St Mary’s University College, Twickenham
in the London Borough of Richmond Upon Thames
planning application no. 07/4107/FUL

Strategic planning application stage II referral (old powers)

The proposal
Refurbishment of existing sports hall block and creation of new sports building (2,045 sq.m.).

The applicant
The applicant is St Mary’s University College, and the architect is Rivington Street Studio.

Strategic issues
The application seeks development on Metropolitan Open Land. One of the key issues is that the proposal constitutes inappropriate development under the criteria set out in PPG2. The applicant has considered the impact on the openness of the MOL and made a case to demonstrate very special circumstances as required by national, strategic and local policy. Other matters including design, energy and transport have now been addressed.

Recommendation
That Richmond Upon Thames Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.

Context
1 On 4 February 2008, Richmond Upon Thames Council consulted the former Mayor of London on an application for planning permission for the above development at the above site. This was referred to the former Mayor under Category 3D of the Schedule to the Order 2000:

“Development on land allocated as Green Belt or Metropolitan Open Land in the development 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”.

2 On the 16 April 2008, the former Mayor considered planning report PDU/1503/01, and subsequently advised Richmond Upon Thames Council that the proposal was acceptable in principle with regard to strategic planning policy subject to the resolution of the following issues:
3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the applicant has provided additional information in response to the former Mayor’s concerns (see below). On 22 January 2009, Richmond Upon Thames Council decided that it was minded to grant planning permission for the application, and on 29 January 2009, it advised the Mayor of this decision. The referral was incomplete at that time and was formally validated on receipt of copies of representations made to the Council as part of the consultation process. The referral was formally validated on 9 February 2009. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor may direct the Council to refuse planning permission, and has until 22 February 2009 to notify the Council of such a direction. This report sets out the information needed by the Mayor in deciding whether to direct refusal.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 The applicant and the Council have provided further information in response to the former Mayor’s comments made at the consultation stage. These are considered below.

MOL

6 At the consultation stage, the former Mayor accepted the principle of development on MOL in this instance. The former Mayor considered that the impact on openness had been reasonable well managed through design and extensive landscaping of the building. The former Mayor also considered that the very special circumstances identified in paragraph 29 of the stage 1 report outweighed the harm by inappropriateness, in particular the strategic role and function the university plays in developing, teaching and training of elite athletes. As previously reported, the school has considered a sequential approach to development of the new sports hall in other less sensitive locations. The approach in the circumstances has demonstrated very special circumstances; the policy test set out in PPG2 has in this instance been met.

Access

7 A further issue raised at the consultation was in relation to the proximity of disabled parking spaces in relation to the main entrance of the facility. The reconfiguration of parking spaces for closer access to the main entrance for disabled users can be overcome through the use of drop off facilities by the main entrance and by locating the disabled parking bay as close to the entrance as possible. The applicant has amended to proposals on this basis to ensure access will be appropriately managed.

8 The application is broadly consistent with the aspirations of the London Plan design policies 4B.1 and 4B.5.
Energy

9 At the consultation stage the former Mayor requested further information on a number of technical matters regarding the energy strategy. The applicant has responded in documents received 18 February 2009.

10 A range of demand reduction and energy efficiency design measures are proposed that include the following:

- High efficiency lighting and fully integrated control system including presence and absence detection and automatic control.
- Ventilation systems using automatic presence detection.
- High efficiency plant.
- External shading and natural shading will be used to minimise cooling loads.
- Lower air tightness than the value required by building regulations.

11 In terms of heating infrastructure, combined heat and power has been rejected on technical grounds. The approach is accepted in this instance. The heating and cooling will be largely renewable led and through the use of passive design measures identified above. The following renewable technologies will be included.

- Ground source heat pumps with under floor heating to serve the majority of the areas including sports hall.
- Natural ventilation of the sports hall will be achieved using roof monodraught windcatcher torrets, which use photovoltaic driven ventilation boost fans.
- 180 sq.m. of photovoltaic panels will be added in other parts of the development to provide some of the electricity requirements of the mechanical ventilation system.
- 100 sq.m. of solar thermal collectors will be used to provide part of the domestic hot water and hence reduce the need for gas used in the condensing boilers.

12 The applicant has used building regulations approved modelling and concluded that as a result of all the solutions proposed above, carbon emissions are reduced by 33% beyond building regulation requirements through both energy efficiency and renewable energy measures.

13 The Council has agreed that conditions can be added as appropriate to ensure the proposed technologies will be secured and delivered and that carbon savings will be achieved in accordance with London Plan energy polices. The proposals are broadly consistent with the London Plan energy policies.

Climate change adaptation

14 At the consultation stage the former Mayor raised particular concern that the proposal had not considered key elements of climate change adaptation. The applicant has responded to this concern and confirmed the following:

Overheating (Policy 4A.10)

15 The Sports hall will be clad internally in pre-cast concrete panels. These panels provide thermal mass to regulate internal temperatures. The Sports Hall, toilets and changing rooms will be ventilated with Monodraught Windcatcher roof mounted ventilators. These draw air from inside the building using a natural stack effect. Photovoltaic cells on top of each unit provide power to fans, which supplements the ventilation when required. This is a zero carbon ventilation system. The entrance, reception and office are naturally ventilated with openable windows.
Living roofs and walls (Policy 4A.11)

16 The policy expects these to be incorporated where feasible. The design of the roof structure has limited the opportunity to include living roofs in this instance. There is, however, a significant and enhanced planting strategy around the new building that is proposed as part of the application. This will enhance biodiversity to this part of the site.

Flooding (4A.13), Sustainable drainage (4A.14) and water use (4A.16)

17 A Flood Risk Assessment has been carried out on the site. The study concluded that the proposed development was appropriate under PPS25 as it lies predominately in Flood Zone 1 and partially into Flood Zone 2. Fluvial flood risk to the development is minor and impacts on flood flow paths and floodplain storage are insignificant.

18 The proposals also seek to minimise run-off, by collecting all of the roof rainwater run-off in an underground rainwater harvesting tank. The water collected will be used for irrigating the College grounds and for flushing the WC’s in the building.

19 The site for the new building is currently an impermeable surface of clay Redgra. There will be reduction of surface water runoff into the mains system as the building footprint (2,049sqm) is smaller than the existing impermeable surface (4,416sqm), with the remainder being replaced by permeable surfaces. All external hard landscaping will be either permeable or drained into a local underground soakaway. The area to the west of the new building is to be planted with native trees and understorey vegetation. The proposals are broadly consistent with policies, 4A.13, 4A.14 and 4A.6 of the London Plan

Transport for London’s comments

20 At consultation stage, Transport for London requested clarification regarding car parking and a commitment to more robust monitoring of the travel plan. The car parking and travel plan have been revised since the initial application. TfL considers the proposals to be acceptable in this case and has no objection to this proposal.

Response to consultation

21 Richmond council has undertaken public and statutory consultation process on the application.

22 The Council received a number of responses from various groups, organisations and residents. 15 letters of objection were received.

Objections

- Continued use of redgra pitch contrary to St Mary’s claims that use discontinued in September 2007.
- Loss of parking resulting from sports hall and parking congestion related to the additional vehicles generated by the sports hall itself.
- Inconsistencies within the travel plan.
- Inadequate entrance via the ‘white gates’.
- Failure to record fauna within the ecology report.
- Visually intrusive structure and no relationship with adjacent building or wider landscape.
• The proposal would result in an over concentration of large buildings with visual harm to residential area.
• Loss of trees.
• Loss of a timber fence and impact of noise.
• Impact on, and loss of MOL.
• Request to increase parking restriction hours.
• Noise and litter.
• No benefit in terms of use to residents.
• Planting of new trees essential to screen ‘obtrusive’ structure.
• Objection to the proposed railings as this would increase noise emanating from the college grounds and light pollution (unless a suitable acoustic planted buffer were in place) although it is recognised that this would be an aesthetic improvement.
• Impact on flooding.
• The expansion of facilities will lead to an increase in the student population.
• Non-planning matters (impact on property prices, consultation during holiday periods).

23 From the objections received by the Council, the key strategic matters include the impact on MOL, loss of trees, flooding and transport.

24 In relation to the impact on and loss of MOL, this matter has been considered previously by the former Mayor and is set out in paragraph 18-31 of the attached appendix. Regarding flooding, the Environment Agency is satisfied with the submitted assessment and has suggested appropriate conditions.

25 Regarding the replacement of trees, the Council’s committee report goes into significant detail at paragraph 88 – 97. The Council’s arboriculture officer recommends approval subject to a number of conditions related to tree protection, schedule of works, supervision and production of landscape management plan.

Support

26 The following groups have indicated support for the proposed development.
• Sport England.
• English Institute of Sport.
• Pro-Active (County Sports Partnership for South London).
• Go South Go (South London Partnership).
• UK Athletics.
• Busen Martial Arts and Fitness Centre.
• Other organisations including, Fast Track, Rugby Football Union, local schools and sports clubs.
Legal considerations

27 Under the arrangements set out in article 5 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has the power to direct the local planning authority to refuse permission for a planning application referred to him under article 3 of the Order. In doing so the Mayor must have regard to the matters set out in article 5(2) of the Order, including the principle purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

Financial considerations

28 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 8/93 (‘Award of Costs in Planning and Other (including Compulsory Purchase Order) Proceedings’) emphasises that parties usually pay their own expenses arising from an appeal.

29 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

Conclusion

30 The principle of development remains acceptable in this instance and the policy test set out in PPG2 has been met. The Council has agreed to allow detailed energy conditions to be attached, which will ensure that the proposed development will include appropriate energy infrastructure and carbon saving technologies to ensure consistency with London Plan energy policy. The proposals are broadly consistent with the London Plan.

for further information, contact Planning Decisions Unit:
Giles Dolphin, Head of Planning Decisions
020 7983 4271 email giles.dolphin@london.gov.uk
Justin Carr, Strategic Planning Manager (Development Decisions)
020 7983 4895 email justin.carr@london.gov.uk
Matthew Carpen, Case Officer
020 7983 4272 email matthew.carpen@london.gov.uk
Strategic planning application stage 1 referral


The proposal

Refurbishment of existing sports hall block and creation of new sports building (2,045 sq.m.)

The applicant

The applicant is St Mary’s University College, and the architect is Rivington Street Studio.

Strategic issues

The application seeks development on Metropolitan Open Land. One of the key issues is that the proposal constitutes inappropriate development under the criteria set out in PPG2. The applicant has considered the impact on the openness of the MOL and made a case to demonstrate very special circumstances. Other matters including design, energy and transport require further detailed work.

Recommendation

That Richmond Upon Thames Council is advised that there is further work required as set out in this report before the Mayor can make a decision.

Context

1 On 4 February 2008, Richmond Upon Thames Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor’s use in deciding what comments to make.

2 The application is referable under Category 3D of the Schedule of the Order 2000: “Development on land allocated as Green Belt or Metropolitan Open Land in the development 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 of the Schedule of the Order 2000”
3 If Richmond Upon Thames Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

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

Site description

5 St Mary’s University College, which is a College of the University of Surrey, has its main campus located in Twickenham on a triangular site of approximately 14.6 hectares. The site is bounded by the A309 Waldegrave Road to the north and west, Waldegrave Park to the south, and the A310 Strawberry Vale to the east. The majority of the site is Metropolitan Open Land and includes three Grade II listed buildings and nearby Grade II* listed Strawberry Hill Park.

6 The area of land for redevelopment is currently an area of hard standing, previously a redgrá (type of hard court surface) all weather pitch but has been used as a car park for the college for some time.

![View across site standing on 1m high garden wall](image1)

![View across site looking over timber fence along Waldegrave Rd](image2)

Figure 1 photos of existing development area (source: design and access statement)

Figure 2 Photos from within the grounds of existing development area and R block behind. (Source: design and access statement)

7 The redevelopment site sits near the southwest corner of the campus. Vehicular access to the site is from three entrances along Waldegrave Road. The site is approximately three kilometres from the nearest Transport for London Road Network and 1.5 kilometres from the nearest Strategic Road Network. The site has a public transport accessibility level of 2, on a scale of 1 to 6 where 6 is most accessible. Strawberry Hill rail station is approximately 500 metres northwest of the
redevelopment area; more frequent service is provided from Twickenham rail station, approximately 1.6 kilometres north of the site. Bus route 33 runs along Waldegrave Road, with stops directly outside the campus entrance, whilst route R68 serves Strawberry Vale with stops approximately 280 metres southwest of the campus.

**Details of the proposal**

8 Full planning permission is sought for the refurbishment of the existing R block to accommodate office and treatment space, gym and sports rehabilitation area with treatment and lecture space.

9 A new building will be erected on part of the existing hard standing, previously used as an all-weather pitch but now used as a car park. This will be linked into the old R block and will comprise 2,045 sq.m.

10 The new building will provide the following facilities:

- Multi-use games court and cricket nets
- Changing rooms to serve internal and external activities
- Reception and administration space
- Strength and conditioning suite
- Office lab and treatment space
- Gym space
- Treatment rooms and lecture space.

11 The building will be double height with a curving canopy surrounding entrance and flank of the building. Materials will be predominantly timber, glazing and weatherboarding. A comprehensive landscaping scheme is proposed with new treatment (railings replacing timber fence) to the highway boundary along Waldegrave Road.

![Figure 3 Entrance to new R Block (Source: design and access statement)](image-url)
St Mary’s College

12 St Mary’s University College specialises in sporting excellence, training and teaching and has strong links nationally with UK Athletics, The London Marathon and the English Institute of Sport (the national body responsible for the sport science/sport medicine support for elite performers).

13 In 2001 UK Athletics, The London Marathon and St University Mary’s established a National Endurance Performance Centre to promote middle and long distance running. St Mary’s is now one of two such centres that exist in England and in 2007/2008 there are 41 runners formally attached to the centre who have achieved international honours.

Case History

14 None relevant

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Economic development  London Plan; the Mayor’s Economic Development Strategy
- World city role  London Plan
- Urban design  London Plan; PPS1
- Regeneration  London Plan; the Mayor’s Economic Development Strategy
- Transport  London Plan; the Mayor’s Transport Strategy; PPG13
- Parking  London Plan; the Mayor’s Transport Strategy; PPG13
- Green Belt/MOL  London Plan; PPG2
- Playing fields  London Plan; PPG17
- Biodiversity  London Plan; the Mayor’s Biodiversity Strategy; Improving Londoner’s Access to Nature: Implementation Report; PPS9
- Access  London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Equal opportunities  London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)
- Sustainable development  London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2005 Richmond Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

17 The Richmond Core Strategy has reached submission stage and is a material consideration.

Impact on MOL

18 Chapter 3 of the London Plan is concerned with, amongst other things, open space. Policy 3D.8 (Realising the value of open space) states that “The Mayor will work with strategic partners to protect, promote and improve access to London’s network of open spaces, to realise the current
and potential value of open space to communities.” In addition, London Plan policy 3D.10 (Metropolitan Open Land) also requires that “The Mayor will and boroughs should maintain the protection of Metropolitan Open Land from inappropriate development”.

19 The reference to “inappropriate development” flows directly from PPG2, which sets out the Government’s policy towards Green Belts but which equally applies to the protection of Metropolitan Open Land. London Plan policy 3D.10 states that there is a presumption against inappropriate development of MOL and that it is afforded the same level of protection as the Green Belt.

20 PPG2 goes on to consider the construction of new buildings on Green Belt or MOL to be inappropriate, except in very special circumstances for the following purposes:

- Agriculture and forestry.
- Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land that preserve the openness of Green Belt and MOL.
- Limited extension, alteration or replacement of existing dwellings.
- Limited in-filling or redevelopment of major existing developed sites identified in the adopted development plan.

21 Following detailed pre-application discussions it was agreed that the proposed development does not fall within any of these categories and is therefore inappropriate in the context of PPG2, in particular the site is not designated as a Major Developed Site. PPG2 states that inappropriate development is, by definition, harmful to the Green Belt and MOL. It is for the applicant to show why permission should be granted. The very special circumstances needed in order to justify the inappropriate development will not exist unless the harm, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to Green Belt and MOL. In consideration any planning application or appeal concerning such development. A key consideration is the level of impact to the openness of the Green belt and MOL.

22 In response to the assessment against PPG2, and at GLA officers request, the applicant has put forward the following case regarding the very special circumstances. The level of harm to openness has been a key consideration and has been assessed against the three functional criteria for MOL as set out in the London Plan (paragraph 3.302).

23 The three purposes of the MOL are to protect open space and provide a clear break in the urban fabric; to serve the needs of Londoners; and to protect open space of regional significance.

24 The former and latter of these can be considered as follows. The key issue or main area is the potential impact from the new R block. The existing area of hard standing (all weather pitch) is approximately 4,600 sq.m. (measured off plan). The new floor area for the R Block to be 2,045 sq.m. with associated surrounding access road. The overall footprint of hard standing area will be reduced, however the creation of a new building will result in a new and permanent impact on openness in comparison to the current use as a car park.

25 The new R block will be set back from the main road frontage of Waldegrave Road and set back from the rear of properties along Waldegrave Park. Current views through the site across the playing fields are limited to within the grounds, due to the screening from a timber fence on Waldegrave Road (see figure 1).
The applicant proposes to establish a new arrangement of planting and remove the fence to provide railings to improve access to the views across the playing fields towards the athletics track. Whilst the views across the playing fields are currently restricted from Waldegrave Road and are only significantly visible from within the site, the proposed R block will maintain the existing green finger corridor between Waldegrave Road and the rear of the site given it will be set back on the existing hardstanding area thereby maintaining the break from the main campus building. Whilst the structure will be visible, the impact on openness will be partially mitigated using intensive landscaping, new trees and sympathetic construction materials.

The protection of this gap between the main campus and the new building is important as it ensures the MOL reference, through views across the site, is maintained and enhanced by the removal of the temporary car park and upgrade to the boundary and western landscaping treatment.

In terms of serving the needs of Londoners, the applicant states the site currently, and will continue to provide public access to the grounds at all times.

Whilst the harm to openness may be mitigated to an extent, the proposal remains inappropriate in the context of policy and therefore the very special circumstances put forward by the applicant to outweigh the associated harm include the following:

- St Mary’s role in London as a high performance centre with substantial development and training links on a national scale and with substantial training links to London 2012.
- Significant demand for sporting related courses.
- Links with local schools and clubs.
- The college is privately owned, however public access is afforded at all times to enable the site to serve the local community.
- The impact has been mitigated through design, materials and landscaping.
- A sequential approach to the redevelopment has been considered with four possible alternative options having been considered ahead of new build project in the MOL.
- Amendments to the formal boundary of the MOL were considered, however the Council is not at an appropriate stage within the LDF process to pursue alterations or designation as a Major Developed Site.
- Closure and removal of the car park currently used on the all weather pitch. Introduction of a new travel plan to reduce car usage associated with the University College.

These are covered in detail in the planning statement and make a strong case particularly regarding the London wide, and beyond, attraction of the College and its reputation in track and field excellence, and teaching, as one of only two centres in England.

The case put forward is therefore reasonable, and the harm to openness, would be clearly outweighed by the very special circumstances, community and London wide benefits arising from the development.
Design and access

32 London Plan Policy 4B.1 ‘Design principles for a compact city’ states that the Mayor will seek to ensure that new developments should maximise site potential, enhance public realm, provide a mix of uses, be accessible, legible, sustainable, safe, inspire, excite and delight in respect of London’s natural and built heritage. Policies 4B.2, 3, 5, 6 and 8 provide further policy guidance and context for Policy 4B.1.

33 The design is in the form of a simplistic structure of blocks with an undulating single storey roof canopy that defines the entrance points and provides solar shading to the conditioning suites on the flank elevation. This is modern but remains sympathetic to the sensitive location overlooking the playing fields and conservation area to the rear. The grounds include the grade II listed Chapel, located to the north of the site. The proximity of the new building has negligible impact on the Chapel. The materials specified are a combination of timber and weatherboard cladding with various elements of glazing. The appearance is high quality and consistent with London Plan policy 4B.2.

Figure 4 View across green finger to the new R Block (source: design and access statement)

34 The entrance point is clearly defined for future users, however there is a substantial distance from the disabled parking area to the entrance point. This should be reconsidered. The remaining element of the new building will be accessible to a range of potential future users with appropriate disabled washing and changing facilities.

35 The new internal road and servicing layout will be well screened to the west and overall the landscaping strategy is comprehensive and will frame the building from the most prominent views from Waldegrave Road. This strategy will help to limit the impact on the MOL setting.

36 Subject to consideration of the disabled parking bay the application is broadly consistent with the London Plan design objectives.

Climate change mitigation

37 The London Plan requires developments to make the fullest contribution to the mitigation of, and adaptation to, climate change and to minimise carbon dioxide emissions (Policy 4A.1).

38 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon reduction targets that are necessary across London to achieve this. Developments are
required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan.

**Energy**

39 London Plan policies 4A.4 and 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction techniques, demonstration of how heating and cooling systems have been selected in accordance with the Mayor’s hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy.

40 An energy statement has been submitted, which provides details and estimates for the energy consumption and carbon emission production for the proposed development. Further information and commitments are, however, required before this is acceptable in terms of London Plan energy policy. The carbon reduction levels proposed by the applicant are not clear.

**Energy demand assessment**

41 The energy strategy has been developed using energy consumption. Instead, this should be based on carbon emissions. The applicant has used existing benchmarks for energy consumption values. The applicant should use SBEM (or other approved software) in order to calculate the baseline carbon emissions, which should be those of a building/s that meets with 2006 building regulations, i.e. the baseline emission should be equal to the target emissions rate (small power needs afterwards to be added).

42 Both new built and refurbished buildings energy usages should be considered for the energy strategy and renewable carbon savings target.

**Power, heating and cooling infrastructure, and CHP/CCHP (Policies 4A.5 and 4A.6)**

43 The scheme should include a single heating network in order to distribute hot water where it is required. The heating network should be supplied from a centralised energy centre.

44 Feasibility of combined heat and power should be undertaken bearing in mind that a single heating network would be installed. Within the current energy statement, the applicant has rejected combined heat and power on the basis of insufficient hot water load to provide a cost effective electrical output. This option should be reconsidered using the specific space heating and hot water requirements indicated by the modelling results.

45 The applicant should provide heat profiles accompanying the combined heat and power analysis. In addition, further information is required regarding the cooling load requirements and how that would be provided.

**Renewable energy**

46 It is not clear which is the preferred renewable technology or combination of renewable technologies that would provide the required carbon target (20%). Ground source heat pumps are proposed for the space heating and a separate circuit in the changing room would be required in order to supply the hot water using solar thermal and condensing gas boilers. As such the scheme does not provide a single heating network for space heating and hot water.
47 The carbon savings (not energy) should be provided more clearly and they should be calculated upon the figure of carbon emissions after energy efficiency measures have been adopted.

48 The applicant needs to develop a more robust renewable option appraisal having regard to the integration of the renewable options suggested with a single heating network and how that can be delivered.

49 The applicant should develop an alternative option considering a single heating network and to explore which renewable technologies could be used to comply with the carbon targets, for example consideration of photovoltaic panels.

**Climate change adaptation**

50 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contribute to flood risk reductions, including applying sustainable drainage principles, minimise water use and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water.

51 There is limited information regarding the five principles set out in policy 4A.9. The applicant will need to provide further detail on how the proposal has considered adaptation to climate change.

**Transport for London’s comments**

52 TfL welcomes and supports the car parking management strategy introduced in September 2007. The measures to exclude students and staff who live within two miles and to favour car sharers for the available spaces are particularly welcomed. This, combined with the controlled parking zones in the area, is expected to produce a shift in travel to more sustainable modes. However, it appears that an additional nine car parking spaces are proposed as part of the development. As no increase in staff or student numbers is expected as a result of the development, it is unclear why additional parking would be proposed. Increased car parking provision would undermine the restraint-based car parking approach and the measures set out in the travel plan, and it is recommended that the existing level of car parking be maintained. TfL requests clarification on this matter.

53 The level of proposed total cycle parking across campus falls well below TfL’s cycle parking standards, although no increase in cycle parking is required given that no change in staff or student numbers is expected. However, St Mary’s has identified an existing need for more covered cycle parking on campus and proposes to provide an additional 85 covered spaces as part of this planning application, which is welcomed.

54 The travel plan and its proposals are welcomed and supported. However, the monitoring arrangements in the travel plan only appear to commit to monitoring up to 2009. In line with best practice guidance, the travel plan should be monitored for at least five years, with a full survey in years one, three, and five. TfL recommends that St Mary’s commit to this in a revised travel plan. It is expected that the travel plan will be secured, enforced, monitored and reviewed as part of the section 106 agreement.

55 TfL requests that a contribution be made towards upgrading, where necessary, the bus stops outside the main campus entrance on Waldegrave Road and the nearest stops on Strawberry Vale to meet TfL’s bus stop accessibility standards. This is estimated to cost a maximum of £10,000 per stop.
In summary, TfL is generally satisfied with the proposals, although clarification regarding the nine car parking spaces is requested and a commitment to more robust monitoring of the travel plan is requested.

**London Development Agency’s comments**

The London Development Agency supports this application in principle given the proposed improvements to the existing facilities within this high performance centre for sports. The qualitative and quantitative improvements to these dilapidated facilities would help meet the future demand for this higher education college and help maintain it as a centre of excellence for sports in this part of London. The proposed improvements will further help in the preparation of this facility as a proposed holding camp for Olympiads during the 2012 Olympic games. This scheme is in accordance with the Mayor’s Economic Development Strategy and policy 3D.6 in the London Plan in that it seeks to promote the development of high quality and affordable local sports facilities in this part of London.

The use of the current sports facilities by local schools and community groups for events is commended. The applicant needs to ensure that the facilities proposed are accessible to all sections of the community, including disabled people, in line with policy 3D.6 of the London Plan. The use of these facilities by local schools and communities should be formalised in a section 106 agreement between the London Borough of Richmond and the applicant.

Initiatives to create training and employment opportunities for local people during construction should be formalised through a section 106 agreement between the local borough and the applicant where possible as well as the need to address other barriers to employment. Similarly the applicant should also secure the use of local businesses during construction, as well as, in the procurement of services and supplies from small and medium size enterprises or micro businesses.

**Local planning authority’s position**

The application is due to be reported to Richmond upon Thames Planning Committee in May. Officers are still considering the application.

**Legal considerations**

Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Richmond upon Thames Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s comments unless specifically stated.

**Financial considerations**

There are no financial considerations at this stage.

**Conclusion**
63 The proposal constitutes inappropriate development in MOL as defined by PPG2. The case for very special circumstance has been put forward and is broadly accepted. Further work is, however required on climate change adaptation, energy and transport, community use and local training and employment initiatives as set out in this report before the Mayor can make a decision.

for further information, contact Planning Decisions Unit:

Giles Dolphin, Head of Planning Decisions
020 7983 4271  email giles.dolphin@london.gov.uk

Colin Wilson, Strategic Planning Manager (Development Decisions)
020 7983 4783  email colin.wilson@london.gov.uk

Matthew Carpen, Case Officer
020 7983 4272 email matthew.carpen@london.gov.uk