children.etc. Also look at the green lung which is in danger. We need this to fight the Heathrow fumes and already high local traffic fumes.

Thankyou for turning down the daft Tulip tower in London! Have another go for the common good here too please!  
best wishes, [REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 July 2019 14:42  
**To:** Mayor; Tony Arbour; Caroline Pidgeon; Jennette Arnold; Joanne McCartney; Jules Pipe; Heidi Alexander  
**Subject:** Turing House Planning Application 2019.

Dear Leader, members and officers of the GLA

I am writing, as a parent of two children at Turing House School, in support of plans for our new permanent home on Hospital Bridge Road.

Following an exhaustive scrutiny process the plans were approved at the London Borough of Richmond upon Thames planning meeting on Wednesday 10th July. As such we wanted to take the opportunity to bring to your attention the benefits the project will have, not just for our children, but also the wider borough community, these include;

- **New Public Access** – it is in the plans that new open space for the local community will be made available.
- **Improvements to local bus services** – our transport consultants have been discussing contributions with Transport for London and there is a thorough travel plan for the new location.
- **Encouraging sustainable travel to school** - 85% of students live within 3km of the Hospital Bridge Road site; improvements will be made to pedestrian and cycle movements on the A316; a new speed limit, cycle lanes and pedestrian crossing planned on Hospital Bridge Road and a separate pedestrian access point all form part of the plans
- **New sports facilities available for community use** – local sports clubs have already made enquiries and others have offered their support for the Hospital Bridge Road site
- **Education provision** – Turing House first opened in September 2015 and has established a fantastic reputation, broadening school choice in the Borough and helping meet the need for places in the western side of the Borough. Richmond upon Thames borough will have a significant secondary school place shortfall in 2020 if the plans do not go ahead.
- **Minimal impact on openness of the MOL** – the carefully considered location and design of the school supports the premise for it too be allowed on MoL land under the exceptional need for the school.

The project team have responded to issues relating to Very Special Circumstances and have demonstrated that there are no other sites sequentially preferable, available and viable within Richmond or Hounslow.

I would also like to bring your attention to the almost 700 comments from Borough residents in support of the project. As parents of children at Turing House, I feel it is important for the staff and 450 current pupils of this already establishing and thriving school to have a permanent home as soon as possible. As you may be aware the school are already some years behind where we expected to be in terms of this fantastic school having a permanent home.

We believe that the scheme has evolved from the initial proposals, through community and statutory stakeholder consultation and discussions with Borough officers and the GLA, into one that best matches the requirements of all local stakeholders. I sincerely hope that you will carefully consider all of the above and support by approving the plans as they pass through the GLA scrutiny process.

Kind regards

[REDACTED]



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 January 2019 18:56  
**To:** [planning@richmond.gov.uk](mailto:planning@richmond.gov.uk)  
**Cc:** Mayor  
**Subject:** Turing House School - Planning Reference 18/3561/FUL

Dear Sirs/Madams,

I am utterly opposed to the proposed building of Turing House School on Metropolitan Open Land at Hospital Bridge Road for the following reasons:-

- As a resident of [REDACTED] I am aware of the traffic congestion that currently accrues on Hospital Bridge Road in the direction of the A316/M3 at rush hour times: the idea of adding to this problem is utterly thoughtless of the local residents and very dangerous- not to mention the inevitable increase in pollution.
- May I suggest that Richmond Council would far better serve the local residents by supplying a pedestrian crossing at the junction of Hospital Bridge Road and Vincam Close, as well as a speed restriction camera to check the dangerous speeds that some motorists use over that bottle neck of a railway bridge; and this rather than increasing the potential dangers of this part of Whitton by the building of a large school
- There is already a problem with people parking - even briefly - in Montrose Avenue, some of whose residents appear to have accessed council looking cones, which they plant on legitimate parking spaces in order to prevent anybody parking there. Is this even legal? This lack of decent citizenship will surely be exacerbated. This point is made to highlight that the already big parking problems in part of Whitton would become severe.
- The proposed site is Metropolitan Open Land which should not be lost to us in Whitton other than for special circumstances. Loss of this open land will adversely impact on the native biodiversity - please do not take away another piece of land that the bees love! As residents we care about this; we value the positive effect that this particular piece of open and recreational land has on our physical and spiritual (intellectual and emotional) environment.
- We have Twickenham School a stone's throw away from the proposed building of another secondary school. Twickenham School has vacancies for Whitton children - plenty! The Turing House project was initiated by a demand for secondary school places from residents in Teddington, whose children will ultimately be favoured in the demand for places at Turing House! Other, safer and more appropriate sites have been proposed for the Turing House project, which by all accounts is a good school. Lets put suitable resources into building up the reputation of our own Twickenham School which is already in Whitton and has places for Whitton youngsters.

Yours sincerely,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2019 15:09  
**To:** Mayor  
**Subject:** Turing House school proposal Whitton

Hi

I would just like to express to express my objection to this location.  
Common sense would say that a school designed for majority pupils from outside the local area should not be in this location when other sites closer to Teddington are available eg David Lloyd site.  
It seems a great disappointment that the only bit of open land in Whitton will give way to this proposal whilst those in the Teddington catchment area will get to keep there green belts.  
As the final decision lies with you I hope you will see sense and not allow this to happen in an already congested area with Whitton school just down the Rd.  
The proposed school entrance is on an already tight and busy Rd during peak times is frankly ridiculous.  
Please carefully consider your decision and not bow down to some obvious "underhand" planning recommendations.  
I am not against the building of a new school but it has to be in the correct location for the correct people.

Regards [REDACTED]

Sent from my iPhone

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**From:** [REDACTED]  
**Sent:** 11 January 2019 10:35  
**To:** Cllr.AHambidge@richmond.gov.uk; planning@richmond.gov.uk; Mayor;  
info@vincentcable.org.uk; contactholmber@parliament.uk;  
admin@russelleducationtrust.org.uk; Cllr.GElliott@richmond.gov.uk;  
Cllr.GHealy@richmond.gov.uk; Cllr.PHodgins@richmond.gov.uk; Cllr.AButler@richmond.gov.uk  
**Subject:** Objection to Turing House School building plans in Whitton rather than Teddington - REF  
18/3561/FUL

Dear Council,

My family and I live in Whitton and are **strongly opposed to Turing House School being built on an MOL site in Whitton**. The community is in disbelief that a school should be built in Whitton for children predominately in the Teddington catchment area (80% places to Teddington, 20% to Whitton) and for all the reasons stated below.

We very much hope that you listen to the people and stop this ill-thought out scheme.

My Objections are based on my observations below:

#### DESIGN

- 1) The large SUPERBLOCK building will dominate area
- 2) Standard design "Superblock" rather than one designed to minimise impact on the area
- 3) Poor quality design in places – especially facing onto residential areas
- 4) Metal cladding on sports hall not suitable for a sensitive Metropolitan Open Land site
- 5) There are no building dimensions on the plans
- 6) Noise & smells from the use of development/dining room

#### ROAD SAFETY

- 1) Both entrances each conflict with a separate primary school putting young children at extra risk
- 2) Dangerous site access shared with HGVs
- 3) Bridge on HBR too narrow for both cars and pedestrians
- 4) Proposed zebra crossings on the bridge is dangerous
- 5) No crossing provided from Hospital Bridge Road to Nelson Road
- 6) A316 crossings need improving. Richmond Cycling Campaign agree that cyclists are expected to use routes that are not suitable or safe for adolescents

#### TRANSPORT

- 1) Whether extra cars or buses, extra vehicles will cause extra congestion in a gridlocked traffic accident hotspot
- 2) Breakfast clubs and afterschool clubs will make very little difference in practice to reducing congestion and will lengthen the time of the impact
- 3) More pollution from extra cars & buses queuing and sitting in traffic
- 4) Parking impact on local roads will cause problems – especially as the Mayor of London wants fewer than 50% of teachers to have a car parking space

#### NO NEED

- 1) In response to parental demand for 'good' school places, parents in Whitton and Heathfield can get their children into local schools such as Heathlands and Waldegrave which have higher OFSTED ratings than Turing House
- 2) In response to capacity, there is space in local schools for all local school children, so we do not need Turing House in Whitton
- 3) School place projections for secondary places were revised downwards in 2018

#### ENVIRONMENT

- 1) The school should be sited close to its main admission point to be 'sustainable' and to reduce the need for transport
- 2) HBR site is important to biodiversity and is part of a green chain
- 3) HBR site currently provides a green lung removing pollution – this proposal will remove it
- 4) Proposed mitigation measures are weak and do not go far enough to undo the harm of the development
- 5) Playing fields are excessive – especially as they are next to a large public sports ground
- 6) The area that was going to be added to Heathfield Rec has reduced in size from the original proposal made as part of the Environmental Screening Opinion.
- 7) Extra parking demand and pressure for cycle lanes will lead to increasing driveways and the removal of front gardens

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 July 2019 11:04  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Support for Planning Ref: GLA/4739/01; Richmond Planning Ref: 18/3561/FUL

I am writing in support of the planning application to build Turing House School on the site in Hospital Bridge Road in Whitton. I am writing as a parent of a pupil in the founding year of the school who is now finishing [REDACTED] with hopefully another three years to go at this excellent state secondary school. We have been extremely pleased with our decision to send our child to Turing House, the school is amazing despite all the hurdles and uncertainties that it has had to face in terms of site and accommodation which we now hope with your approval can be resolved.

We are so pleased that Richmond Borough Council and its planning committee have found in favour of the Hospital Bridge Road site, given the recognised educational need for secondary school places in Richmond Borough in future years and the carefully designed plans to accommodate a school building on the site itself that will not be detrimental to neighbouring properties. While a decision to build on MOL land will always be controversial, I am sure the local community would prefer to keep the majority of the land as open space, with reserved areas for wildlife and public use rather than having it overdeveloped. Other possible sites for the school that were fully explored in the Teddington area were snapped up by property developers, land being at such a premium, but I am sure community groups in those areas would now have preferred a school with open playing fields and community access to the luxury housing developments that are now planned.

I understand concerns over additional traffic in the area but I think this would be very limited. My son currently goes to school from Hampton to Teddington by bus, as do the majority of his peers, and would continue to do so to the Whitton site. Very few secondary school pupils are accompanied to school by their parents (and the few that are do not wish to be dropped off close to school). An additional school pedestrian entrance near Powder Mill Lane has been specifically planned so that a large number of students using a bus route from Hampton to Whitton can easily access the school site, reducing the number of pupils arriving on Hospital Bridge Road and without causing additional disturbance to neighbouring residents.

Parents feel that while the temporary two sites that Turing House currently uses have been adequate, the school cannot continue to function well and flourish in such a situation. In terms of staffing, timetabling, costs and day-to-day organisation, this has been extremely hard on the school and the leadership team. To continue indefinitely on split sites would place the entire future of the school at risk which would be disastrous for the Borough and the sense of community that has been built up around the school. There are already hundreds of families in Whitton, Twickenham, Teddington, Hampton and Hampton Hill who are now fully vested in the school for their children's education who would be devastated if this were to be put at risk.

Founding parents, current parents, governors, leadership team and staff have worked so hard since the need for a new school in this area was recognised over seven years ago, it would be such a shame if the long-awaited permanent site were not to be approved. It would be so wonderful for the school to be able to concentrate all its efforts on its excellent academic standards and pastoral care for its pupils and to finally have a home.

Many thanks for your consideration and we trust we can count on your support for the school.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 January 2019 18:44  
**To:** planning@richmond.gov.uk  
**Cc:** Mayor  
**Subject:** Turing House School ref 18/3561/FUL

I am writing to object to the moving of Turing House School to the site on the Metropolitan Open Land in Hospital Bridge Road. It is absurd, dangerous and unnecessary for the following reasons:

- 1 There are already five schools in the area north of the A316.
- 2 The demand for a secondary is south of the A316.
- 3 The access to the site would be extremely dangerous and the railway bridge is very narrow.
- 4 The congestion is already serious am and pm in the area.
- 5 Hospital Bridge Road is poorly served by public transport. The 481 runs only every half hour.
- 6 The loss of open space, the impact on biodiversity.
- 7 Even more pollution than there is now.

I urge you to reconsider this disastrous plan and to build the school where it is needed and where it does not affect the environment as much as the present one.

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 July 2019 11:37  
**To:** Mayor  
**Subject:** PLANNING MATTER - RICHMOND 18/3561/FUL

Mayor Khan

I call on you to call-in and reject the planning application to relocate Turing House School onto Metropolitan Open Land (MOL) in Hospital Bridge Road in Whitton.

The plans were approved on the 10th July 2019 by Richmond Council after a marathon planning meeting, and over 1,200 objections. I was present and it was very clear that the Planning Committee treated it as a 'council'/their own application. They exercised their judgement in favour of the application.

There are a number of alternative sites, big enough and closer to the main catchment area which has been ignored by Richmond Council; one of these should be used instead of destroying MOL. The Hospital Bridge Road Residents Action Group have sent you ample material demonstrating the grounds on which you can call-in/reject the development, including by reference to failure to address the requirements in GLA officers' pre-planning advice.

Successive Tory and Lib Dem Richmond councils have failed properly to plan for this school. Before 2018 the Tories failed to ensure a full sequential site search was carried out. After 2018 the Lib Dems are now blaming the Tories for that failure, but are saying it is too late.

It is never too late to save MOL. The test you should apply is whether this school has to be built on this (as opposed to any other) land right now. It doesn't. The school can continue to operate successfully from its temporary premises and can also occupy the sixth form of a recently built school not half a mile away from Hospital Bridge Road. The sixth form is empty due to lack of need for school places!

[REDACTED]

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[REDACTED]

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**From:** London City Hall <noreplies@london.gov.uk>  
**Sent:** 09 July 2019 19:39  
**To:** Mayor  
**Subject:** Hospital Bridge Road

Submitted on Tuesday, July 9, 2019 - 7:38pm

Submitted by anonymous user: 51.9.128.81

Submitted values are:

[REDACTED]

[REDACTED]

[REDACTED]

I am a: Member of the public

Where do you live?

Have you contacted us about this issue before? No

I want to: Make a complaint

What is your message regarding? Hospital Bridge Road

Your message Why after this report is this planning going ahead. I hope Tony Arbour has no say in this as he was on the Richmond Council that approved this so that should not be allowed.

SWLEN believes that the proposed development represents inappropriate development on Metropolitan Open Land (MOL), and is contrary to policies relating to the Green Belt/MOL at national, London and local levels. The 'very special circumstances' which might justify such development do not appear to be present in relation to this development. The National Planning Policy Framework does not list building an entire new school as an exception to the general rule that building on MOL is inappropriate development. The Sequential Site Assessment Report examines a number of other sites but dismisses them on the basis that they are MOL so it is not clear why a different rule should apply to this site.

The site has considerable biodiversity interest and potential although records of species directly on the site are currently limited as it has not been open to the public. The site is close to Hounslow Heath and the River Crane corridor and adjacent to the railway and gardens which form a wildlife corridor from Hounslow Heath to the site. There have been many bat sightings to the north of the site and the Preliminary Ecological Appraisal (PLA) states (para 4.3) that "it may be possible that bats forage along the trees that line the borders of the site", a conclusion that we endorse. The fact that the site is currently largely unlit will contribute to its biodiversity value and we are concerned that placing a large building and floodlit multi-use games areas (MUGAs) close to the northern boundary will interfere with the dark corridor. We agree with the PLA's recommendation that there is a need for additional bat roost surveys (November-March) and emergence and re-entry surveys (May-August). The impact of lighting must be kept to a minimum following guidance. We also agree with the need for further surveys looking for evidence of badgers, nesting birds and hedgehogs and a further botanical survey, plus consultation with the LB Richmond Ecology Officer.

The impact on Heathfield Recreation Ground of opening a pedestrian entrance leading across the park to the school also needs to be carefully considered. This park has recently had some improvements to make it a "friendly park" where the elderly, particularly those with dementia, and those with mental health problems can feel safe. It is also used extensively by younger children particularly those from Heathfield Infant and Junior Schools. The impact of a large number of secondary school children using the park after school needs to be considered and we suggest that supervision arrangements might need to be put in place by the school to ensure that more vulnerable park users do not feel intimidated and that standards of behaviour are good. Should the



Council be minded to grant this application we ask that some CIL money is allocated to improvements to Heathfield Recreation Ground to be chosen in consultation with the Parks Department, Friends' group and local residents.

We agree with the comments by many others about the dangerous access to the site, lack of safe cycling infrastructure in the area, particularly considering that many students would need to cycle from the Fulwell and West Twickenham area, the limited public transport to this site and the potential for further traffic to be generated leading to further air pollution in an area which already suffers from air pollution.

Should the Council be minded to grant this application we suggest that the proposed size of the school and therefore the size of the impact on MOL cannot be justified. The increased intake appears to be excessive considering that Twickenham School is not full. There should be scope for sharing sports facilities with other local schools reducing the need for MUGAs and associated floodlighting which will have an impact on biodiversity. We also suggest that there does not appear to be sufficient demand for such a large sixth form considering Twickenham School closed its sixth form because there was so little demand and Teddington School's sixth form is only half full. Therefore, if a school sixth form is needed in this area, we suggest that Turing House's sixth form could be provided jointly with Twickenham School at the Twickenham School site.

Please feel free to attach supporting information with your enquiry  
Further supporting information  
The results of this submission may be viewed at:

<https://www.london.gov.uk/node/15165/submission/454636>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 09:10  
**To:** Mayor  
**Subject:** Turing House School 18/3561/FUL

Hi Sadiq,

I hope you're well.

I'm emailing re: Richmond Planning reference 18/3561/FUL and GLA reference GLA/4739/01.

[REDACTED] The quality of the teaching and leadership is outstanding.

The downside is that they are on different sites (so they can't enjoy interacting with each other) and the facilities are very limited.

I'm asking you to support the plan to move the school to one permanent site on the Hospital Bridge Road site. The boys would be able to cycle to and from school together. The school would have the facilities the students and teachers deserve.

Thank you for reading this. If you want to know more about why I support the school's plan, please get in touch.

Yours sincerely

[REDACTED]

PS: I love listening to the 'Speak to Sadiq' slot on LBC!

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2019 16:26  
**To:** Mayor  
**Subject:** Land West of Hospital Bridge Road, Whitton GLA 4739, LPA 18/3561/FUL

Dear Mr Kahn,

I would like to add my voice to others in the Whitton Area to ask that you refuse to sign off the development Turing House School. I am sure that you will consider all of the arguments, which are well documented, as to why it doesn't make sense to build a school for children who live in the Teddington area in Whitton on Metropolitan Open Space, increasing traffic and taking one of the few green areas in an area where there are small children attending 4 primary schools in close vicinity. There are railway lines and the airport: we do not need to add more road pollution and lose the benefit of open spaces when there are so many young children walking to school. As you say in your advert: every journey matters. Please do not increase the journeys to this area by signing off Teddington's development.

Yours sincerely,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 January 2019 20:07  
**To:** Mayor  
**Subject:** Metropolitan Open Land at Hospital Bridge Road, Whitton, Middlesex. LBRUT PLanning application reference 18/3561/FUL

Dear Mr Khan,

I understand that before the above goes to planning committee decision stage that the application must first be referred to yourself. I write to ask that you intervene to save the MOL situated above on which Turing House School wishes to build a new school and has submitted a planning application to the London Borough of Richmond as above.

The application flies in the face of your published statement that all MOL must be protected at all costs. MOL is protected for Londoners permanently and for all future generations. It is a strategic asset for all Londoners not just Richmond residents. No case should be made to develop protected land if it is to respond to "demand or need". There is no need for a school in this area as there are currently undersubscribed schools in the area. The building will lead to loss of openness of the site .

The proposed school is primarily intended for students living in the Teddington area, it is unsustainable due to its distance from its point of need. There are other non MOL land available closer to the point of need which have not been fully explored / investigated. Teddington students will need to travel about 4 miles, crossing the very busy A316 arterial road. Travel by car, bus etc will add more pollution to an area already polluted by Heathrow airport and traffic taking children to the 3 existing primary schools and one undersubscribed Secondary school already in close proximity to the proposed site. At peak times, traffic is at a standstill and adding more traffic to this area will exacerbate the problem, adding more congestion and pollution.

Furthermore, the entrance to the proposed school is at the foot of a very narrow humpback railway bridge, which is currently not wide enough to provide a passable footpath. The attending school children and others walking in the opposite direction, will be subject to an unnecessary risk of accidents in walking to school.

A natural boundary hedgerow to our land, running directly alongside the main building will be destroyed. Trees, shrubs and wildflowers will be cleared to be absorbed into the grounds of the school. We have maintained this natural eco system for the past 35 years to support biodiversity and it is a natural habitat for hedgehogs, urban foxes, frogs, butterflies, nesting birds, birds of prey etc.

From a personal perspective, the proposed plan shows the MUGA as sited parallel to our garden patio, denying us the peace and tranquillity we have enjoyed for the past 35 years in this residential location. . The height of the school will take light from our garden rendering it useless to grow the fruit and vegetables we currently enjoy and depend upon.

We urge you Mr Khan to support the objection and intervene to stop this proposed development on important Metropolitan Open Land.

We would appreciate acknowledgement of receipt of this email by yourself.

Kind regards,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 16:04  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Richmond planning reference number:18/3561/FUL and GLA Reference GLA/4739/01

This email is to let you know that I fully support the decision to build Turing House on the Hospital Bridge Road site.

My son attends Turing House school at the current Teddington site, we chose this school because of it's values and vision and are really pleased with how it's progressed as a very successful and oversubscribed local state school. The fact that nearby Waldegrave school is only open to girls means that Turing House is a well needed decent school option for boys leaving local primary schools.

The teachers (having to operate over split sites) and the parents have been very supportive and patient in the very long planning process of trying to establish a permanent site but the children are the ones who have been affected the most, with having to make do with very small outside play spaces and restricted access to PE facilities which are key at any age for children spending long periods sitting in classrooms studying during the day.

My son currently travels to school by bicycle and will continue to do so if and when the permanent site is agreed for Hospital Bridge Road.

In hope,


[REDACTED]

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**From:** Wilson, Michael (Cllr) <Cllr.M.Wilson@richmond.gov.uk>  
**Sent:** 19 July 2019 19:19  
**To:** Mayor  
**Cc:** Allen, Piers (Cllr); Juriansz, Alan (Cllr); LeeParsons, Helen; Jaeger, Liz (Cllr); Humphreys, Jo (Cllr); O'Carroll, Rob (Cllr); Pollesche, Lesley (Cllr); Wilson, Michael (Cllr); Coombs, John (Cllr); CABLE, Vince; Roberts, Gareth (Cllr); Caroline Pidgeon  
**Subject:** Land West of Hospital Bridge Road, Whitton, GLA 4739, LPA 18/3561/FUL

**Subject: Land West of Hospital Bridge Road, Whitton, GLA 4739, LPA 18/3561/FUL**

Dear Mayor

We are writing to you to ask that you REFUSE the proposed development on Hospital Bridge Road that is about to be referred back to you for a Stage 2 decision (Council officers suggest it is being referred to you on Monday). The planning committee at Richmond Council approved the local planning officer report on Wednesday 10 July despite significant concerns relating to the loss of Metropolitan Open Land (MOL), safety issues for pupils, transport concerns and overall environmental impact on the area surrounding the proposed development.

The loss of MOL just off Hospital Bridge Road is of significant concern to local residents who value the 'green lung' in an area which has less green space compared to others part of the borough, areas of significant social deprivation and an area which has the highest levels of pollution in the Borough.

We do not believe the 'Very Special Circumstances' presented in the planning report justify the loss of MOL. Turing House School is currently located in two temporary buildings – one is owned by Richmond upon Thames Council and the other is owned by the ESFA on a thirty year lease. Although in the long term we accept the need for a permanent home for the school, there is no short term threat to either site and the school could continue in its current locations.

You have previously rejected school development on MOL because part of that development has been unnecessary. In this case the proposed 11-19 free school includes a sixth form which is neither necessary in the proposed location or needed in the Borough. Recently two sixth forms closed (one only a few minutes away) and there are 6 more in the borough that are running below capacity, 4 of whom have less than the DfE recommended minimum numbers. As you are also probably aware the changes in DfE policy on free school sixth forms reflects the concerns they have regarding post-16 over-provision and shows that they would look favourably on any request by Turing House to reduce their age range.

As there is no statutory requirement to build a sixth form and no evidence of local need for one we believe the current plan represents over-development on MOL. Given the school is under no threat of closure there is time for them to submit a revised plan for a 750 student building that would allow for smaller and less

protected sites to come back into any sequential testing. Even if sequential testing still concluded that Hospital Bridge Road was the only suitable site, the removal of the sixth form would result in a much smaller development and the site could be configured so that there would be less of an impact on the MOL as well as reducing pressure on local infrastructure.

The other mitigation for loss of MOL is the community gain. Details of the community use agreement have not been finalised yet, but the absence of floodlighting on the site will mean much of the external space (97% of the sporting square footage) is unavailable to the general public during the suggested hours of hire due to the lack of daylight. So with weekdays ruled out for most of the year and only 4 hours offered at weekends we do not believe this represents significant community gain.

We also have a number of other concerns relating to the current proposal which we would like to highlight to you:

**Safety of Entrance:** There are significant safety concerns relating to the pupils getting to and from the site as well as entrance on to the school site. The school as proposed will share an entrance with a garden centre. They have large HGV vehicles delivering to and from the site on a daily basis when the school would be in operation. The majority of pupils including those who are cycling will be sharing the entrance with these vehicles and there is no agreement currently in place about how it will operate.

**Cycling:** The ambitious school travel plans also suggest a number of pupils cycling from the main catchment area to the new school location. There are no proper cycle routes in the immediate vicinity and the busy A316 remains as a barrier between the two. Richmond Cycling Campaign described the plans as "wholly inadequate for adolescents...Parents will not consider cycling to be a safe option".

**Humpback Bridge:** The road bridge going over the railway line to the North of the School also remains a concern. The bridge itself was modified some years ago, but the pavement which is only on one side remains very narrow (north and south of Bridge) for pedestrians and the road itself at the crown of the bridge is incredibly narrow especially with the proposed increase in cycling, double decker buses and other vehicles going to the school. The pedestrian footways to and from the footbridge are very busy at school times with pupils and parents going to and from four nearby primary schools on either side.

**Congestion & Air Quality:** We are also concerned about the added congestion to and from the A316. Currently TfL have accepted the need for a new controlled pedestrian crossing on the A316 but the surrounding roads from Whitton are incredibly congested especially in the morning and evening rush hour. Due to the phasing of traffic lights on the A316, traffic regularly backs up Hospital Bridge Road, Powder Mill Lane and Percy Road. The increased road traffic will increase pollution in the area (close to Primary Schools, Health Centre, Respite Care Centre and busy bus stops). It is likely the new controlled crossing will also add to the congestion on the residential roads and exacerbate the poor air quality. Even though air



quality will worsen, the applicants also refused to pay £20,000 toward awareness training at local schools to help mitigate the likely increase as a result of increased school traffic.

**Public Transport:** We know TfL has concerns about the public transport – specifically the current 481 bus service not being adequate for the number of pupils travelling to and from the site from the area of need. Although the School has accepted it will pay for some additional double decker services, we do not believe it will be adequate and TfL will be left to pay for additional services to accommodate the projected extra 635 return journeys. The school suggest a number of pupils will use the 111 bus service but we agree with the TFL assessment that this will not be a popular option - "given the much longer walking distance" and whilst potential cycling routes remain so dangerous we believe the limited and busy bus service will become significantly congested.

**Travel Plan:** Planning committee members were told both in the report (45/127) and at the meeting that the ambitious travel plan targets for Turing House could be met, by reference to two other local secondaries with similarly low PTAL who had achieved this. However, on subsequent analysis of the postcode data for the pupils at those other schools, only received after the planning committee meeting, it is now clear that due to the very different admissions policies only 15% and 30% of their pupils have journeys longer than 1.6km, as compared to 54% of Turing House pupils. This raises big concerns that ultimately more pupils than projected in the application will end up travelling to the new site by car and the target to reduce to 5% within 5 years is unachievable.

**A316:** The A316 'barrier' is going to be a significant challenge for pedestrian and cycling safety even if a new pedestrian crossing is installed on the Eastern side. As a result of the catchment area being south of the A316 and the school's 'ambitious' travel plan (walking and cycling), a number of pupils from areas to the south including Twickenham, Fulwell, Hampton Hill and Hampton will have to cross this, (a busy main route in and out of London), including during the very busy morning rush hour traffic. A number of parents, as well as local councillors, from across the borough are concerned about this even if the modest changes are implemented.

**Sustainability:** Finally, in terms of the wider environmental impact we know the School is not being constructed to excellent BREEM quality when other schools in the UK have been funded by the ESFA or local authorities to a higher standard. We also know the developer is using the carbon offset fund to offset some of the environmental impact rather than meeting the full obligations to pupils and local people.

Whilst it remains possible for other sites to come into consideration or a smaller less impactful development to be proposed on Hospital Bridge Road, we urge you to reject this proposal at Stage 2 and ask the school, the ESFA and the local authorities involved to come up with a better and greener plan.

Finally, this is a difficult and complex issue that will affect the lives of our residents for generations to come. We believe our considerable knowledge and experience of the area could be helpful to everyone

concerned and we would therefore very much welcome the opportunity to meet with the GLA to discuss this application.

We look forward to hearing from you.

Yours sincerely

Cllr Piers Allen (West Twickenham) - [Cllr.p.allen@richmond.gov.uk](mailto:Cllr.p.allen@richmond.gov.uk)

Cllr John Coombs (Heathfield) - [cllr.j.coombs@richmond.gov.uk](mailto:cllr.j.coombs@richmond.gov.uk)

Cllr Jo Humphreys (Whitton) - [cllr.j.humphreys@richmond.gov.uk](mailto:cllr.j.humphreys@richmond.gov.uk)

Cllr Liz Jaeger (Whitton) - [cllr.l.jaeger@richmond.gov.uk](mailto:cllr.l.jaeger@richmond.gov.uk)

Cllr Alan Juriansz (West Twickenham) - [Cllr.a.juriansz@richmond.gov.uk](mailto:Cllr.a.juriansz@richmond.gov.uk)

Cllr Helen Lee-Parsons (West Twickenham) - [Cllr.h.lee-parsons@richmond.gov.uk](mailto:Cllr.h.lee-parsons@richmond.gov.uk)

Cllr Rob O'Carroll (Whitton) - [cllr.r.ocarroll@richmond.gov.uk](mailto:cllr.r.ocarroll@richmond.gov.uk)

Cllr Lesley Pollesche (Heathfield) - [cllr.l.pollesche@richmond.gov.uk](mailto:cllr.l.pollesche@richmond.gov.uk)

Cllr Michael Wilson (Heathfield) - [cllr.m.wilson@richmond.gov.uk](mailto:cllr.m.wilson@richmond.gov.uk)

CC: Caroline Pidgeon AM (Chair of the London Assembly Transport Committee)

Vince Cable MP (Twickenham MP)

Cllr Gareth Roberts (Leader of Richmond Council)

Michael

Cllr Michael Wilson

(Liberal Democrat)

Heathfield Ward

Vice Chair: Finance, Policy & Resources Committee

Lead Member for Communities, Equalities & the Voluntary Sector

Health & Wellbeing Board Member



(E) [cllr.m.wilson@richmond.gov.uk](mailto:cllr.m.wilson@richmond.gov.uk)

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[REDACTED]

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**From:** London City Hall <noreplies@london.gov.uk>  
**Sent:** 26 July 2019 12:32  
**To:** Mayor  
**Subject:** Turing House School

Submitted on Friday, July 26, 2019 - 12:32pm

Submitted by anonymous user: 91.237.231.10

Submitted values are:

[REDACTED]

I am a: Member of the public  
Where do you live? Richmond upon Thames  
Have you contacted us about this issue before? No  
I want to: Other  
If other, please specify: Raise any issue about the council building on MOL  
What is your message regarding? Turing House School  
Your message Hello,

EIR - Turing House free school  
Request reference number: MGLA201118-8564

I strongly object to the building of a new school on the Hospital Bridge Road site in Whitton (in the London Borough of Richmond) and I believe the local council, the Mayor of London and the London Assembly is undermining the views of the residents if this project is progressed.

The suggested site is Metropolitan Open Land, which makes it an important part of London's open space network, recreation and biodiversity system. The Mayor of London has consistently supported the protection of these spaces and stated that they should not be adversely impacted by new developments.

Wildlife in the local area needs to be protected and its natural habitat should not be put at risk for the sake of a project that can go elsewhere. As a local resident, I am often amazed at the beauty of the local surroundings and we get a large variety of plants and animals in our garden and the field behind. This all contributes to the local ecosystem and ensures that Whitton is green and healthy. Richmond Council refer to Whitton as the "garden market", due to its "village feel". A huge development like a school would undermine the "village feel" and ruin the charm of the place.

The council has stated in its own Transport consultation document that Hospital Bridge Road is a traffic hot spot and lacks decent transport links (110 and H22 are only every 22 minutes and the 481 runs only twice an hour). How do the school and council intend to reduce traffic problems and improve transport when an extra 1000 students, plus school staff, will be frequenting the site daily?

Weekdays, as well as weekends, the site will be busy, as schools use their property all year around, from early in the morning to late at night. If the council is truly committed to the Mayor's Transport Strategy (LIP), and believes it will achieve the target of 80% of all journeys being made on foot, by cycle or using public transport by 2041, then the council need to scrap this project immediately. The daily volume of people in the area will increase 10-fold. There are no direct buses or trains from Teddington to Whitton and the roads are very dangerous, especially for young cyclists.

The number of children, staff and traffic will affect noise, air and light pollution in the area, which has a direct impact on the residents and their quality of life. The fact that the council is willing to let thousands of residents suffer for the sake of a new school, which is not required, is disgusting. Building anything on the site would have an impact on residents' health due to the increasing lack of green spaces in the borough and an increased in the volume of traffic, which would create further air pollution in an area, which already has many schools. If the Mayor of London is serious about reducing the impact of pollution on children and local resident (who are already feeling the impact of Heathrow and its expansion) then building a school in a highly populated area is wrong.

Several alternative locations for the school have been suggested to the council, which would more appropriate, but have fallen on deaf ears. Former deputy leader of the council stated at a full council meeting that the site was moved from Fulwell to Hospital Bridge Road because the people who live in Fulwell are richer (then Whitton residents) and more likely to take the council to court. This this issue has now become a very toxic class war, between the rich and poor. When it is money verse nothing, we know who will win. The Labour Party has consistently stated that it is a party for the many, not the few, when will London's Labour Mayor step in and protect its most vulnerable citizens?

Richmond's Liberal Democrat-led council has been campaigning to prevent the closure of Kneller Hall; herein lies the perfect solution to their problem. Kneller Hall is a school and is no longer in use. It is a large building with grounds and has a prestigious history. If Turing House School were to move into Kneller Hall, it resolve many issues and prevent the building of an unnecessary school on Metropolitan Open Land.

The project directly affects myself and my family, as the new school field would back directly onto our property. This will impact on our lives in an unfair manner, affecting our right to a private family life, as our property would be visible from the field. Also, the noise would impact on our daily lives; we can already clearly hear the primary school on Powder Mill Lane. The noise is constant and having a school even closer to our property would have a deleterious impact on our physical, mental and emotional well-being.

I kindly request that the council, London Assembly and London Mayor considers the needs and feelings of the residents, who overwhelmingly do not want this school built. Privacy, congestion, air pollution and noise issues clearly make this project detrimental to residents, wildlife and potential students/staff. I request that the council, Mayor and Assembly fully debate and considers the issues I have raised and responds in due course.

Many thanks.

Kind regards,

[REDACTED]

Please feel free to attach supporting information with your enquiry  
Further supporting information

The results of this submission may be viewed at:

<https://www.london.gov.uk/node/15165/submission/459552>

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**From:** [REDACTED]  
**Sent:** 18 July 2019 10:07  
**To:** Mayor; Tony Arbour  
**Subject:** 18/3561/FUL GLA Reference GLA/4739/01

Dear Mr Khan,

I write with reference to the above case and the impending decision on it's permanent site.

[REDACTED]

The school have been amazing [REDACTED]

[REDACTED] The teachers are inspirational and have an amazing energy, which they pass on to the students.

The only negative side to the school has been the uncertainty over it's permanent site, and the fact that it has to operate over 2 sites. The children cannot feel like it's a proper school when they are split into 2 sites not near each other. I think that they loose a part of the whole school experience by continuing with this situation. We understand that the local residents have got their reasons for not wanting the site to be at Hospital Bridge Road, but to all the families and the children that attend the school, it is critical that they find their permanent home soon. The site is perfect for their new home, my children will be cycling or getting the bus there, so access will not be a problem. I believe that very few parents actually drive their children to secondary school at the moment, and there is no reason for that to change with the site moving to Whitton.

Please can you give our children a chance to have an amazing state education at a site that will offer them opportunities that they are currently missing.

Please support the application and allow the future of Turing House to be settled.

Yours sincerely,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 January 2019 19:21  
**To:** Mayor; planning@richmond.gov.uk  
**Subject:** object to the plans no.18/3561/FUL

I am a local resident having lived here for 40 years am very concerned about the impact on the area with a new house school being built on MOL with the loss of green space to local community who are obviously very upset with proposed school. In my opinion this school which is being built for children from Teddington area with no direct bus or train connections, therefore mostly traveling by car will create massive traffic problems in an already very congested area. Furthermore it is unjustifiable to build another school when we already have good established schools Waldgrave, Hampton School, Richard Reynolds, Twickenham, Rts, Twickenham School and Heathlands we currently have a choice of good secondary schools on this side of

the river. In addition Twickenham School has 65% vacant spaces after a costly 24 million refurbishment and this school can do with our support.

The demand for this school is questionable if sixth form is needed it can be developed at Twickenham School

As mentioned above there are no direct transport bus or train connections so school journey will rely on car which will create massive congestion in already congested area. It will cause pollution with the increase in traffic.

The Cobble Road estate is used as a rat run to get through to HBR and bypass heavy traffic in the Powdermill Lane and 110 bus face difficult time to get through.

The junction at the bottom of Montrose Ave and HBR will become a dangerous place because parents dropping off children will have to turn right into Montrose Ave to drop. The bridge is narrow and weak unfit to handle massive increase in traffic.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 09 January 2019 09:41  
**To:** Mayor  
**Subject:** Turing House School,Whitton

Dear Sir

I'm emailing you to express my concerns over the building of yet another school in Whitton called Turing House.

It will take over a large pleasant green area which are rare in London these days and the traffic it would generate would not only increase the dangers to the enviroment but would be very dangerous as the raea already has other schools and the traffic is very congested.

I hope you will understand everyones concerns and this does not happen.

Yours Sincerely  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 10:38  
**To:** Mayor  
**Cc:** info@turinghouseschool.org.uk  
**Subject:** Turing House School in Richmond Borough

Dear Sadiq Khan

I am a Whitton resident and parent to a boy who attends Turing House School. As you know the school was the subject of a positive decision from the Richmond Planning Committee, which I am delighted about.

Whatever the outcome, even with planning permission granted, my son will not attend the school at the new site (other than to take his GCSEs possibly) - it will be too late, . So my message to you is not motivated by my personal circumstances, but rather my full support for the school to move to its permanent site, about 150 meters from where we live.

My reasons for supporting the permanent site in Whitton:

The school is ran exceptionally well and has harvested a fantastic learning culture with its students The school will be in Heathfield, an area that would greatly benefit from such a project. Heathfield is possibly the most deprived corner of the Richmond borough and has sadly been rather neglected by the borough over the years.

Although the school will be built on open land, it will not compromise other green spaces such as the heathfield rec or cemetery land.

The school will present exciting extra facilities and activities for locals There is no evidence that Whitton children will not be admitted to the school. Several children in my street currently attend the school.

The school is likely to be served with additional bus routes which are really badly needed to connect Heathfield from the rest of the borough

I hope the above will be helpful

Many thanks  
[REDACTED]

[REDACTED]

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[https://www.mailcontrol.com/sr/bsv2dDdGvKDGX2PQPomvUmaGI8Tu3yGrGEMbXKcHvp\\_N26yWgO-QYXzsahMIK6wxYBRYzhqBd-bUfE-mA-MlhQ==](https://www.mailcontrol.com/sr/bsv2dDdGvKDGX2PQPomvUmaGI8Tu3yGrGEMbXKcHvp_N26yWgO-QYXzsahMIK6wxYBRYzhqBd-bUfE-mA-MlhQ==) to report this email as spam.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Turing House School - 18/3561/FUL.  
**Date:** 10 December 2019 17:35:29  
**Attachments:** [Screenshot 2019-12-10 at 4.32.00 pm.png](#)  
[admissions2019.jpg](#)  
[image001.jpg](#)  
[2019\\_0373\\_Bus\\_Impact\\_Analysis\\_-\\_Passenger\\_Distribution.pdf](#)  
[2019\\_0373\\_4185\\_002\\_T04\\_Bus\\_Impact\\_Analysis\\_Redacted.pdf](#)  
[2019\\_0373\\_TfL\\_email\\_Redacted.pdf](#)  
[2019\\_0373\\_Bus\\_Impact\\_Analysis-Background\\_Info.pdf](#)  
[2019\\_0373\\_Bus\\_Impact\\_Analysis\\_-\\_Postcode\\_Info.pdf](#)

---

Dear [REDACTED]

I would like to make this comment to the Mayor / Deputy Mayor over this application:

The proposed bus services for this school are not good enough and will result in many more pupils travelling to the school by car than is projected by the applicants.

The bus provision for the planning application heard by Richmond Council was based on this map - showing the home postcode of pupils.

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However, the latest information (that been released since the application was heard by the council) shows the catchment area has shrunk further now the school is established. The 2019 admissions map from the Turing House School's own website shows - none of the new year 7 pupils can use 111 bus that is supposed to be carrying 40% of the pupils when it moves sites.



This means the local bus network will not be able to cope, and that more car trips will be made. The GLA has the opportunity to have the transport funding amended by working with Transport for London and the ESFA to revise the bus contribution package and we feel that you need to be doing this as a matter of priority.

The 481 bus route will clearly need more funding along with the H22 and we feel the ESFA need to be contributing more.

Kind regards

[REDACTED]

Begin forwarded message:

**From:** FOI LBR <[FOIR@richmondandwandsworth.gov.uk](mailto:FOIR@richmondandwandsworth.gov.uk)>  
**Subject:** Request for Information - LBR2019/0373 - Planning Correspondence  
**Date:** 9 August 2019 at 9:17:55 am BST  
**To:** [REDACTED]

Official



**Request for Information - LBR2019/0373 - Planning Correspondence**

I refer to your request for information received on 24/07/2019.  
Please see the information below in response to your request: -

**Your Request:**

On 24th may 2019 an email from [REDACTED] [REDACTED] of Robert West was sent to someone at Richmond Council (we assume it was [REDACTED] of the planning department).

We request a copy of this email and the attached documents.

**Our Response:**

Please see attached.

We trust this response satisfies your request.

If you are dissatisfied with the information provided in relation to your request, you may make representations to the FOI and Complaints Manager. Correspondence should be addressed to: FOI and Complaints Team, Ground Floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. Email: [foir@richmond.gov.uk](mailto:foir@richmond.gov.uk)

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. [www.ico.org.uk](http://www.ico.org.uk)

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Regards

FOI and DPA Officer

[foir@richmond.gov.uk](mailto:foir@richmond.gov.uk)

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 May 2019 14:10  
**To:** [REDACTED]  
**Subject:** FW: Turing House School- Bus Contributions Update  
**Attachments:** 4185\_002\_T04\_ Bus Impact Analysis.pdf; Bus Impact Analysis.xlsx

Hi [REDACTED]

Just in case you didn't get sent this.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 May 2019 14:07  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Turing House School- Bus Contributions Update

Dear [REDACTED]

Following the meeting we had on 25 April 2019 when we have discussed the financial contribution towards bus enhancement for Turing House. We have agreed that the next step will be review bus trips estimate with the most recent students' home postcode data. The revised analysis also took into consideration student trips that are currently taking place to and from the two temporary school sites (Teddington site and Hampton site) and that the bus contributions should be estimated based on the net new trips by future students.

We believe that a figure of **£950k** for bus contributions would be more appropriate. We have provided the reasons for this in the attached documents. I would be grateful if you could review and respond accordingly.

Regards  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED] <[\[REDACTED\]@richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)>  
**Sent:** 15 May 2019 10:52  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Turing House School- Bus Contributions Update

Thanks [REDACTED],

[REDACTED] – if you could please discuss with the applicant and ask DPP to confirm whether this contribution is agreed.

Thanks,

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 15 May 2019 10:49

**To:** [REDACTED] <[\[REDACTED\]@richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)> [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** Turing House School- Bus Contributions Update

Dear all,

My colleagues in Buses have got back to me in regards to a updated contribution figure.

When the school is fully occupied, the numbers provided show that we will need to run the following additional services;

Route 111 – run two additional northbound journeys in the morning and two southbound journeys in the afternoon.  
Route 481 – convert service to double deck vehicles and run an additional northbound journey in the morning and southbound in the afternoon.

An additional return journey costs approximately £75k per annum and converting route 481 to double deck operation will cost around £80k per annum. This gives a total annual cost of £305k. We will seek a total of **£1.525 million** over five years.

Our loadings data shows that on route 111 northbound, 240 to 300 people arrive at the bus stop nearest to the school in the 07:30 – 08:00 period (the time the applicant has stated the majority of students will arrive at the school). The increased demand due to the school is 138 – 199 at the same time during this period giving a total of 378 to 499 people. With the additional journeys we would have 6 buses in this period going northbound and so there would be between 63 and 83 people per bus. Without the journeys, there would be between 94 and 124 which is unacceptable.

Route 481 currently has loads of around 35 people travelling north from Hospital Bridge Road in the morning across the 07:20 and 07:50 departures from Kingston. If converted to double deck vehicles, this increases planning capacity from 80 to 150. 130 – 188 new trips are forecast for route 481 in this direction so we propose to run 1 northbound journey in the AM peak, returning south in the afternoon. There would be 55 - 74 passengers per bus, which is acceptable. Without the journey, there would be 82 – 94 per bus which would be unacceptable considering the low frequency of the service. Travelling southbound in the morning and northbound in the afternoon, the uplift in capacity from introducing double decks will be sufficient to handle the forecast demand.

Assuming the network remains as is, routes 110, H22 and H28 should cope with current levels of capacity.

Also, I have received your response to our initial comments. I am on leave from this afternoon but will respond accordingly, early let next week.

Please let me know if you have any further questions.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 July 2019 16:44  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Turing House School 18/3561/FUL and GLA/4739/01

Dear Mr Kahn and Mr Arbour

I am writing to ask you to support the decision to build Turing House school on the Hospital Bridge Site. The planning and appeal processes have been very thorough but I think it is now time to get this project underway.

Both my grandchildren attend this excellent state school, [REDACTED] It is very awkward at the moment as they are on different sites and used different bus routes, none of which are direct. Neither of the current sites have good PE or outdoor spaces and I feel that is vital for teenagers to encourage health and exercise.

Once the Hospital Bridge Site has been constructed both children will be able to walk to school and the facilities will be world class.

My own children were state educated in London and both of them walked to their local comprehensive school and that is something that has stood them in good stead over the years.

[REDACTED]

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**From:** Frieze, Andree (Cllr) <Cllr.A.Frieze@richmond.gov.uk>  
**Sent:** 17 July 2019 08:58  
**To:** Mayor  
**Cc:** Caroline Russell; Sian Berry  
**Subject:** Turing House School - Richmond Borough

Dear Mayor of London

I am writing to ask you **NOT** to give permission for Turing House School to built on Metropolitan Open Land as per Planning Application [18/3561/FUL](#), despite it being given planning permission by Richmond Council on Wednesday 10 July.

I would like it be refused on the grounds that the need for a site for a school does not demonstrate exceptional circumstances, as per the draft London Plan, 8.3.2: *"The principles of national Green Belt policy[104] also apply to MOL. Any proposed **changes to MOL boundaries** which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF."*

Currently the school is based on two sites in Teddington and Hampton, having been set up by Teddington parents to fill a perceived gap in provision there, but the plan is to build it on Metropolitan Open Land in Whitton. I would like you to oppose it for the following reasons:

**1. MOL is open land protected permanently. As such it is a strategic asset for all Londoners.**

The area, of which the site subject to the planning application is a part, is one of the worst areas in Richmond borough for green space. It rates only 16th out of 18 areas in the borough.

The supporting text to the Greater London Authority Policy 7.17 makes it clear that The Mayor of London is keen to see improvements to the overall quality of MOL. The same paper states that "appropriate development should be limited to small scale structures to support open space uses and minimise any adverse impact on the openness of MOL.

For this reason alone, the application should be rejected. However, there are a number of additional reasons for rejecting the application.

**2. The site suffers from poor public transport connections**

The PTAL rating for the area is 1 and there are no plans for this to change. Indeed a recent Transport For London consultation involving changes in five bus routes in Richmond, Twickenham, Whitton and Hounslow proposed only very minor changes to the bus routes serving the site and no changes/improvements to bus routes between the site and the school's target audience.

**3.The school was started with the intention of addressing the perceived lack of secondary school places in Fulwell and North Teddington**

The school was founded in 2015 under the government's free schools initiative to address the preceived lack of secondary school places in these areas. It opened on a site next to Teddington Memorial Hospital in that September. A further site was opened in September 2018 on the old Clarendon Road school in Hampton.

These sites, whilst being unfit for purpose, are at least in the right area to address the perceived problem. it is common knowledge that there were several other more suitably located sites for the whole school on brownfield or mixed use sites that were investigated and rejected on the advice of the previous administration.



The proposed development is quite simply the wrong proposal in the wrong place.

#### **4. The site is very close to Twickenham Academy**

Twickenham Academy has been a failing school that is now recovering. Having two similar schools in the same area may well create a false market between the two schools resulting in one being forced to close and the upheaval that would cause.

#### **5. The proposed development of the site is contrary to the Mayor of London's strategies for Air Quality and Transport.**

The proposal will, using its own estimates, result in a significant increase in car use and a deterioration in air quality in the area. This at a time when boroughs are being asked to implement the Mayor's targets for a reduction in car use and an increase in air quality. Attempts to reduce any car use through (say) by encouraging cycling are unlikely to be successful. The standard of cycle provision between North Teddington and the Hospital Bridge Road site itself is inadequate and parents are unlikely to consider the route safe.

Air Quality assessments of the site carried out by DEFRA indicates that pollution currently exceeds EU limits.

#### **6. Access to the site is dangerous for children**

Hospital Bridge Road (A312) has a Hump Back Bridge which is very narrow and heavily used by traffic to Heathrow. The proposed entrance to the school would be off this road, which raises very serious safety concerns.

If you are minded to give planning permission for this school, can I ask you to consider placing the following restrictions:

##### **Removal of the sixth form**

The sixth form represents a complete and utter over-development of MOL. There is absolutely no need for the places as sixth forms in Richmond borough are under-subscribed. Two schools in the borough - Hampton and Teddington - have merged their sixth forms due to the lack of demand, so Turing House could merge theirs with Twickenham to make it sustainable. So, at the very least you should insist that this is removed from any application and then the provision for 11-16-year-olds can be re-submitted. A smaller school, for 750 pupils rather than 1050, would ensure there is less pressure on infrastructure, such as public transport, pathways, highways etc and less environmental damage due to less building on the MOL, fewer buses and cars required therefore less pollution. There is a mechanism in place for Turing House to be able to apply to become an 11-16yr school and changes in DfE policy indicates they would get permission for this.

##### **Make the ESFA resolve/improve certain situations through S106 conditions**

If you 'must' give permission to build on MOL, do please be be tougher than the Council on the need to mitigate the sacrifice of Metropolitan Open Land, ie:

1. Improve the safety of Hump Back Bridge on Hospital Bridge Road;
2. Make the entrance safe;
3. Tackle the width of pavement for bus stops and to enable a signalled crossing
4. Bus provision - go back to recommendations made by TFL earlier in the year and put more of that provision onto the 481 rather than the 111. Look at putting on a school service from Hampton Hill where there is no provision at all;
5. Insist on an increase on the Communal Use - currently 97% of the square footage of proposed sporting provision cannot be used for 10 months of the year apart from 4hrs on a Saturday morning. School holiday provision is only suitable for those who don't work;
6. Significant improvements to the Cycling route;

7. Insist on a BREEAM of at least excellent and a building that is carbon neutral.

I do hope you will take the time to look at this application and, having read these points, consider refusing the application to build on our much-needed and valuable Metropolitan Open Land.

Kind regards,

Andree

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**Andree Frieze**

**Green Party Councillor, Ham, Petersham & Richmond Riverside**

To contact me please text 07971 534001 with your details & I will call you back.

*I will only use any personal details and information you provide to me to deal with your requests. At times, I may need to share this information (except information you want me to keep to myself) with other relevant people or organisations, but I will always try to let you know if I am going to do this.*

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Dear Mr Mayor

I am writing in support of the application by Turing House School, which received planning permission from LBRuT last week to build its school on a permanent site on Hospital Bridge Road, Whitton (on Metropolitan Open Land).

As you may know, the school has been operating from two sites in Teddington and Hampton for the past four years, and despite the many challenges a split site brings it has achieved a **Good with Outstanding Features** Ofsted report and places at the school remain sought after, with long waiting lists.

\_\_\_\_\_

Conditions are very limited at the Teddington site (they have to travel some distance for sporting facilities) and accommodation is cramped, but a good school still manages to enrich the lives of the children **as Turing House has done**. We have received countless letters about the **positive behaviour of the children**. Although the new site may not benefit my [REDACTED] [REDACTED] I know how much more the school will be able to achieve with first-class facilities.

## Best wishes



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 August 2019 21:41  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Planning ref. 18/3561/FUL & GLA ref. GLA/4739/01

Dear Mayor Khan

We are emailing to urge you to approve the decision to build Turing House School on the Hospital Bridge Road site.

As Whitton residents [REDACTED]  
[REDACTED], we support the planning application.

We are pleased with Turing House School and have every confidence that overall it will have a beneficial effect on our local community.

Please look to the future and support this application.

Kind regards

[REDACTED]

cc Tony Arbour AM

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 19:26  
**To:** Mayor  
**Subject:** Turing House School

Dear Mayor

I would like to encourage you to approve planning for Turing House School. Like many families in this area our son's secondary education has been affected by ongoing uncertainty about the school's future. The pupils would really benefit from outside space, science labs and sports grounds, and bringing the school together on a single site.

It is a great school that deserves to be supported and invested in.

Kind regards

[REDACTED]

Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 20:57  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Richmond council ref. 18/3561/FUL

Dear Sirs

With reference to Richmond Upon Thames reference 18/3561/FUL and GLA reference GLA Reference **GLA/4739/01**.

I would like to express my full support to the decision to built Turing House on the Hospital Bridge Road site as it is a school so much needed in our area. School is running for a number of year now in two sites (temporary) and the results are amazing the students are thriving.

Yours sincerely

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 July 2019 15:09  
**To:** Mayor  
**Subject:** Application 18/3561/FUL

Dear Mr Khan

I am writing to object to the above application of building Turing House School at the proposed site of Hospital Bridge Road. I have lived in very close proximity to this site all my life. [REDACTED] It has got to be the worst possible site for the school. The position is so dangerous, on a humped railway bridge. A danger spot for children arriving and departing. There have been many near fatal accidents here all ready without a new school being built. Within a few metres is an infant school which has the same opening time of 8.30!!!! A few hundred metres is another secondary school which is still not at full capacity and could already take children from the local area. There are 2 more primary schools and another senior school within close proximity. It is a traffic nightmare already. Pollution is at its highest in this area. [REDACTED] we don't need any more fumes, congestion or pollution from extra traffic in the area.

Please consider other sites for this school which is not even being given priority to local residents !!! It is not wanted here and not needed !!!

Thank you

[REDACTED]

Sent from my iPhone

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 14:50  
**To:** Mayor  
**Cc:** Tony Arbour; [REDACTED]  
**Subject:** Turing House - Permanent site

Dear Sirs

Richmond council ref: 18/3561/ful

GLA ref:

GLA/4739/01

I am writing to strongly support Turing House school's permanent site being built on Hospital Bridge Road.

We have a son who is in year 10 and has had to go through all years with very limited outdoor space and sporting facilities . In addition children have to travel between sites for some classes such as practical cooking lessons . This is costly for the school and does not seem to be a viable option longer term .

The school is absolutely fantastic and provides a very rounded education. We believe they provide a very high level of education. Their pastoral care has been brilliant, which in the challenging climate our children live in, this seems to be of ever increasing importance to compliment good education. I personally have an interest in this , as I work in the nhs with young people who face difficulties with psychosis.

[REDACTED] . We are therefore very keen for the permanent site planning to go ahead, especially as I would love my children to all be on one site to share their educational experiences and benefit from being in a structure with older peers to look up to and learn from.

My children will travel to the site by bicycle. We also look forward to the prospect of having additional outdoor green space available to the public. My younger child would use the public park and we are also excited by the prospect of fabulous sporting facilities , which will be available to the public outside of school hours . We have had to go on a wait list for st Marys athletics club as this is the only running track in the area. Turing would be able to provide this opportunity to the public .

Thank you very much for your support with this application.

Kind regards

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 20:23  
**To:** Mayor; Caroline Pidgeon; Jennette Arnold; Joanne McCartney; Jules Pipe; Heidi Alexander  
**Cc:** Tony Arbour  
**Subject:** Richmond Planning Application 18/3561/FUL (GLA/4739/01)

Dear Sadiq Khan and officials,

Please support Richmond Planning Committee's decision to build Turing House School on the Hospital Bridge Road site in Whitton.

[REDACTED]. They are thriving academically, but the constraints of the current temporary accommodation do limit their educational experience - they have fewer GCSE options than other schools, the Teddington site has very limited outdoor play area, and the Hampton site has very limited specialist facilities, e.g. for technology. The teachers who move between the two locations are under additional strain, and their capacity to deliver sports and music clubs on both sites is limited.

The school is incurring substantial extra costs for support staff and senior leadership cover at both sites, and this is money that could be much better spent on the children's education. Both sites are very crowded, and will become even more crowded over the next 2 years as the school continues to grow. Furthermore, these sites were only ever meant to be temporary, so have not been refurbished to a high standard - for example at Teddington, the ancient lift is invariably out of order, making things difficult for children with physical disabilities, and at Hampton, the portakabins have inadequate climate control; classroom temperatures are unbearably high in summer and I've been told the old oil-fired heating system costs a fortune to run in winter.

Despite all the above, we love the school and are very excited that it finally has a chance of a permanent home in Whitton. We live in Hampton Hill, which is 2 miles from the site, but this is far less than the distance that I used to travel to secondary school! I understand it is also less than the London average. We have already walked to the site with our boys - it takes about 30 minutes, and would be even quicker on a scooter. We have identified a cycle route along safe back-roads and through Crane Park, which we would be very happy for them to use in Summer. They would also be able to use the 481 bus service, which is being enhanced as part of the scheme. We certainly won't be driving them to Whitton as my wife and I both go to work before they leave for school!

Even on its temporary sites, the school has always reached out to its local community - e.g. by visiting day centres for the elderly, taking part in Remembrance services, encouraging litter-picking and hosting free weekend coding workshops for children. I am sure that in Whitton it will do all that and more, because it will have more facilities that can benefit local people outside of school hours.

So, please do support the school and confirm the local planning committee's decision. The school is well loved, much needed, and this site is its only hope for survival going forward.

Kind regards,

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 July 2019 14:33  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** 18/3561/FUL-GLA/4739/01

Dear Mr Mayor,

We are writing to you to ask for your support in the decision to build Turing House school on the Hospital Bridge Rd site.

As you are aware secondary schools in this area are a big problem especially for boys. [REDACTED]

[REDACTED] We looked at the other local schools available and Turing House was the only school that met our expectations in terms of both Academic and Pastoral care. Turing House has an excellent reputation for both these things however their site in Teddington is at full capacity and the additional split site that they now have in Hampton will soon reach its full capacity. The Hampton site is also very basic and doesn't even have room for a proper library. Both the split sites are very limited in the facilities due to the room that they have and they desperately need the new site to amalgamate both split sites. The plans for the new school will provide many opportunities for the students including the outdoor space which many schools locally cannot offer. The new site would allow our son and others to walk or cycle to school instead of the 35 minute bus journey to the split site in Hampton. We would like to thank you for your consideration in this matter.

Regards



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From: [REDACTED]  
To: [Mayor](#)  
Cc: [Juliemma McLoughlin](#); [REDACTED]  
Subject: Turing House School 18/3561/FUL GLA/4739/01  
Date: 08 September 2019 18:40:56  
Attachments: [IMG\\_0829.jpeg](#)  
[IMG\\_0831.jpeg](#)  
[IMG\\_0832.jpeg](#)  
[IMG\\_0833.jpeg](#)  
[Judge quashes planning permission for relocation of secondary school.pdf](#)  
[Int Greenwich Refused.pdf](#)

---

Dear Mayor,

I am writing to ask that you ***take over the planning application*** under article 7 of the Mayor of London Order (2008) rather than just assessing the application to see if should be refused.

I believe Richmond Council have not managed the application properly, had too many conflicts of interests and thus allowed non-planning matters into the decision making process - which makes the decision highly liable to judicial review. Therefore, I believe the application needs to be considered again from scratch by the GLA.

For example,

- 1) The chair of the planning committee allowed the speakers in favour of the application to repeatedly state the school could close school if planning permission was refused. This is not a planning consideration.
- 2) The council's head of school place planning (the speaker from Achieving for Children) also went to a great length to also say to the planning committee the school was likely to close without planning permission for Hospital Bridge Road.
- 3) The chairman of the education committee said at the planning meeting it would cause a crisis if the planning permission was refused as they had nowhere else to send the children too and the council did not have funding to expand schools (she omitted the Basic Need funding mechanism that would kick and an automatically release funding from central Government).
- 4) The planning committee was also told that a new school couldn't be built on the 1.2 hectare plus site they currently occupy in Hampton - as it was on the councils disposals list and the council needed the money. Again this is not a planning reason.
- 5) Hounslow Council have asked for conditions to be imposed to improve the safety of the railway bridge and routes into Hounslow - to be activated should the catchment area be changed. This request was ignored by Richmond Council.
- 6) The council deferred discussion about site access to a separate conditions meeting - despite this being a key consideration and that the main entrance is being shared with HGVs from the adjacent landscapers compound and the sweep analysis shows lorries will still mount the pavement even with the proposed wider entrance.

If the school was to go ahead the road needs to be widened (the road used to be 1 meter wider before 1990 - when it was narrowed down close to the bridge in an attempt to slow traffic down) and things like cycle lanes added to Hospital Bridge Road and Powder Mill Lane.

The following pictures were taken at 3.08pm on Wednesday 4th September - at the time of day the students would be leaving the site

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At the summing up stage of the meeting the members of the planning committee brought up the prospect of the school closing and lack of alternatives - which clearly show that non-planning matters were taken into account and were likely to be the decisive factor.

I feel you need to watch the webcast planning committee hearing and reply to all the points raised as it could avoid lengthy litigation.

Similar planning committee hearings - such as the International School at Greenwich at their planing committee hearing the chairman stopped speakers making these arguments and required an apology from one of the speakers as they considered such arguments were not related to planning matters. See the attached news article written by the BBC Local Democracy Reporter for Greenwich.

The judicial review that quashed the Saddleworth School planning permission centred on the lack of consideration of redeveloping the exiting site AND treating previous non-planning decisions as a fait accompli - please see the attached article. Both of these issues apply to the Turing House case before you now.

I fear that Richmond Council's planning committee allowed themselves to also become LEA meeting - thus making their decision unsound.

Yours faithfully

[Redacted signature]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 July 2019 15:34  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Re. Richmond Planning Ref 18/3561/FUL and GLA Ref GLA/4739/01

Dear Sir,

With reference to the Turing House planning application: **Richmond Planning Ref 18/3561/FUL and GLA Ref GLA/4739/01**, I write to please ask that you support the decision to build Turing House on the Hospital Bridge Road site.

As a local resident of Whitton / Heathfield, the new school would be in close proximity to where me and my family live and would enable my [REDACTED] to be able to walk to the new school. Something that we all wish our children could do. Walking and cycling should be encouraged for all and this should start at school.

The new school will also give improved local green space for me and my family which would be hugely beneficial for a variety of health/welfare reasons. This green space would align well with the Mayor's recent announcement of London being the UK's first National Park City.

Thank you in advance for your consideration.

Best regards  
[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 July 2019 20:16  
**To:** Mayor; vince.cable.mp@parliament.uk; Caroline Pidgeon  
**Subject:** RE: Land West of Hospital Bridge Road, Whitton, GLA 4739, LPA 18/3561/FUL

Sent from [Mail](#) for Windows 10

I am aware that the above planning application to Site Turing House School on Metropolitan Open Land (MOL) has been recommended for approval and is being referred to you for a Stage 2 decision.

As a local resident with a daughter who is at a local Secondary school and attended a local primary school both within walking distance, I have serious concerns about the development of the proposed site which are listed below.

I am fully supportive of the wishes of the Free School parents who set up Turing House to provide school places for children in the Teddington /Hampton area.

#### Safety

The access to the site off Hospital Bridge Road is at the base of a blind narrow hump back bridge, with a proposed uncontrolled crossing! A bus stop is located where the road narrows near the proposed access to the site. I cannot emphasize enough how busy this road is with a local primary school approximately 100m away and it being a main route from Hounslow to Teddington, the additional 1000 people arriving even if staggered will overload the infrastructure and I can't see how the transport plan has addressed the bus increase in capacity required for the 80% of pupils travelling from the Teddington /Hampton area of need.

Having attended the public consultation where the transport consultants welcomed suggestions and concerns, no amendments to the areas of local concern appear to have been addressed eg introducing an alternative access point to the south of the site.

#### Area of need and size of School

Where there is the opportunity to reduce our carbon footprint and locate a School near the area of most demand with an admissions point in Teddington, this should be the driver, with two local secondary 6<sup>th</sup> forms closing recently the 6<sup>th</sup> form proposed at Turing House at it's proposed location would not be required. There is currently an imbalance across the borough of school places with the intended location exacerbating this. With a smaller school a review of the sequentially tested sites may provide a location nearer the area of demand.

#### Loss of MOL

Are the special circumstances the justification for the proposed size of school in a densely populated residential area with little green space and high pollution levels? The mitigating circumstances do not appear to be fully addressed and the proposal for community use not fully thought through.

I know this is a complex case and hope that the eventual outcome and determination to find the right site shines through.

Regards

[REDACTED]

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[REDACTED]

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**From:** Roberts, Gareth (Cllr) <Cllr.G.Roberts@richmond.gov.uk>  
**Sent:** 29 July 2019 15:30  
**To:** Mayor  
**Cc:** [REDACTED]; Caroline Pidgeon  
**Subject:** Turing House School

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor Khan

As I am sure you are aware a planning application to build a school in the borough of Richmond upon Thames has recently been referred back to the GLA for a Stage 2 decision (GLA 4739).

Turing House is an excellent school, popular with residents and currently providing a much needed 11-16yrs provision. We, as an administration fully support this school and are keen to work with them to secure a suitable permanent site.

Prior to taking control of the Council in May 2018 our position on this matter was to prioritise a different site near the David Lloyd Centre in West Twickenham between Uxbridge Road and Staines Road. In planning terms, it has been classed as not sequentially preferable and also involves some areas of MoL. However, we took the view that despite the challenges of this Richmond Council owned site many other factors made it a good choice.

Most importantly, and key to our identifying this site, we believed its proximity to the area of need (and the school's admissions point) would result in a much more sustainable development as many of the children would be able to walk to school, reducing pressure on our highway and public transport infrastructure. Additionally, having now seen the current application it might be possible that many of the concerns raised would not be an issue at this site.

From an educational perspective this site represented a sensible approach to school planning allowing us to evenly spread out our school place provision rather than having too many schools close together. Unfortunately, by May 2018 plans for the current application were well advanced, our requests for the ESFA to re-consider their choice of site were largely dismissed and our subsequent efforts, as an incoming administration, to take a step back came too late in the overall process. Clearly once the application had been submitted it became inappropriate for us as an administration to intervene and the planning process has needed to play out based on the application before the committee.

For this reason, I am not writing to express an opinion one way or the other regarding the application before you. However, I felt it important to confirm that should circumstances require the ESFA to re-visit other sites they can count on our full support.

Please don't hesitate to contact me should you have any further questions.

Cllr Gareth Roberts  
Leader of the London Borough of Richmond Upon Thames  
Liberal Democrat Councillor for Hampton Ward

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 January 2019 10:48  
**To:** Mayor  
**Subject:** Turing House School: planning application 18/3561/FUL

For the attention of the Mayor of London

Dear Mr Sadiq Khan

I would like to object to the planning application 18/3561/FUL - this being the proposal to build Turing House School at the end of Montrose Avenue, on Hospital Bridge Road.

I feel this location is not suitable for another school -  
this area already has a senior school which is under subscribed  
Hospital Bridge Road is already very busy road and does have queues of traffic at peak times  
the pavement area is very narrow at the proposed end  
the Hospital Bridge Road bridge is blind sighted to the proposed entrance to the new school from the Nelson Road end, heading towards the A316  
no room for cycle lanes on the public roads

I feel this proposal of building Turing House School on Hospital Bridge Rd at the end of Montrose Avenue is not taking the pupils road safety into consideration.

Yours sincerely

[REDACTED]

18/3561/FUL

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 July 2019 16:56  
**To:** Mayor  
**Cc:** Tony Arbour  
**Subject:** Richmond Planning Ref: 18/3561/FUL Reference GLA/4739/01 - Turing House permanent site support

Good afternoon Mayor Khan.

Please allow me to introduce myself. My name is [REDACTED], a year 9 pupil at Turing House School Teddington site.

I wanted to write to you to highlight my offer of support for the proposed Turing House site in Whitton. [REDACTED]  
[REDACTED] I have been incredibly impressed with the school and have nothing but praise for all of the fantastic opportunities that the school has managed to give to my son despite the physical educational constraints and difficult circumstances of having a split temporary site for the school for the last 3 years.

Our family were very pleased, and somewhat relieved, with the successful approval of the latest planning committee meeting last week to grant permission to build the school in Hospital Bridge road, including my [REDACTED]  
[REDACTED] whom we also hoping will be able to attend the school [REDACTED].

I please ask that you also give your support to this fantastic school to help ensure that my son can finish the later part of his schooling in a permanent site and my daughter can have all of the amazing opportunities that Turing House school can offer with the huge benefit of amazing additional facilities that a permanent site can bring.

Yours sincerely,

[REDACTED]

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After much and deep thought I decided I needed to write this letter about planning application  
**LAND AT HOSPITAL BRIDGE ROAD, TWICKENHAM TW2 6LH – PLANNING APPLICATION 18/3561/**

Firstly, let me say this is not a letter saying disagreeing with the decision to approve the planning application. I always viewed the planning process as an opportunity for either a) LBRuT to take control of their town planning with a wide view of what the borough needed both in terms of infrastructure and environment needs or b) to ensure a quality plan with the objective of reducing impact and delivering improvements.

To my dismay neither of the above options happened. Richmond have not taken hold of town planning for the borough and a plan has been approved which has significant issues that will impact the pupils of the school, local residents and Richmond borough. Richmond borough will need to fund fixes such as safe cycle routes and the right number of buses.

The relationship between ESFA developers and LBRuT planning department is quite rightly close with many meetings and other forms of communication. The developers paid for LBRuT planning department to give pre-advice so they could produce plans which would be approved quickly and without issues. I totally agree with this as a logical and correct way forward. LBRuT planning department pre-advice was spot on with such advice as the development could not raise pollution levels, most children would arrive at school in the last 10 minutes before 08:30am, cycling routes needed improving, dangerous access needs fixing.

If the developers had heeded LBRuT planning department pre-advice we would have received an excellent plan. It is very clear the planning department know what constitutes a good and quality development which is right for Richmond.

However, all the developers did with the pre-advice, is to reduce the extremely generous school playing fields so they could get permission to build on MOL. It is notable that the size of school playing fields you have just approved for the school are still far greater than those proposed for the school at Stag Brewery in an area which is awash with community playing fields. Richmond do you feel you are projecting our dwindling green space?

In addition to the pre-advice the public consultation told the developers all about the issues of congestion, slow traffic, cycling, dangerous entrance, lack of public transport, bridge problems, accidents in the area etc. etc.

So, armed with LBRuT pre-advice and community feedback we expected to receive a good and watertight plan from the developers.

The plan was a shock. The developers completely ignored feedback from the public consultation and LBRuT pre-advice and offered nothing to fix issues raised. You have to ask if they actually view the planning process as important with valuable information or just as a tick in the box to say they have done it.

In good faith and with assurances from the planning team that they would sort out issues with the plan, the community submitted their objections – some key ones were:

Congestion and pollution issues caused particularly by the pinch point at Whitton Corner. Due to the pinch point increases in traffic no matter how small have a large effect.

Appalling plans for routes children should take cycling to school. With congested Hospital Bridge Road as the main route and nothing on offer to make it safe for cycling.

Nightmare entrance with an uncontrolled crossing part way up a blind humped back bridge. It appears there were two reasons for this a) the developer did not want to pay to widen the pavement to allow for waiting time needed for a controlled crossing and b) the school was located to the North of the site which means the 95% of kids who come from the south will have to cross over the landscapers entrance. Richmond planning did you really agree to this when widening the pavements at crossings is something LBRuT are committed to for safety reasons?

Claims that the majority of pupils could use a bus route which is located well over 500m from where they live to justify reducing the bus needs.

After many delays requested by the developers they were told to respond to objections.

Their response was to say that none of the objections were valid.??

We did respond to this with more information showing the issues we had originally objected to were valid and due to the delays in the plan reaching committee more information and issues had arisen.

The final blow was LBRuT officers report which also did not support any objections, but tried to justify the objections were invalid despite the community objecting to exactly the same issues as the planning department's pre-advice. LBRuT planning department recommended the development was approved without any fixes for the many valid and substantive objections the community had submitted.

I personally expected something along the lines of: we want this development as we need the school places, but the following need to be resolved – improved cycle routes, improved entrance safety, correct bus routes and numbers, planting of trees along car routes to absorb pollution, use of electric heaters rather than biomass which creates particulate matter etc. etc..... This would have prompted the developers to offer some solutions.

I have puzzled over this apparent capitulation to what is in some areas an appalling plan. My only thought on this, as the planning department clearly knew what was needed, is you thought ESFA would throw their toys out of the pram and close the school down if you demanded a quality build. ESFA like the council have to provide school places and will be targeted on how successful they are. There is no way they are going to close THS on the flimsy excuse that LBRuT was demanding things that planning rules state they have to provide.

I understand this is a public build and money is tight but there are ways of using the money differently to achieve a better and safer build which keeps the impact on the local community to a minimum and provides a safe environment for the pupils. Here are some examples:

- 1) Do not install the dangerous crossing on the humped back bridge and instead use the money to move the landscaper to the North of the site so the 95% of pupils who come from the South do not come into as little contact with business traffic. The school could move the 20% admissions point a little South so no kids get in from North of the site.

- 2) Give TfL the real data on where the kids are located and which buses and routes they will need and leave TfL to demand the money (they appear to be able to get money from ESFA more successfully than LBRuT).
- 3) Demand an electric boiler (no difference in cost to biomass) to keep pollution down.
- 4) Ease congestion and so pollution by having a rota of staggered start and finish times for the 6 schools which will be located within 1km of the HBR site. i.e. on a Monday THS start / stop times 08:00am-14:30 with Twickenham 08:30-15:00, Heathfield 09:15-15:30, BP 08:30-15:15 – then switch them round the next day etc. This could have been a planning condition as the school has already refused to co-operate with Richmond on staggered starts.
- 5) Get the developers to identify grants for large planters for the wide pavements on HBR (or something of this sort). Or just get them to build some - the plants can absorb pollution and shield kids from the road side pollution effects. Friends of Heathfield rec would plant them up and maintain them.
- 6) Demand the cycle route improvements needed to route the kids through the quiet Crane Park Road and Woodlawn Estate. This should be a no compromise demand.

Both LBRuT pre-advice and the planning officers report reference the developers saying LBRuT cannot have fixes as the budget is not available. LBRuT you are the guardians of the borough of Richmond the answer was not to give up on what was needed as it will cause the pupils, community and Richmond huge problems in the future. One of the answers to this was to trust in the relationship with GLA. GLA will back every one of these requirements. There are many examples of developments being rejected by the local council and then apparently overturned on appeal by GLA and Secretary of State. However, what the headlines do not say is to get the plan approved by GLA or Secretary of state the developers have had to change the plan and deliver what the council had demanded in the first place.

There is an example of this on our doorstep. Hounslow council initially rejected the plans for the Kew Corner development because of lack of affordable housing. At appeal to the GLA the developer upped the percentage of affordable housing and GLA approved the plan.

I understand the officers report handicapped the planning committee as they could not overturn the “educational needs” argument and demand the changes the plan needs. They have acknowledged that the many substantive issues the community raised have not been answered. All I can say at this point is at least they have tried their best by asking for a special condition to ensure that some of the issues are resolved.

Richmond this is just not good enough. The community and borough have not been represented and protected by those employed or elected to do so (our local councillors have tried but have not been backed up by the wider administration). The pupils of the school have not been given a safe entrance, cycle routes or enough buses and bus routes. I understand the parents of THS are well aware of the issues with the entrance and are now trying to demand a road is created through Heathfield recreation ground for them. With what has happened already I have no doubt the parents will get their way and more precious open space will be lost due to issues in how LBRuT are controlling planning.

LBRuT have much larger developments at Udney Park, Kneller Hall and Stagg Brewery to consider. Do we really want a repeat of this development where LBRuT show a lack of assertiveness and capitulate to the developers demands driven by keeping cost low? Are we really going to continue to allow our roads to get more congested and polluted, lack cycle routes and lack the means to travel to developments on public transport?

Please do not answer this with a list of we took all the steps the planning process asked us to do and other departments said it was OK and these are the planning rules. I don't think anywhere in the planning process tells you to ignore local knowledge, environment and concerns, and children's safety. Also do not answer this with "this is an open plan so we cannot comment". This stance is not fulfilling your responsibility to the Borough of Richmond.

I request you review how you handle planning applications with a focus on how you can make developments better quality. This includes building relationships with GLA and Secretary of state to understand what they will back you up on (there is a lot). We need an assertive LBRuT to protect the borough from the coming pressures from development. I totally agree there are very few sites in our crowded city to build schools, housing and other infrastructure. This means we need to be more creative in what we build and how we protect and enhance the environment, and local community.

Vince, I have sent this to you as I think our council has been bullied by central government to accept a development of poor quality and safety. Could you help the council with the right contacts to try and resolve the key issues?

GLA I have sent this to you to say despite Richmond having approved the plan as it stands, is there anything you can do to help sort out the issues with buses, safe cycling, entrance safety and pollution the proposed development has.

Richmond, I ask you to talk to GLA and Secretary of state to request help.

My final remark on this is if you think this is how a planning process should be managed, then stop wasting my council tax on opposing Heathrow's third runway. It will be a complete waste of time and budget which could be better spent on more SEN services.



To: Sadiq Khan, [REDACTED] Hannah Thomas

To backup my previous email about issues with planning application GLA/4739/01 - LPA 18/3561/FUL which you received 22<sup>nd</sup> July 2019 for stage 2 I have created this shortened list of problems with the plan and process. I have included links to the main objection documents and those from other groups like local councillors, Richmond Cycling Campaign, Hounslow borough planning department and SWLEN who also have the same concerns.

Despite LBRuT planning committee having approved the plan could I ask you to look into these issues in more detail.

This is a short version of what we think are the relevant points.

<https://images.richmond.gov.uk/iam/IAMCache/2878750/2878750.pdf> HBR-RAG cover letter

#### Other sites and issue with sequential search

There were and are a number of other sites the school could be built on. The list will expand if the excessively large and unneeded 6<sup>th</sup> form was reduced or removed from the build.

The current plans are for a site on 4.8Ha in total (with sports fields). If this did not include the 6<sup>th</sup> form or all the land needed to cope with inappropriate school entrance, this need will reduce to about 3.5Ha.

More details can be found in HBR-RAG sequential search evidence document

<https://images.richmond.gov.uk/iam/IAMCache/2878752/2878752.pdf>

And <https://images.richmond.gov.uk/iam/IAMCache/2947045/2947045.pdf> pages 7-11.

The following available sites are not MOL.

- a) One of the sites THS currently occupies is the old Clarendon school site which is owned by LBRuT. The location of this site is Hampton which is where the demand for school places is.



5.3 The school decided to reject co-location with Buckingham Primary school but no mention is made of the opportunity to move the primary school to the Clarendon site and build THS where the primary school is located.

If Buckingham Primary school was rebuilt at the same time there is enough room for both schools, MUGA and playing fields. Site approximately 4.5Ha.

The land around Buckingham School is not MOL and has the lower level of protection as Other Site of Township Importance. The green space used for the school could be moved to the Hampton Square development.

LBRuT in their pre-advice questioned why this site was rejected.

5. ***Why Clarendon School site is of an insufficient site to accommodate the school?***  
*Detail...*

- b) Sainsbury's St Clares (Hampton) is open to community infrastructure like schools being built above it. This option was never explored and was not included in the sequential search document. More children can walk to this location and it has a good supply of buses that cover the whole of THS catchment area. The cost for extra bus services would substantially reduce and could be put towards the capital cost of the build.

5.6 The Campaign to Protect Rural England (CPRE) proposed various options including mixed used redevelopment at Sainsbury's St Clare's with pupils crossing a bridge to use the sport pitches marked out behind David Lloyd (where the Thamesians RFC played until 1992. With some of the current Sainsbury's carpark – that is all MOL land – regreened.

- c) Viable non-MOL site outside the school catchment area (as HBR is) is Cassel Hospital which the developer has failed to justify why it was rejected.

LBRuT planning agreed that this was a viable site in their pre-advice

Some concern over the robustness of the justification of discounting the following sites:

- Greggs bakery
- Waldegrave road
- Udney Park
- Cassel Hospital.

Developers comments:

The site predominantly comprises green space with the Grade II listed Cassel Hospital located on the north-east of the site and is approximately 4.2ha in size. It is located in a conservation area and the open space associated with the hospital is designated as Other Open Land of Townscape Importance. The Local Plan Review allocates the site for social and community infrastructure uses, though conversion or potential development for residential uses could be considered if it allows for the protection and restoration of the listed buildings.



A school provides social and community infrastructure and the developers have not contacted LBRuT to discuss this site.

MOL site David Lloyd – LBRuT and School's preferred location

The final known option is the council's favourite but is MOL. David Lloyd Site on Uxbridge Road Hampton.

There are many reasons why this is a good site.

- It is in the school catchment area so will provide all its places to the area of need
- The site is big enough for the school and sports pitches
- More children will live close to the site so can walk
- There are frequent bus routes which cover the whole school catchment area, and as most children will be able to walk extra buses are unlikely to be needed
- The entrance will be for the school only so will be safe
- Pollution is high here for NO2 just like HBR but as you are not adding buses or many cars the impact of the school will be less
- The roads outside the school entrance already have crossings so no cost for road changes
- Mitigation for loss of MOL can be via greening David Lloyd buildings by adding green roofs, sharing heat pumps etc.
- This is the school's favourite site
- The land is owned by the council
- The council also own Fulwell Golf club next to the area so could restructure how the land is laid out
- There are very few residential houses around this site so it impacts less people
- The location gives room for the school to expand when demand grows
- There are no closely located schools to this site so the school will not have a cumulative impact on the area in terms of infrastructure and health.

It is difficult to understand why the previous administration rejected this site as it is so suitable. It may be because ESFA suggested 6.5Ha were needed for the school?

There are some land designations for this site:

- It has a public footpath through it. The council have confirmed they would get this rerouted.
- Along with MOL it is designated as an area of natural importance. No one in the council have been able to say why it has this designation and are investigating. It may be because of the trees running along the border of the site which the school have already confirmed will not be touched.

This administration would work very hard to get the school built on this site. Something they have already offered to ESFA.

#### Over development of MOL

There is no demand for the large 6<sup>th</sup> form the school have planned. The 6<sup>th</sup> form at 150PAN is the same size as the school's intake which is unknown for schools as they cannot fill 6<sup>th</sup> forms of the size as the school's intake. In the local area two schools have closed their 6<sup>th</sup> form due to lack of demand and of the rest only 1 is full. The lack of demand is recognised by LBRuT, Heathland's school (1km from HBR location) and SWLEN.

This represents an over development of MOL and permanent loss of green space. Removing or reducing the 6<sup>th</sup> form will mean the school can be located on other non-MOL sites within their catchment area.

<https://images.richmond.gov.uk/iam/IAMCache/2777283/2777283.pdf> Heathland School

<https://images.richmond.gov.uk/iam/IAMCache/2875075/2875075.pdf> SWLEN

The playing fields are very generous and provide little to improve biodiversity in the area.

#### Limited community facilities

The land designation means the school cannot use flood lights as the area is currently a “dark” meadow with many bats. This limits the time the community can get access to 50% of the year. Because the site is MOL the school cannot install all weather pitches. The amount of community use will also be limited by the need to keep the playing fields in a good enough state for school use.

Whitton has a wealth of high-quality community facilities which include Whitton Sports centre 650m from the school proposed site and Heathfield Recreation ground next to the proposed site.

#### Congestion and pollution

The HBR area exceeds EU safe levels for NO2 and some particulates. The exceedances are caused by the congestion cause by the pinch point at Whitton Corner on Hospital Bridge Road. Traffic converges on this junction from A316, Powdermill Lane, Hospital Bridge Road and Percy Road. At rush hour and school run times queues on the surrounding roads to this junction can reach over 650m.

If you add traffic to a pinch point as TfL state small increases in traffic have large disproportionate effects on journey times leading to unreliability and increased congestion. As measured by TfL bus speeds around this site at school run times are less than 5mph.

The development expects to add a minimum of 100 car journeys to the area. This will increase congestion, reduce traffic speed and have a disproportionate effect on pollution levels.

The Heathfield ward which the site is located in has a higher than national average poverty index and with that comes all the associated high levels of respiratory diseases.

There are 4 primary schools located within 1km of this site. The reported exceedences are averages caused by traffic conditions for less than 25% of the time. The pollution levels when the most vulnerable primary school children are traveling to school will be much higher.

More detail can be found at:

HBR-RAG pollution evidence <https://images.richmond.gov.uk/iam/IAMCache/2878745/2878745.pdf>

This view is supported by Richmond Green party and our 12 local Councillors.

<https://images.richmond.gov.uk/iam/IAMCache/2890937/2890937.pdf>

#### Shared entrance

Because the site is shared with a large landscaping business, has a railway bridge one side and housing on the other there is not enough space to expand the entrance to give physically separate routes for pedestrians, cyclists, school traffic, landscapers customers and landscapers vehicles.

The entrance is not large enough to enable lorries of 10m+ the landscaper uses for work and deliveries to enter the site without mounting the kerb.

Lorry delivering at morning school run time



Lorries the landscaper uses for their business.



Because the landscaper is located to the South of the site which is the direction that 95% of the pupils live, they pupils have to navigate past the landscaper's entrance twice a day.

As a result of the landscaper's location the developers are suggesting an uncontrolled crossing part way up the blind humped back bridge. The crossing is 58m from the summit of the bridge which does not give HGVs as pictured here, travelling at 20-30mph. enough stopping distance during times of low visibility, wet or icy weather. The developers do not want to change the location of the landscaper or crossing so are suggesting that the lorry drivers will look over the brow of the hill from the other side and spot anyone crossing rather than be focussed on what is approaching the narrow peak. Clearly this crossing is dangerous.

The crossing is out of the natural direction of travel for 95% of the pupils as they will have to travel North to cross to get to a bus stop which is South of the school. This will not happen they are teenagers and will cross diagonally over the road, especially if they spot the bus coming.

Hounslow borough planning team agree with this assessment along with a huge amount of the 1200+ objections, Richmond Cycling Campaign and all our local Councillors.

<https://images.richmond.gov.uk/iam/IAMCache/2971356/2971356.pdf>

<https://images.richmond.gov.uk/iam/IAMCache/2871110/2871110.pdf>



<https://images.richmond.gov.uk/iam/IAMCache/2871112/2871112.pdf>

### Bus needs

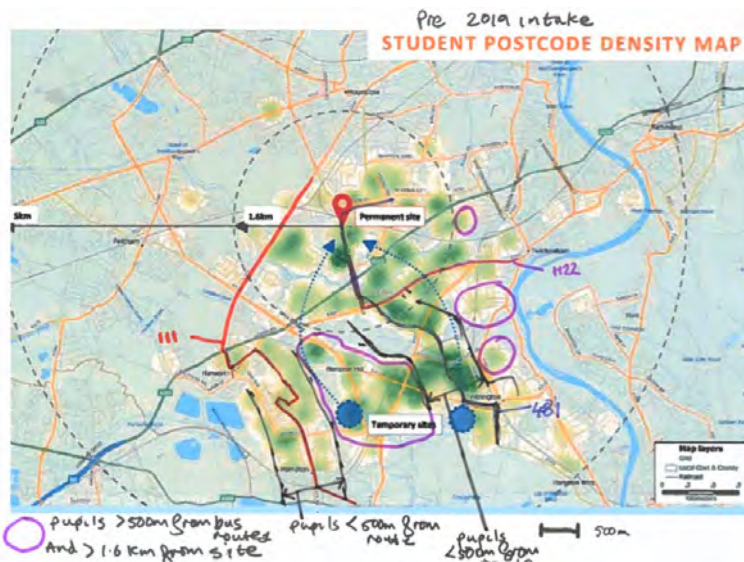
Because this location is over 2km from the school's 80% catchment point they estimate 61% of pupils will need to be transported by bus (650 approx.).

In August 2018 TfL was recommending an additional 6 double decker bus return journeys (rising to 9 by year 5) and a contribution from the school of £2.2m. Yet in the final recommendations there will only be 2 additional double decker returns, 2 conversions from single to double decker and 2 additional single deck returns. The resulting financial contribution has fallen by over a million pounds.

Two of the extra double decker returns are being put on the 111 which in January 2019 was a route that TfL said "I am not convinced that this will be a popular option – given the much longer walking distance". This view is supported by maps of pupil locations and local councillors who have advised that based on where current pupils live the 35% of journeys projected by the school to be on the 111 bus is far too high. The 481 is the route of choice but is a single decker vehicle with low frequency. The limited extra services that are proposed will be unable to absorb the additional passengers.

Hampton Hill is one of the main areas this school was created to serve, and no solution has been provided for the complete lack of a bus route from here to the proposed site.

This is the map of where current pupils live showing how few can use the 111 and no route from Hampton Hill. 50% of these pupils will have left by the time the school is built. The second diagram is a map of where the 2019 pupils live. This reflects a normal pattern for school catchment areas in Richmond so better reflects bus needs in the future.



## HBR-RAG bus objection

<https://images.richmond.gov.uk/iam/IAMCache/2968069/2968069.pdf>

## Bridge

The Bridge just North of the site and whose existence limits how wide you can make the school entrance is an 1850's humped back railway bridge.

It narrows at the crown to 4.7m with a parapet on one side immediately adjacent to the kerb stone (no pavement) and barrier (20cm in) guarding a 1m walk way on the other side. This means it does not meet modern British Standards.

A bus (2.52m wide) cannot pass over the crown if they meet a lorry (2.55m wide) or another bus. You often see a delay whilst they wait on traffic on the other side to reverse backwards to let the bus pass. We understand that you are planning to introduce more services over this bridge to accommodate Turing House School, therefore, this issue will need more careful handling.



Children coming from the North of the site have to cross the busy HBR twice to enter the school and the developers have only offered one pedestrian crossing.

The walkway would be shared with parents and pupils from the five other schools located within 1km of the site. It already causes congestion as it is one-way only when someone is pushing a buggy using this route. This does and will result in more adolescents spilling onto the road to get over the bridge (many ignore the railing on the northern half and walk on the carriage way) due to their different understanding of danger and speed compared to Adults. Nothing has been offered to deal with these issues.

London Borough of Hounslow and LBRuT councillors agree with this along with the six LBRuT Councillors from the Heathfield and Whitton wards and the six Councillors from the two adjacent wards. <https://images.richmond.gov.uk/iam/IAMCache/2971356/2971356.pdf>

#### Cycling issues

- Hospital Bridge Road (HBR) is unsuitable for cycling with a vph of 800+ at the time pupils will want to use it. Developers have neither offered cycle lanes for the four lane HBR or to create an off-road track to route pupils through the quieter Woodlawn Estate.
- Cyclist and pedestrians and vehicles sharing the same entrance. No physical division
- Cyclist have to cut right across the busy HBR
- 1m wide roads in Crane park where 50 children are meant to cycle along in a 30-minute period
- Crane Park specified as a route when it is unlit so unavailable for much of the year
- Routes specified which are designated footpaths only
- Powdermill Lane crossing point traffic islands not wide enough to accommodate a bike
- Cyclists going North have to cross HBR twice and the Nelson road end has no crossing
- Entrance fails to give cyclists and pedestrians the priority
- Neither the cycle routes or entrance is safe for adolescents who are known not to have the safe understanding of speed and safety as adults

Along with local residents Richmond Cycling Campaign and Hounslow Borough planning department objected to the complete lack of cycling improvements in the plan.

HBR-RAG transport evidence pages 51-72

<https://images.richmond.gov.uk/iam/IAMCache/2878747/2878747.pdf>

Richmond Cycling Campaign <https://images.richmond.gov.uk/iam/IAMCache/2871110/2871110.pdf>

<https://images.richmond.gov.uk/iam/IAMCache/2871112/2871112.pdf>

School Ward councillors <https://images.richmond.gov.uk/iam/IAMCache/2876767/2876767.pdf>

Hounslow borough planning department

<https://images.richmond.gov.uk/iam/IAMCache/2971356/2971356.pdf>

Rgds

[Redacted signature]



[turinghouseschool.org.uk](http://turinghouseschool.org.uk)

Turing House School, 2 Queens Road, Teddington, TW11 0LR

## **Land at Hospital Bridge Road Twickenham for development for Turing House School**

London Borough of Richmond Planning Reference **18/3561/FUL**

GLA Reference **GLA/4739/01**

Dear Mayor Sadiq Khan,

I am writing on behalf of the Governing Body of Turing House School to request your support for this planning application, which is under review by your office.

Turing House School was founded in 2015 by the Russell Education Trust, in partnership with a local group of parents who wanted to provide further much-needed high quality mixed comprehensive education for the Middlesex side of the London Borough of Richmond.

The land in Hospital Bridge Road was identified by officers of Richmond Council; their initial discussions with the land's owners (LB Hounslow) were sufficiently positive to enable the Department for Education to allow us to open in temporary accommodation. Hospital Bridge Road has always been the only site which the DfE has ever had the opportunity to develop for us.

We have been in temporary accommodation for much longer than originally intended because the ensuing negotiations to purchase the site were difficult and protracted. We have grown out of our original temporary site and are operating now in two locations, which are 1.8 miles apart. Our founding cohort will complete all of their secondary education without ever having set foot in our permanent home.

Despite the challenges of founding a new school, and latterly of a split site, we have set up an extremely successful school, judged good with many outstanding aspects by Ofsted last year. We are full in every year group and have a very healthy waiting list – our popularity with parents and students is rooted in the tremendous community of learning we have created where students make excellent academic progress, enjoy their learning and care and respect for each other and their community. As Ofsted said: “Leaders, governors and staff have come together and turned their dream of creating a successful school in Richmond into a reality.”

The temporary split site arrangement is not sustainable in the long term, nor indeed for very much longer at all. It undermines the ability of the school to plan for the long term and constrains opportunities and provision for students: they have almost no external play area nor access to sports facilities. Specialist curriculum facilities for technology are extremely limited. Financially, a split site is not viable and we now have to apply to the DfE for additional revenue grants on an annual basis to keep the school open. There is no guarantee that these applications will continue to be successful, leading to serious issues with forward planning for staffing and resources, and potential loss of confidence in the school from parents and prospective parents.

The delays to our permanent site have been much longer than anyone anticipated and the students at the school and those joining next year and in the future need and deserve **permanent accommodation on a permanent site**. As confirmed by the Council's own officers, we bring much needed school places to the Borough and this scheme brings significant additional resource of benefit to the wider community: transport infrastructure improvements, additional bus service capacity and open space for the whole local community – not to mention community use of new sports and other facilities.

Lengthy and detailed searches indicate that there is no other site on which to build Turing House in the Borough of Richmond. We urge you to support this planning application and in doing so safeguard hundreds of children's educational future.

Yours Sincerely,

Janet Hilton

Chair of Governors



12<sup>th</sup> July 2019

Dear Mr Khan

**Re: Objection to planning application to build a school on MOL in Heathfield**

On Wednesday 10<sup>th</sup> July, the Planning Committee at the London Borough of Richmond Upon Thames approved a planning application to build Turing House School on MOL at Hospital Bridge Road.

I believe that the planning officers and planning committee members approved this application on the basis that there were “special circumstances” when in reality there are none. In particular:

- The school appears to be operating effectively on two sites in Teddington
- There are serious concerns about the reliability of the sequential sites test
- The school has funding for 11-19 year olds. Whilst the places that it provides for 11-16 year olds are needed, those for a sixth form are not. And it is not a statutory duty for the council to provide those places. If the school requested a change to its funding for just years 11-16 it could find a smaller site in a more suitable location.
- There is another secondary school just a few hundred yards from the MOL site
- No Environmental Impact Assessment was conducted – despite the authority declining its first application

Furthermore, the planning committee approved the application while there are still serious issues:

- **Child safety** – Particularly an entrance that is to be shared with HGVs and a proposed pedestrian crossing at the base of an unsafe, blind hump back bridge. There is also an infant schools a few hundred yards from the proposed development and there are concerns about those young children and their parents with almost a thousand extra children using the narrow pathways there.
- **Transportation** – Only 20% of the places will be allocated to local children. The majority will be coming significant distances from Teddington, Fulwell and Hampton. The transportation plan – which includes some provision for additional buses from TfL – offers only “show of hands” data on how children intend to travel to school. Local cycling associations have also deemed that the cycle paths are unsafe.

Heathfield ward is the poorest in the London Borough of Richmond upon Thames. It is also the most polluted and has the highest rates of respiratory disease. It also has the least open space in the Borough. It seems utterly unfair that those in the poorest borough should be deprived of this limited open space to make way for a school that is predominantly for those children living in much wealthier, healthier and greener parts of the Borough.

Environmental protection is high on everyone’s agenda. We cannot allow more of our rare open land and “green lung” to be used by people who simply want over-large development sites. Yes, we need to make hard choices but the school should moderate its demands and seek a smaller site that is nearer to the point of need. And there are plenty of such sites in Teddington, Fullwell, Twickenham and Hampton. Or it can review and enhance its current operations on a split site.

I hope very much that you will direct your officers to reject the permission to build on MOL land. Or at the very least to request further detailed assessments of the safety, transportation and environmental issues.

Thank you for your attention.

[Redacted signature block]

# Caroline Pidgeon MBE AM

City Hall  
The Queen's Walk  
London SE1 2AA  
Tel: 020 7983 4362

Mayor of London

Letter sent by email only

17 July 2019

Dear Mr Mayor

**RE: Land West of Hospital Bridge Road, Whitton, GLA 4739, LPA 18/3561/FUL**

I have been approached by colleagues and residents with regards to a planning application to build on Metropolitan Open Land (MOL) that is about to be referred to you for a Stage 2 decision. Last week, Richmond Council's planning committee followed officers' recommendation for approval despite local councillors, educational professionals and residents raising some worrying concerns.

Building on any piece of MOL should be the absolute last resort but my understanding is that the wards in question, Whitton and Heathfield, have significant areas of social deprivation, with some of the lowest amounts of green space and highest levels of air pollution in the Borough, making this loss of MOL particularly of concern.

The Very Special Circumstance (VSC) that have been presented as justification for this loss of MOL is the need for secondary school places in Richmond and from what I've been told some of the capacity that Turing House School would be providing is needed. However, colleagues have suggested the possibility that the specific location of this would, due to shrinking catchments in the long term, not even meet the need in the wards for whom the School was originally opened thus severely weakening the VSC.

Additionally, there is no local demand for the 300 sixth form places that make up part of the proposal. Recently due to low numbers two schools have closed their post-16 provision and out of the remaining school sixth forms four are operating below the DfE recommended minimum numbers of 200, and of the three that have in excess of 200 students only one is full.

This leads me to believe that any building that is of the size required to house this sixth form represents an over-development of MOL and even more importantly removing the additional 300 students could bring back into play previously rejected sites.

Colleagues have advised that planning officers confirmed that any new application for a smaller development would require the sequential testing to be re-done and it hugely concerns me that we could be losing important green space when a proposal that would only include provision for the needed places has not been fully explored.

However, even if new sequential testing for a smaller school concluded that this is still the only site, the new plans would not only significantly reduce the impact on the

environment and infrastructure but could help reduce the MOL footprint, including making possible the moving of the MUGA as detailed in the Stage 1 response.

Turing House School is understandably extremely anxious to move from their temporary sites. However, my understanding is that they are able to manage, albeit with some logistical challenges, and are currently offering a high standard education whilst providing all additional places needed by the Local Authority. If this is the case I cannot see any reason why it is not appropriate for the whole proposal to be revisited in order to properly address the environmental, safety and infrastructure problems as well as fully investigate if there is actually the need to build on MOL.

I am aware that the School was approved as an 11-19 years school but recent changes in DfE policy towards school sixth forms indicates that they would give permission for the Turing House to reduce their age range. Clearly this is not something the School would want, however central to the concerns as to whether the development should proceed is the question of balancing the applicant's desires verses legitimate planning concerns.

Looking at other GLA Stage 1 concerns that were raised I note that issues with the details of community use have not yet been fully addressed. They are not yet finalised or secured by a legal agreement. However more worryingly it appears that much of the proposed sporting offer will actually be unavailable for most of the year due to the land designation not permitting floodlights, and I can certainly understand the anger and disappointment of local residents who were promised significant additional public benefits.

Furthermore, as well as questioning if the VSC has, in fact, been adequately demonstrated; the application appears to also raise a long list of additional concerns not fully addressed including:

- Safety of the hump back bridge on Hospital Bridge Road
- Safety of the school entrance
- Safety of the proposed cycle routes
- Proposed levels of public transport
- Acceptance of lower standards with regards to BREEAM and carbon neutrality

Regarding the issue of public transport there is no doubt that this is a high trip generating development. Given the site has a PTAL rating of 1b (very poor) to comply with LP44 the proposal must support improvements to existing services and infrastructure and I have concerns that currently this is not the case.

The TA estimates that approximately 61% of pupils will travel by public transport and it is acknowledged that the current bus capacity will not be able to deal with approximately 635 additional return trips. I understand that discussions with TfL are ongoing and an agreed proposal detailed in the officers' report. However, concerns have been raised with me with that despite no reduction in the projected bus journeys there appears to be a significant difference between the officers' report and previous TfL recommendations.

In August 2018 TfL was recommending an additional 6 double decker bus return journeys (rising to 9 by year 5) and a contribution from the school of £2.2m. Yet in the

final recommendations there will only be 2 additional double decker returns, 2 conversions from single to double decker and 2 additional single deck returns. The resulting financial contribution has fallen by over a million pounds.

Additionally, two of the extra double decker returns are being put on the 111 which in January 2019 was a route that TfL said "I am not convinced that this will be a popular option – given the much longer walking distance". This view is supported by local councillors who have advised that based on where current pupils live the 35% of journeys projected by the school to be on the 111 bus is far too high. The 481 is much more likely to be the route of choice but given that it is a single decker vehicle with low frequency there is understandable scepticism that the limited extra services that are proposed will be able to absorb the additional passengers.

Lastly, Hampton Hill is one of the main areas this school was created to serve, and no solution has been provided for the complete lack of a bus route from here to the proposed site.

As a result, there is a situation where: additional capacity is below the original recommendations; some of it has been put on a bus route that potentially is not going to be used by the projected numbers; a significant area of need is not served by appropriate public transport at all; and the agreed financial contribution is lower than originally requested. All of this raises the question that if once the school is open these slimmed down solutions do not meet the needs is TfL going to foot the bill to ensure that the lack of bus capacity doesn't result in a modal shift to car use with the associated increase in congestion and pollution?


Discussions with ward councillors has not only shown the complexity of this issue but highlighted their considerable knowledge of the area and its residents. I therefore wondered, if appropriate, if the GLA might be able to meet with some of them to discuss the application. If so I am happy to put your office in contact with them.

I hope my concerns are considered as part of your consideration of this application.

Please do not hesitate to contact me should you require anything further.

With best wishes

Yours sincerely

A handwritten signature in black ink, appearing to read 'Caroline Pidgeon', with a stylized flourish at the end.

**Caroline Pidgeon AM**  
**Liberal Democrat Londonwide Assembly Member**



Mayor of London.  
Planning Department.  
City Hall.  
The Queen's Walk.  
London.  
SE1 2AA.

[REDACTED].

Twickenham.

Middlesex.

[REDACTED]

13-01-2019.

**Reference, Richmond upon Thames Planning Application 18/3561/FUL.**

Dear Sir.

I wrote to you about the proposal to build a secondary school (Turing House School) on Metropolitan Open Land at Hospital Bridge Road, Whitton, Twickenham, Middlesex.

Below is a summary of my objections to the siting of the school on this site.

1. The proposal to build on Metropolitan Open Land in Whitton.
2. The school has been described as a Teddington School taking 80% of pupils from Teddington and 20% from other areas. ( The school should have been found land in the Teddington area)
3. There are 4 infant schools and a secondary school within a half mile radius of the proposed development.
4. The volume of traffic and pollution from motor vehicles at the beginning and end of the school day will increase if a new school is built. This will impact on the health and welfare of the children going to and from the local schools.
5. The road network - Hospital Bridge Road, Percy Road, Powder Mill Lane and the A316 will take the brunt of congestion and pollution. The access to this proposed school is not adequate, and I feel a danger to the children. The bus service is impacted on by this volume of traffic and will further be affected if the development was to go ahead.
6. There is also the issue of the nursery next to the proposed development. It has been there for many years and is an employer in the district. Any future expansion the proposed school may want to make will affect the future viability of the nursery.

I look forward to you reviewing the proposed school development and the impact on the locality, Metropolitan Open Land and health and welfare of the local children.

I look forward to hearing from you.

Yours faithfully.

[REDACTED]