

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA201118-8564

17 December 2018

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 20 November 2018. Your request has been dealt with under the Environment Information Regulations (EIR) 2004.

You asked for;

*We would like to make a Freedom of Information of the pre-application planning advice, or other planning advice given to the following parties:-*

- (1) London Borough of Richmond upon Thames Council*
- (2) Education London*
- (2) Russel Education Trust*
- (3) Turing House School*
- (4) Education & Skills Funding Agency*
- (5) London Borough of Hounslow*

*Regarding the proposed Turing House free school at Bridge Farm Nursery, Hospital Bridge Road, Twickenham, TW2 6LH.*

*This is land that is MOL.*

Please find attached the information the GLA holds within scope of your request.

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

Yours sincerely

**Paul Robinson**  
**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>

GREATER **LONDON** AUTHORITY

Development, Enterprise and Environment

**Bob Robinson MRTPI**

Director  
DPP Planning  
66 Porchester Road  
London W2 6ET

**Department: Planning**

Our ref: GLA/4739/AP/01

Date: 19 October 2018

Dear Mr. Robinson,

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

**Turing House School, Land off Hospital Bridge Road, London Borough of Richmond upon Thames**

**Our reference: GLA/4739**

Further to the pre-planning application meeting held on 30 July 2018, I enclose a copy of the GLA's assessment (pre-application report GLA/4739) which sets out our advice and matters which will need to be fully addressed by the future application.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely,

PP. 

**John Finlayson**  
Head of Development Management

cc  TfL

19 October 2018

# Turing House School, Land off Hospital Bridge Road

in the London Borough of Richmond upon Thames

## The proposal

Proposed 5FE Secondary School and 300 Place Sixth Form, MUGA and playing fields/informal open space, staff parking area and on-site servicing, amended vehicular and pedestrian access from Hospital Bridge Road.

## The applicant

The applicant is **Education and Skills Funding Agency (ESFA)/Bowmer & Kirkland** and the architect is **Stride Treglown Architects**.

## Context

1 A request was received on 21 June 2018 for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 30 July 2018, a pre-planning application meeting was held at City Hall with the following attendees:

### GLA group

- [REDACTED], Senior Strategic Planner (case officer), GLA
- [REDACTED], Principal Strategic Planner, GLA
- [REDACTED], Senior Urban Designer, GLA

### LPA

- [REDACTED], LB Richmond

### Applicant

- [REDACTED], Bowmer and Kirkland
- [REDACTED], Stride Treglown Architects
- [REDACTED], Ares Landscape
- [REDACTED], DPP Planning

2 The advice given by officers does not constitute a formal response or decision by the Mayor regarding future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

## Site description

3 The application site is private land with no public access and is designated as Metropolitan Open Land (MOL). It is irregularly shaped and is approximately 6.4 hectares. The site is bound by residential dwellings along Redfern Avenue to the north-west, a railway line to the north east, and Hospital Bridge Road to the east. A horticultural nursery is located to the south east, whilst dwellings along Springfield Road and Berwick Close, as well as a recreation ground, are located to the south-west of the site. The horticultural nursery has informally expanded into open space, resulting in a sprawl of yard and storage areas into the MOL.

4 The nearest section of the Transport for London Road Network (TLRN) is the A316 Great Chertsey Road which is approximately 800 metres south of the site. The site is within approximately 800 metres of Whitton rail station. There is also one bus route (481) within 640 metres, which is an acceptable walking distance, with stops located on Hospital Bridge Road. The site has a public transport accessibility level (PTAL) of 1b on a scale of 1 to 6 where 6b is most accessible.

## Details of the proposal

5 The applicant proposes to erect a 3-storey main school building and single storey adjoining sports block, with sports facilities to be provided including sports pitches and a MUGA. The new school would be designed to accommodate 1,050 students and its facilities would be made available to the wider community through a community use agreement.

6 The proposed scheme would be referable to the Mayor under Category 4 of the Schedule to the Order 2008:

- **Category 3D:** *“Development (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”*

## Planning history

7 There is no relevant strategic planning history on this site.

## Strategic planning issues and relevant policies and guidance

8 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is London Borough of Richmond upon Thames Local Plan (2018); and The London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

9 The following are relevant material considerations:

- The National Planning Policy Framework (2018) and National Planning Practice Guidance;
- Draft London Plan (consultation draft December 2017 incorporating early suggested changes published August 2018);
- Metropolitan Open land *London Plan;*
- Education facilities *London Plan; Social Infrastructure SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*

- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy; Mayor's Transport Strategy.*

## **Summary of meeting discussion**

10 Following a presentation of the proposed scheme by the applicant's team, meeting discussions covered strategic issues with respect to: principle of development, urban design, inclusive access and flood risk. GLA officer advice in respect of these matters as well as transport is set out within the sections that follow.

## **Principle of development: Provision of school on MOL**

11 London Plan Policy 7.17 accords Metropolitan Open Land (MOL) the strongest possible protection, whilst Policy G3 of the draft London Plan states that MOL should be protected from inappropriate development and proposals that harm MOL should be refused. Both policies state that national Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is given the same protection as Green Belt.

12 Chapter 13 of the NPPF 'Protecting the Green Belt land' also applies equally to MOL. Paragraph 133 states that the fundamental characteristic of the Green Belt is its openness and its permanence, and a key purpose of the Green Belt is to prevent encroachment and check urban sprawl. Furthermore, paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to Green Belt and should not be approved except in 'very special circumstances'. In accordance with paragraph 144, when determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to Green Belt (MOL) by reason of inappropriateness, or any other harm, is clearly outweighed by other considerations.

13 The NPPF, however also sets out instances where the construction of new buildings are not considered inappropriate in Green Belt (MOL), including but not limited to: buildings for agriculture and forestry; the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; and, limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites).

14 The proposed development would have an impact on the openness of the MOL. Given that proposed scheme does not meet any of the above exception tests or any of the others set out in the NPPF, it is therefore inappropriate development, which is harmful to the MOL. As such, it is necessary for the applicant to demonstrate that very special circumstances exist to justify permitting the future application.

## **Very special circumstances**

15 The applicant has identified the need for additional school places and the lack of alternative sites as 'very special circumstances'. Regarding need, paragraph 8.16 of the Richmond Local Plan (2018) identifies the Council's School Place Planning Strategy (2015-2024) as the evidential basis for meeting school needs. The School Place Planning Strategy highlights the importance of Turing House School to ensuring a wider diversity of secondary places within the borough and emphasises the need for the school to acquire a permanent site. The Strategy further states that in the absence of a site for Turing House School, demand for places from Richmond Borough residents would almost match supply. The failure to secure a site, however, would have a

detrimental impact on the availability of school places within Richmond for residents of neighbouring boroughs such as Hounslow, Wandsworth and Kingston. In addition, the applicant contends that notwithstanding the importance attached to securing a permanent site for Turing House School, a site has not been identified in the recently adopted Local Plan.

16 It is noted that paragraph 8.2.12 of the Local Plan makes clear that the Council will work with the requisite stakeholders, including the EFSA, to identify and allocate sites for future provision of schools to meet the needs of local communities and enable the Council to meet its statutory requirements.

17 Regarding alternative sites, the applicant has submitted a draft Sequential Assessment to support its case. The Assessment is extensive and considers various site suitability criteria, including:

- Size and location;
- physical constraints;
- current site use and ownership of the building or site;
- compatibility of a school with adjoining land uses;
- planning policy and suitability;
- flood risks;
- opportunities for co-location with other uses;
- availability and timeframes to acquire / develop to meet educational need; and,
- development of greenfield sites, such as playing fields.

#### Analysis of very special circumstances

18 There is clearly a need for school places to meet the combined demand from within the borough and neighbouring boroughs and the Sequential Assessment appears to be thorough in demonstrating that the identified site is the only suitable one available. Moreover, the plan to make the proposed facilities available to the wider community could also weigh in favour of the scheme. However, the NPPF makes clear that the essential characteristic of Green Belt/MOL is its openness and permanence. Whether 'very special circumstances' exist to outweigh the harm caused by inappropriate development on Green Belt, it is also necessary to consider the impact on the openness and character of the Green Belt. Minimising the proposed development's impact on the MOL through design is therefore critical and this is addressed later in this note under Urban Design.

19 In view of the Council's approach to addressing the identification of sites for schools (previously mentioned at paragraph 16 above) it would also be necessary to demonstrate that the Council supports the use of the application site for the provision of the school.

### **Education facilities and community use**

20 London Plan Policy and draft London Plan Policy emphasise the importance of the provision of social infrastructure, including schools, community, play and sport facilities, to meet the diverse needs of Londoners. Paragraph 94 of the NPPF, London Plan Policy 3.18 and draft London Plan Policy S3 support the provision of new educational facilities to meet the needs of existing and new communities. Policy 3.18 and Policy S3 also encourage development proposals that maximise the extended or multiple use of educational facilities for community or recreational use. Locally, Policy LP29 supports the provision of educational facilities and encourages co-location with other social infrastructure.

## Urban, heritage and inclusive design

21 Good design is central to all objectives of the London Plan, the objective to create a city of diverse, strong, secure and accessible neighbourhoods, to which Londoners feel attached whatever their origin, background, age or status. These objectives are mirrored in the draft London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable. Policies contained within chapter seven of the London Plan, and chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

22 The layout, scale and massing of the proposals are broadly supported. The proposed development would be concentrated in the eastern corner of the site on its boundaries with Hospital Bridge Road, the plant nursery and the railway. The approach to developing the site also includes reducing and rationalising the horticultural nursery's storage and yard areas. This would minimise the development's impact on MOL and is supported. To further minimise impact, the applicant should explore reducing the level of car parking so that the proposed hard outdoor PE could be provided within the area currently proposed for the buildings.

23 The applicant should ensure that materials are robust, and any formal application would require the Council to secure key details of materials to be used to ensure the best possible build quality is delivered in the context of the MOL setting.

### Inclusive design

24 The aim of London Plan Policy 7.2 and draft London Plan Policy D3 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that people, including older people, disabled and deaf people, children and young people can use the places and spaces proposed comfortably, safely and with dignity. Further information is available in the Mayor's Accessible London: Achieving an Inclusive Environment SPG.

25 The design and access statement submitted with the application must demonstrate that entry points and vertical and horizontal movement within the buildings have been designed to be accessible, with level thresholds and appropriate lifts, bathrooms and shower facilities. Additionally, links to adjacent public transport should be designed to be accessible, safe and convenient for everyone. Special attention should therefore be paid to ensuring that gradients are gentle and surface materials are durable, slip resistant, and conducive to wheelchair users and people with walking aids.

## Flood risk and surface water run-off

26 The site is in Flood Zone 1 and at a low risk of flooding; however, given the size of the site a Flood Risk Assessment would be required. Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy set out in the London Plan and draft London Plan would also be required. Any attenuation tanks proposed should be designed to also provide benefit during lower order storm events by utilising the Method 2 tank design taken from the CIRIA Susdrain website:

[http://www.susdrain.org/files/resources/fact\\_sheets/01\\_15\\_fact\\_sheet\\_attenuation\\_for\\_redeveloped.pdf](http://www.susdrain.org/files/resources/fact_sheets/01_15_fact_sheet_attenuation_for_redeveloped.pdf).



## Transport

27 A robust Transport Assessment (TA) to be prepared as part of the planning submission in accordance with TfL's Transport Assessment Best Practice Guidance: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>

28 The car parking provision proposed should be reduced so as not to undermine walking, cycling and public transport. Cycle parking would be provided for both staff and students in accordance with minimum London Plan and draft London Plan standards, which is welcomed.

29 A bus contribution to accommodate the uplift in demand generated by the proposed school would be sought by TfL; and any mitigation to increase the capacity of the bus network to accommodate the school would need to come from either the school provider or the council.

30 Cycling and pedestrian improvements, travel planning, car park management and servicing and construction management would all be covered in the TA and discussed with TfL. Any mitigation measures relating to TfL infrastructure and services must be secured through the s106 agreement, it may be appropriate for TfL to be a signatory to receive financial contributions and obligations relating to transport.

## Conclusion

31 GLA officers welcome the opportunity to engage with the applicant on the proposals for the redevelopment of the site. The proposed development would cause harm to the openness of the MOL; however, a case for 'very special circumstances' could be made provided that the applicant demonstrates that the selection of the site has been agreed with Richmond Council via the process set out in the borough's Local Plan, and that the impact on MOL has been minimised as far as possible.

32 Furthermore, any future planning application will also need to address the issues raised in this report on urban and inclusive design, flooding and transport to ensure that the development complies with the London Plan and draft London Plan.

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for further information, contact GLA Planning Team:

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