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London Borough of Richmond-upon-Thames Local Plan Examination in Public

Hearing Statement prepared on behalf of
Defence Infrastructure Organisation

Hearing 3 (Housing)

Hearing 4 (Site Allocations)

September 2017

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For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 This statement has been prepared by GVA, acting on behalf of the Defence Infrastructure Organisation (DIO), an operating arm of the Ministry of Defence (MoD) which owns the Kneller Hall site in Whitton (site allocation ref. SA14). Refer to Appendix A for further site details.
- 1.2 DIO submitted representations to the Pre-Publication and Publication draft versions of the plan, which included a request to participate in the oral part of the examination. DIO request to participate in Hearing session 3 (Housing) and 4 (Site Allocations), with specific respect to Policy LP34 and Site Allocation ref. SA14.
- 1.3 This statement has been prepared to set out our position in respect to both hearings and should be read in conjunction with our representations to the consultation on the Publication draft.

Overview of Our Position

- 1.4 Overall we support the Local Plan.
- 1.5 We consider the principles of LP34 and SA14 to be generally sound, however we consider that modifications are necessary in order for the policies to fully meet the tests of soundness (in terms of being positively prepared, justified, effective, and consistent with national policy).

2. Policy LP34

2.1 We support the main principles of Policy LP34, however consider that modifications are necessary to make it sound, on the following grounds:

- (1) It fails to meet the full objectively assessed housing needs for the borough for the plan period, on the following grounds:
 - o It covers the period 2015-25, instead of 2018-2033 which is the plan period. Accordingly in practice it only plans for an 8-year period instead of the 15-year period required by NPPF para. 47, with no explanation/justification.
 - o The target is based on the continuation of the existing London Plan target of 315 net additional homes per annum. It refers to the forthcoming review of the London Plan and how this may change this target, but does not put in place a mechanism to capture any changes to the annual requirement part-way through the plan period. This lack of flexibility to account for changing circumstances indicates that the policy is not effective.
 - o The annual target to 2025 of 315 dwellings per annum falls well short of the housing needs identified in the borough's SHMA (as referred to in 9.1.5), therefore we question whether a higher figure would be justified (over and above the London Plan 315 figure).
- (2) It does not identify a supply of specific deliverable sites for the first 5-years of the plan and is therefore not in accordance with national policy (NPPF para.47). Instead it appears to rely upon a housing trajectory in the Council's Annual Monitoring Report (2016) (AMR) as the means of specifying sites (in our opinion this does not satisfy the NPPF).
- (3) When read in conjunction with the site allocation policies (SA1-28) it fails to provide sufficient clarity/certainty over the target quantum of development to be delivered in each 'area', as the site allocations do not include a quantum for each site (again the housing trajectory in the AMR is relied on to do this). This fails to accord with National Planning Practice Guidance (PPG) that advises that where sites are proposed for allocation, sufficient details should be given to provide clarity to developers, local authorities, and other interests about the nature and scale of development (paragraph 010 ref. ID: 12-010-20140306). This poses a risk to the effectiveness of the Plan and its ability to optimise output from housing sites (as required by the London Plan), and is not consistent with national policy.
- (4) The approximate number of units for Whitton identified in the policy falls short of the capacity of allocation sites SA13 and SA14, and therefore the policy is not justified. Our

capacity assessment work indicates that the Kneller Hall site has capacity to accommodate at least 150 homes (refer to Appendix B).

2.2 It is our view that the policy can be made sound by the following modifications:

- The policy should cover the period 2018-33;
- Identify an increased supply of deliverable/developable land to cover the full plan period, or include a provision for an early review of housing supply policies prior to 2025;
- The annual requirement to be based on current London Plan targets as a minimum (i.e. 4,725 homes for the period 2018-33), but with a clearer/more positive aspiration to significantly exceed this), and to include provision for an early review should the review of the London Plan increase the borough's target;
- Include a site-specific breakdown of supply for the first 5-years of the plan (to include commitments, windfalls, and allocation sites); and
- Increase the indicative target for Whitton to reflect the actual capacity of the Kneller Hall site.

3. Policy/Site Allocation SA14 – Kneller Hall

3.1 We support the main principles of Site Allocation SA14, however consider that modifications are necessary to make it sound, on the following grounds:

- (1) It suggests uncertainty regarding the availability of the site. The Government has announced that the site is to become available for development by 2020 (refer to site details at Appendix A). This uncertainty is not justified.
- (2) The supporting text is misleading regarding the site's current use (it is military barracks – not a school), which creates uncertainty regarding the application of any other land use related policies. This is not effective.
- (3) It does not make clear that residential should be the principal future use, and therefore is not clearly justified/effective. The site is most suited for reuse for housing (over other uses), a principle that is given further weight bearing in mind the MoD's committed obligation to UK Government to rationalise its estate as a means of delivering housing (refer to Appendix A for more details).
- (4) It does not provide a target quantum of residential accommodation. This fails to accord with National Planning Practice Guidance (PPG) that advises that where sites are proposed for allocation, sufficient details should be given to provide clarity to developers, local authorities, and other interests about the nature and scale of development (paragraph 010 ref. ID: 12-010-20140306). The details provided at Appendix A demonstrate that the site has an estimated capacity of at least 150 dwellings plus non-residential uses.

3.2 It is our view that the allocation/policy can be made sound by the following modifications:

- Confirm that the site will be available for development from 2020;
- Confirm that the site has an existing lawful use as a military barracks (Use Class C2A: Secure Residential Institution); and
- Confirm the acceptability of housing being the principal land use (as part of mixed use development), with a minimum target housing output of 150+ units.

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Appendix A

Kneller Hall Site
Details

Introduction to the Site

- i. Established in 1857, the Royal Military School of Music has been based at Kneller Hall for over 150 years. The school has developed a national and international reputation as a military music centre of excellence and is regarded as the 'home' of many generations of army musicians. The school continues to operate today as a secure musical training facility, with both pupils and some staff residing on site throughout their terms.
- ii. The following activities take place at the site today, all associated with the principal use as a Military School of Music with accommodation for staff, students and visitors:
 - Classrooms (for use by students);
 - Concert Halls (for use by students);
 - Practice Rooms (for use by students);
 - Student and staff residential accommodation and facilities;
 - Outdoor training/sports grounds (for use by staff and students);
 - Officer's Mess;
 - Ancillary offices (for staff); and
 - Kitchens, canteens and break-out areas (for staff and students).
- iii. The existing lawful use of the site is as a military barracks (Use Class C2A: Secure Residential Institution).

MOD Estate Rationalisation Plan and Site Disposal

- iv. The decision to release Kneller Hall for disposal was made on 18 January 2016 in the House of Commons by Mark Lancaster MP. The site was one of 12 announced as part of the delivery of the Footprint Strategy. The Footprint Strategy is a MOD initiative which aims to create a smaller more efficient and fit for purpose and better estate that effectively supports our Armed Forces and their role in protecting the security independence and interests of our country at home and abroad. The Footprint strategy will implement the following from the Strategic Defence and Security Review of 2015:
 - That the MOD's built estate footprint will reduce by 30% by 2040; and
 - That 55,000 new homes will be created in this parliament.
- v. Kneller hall was included in the Better Defence Estate document published in Nov 2016 with the estimated date of disposal stated as 2020.
- vi. Work is currently underway to decide a new location for the Royal Military School of Music (RMSM) and the corps of Army Music (CAMUS) HQ currently located at Kneller Hall. The training facilities and accommodation at Kneller Hall are non-compliant in terms of Health and Safety and do not

meet the needs of the RMSM. The assessment study into possible new locations started in April 2016. The possible sites contain Phase 1 army training which is compatible with the facilities required by the musicians.

- vii. As a result of the above, we confirm that Kneller Hall is soon to be vacant and available for development.

Site Description

- viii. The Kneller Hall site is located in West London within the London Borough of Richmond upon Thames (LB RuT).
- ix. The site is uniform in shape and extends to approximately 9ha of previously developed land accommodating approximately 10,683 sq.m of existing floorspace within a number of buildings.

Access

- x. The site is accessed by road via Kneller Road, a 'Local distributor road' (Kneller Road/Warren Road) which provides access to Chertsey Road (A316) which links Richmond to Central London via Hammersmith and the M3 to the west.
- xi. The site has good access to a range of public transport services within walking distance, including a number of local bus stops in the immediate surroundings with access to services 281, 481, 681 and H22. These services provide regular buses to locations such as Twickenham, Hounslow, Teddington, Kingston and Richmond. Train stations within a 20 minute walk from the site include Whitton (1km), Hounslow (1.4km) and Twickenham (1.5km), all of which provide regular services into Central London.

Surrounding Context

- xii. The prevailing character of the area surrounding the site is residential, with the predominant typology being suburban, semi-detached and detached housing accompanied by generous front and rear gardens all within a green setting. Neighbouring buildings in the immediate surrounds are modest in height, with the majority at a scale of two-storeys along the northern, southern and western boundaries of the site. The residential flats to the east of the site boundary are three storeys in height.
- xiii. The site is not within a town centre but is located approximately 700 metres (8 minute walk) from Whitton district centre and a 20 minute walk from Twickenham district centre. It is also situated directly west of Twickenham Stadium, one of London's most prestigious sporting grounds.
- xiv. The site has excellent access to a range of shops and services within:

- Local Parades on Whitton Dene, Kneller Road and Nelson Road including the Duke of Cambridge Pub on Kneller Road (100m);
 - Whitton District Centre which includes a Tesco Metro convenience store (900m);
 - Tesco Extra Twickenham (1.3km north east);
 - Twickenham District Centre which includes a Waitrose and Marks & Spencer Simply Food (1.5km);
 - Hounslow Town Centre (1.5km north-west which includes an ASDA and the Treaty Shopping Centre; and
 - Ivybridge Retail Park which includes an ASDA, TK Maxx, Sports Direct and Halfords (1.5km).
- xv. The site is also well provided for in terms of access to community facilities, with the following located near to the site:
- Whitton Social Centre (50m) on Kneller Road;
 - Chase Bridge Primary School (400m) to the east;
 - Nelson Primary School and St Edmund's Catholic Primary School (700m) to the west; and
 - Richmond upon Thames College (1.3km) to the south east.
- xvi. The following leisure/tourism and hotel facilities are also located near to the site:
- Whitton Tennis Club (200m) to the north east;
 - Twickenham Stadium, home to England Rugby RfU, (800m) directly to the east;
 - Twickenham Stoop (Harlequins Rugby Club) (800m) to the south east;
 - London Marriot Hotel (Twickenham Stadium) (800m) to the east;
 - Travelodge (Twickenham Station) (1.5km); and
 - Premier Inn Twickenham Stadium (Whitton) (1km).
- xvii. The site is well provided for in terms of access to public open spaces, with the following located near to the site:
- Murray Park (160m);
 - Hounslow open space (180m);
 - Hounslow Heath (1.6km);
 - Crane Park (1.8km);
 - Syon Park (3km); and
 - Richmond Park (4km).

Site Characteristics

- xviii. The site comprises previously developed Brownfield land. A full site analysis has been undertaken to identify the constraints and opportunities that any future use or development would need to respond to. A summary of the key findings from the various surveys are provided below.

Buildings

- xix. The site has the following built form (layout and scale) characteristics:
- Buildings are located in the western half of the site;
 - Kneller Hall (Grade II Listed) is the most prominent building (equivalent of 4 storeys);
 - There are a range of other buildings within the site which vary in scale (1 - 4 storeys);
 - Buildings are set within a context of parking and circulation areas, green space and sports facilities.

Landscape

- xx. The site has the following landscape and open space characteristics:
- The overarching landscape typology of the site is a parkland setting featuring numerous trees throughout, some of which are mature;
 - The western part of the site contains a large amount of hardstanding and car parking; and
 - The eastern part of the site is within Metropolitan Open Land (MOL), largely comprising grassed playing fields, with some sports pitches, buildings and structures.

Secure Boundary

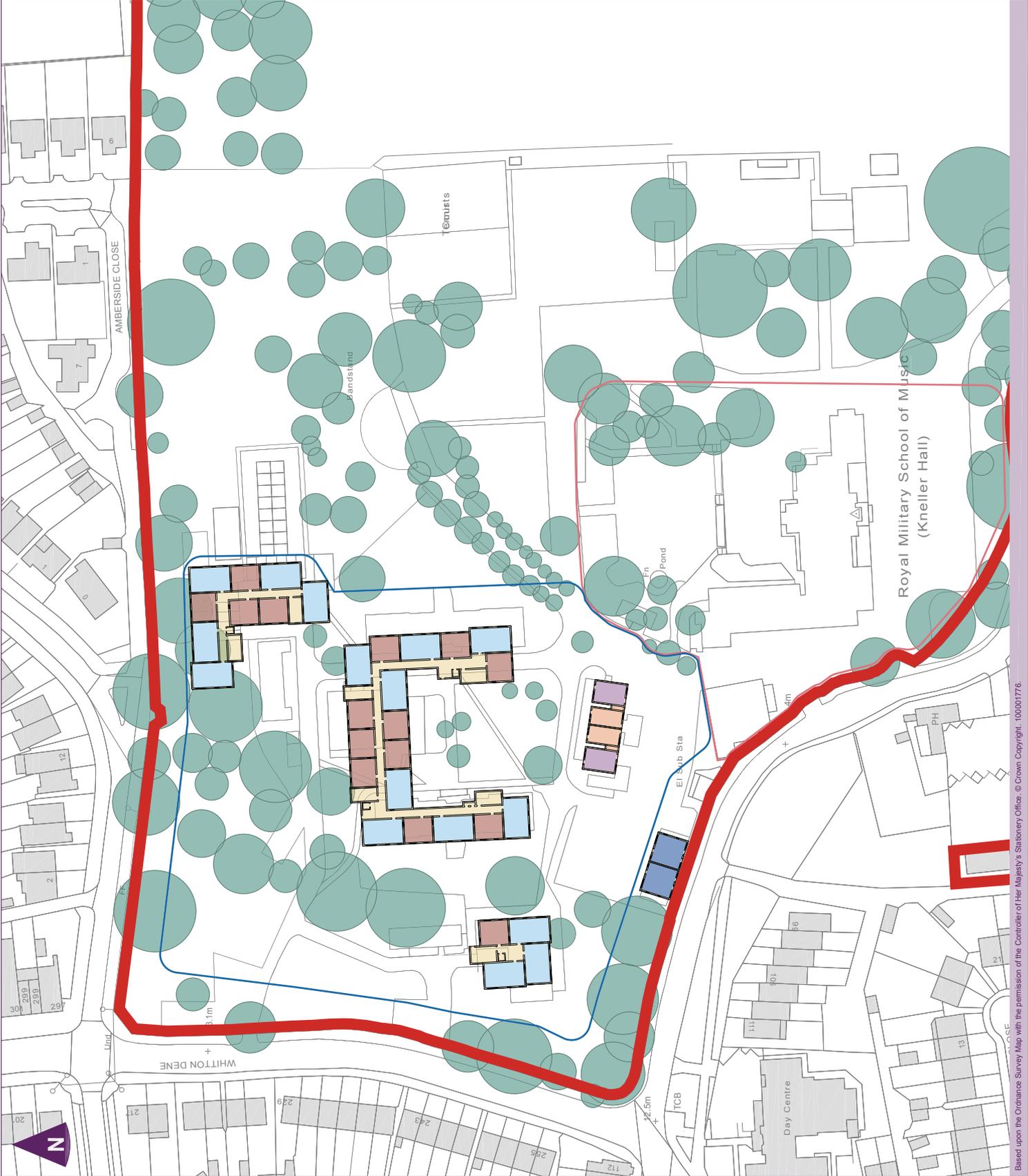
- xxi. The site has a secure boundary, comprising a combination of walls and fencing, which is currently guarded and monitored at all times. In addition, part of the boundary wall and four Gatepiers (at the main entrance and the end of the railed part of the boundary wall) are Grade II Listed.
- xxii. The boundary to the site (including the listed wall) varies considerably in quality and type. Metal fencing to the east and south of the playing fields contribute positively towards views of the open space. The boundary walls located on the west and northern edges of the site varies considerably in height, coupled with the barbed wire/spiked fencing acting as a physical deterrent from entering unlawfully. A significant portion of the northern boundary wall is currently made up of thick grey concrete detracting from the setting of the site.

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Appendix B
Site Capacity

- i. The following plans indicate one way in which the existing Listed Buildings could be converted to residential uses, which indicates a capacity of around 32 apartments.
- ii. In addition we estimate that the site has capacity to accommodate at least a further 117 dwellings (flats/houses/duplexes) within the grounds (outside of Metropolitan Open Land) alongside non-residential floorspace.



Key

- Site Boundary
- 1B2P Apartment
- 2B4P Apartment
- 2B4P House
- 3B5P House
- 4B7P House

New Build Accommodation Schedule

	Number	Target Parking
1B2P apartments:	55	55
2B4P apartments:	56	56
Sub - Total:	111	111
2B4P houses:	2	2
3B5P houses:	2	3
4B7P houses:	2	4
Sub - Total:	6	9
Total:	117 dwellings	120 parking spaces



Client



Kneller Hall
Disposal Strategy

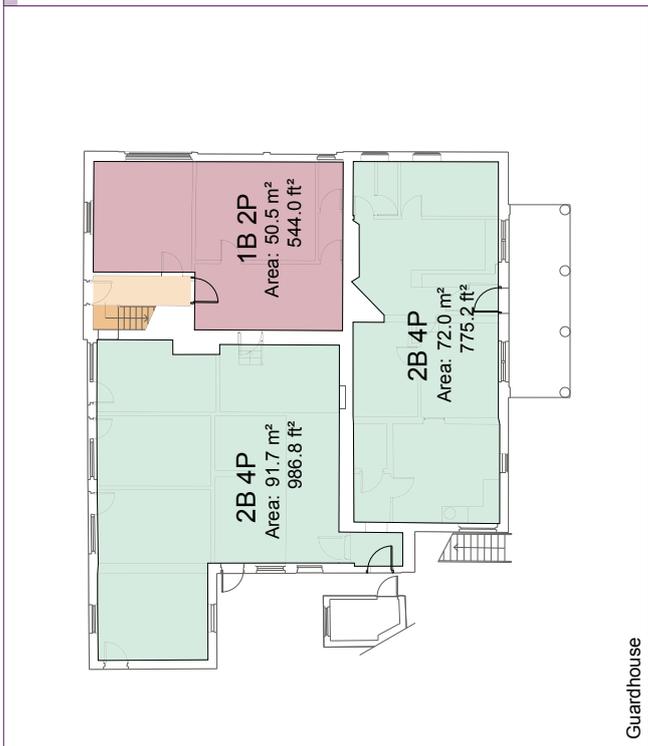


F006-001
Capacity Study

DRAFT

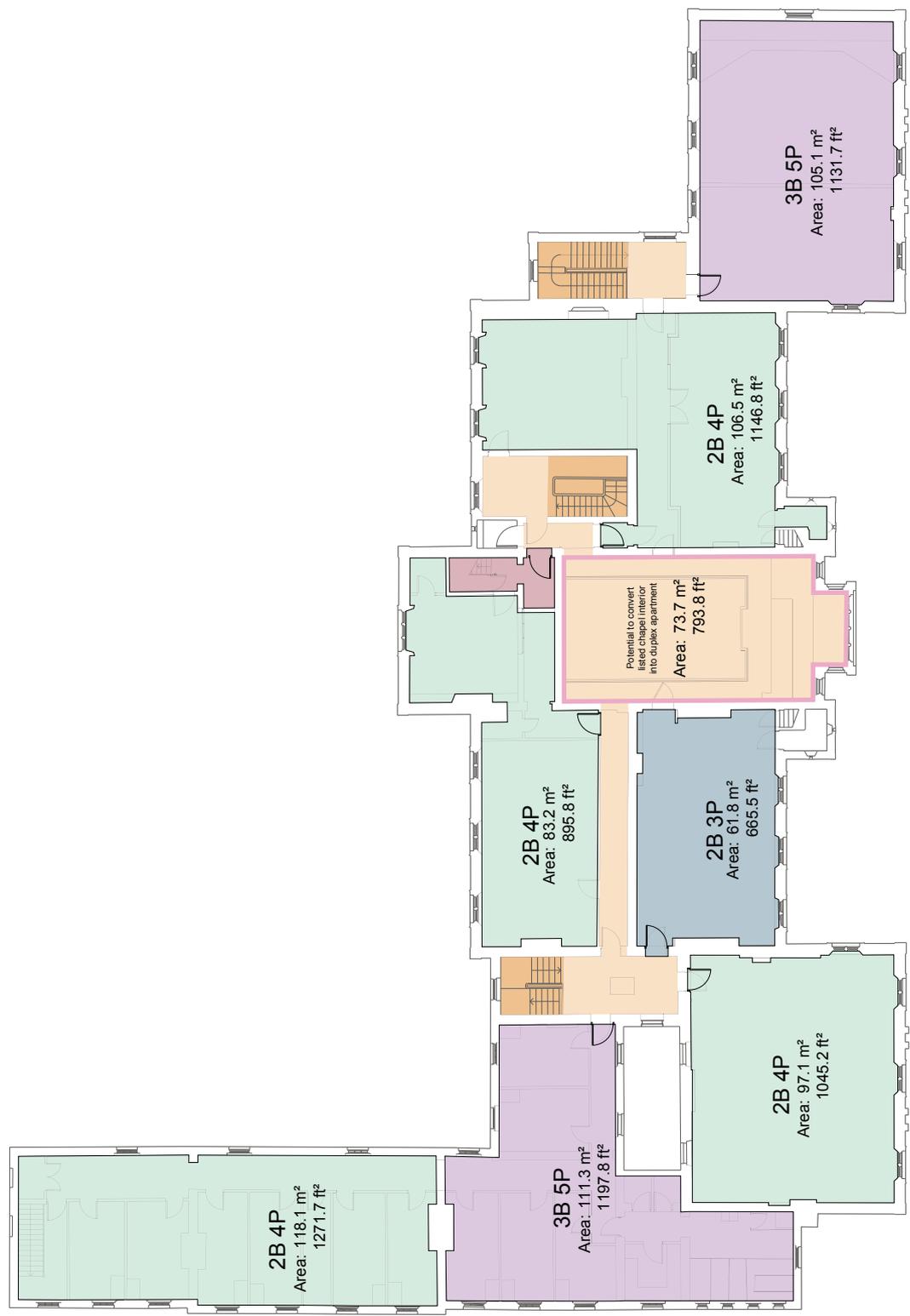
- 1 Bedroom 2 Person
- 2 Bedroom 3 Person
- 2 Bedroom 4 Person
- 3 Bedroom 5 Person
- Communal Hallways
- Existing Staircases

Notes:
 1. The floor area shown is for the proposed development and is subject to the design, when approved and building regulations in force. It is not intended to be used as a basis for any engineering calculation or for any other purpose.
 2. The floor area shown is for the proposed development and is subject to the design, when approved and building regulations in force. It is not intended to be used as a basis for any engineering calculation or for any other purpose.
 3. The floor area shown is for the proposed development and is subject to the design, when approved and building regulations in force. It is not intended to be used as a basis for any engineering calculation or for any other purpose.



- 1 Bedroom 2 Person
- 2 Bedroom 3 Person
- 2 Bedroom 4 Person
- 3 Bedroom 5 Person
- Communal Hallways
- Existing Staircases

Notes:
 1. This plan is illustrative only and is subject to design development and building regulations. It is not intended to be used for any engineering or other purposes. The engineering position must be established by a qualified professional engineer before any construction is undertaken.



- 1 Bedroom 2 Person
- 2 Bedroom 3 Person
- 2 Bedroom 4 Person
- 3 Bedroom 5 Person
- Communal Hallways
- Existing Staircases

Notes:
 1. All units are subject to the current and future regulations of the City of New York.
 2. In respect to the building, all units are subject to the current and future regulations of the City of New York.
 3. All units are subject to the current and future regulations of the City of New York.

