

Runnymede Borough Council - Brownfield Register: Royal Holloway University of London Submission

25<sup>th</sup> November 2022.

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Questions are presented in bold font, responses are presented in italics.

**“Your Details”**

*Graham Stephens*

[REDACTED]

*Acting as Agent*

**Landowner Details**

*Royal Holloway University of London  
Egham Hill  
Egham  
Surrey  
TW20 0EX*

**Contact number and email address**

[REDACTED]

[REDACTED]

**Street Search**

*Kingswood Halls, Cooper’s Hill Lane*

**Additional information about the location**

*Access to the Kingswood Hall site is via Cooper’s Hill Lane in the west, which leads to extensive car parking within the site. A public right of way leads from the site entrance in a southern direction towards Englefield Green centre along Kingswood Rise. The route continues along Cooper’s Hill Lane and diverts via Cooper’s Hill to the Thames River path.*

**Site area (ha)**

*c6.85ha of which c1.72 ha is considered as “previously developed land”.*

**Brief description of the site**

*The c6.85ha Kingswood Hall site is accessed off, and bordered by, Cooper’s Hill Lane to north and west. Englefield Park, a large residential property in extensive grounds is located to the south with Runnymede Park to the east. The wider area is dominated by dense woodland areas. The site lies adjacent to the Runnymede Air Forces Memorial and is located within the Green Belt, but outside of the Englefield Green Conservation Area, which lies to the east. The urban boundary of Englefield Green lies c125m to the south-west of the site boundary.*

*The site broadly comprises two areas. The first is the developed core of the site situated within an extensive woodland setting. This area includes peripheral car parking areas and former tennis courts,*

*both surrounded and screened by trees. The second area comprises an undeveloped area known as The Paddock, also surrounded by trees. The built core of the site sits on a series of plateaux in the landscape, however the wider site slopes down to the north and east. The site slopes from c80m AOD at the entrance onto Cooper's Hill Lane to c50m AOD at the lowest part of the site within The Paddock.*

*Including areas devoted to car parking and the former tennis courts, approximately 1.72ha is considered as previously developed.*

*The core of the Kingwood Hall site comprises a quadrangle of buildings. Although none of the buildings are Listed, the frontage building onto Cooper's Hill to northeast (Kingswood Hall), and Coach House to the southeast are recorded on the Runnymede Local List (September 2019). Kingswood Hall and the Coach House (otherwise known as The Stables) are described as an example of large early to mid-19<sup>th</sup> century grand mansion with shaped gables and finials.*

*The more modern student blocks to the northwest and west were constructed between the 1960'-1990's, the last block(s) under consent RU.94/0482: erection of 212 student study bedrooms in one, three/storey and one four-storey block with associated car parking areas, granted 25<sup>th</sup> August 1995.*

#### **Current land use**

*Student accommodation*

#### **Land ownership**

*The land is owned by Royal Holloway University of London. Title plan details have been captured in the uploaded plan submitted with this response.*

#### **Other information**

##### **Student Accommodation Summary**

*The Kingswood Hall site accommodates a total of 413 student study bedrooms, however only 352 are currently occupied. The majority of the accommodation is provided in purpose-built student accommodation (PBSA) blocks. Accommodation is also provided within the main Kingswood House and the Coach House.*

##### **Acknowledge alternative residential development capacity (SHLAA Feb 2022)**

*The Kingswood Hall site is acknowledged as a future residential development opportunity within the latest Strategic Housing Land Availability Assessment 2021 (published Feb 2022). The site was listed as "Ref 404" with the assessment concluding that the site has a capacity of 161 units (net).*

##### **Draft Englefield Green Neighbourhood Development Plan (September 2022)**

*The recently published Draft Englefield Green Neighbourhood Development Plan acknowledged the potential residential redevelopment / repurposing of the site, however suggested a capacity of just 84 units.*

*Without regard for the constraints and opportunities facing the site, and the delivery of a more efficient redevelopment scheme, the application of the residential comparator ratio of 3.1:1 (student study bedrooms to residential units) would suggest that the site has a baseline residential capacity of 133 residential units.*

*The Draft Neighbourhood Plan therefore suggested a net loss in (residential) development capacity. The university has submitted a representation to the Draft Neighbourhood Plan challenging the baseline assumptions presented.*

### **Future Redevelopment/ repurposing**

*The Kingswood Hall student accommodation is considered sub-standard for medium to long term use in its current form. The university is considering the best route to secure optimal capital receipt of disposal in accordance with its charitable status.*

*A particular challenge facing the university is the supply of purpose-built student accommodation across its estate. The university submitted an outline planning application in January 2020 seeking permission for the principle of erecting up to 2,000 student study bedrooms at its Rusham Park site. Post-submission discussions with Runnymede Council resulted in a reduction in the scale of the proposal and an alternative scheme for Phase 1 only (comprising up to 1,400 beds) was presented. It was this reduced scheme, which was granted permission in February 2022, with a subsequent reserved matters approval being secured for the details in September 2022.*

*As acknowledged at the time of the Planning Committee resolution to support the Rusham Park outline planning application (December 2020), the reduction in the number of student study bedrooms results in a need to progress a Phase 2 scheme in due course. It is considered by the university that the Rusham Park would be a preferred location for ongoing investment in purpose-built student accommodation (PBSA). However, the lawful use of the Kingswood Hall site is as student accommodation. While the university may not wish to manage accommodation for its students at Kingswood Hall in the long term, the site could remain attractive to a third party PBSA provider.*

### **Strategic Housing Land Availability Assessment (SHLAA) and Appendix 4 (2021)**

*In relation to the potential for the site to be redeveloped / repurposed as residential accommodation, the Council's 2021 assessment confirmed that "as the site is partially Previously Developed Land in the Green Belt, as long as the proposed development does not have a greater impact on the openness of the development than the extant buildings it [residential redevelopment] is, in principle, acceptable. Alternatively, the site would need to be either removed from the Green Belt or be able to demonstrate Very Special Circumstances to justify a greater level of development."*

*The SLAA states that the total site capacity of residential units on the Kingswood Hall site is 161, and this has been counted in their calculations towards meeting housing needs in the SHLAA. The SHLAA anticipated the site was available for redevelopment during the Local Plan period with an annual delivery of residential units expected in the period 2026-27 (32 units) through to 2030/31 (33 units).*

### **Capacity Assessment and Site Release**

*Commercial property consultants have been appointed by the university to help devise and execute a site disposal strategy. Initial concept plans have been prepared based on the anticipated repurposing of the site as both a residential and retirement village scheme: the former reflecting the Council's acknowledgement of residential redevelopment through the SHLAA, the latter reflecting the local perceived strength of the specialist housing market.*

*As part of the emerging site strategy, test for fit options have been considered by architects appointed by the university. Each capacity option is based on the preservation of the existing woodland areas*

*(existing tree canopies and assumed root areas), maintaining existing access points (from Cooper's Hill Lane) and access routes across the site (to allow access for car parking), and the enhancement of the formal open space that relates to the principal elevation of the Kingswood building.*

*These options indicate that the redevelopment of the existing student accommodation blocks, introduction of new apartments and town houses within peripheral parking and other previously developed parcels (each within a woodland setting) and conversion of Kingswood Hall and the Coach House would cumulatively deliver approximately 157 residential units. This is considered a baseline assessment which is broadly consistent with, and would support, the Council's own assessment undertaken in relation to the SHLAA 2021 published in February 2022.*

*The test for fit is however based on a more robust assessment of the site and its context and has applied appropriate National Design Space Standards to a general site arrangement. A more intensive redevelopment option would also exist which would increase the overall capacity of the site.*

*The university is currently considering the timing of the release of the site. However, it is currently anticipated that the opportunity exists to potentially bring forward alternative redevelopment / repurposing proposals one year ahead of the trajectory stated in the SHLAA: during 2025/26. This will be dependent upon the details of any disposal strategy, evaluation of responses, legal conveyancing and any subsequent planning permissions which would be required to facilitate a residential redevelopment scenario.*

*In summary, the university considers that the minimum number of residential units capable of being delivered in a residential redevelopment of the Kingswood Hall site is 157 and that the appropriate range (allowing for alternative configurations) should be between 157 and 172 units (based on a 10% upward variance).*

*The site is currently occupied but has the potential to be available from late 2023 (tbc).*

## **Site plan**

*[Uploaded]*

### **Is the site available now?**

*Yes - The expression of interest to dispose of the site results in a positive response to this question as per the guidance notes. The site is currently occupied but has the potential to be available from late 2023 (tbc).*

### **Is the site achievable?**

*Yes*

### **Is the development likely to take place in the next 15 years**

*Yes*

### **Minimum number of dwellings that the site could support.**

*152*

### **Potential range of dwellings that the site could support.**

*157 - 172*

**Will there be any non-residential development proposed?**

*For the purposes of this Brownfield Register submission, no commercial uses (employment / retail / leisure) are anticipated.*