

LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

HEARING 8: SITE ALLOCATIONS (PART); SA 17 - 28

THURSDAY 12 OCTOBER

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1. SA 24 – is the allocation justified by the evidence base with due regard to alternatives and in particular:

- a. The accessibility of the site;**
- b. The need for a secondary school;**
- c. The capacity of the site for mixed use development including housing;**
- d. The presence and use of the sports field;**
- e. The presence of heritage assets;**
- f. The deliverability of the redevelopment.**

The Council considers the Site Allocation for Stag Brewery to be justified by strong and robust evidence. Alternatives have been duly considered and appraised as part of the Sustainability Appraisal (also see Appendix 1). In addition, a thorough search for alternative sites for a secondary school has been carried out (see question 1.b. below).

The Stag Brewery site presents by virtue of its size and location a unique and key development site in this borough. Indeed it is the only real large scale brownfield site (comprising some 8.6 hectares) and the most significant development opportunity within Richmond borough, which is characterised by large swathes of protected parks and open spaces, with the remaining areas being relatively dense low-medium rise towns and villages. As outlined in other Council statements, with the exception of very few large sites, of which Stag Brewery is the most significant, the majority of development takes place on small/smaller brownfield sites. Due to the scale and the once-in-a-lifetime opportunity this site represents, it is of utmost importance that the Council takes into account borough-wide as well as local needs when considering the most appropriate land uses for this site.

The Council recognises that any redevelopment scheme will be of significant local impact, particularly on Mortlake and East Sheen areas, and therefore the Council committed in 2010 to working with the previous landowner Anheuser-Busch InBev and the local community on the development of a site brief (SPD) for this site. Extensive community consultation was carried out and a site development brief (SPD) was adopted in 2011 (PS-095). The wording for SA 24 reflects as much as possible the adopted SPD, which sets out the vision, the principle land uses and the development opportunities and constraints, which were developed in conjunction with the previous owners, key stakeholders and the local community.

When the brewing operations ceased in 2015, the Council had some involvement in the marketing particulars for the site, and Reselton Properties Ltd (Representor ID 237) acquired the site in 2015. Since then, the Council had extensive pre-application discussions with the

developers (for which a Planning Performance Agreement is in place), to ensure that the redevelopment delivers a truly mixed use scheme consisting of residential, community (including education), recreational and commercial uses, with the overall aim of providing a new village heart for Mortlake. The pre-application discussions are at a fairly advanced stage, and it should be noted that the landowner has already carried out two public consultation exhibitions (March and July 2017) on the emerging proposals and to date held three Community Liaison Group meetings. In addition, the local planning authority has carried out the necessary consultations associated the scoping opinion request in relation to the Environmental Impact Assessment (EIA).

It is recognised that some local and borough-wide needs have changed since the adoption of the SPD in 2011, such as the need for a secondary school rather than a primary school, which is based on an updated School Place Planning Strategy (SPPS) (SD-028); or the demand and need for office space since the substantial loss of B1(a) floorspace that have occurred since the introduction of the Prior Approval process in the General Permitted Development Order 2013. Such changes in borough-wide and local needs have been reflected within the policy wording of SA 24.

1. a. The accessibility of the site

It is acknowledged that the site is located in Transport for London's (TfL) Public Transport Accessibility Level (PTAL) 2, which is a poor level of accessibility to public transport services. This is generally a reflection of the relatively low frequency of the rail services that serve Mortlake Station, despite being located within 400m from the site. In addition, a number of low frequency bus services operate along Lower Richmond Road, Mortlake High Street and Clifford Avenue (the A316).

It is recognised that a significant redevelopment as proposed for Stag Brewery is going to bring about changes to traffic flows and some impacts on the local highway network as well as demands for public transport. In line with the statutory development plan for the borough, a Transport Assessment (TA) will need to be undertaken, and the EIA will need to fully consider the potential adverse impacts. In addition, a Travel Plan will need to be agreed, particularly in relation to the secondary school.

It should be noted that the developers, the Council and TfL are already working closely on addressing the transport and accessibility issues and securing public transport improvements. Early results of which indicate that the site would be capable of being within PTAL 3.

1. b. The need for a secondary school

The Site Allocation requires the provision of a six-form entry secondary school (this would allow for 900 pupils in total across Years 7-11), with an eventual sixth form of 250 pupils.

Forecasts of need for school places within the borough for the primary phase are undertaken within 10 school place planning areas of the borough; for the secondary phase, need is quantified firstly within each half of the borough and then across the borough as a whole. Forecasts are principally based on actual and forecast live-birth and cohort- and roll-retention rates, i.e. the percentage trends of children who enter the local state-funded schools as opposed to those who are educated in the private sector or whose families move away from the area. Those rates vary from area to area for Reception entry, but there has been a general upward trend across the borough towards the state-funded sector for Year 7 entry in recent years, explained partly by higher numbers of children leaving Year 6 and the higher number of places available.

Since July 2011, the Council has provided 13.5 extra forms of entry through its primary school expansion programme and helped to ensure the establishment of four free schools, which have provided a further eight forms of entry. A total of 21.5 additional forms of entry have provided to meet primary need across the borough, whereby 6.5 forms are within the eastern half of the borough, through the expansions of Darell, East Sheen, Lowther, Sheen Mount and The Vineyard, and the establishment of Thomson House free school. Consequently, the need for additional secondary places has grown within the eastern half of the borough to an extent which had not been foreseen in July 2011.

See Appendix 2 to this statement for further information on the need for a secondary school and pupil numbers.

See Appendix 3 to this statement for alternative locations for a secondary school.

1. c. The capacity of the site for mixed use development including housing

This is the largest brownfield site (approximately 8.6 hectares) within the London Borough of Richmond. It presents the most significant development opportunity and for this purpose the Council has set out in the site development brief (SPD), adopted in 2011 (PS-095), the mix of uses that should be provided. The Council has not undertaken a capacity analysis in terms of what the site could accommodate.

The Authority's Monitoring Report for Housing for financial year 2016/17 (SD-045) sets out an indicative range of 500-600 units that the Council expects to be forthcoming on this site between 2018-2028, and therefore contributing to the overall housing land supply and housing target. However, like the majority of other developable sites in the borough, this site requires a very site-specific approach and it would be considered inappropriate to be more prescriptive within the site allocations, such as setting out a range of residential units or commercial floorspace to be delivered, as these discussions are currently taking place through the pre-application process, taking account of the significant need for the provision of a secondary school and other site specific circumstances, such as in relation to transport, design, character of the site and surrounding area etc. This is to ensure that the site is flexible and effective in its delivery, and it is noted that Representor ID 237 overall welcomes this policy.

It is anticipated that the development could accommodate approximately 700-1,000 residential units, ranging from 1-bed to 4-bed units, alongside other uses including education (i.e. secondary school) retail, office, hotel, leisure and community (e.g. gym and cinema), and healthcare and extra care uses. It is also envisaged that a new High Street will be provided within the site, providing an opportunity for active frontages for commercial uses and community uses. Future AMRs could increase the potential number of residential units, however this is assessed each year and will be informed by a scheme progressing further through the planning process.

1. d. The presence and use of the sports field

The existing playing field land is located in the western corner of the site and covers an area of approximately 2.07ha. The land accommodates two youth sized 11v11 football pitches (each measuring 91m x 55m) and a small sports pavilion which includes changing room facilities.

The playing fields are in private ownership and were originally used by brewery staff and the playing fields have never provided unrestricted public access nor do they allow public access on a day to day basis. Through agreement with the new landowners, the playing pitches are used by Barnes Eagles Football Club, Thomson House School and St Mary Magdalen School. Barnes Eagles use the playing pitches for football matches and football training at weekends during the football season. Thomson House School use the playing pitches for sports and games on Tuesdays during school term time. St. Mary Magdalen School use the playing pitches for its annual sports day.

The approximate level of use since 2015 can be summarised as follows:

User	Activity	Approximate annual usage (days or part of days)
Barnes Eagles FC	Football matches and training	70 days
Thomson House School	Sports/games	40 days
St Mary Magdalen School	Sports day	1 day
TOTAL		111 days (30% of the year) since 2015

The Site Allocation makes it clear that the policy seeks the retention and/or reprovision and upgrading of the playing field. Whilst it is recognised that the sports field is in private ownership, with limited access for a small number of groups under licence, and hence the playing pitches could be considered under-utilised, policy LP 31 of the Local Plan would be applied should there be a proposal that could affect the loss of or the quality of a playing field. Any such loss will be resisted by the Council unless the proposal meets the exception circumstances test as set out in the Sport England policy (see paragraph 8.4.18 of the Local Plan).

The Council is proposing a minor modification to the supporting text of SA 24, bullet point 10 to clarify that reference to the reprovision has to be within the site: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. **This includes the retention and/or reprovision and upgrading of the playing field within the site.**"

1. e. The presence of heritage assets

It is acknowledged that the site and its surroundings are located within an Archaeological Priority Area. See Statement of Common Ground (SOCG) with Historic England (LBR-LP-008). As indicated in the adopted site brief SPD, the site is likely to be of archaeological significance due to the location of various earlier historic buildings, for example related to the brewery operations, and with potential for buildings from the prehistoric periods. Any redevelopment will necessitate intrusive groundworks and any likely significant effects in relation to heritage assets will be fully considered as part of a planning application and EIA.

There are no listed buildings or structures within the site, although there are several listed buildings in proximity to the site. Mortlake Conservation Area covers an area within the east

of the site, and it encompasses the three buildings within the site that are locally listed as Buildings of Townscape Merit.

There is no doubt that a redevelopment of this site at this scale is likely to lead to some significant changes to the character. Therefore, SA 24 sets out that the BTMs should be retained and that the reuse of these historic buildings offers an excellent opportunity to ensure that the redevelopment incorporates and promotes a cultural and historic legacy.

Any forthcoming planning application will need to be assessed against national policy and guidance and the policies within the development plan. There will be a need for a balanced judgement to be made and regard to be had to the significance of the heritage assets, the scale of potential harm, and/or loss. The Site Allocation in relation to the presence of heritage assets is therefore justified and this approach has been agreed with Historic England.

1. f. The deliverability of the redevelopment

As set out above, since the closure of the brewing operations in 2015, the Council had detailed discussions, informal as well as formal pre-application discussions with the landowners Reselton Properties Ltd (Representor ID 237). Discussions are also ongoing with the Mayor of London to ensure that this redevelopment will be delivered.

The landowner has carried out several public exhibitions as well as Community Liaison Groups; further information can be found on this website: <http://stag-brewery.co.uk/news-events/>

The Education and Skills Funding Agency (ESFA) is responsible for securing sites for free schools. In this instance, although an application has not yet been submitted to the Department for Education (DfE) for a secondary free school at the Stag Brewery site, the ESFA has, exceptionally, been working with the owner/developer of the site to ensure, firstly, that there would be sufficient space for the proposed school, and, secondly, that the initial designs for it are appropriate. It is anticipated that the Stamp Education Trust, which runs the nearby Thomson House School, a primary free school which opened in September 2013, will submit an application to the DfE in the next free school application round (Wave 13), the closing-date for which is anticipated to be in late 2017 or early 2018.

Overall, this Site Allocation is considered to be effective and deliverable. There is a willing landowner (i.e. Reselton Properties) who will, together with the ESFA, be taking this site

through the formal planning application process in due course. Detailed negotiations and discussions are underway with the ESFA, who will fund and commission the secondary school building. It is anticipated that a planning application will be submitted later in 2017. It is noted that Representor ID 237 supports overall the inclusion of the Stag Brewery site as an allocated mixed use site within the Plan.

2. SA 19 – is the allocation justified by the evidence base with particular regard to the presence of heritage assets?

Is it sufficiently flexible to ensure effective implementation?

Yes, the allocation for Richmond Station is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1). In relation to the heritage assets, it should be noted that the station building is not a statutorily Listed Building but a locally listed building, i.e. designated as Building of Townscape Merit (BTM), as set out within bullet point 3 of the supporting text. The BTM designation for the station building makes it clear that the visual character lies principally in the façade and booking hall, with the side and rear of the buildings being unattractive and not contributing to the setting. The fact that the whole site is located within a Conservation Area is reflected within bullet point 4 of the supporting text, which states that any redevelopment proposal must be of the highest quality in character and respond positively to the Conservation Area. In addition, part of the south boundary adjoins Sheen Road Conservation Area and there are a number of BTMs that are within the setting of the site.

It is noted that Representor ID 299 (see page 238 of LBR-LP-002) considers that the Station building merits statutory listing. However, neither the Council nor Historic England share this view as the value of the heritage asset lies principally in the façade and booking hall, and therefore it has been designated as BTM. As the building is a non-designated heritage asset, in line with the NPPF (paragraph 135), the effect of an application on the significance of this asset will need to be taken into account in determining an application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. In line with paragraphs 131-134 of the NPPF, great weight will be given to the heritage assets, and the LPA will seek to sustain and enhance the significance of these assets, and make a positive contribution to the local character. Therefore, the Council considers that the allocation is justified by the evidence with particular regard to the heritage assets, and this has been agreed by Historic England.

With respect to the site's location within an Archaeological Priority Area (APA), see the SOCG with Historic England as to why the Council does not consider it necessary to include cross-references to policy LP 7. This is because the assumption is that all policies set out in the Plan and other adopted guidance applies, and because the APAs are currently under review and could change prior to the adoption of the Plan.

With regard to whether the site allocation is sufficiently flexible to ensure effective implementation, it should be noted that this is a very complex site with a variety of landowners, including Network Rail, London Underground, Curzon St Ltd (Representor ID 58) and others. It is acknowledged that the Council has produced a site development brief (PS-095), and the Council is committed to updating this in due course.

The Council is expecting a comprehensive redevelopment on this site that focuses on transport interchange improvements as well as an appropriate mix of main centre uses. This Site Allocation is considered sufficiently flexible as it sets out a variety of land uses that are appropriate for its location within Richmond main centre. This ranges from residential, retail and employment to social infrastructure, community, leisure and entertainment uses. By providing this flexibility in the range of uses it will allow the landowners to consider the site in its entirety and take account of local needs, local evidence as well as financial viability considerations.

It is noted that one of the key landowners (Representor ID 58, see page 241 of LBR-LP-002) supports the allocation in principle, and that flexibility is important so that parts of the wider site can be brought forward separately. This is a key development site and provides a unique opportunity as it is the only larger scale development site within Richmond centre. The Council therefore has an expectation for the relevant landowners to work together to provide a comprehensive redevelopment for the whole site. Where this is not feasible, and has been robustly demonstrated, the Council wouldn't resist certain parts of the site to be brought forward separately, subject to the uses and layout complementing each other. In addition, it would need to be ensured that development of part of the site would not jeopardise the provision of another development within this site, and it would need to be demonstrated that the vision and aims of the overall site allocation proposal are not compromised.

Whilst Network Rail has to date not outlined any specific proposals as to how this site could be redeveloped, [Government announced on 10 April 2016](#) a massive programme of development of railway stations and surrounding land, which are expected to deliver thousands of new homes and jobs (providing a significant boost to local growth and economy) across the country. It is therefore anticipated that a station redevelopment programme for Richmond will commence during this Plan's period. It is worth noting that Solum, a partnership between Network Rail and Kier Property, is currently redeveloping Twickenham station (construction of [11/1443/FUL](#) is underway), which will deliver significant public transport interchange facilities and improvements, 115 new homes, some commercial uses (e.g. retail units) as well as a riverside walk and a new public plaza.

3. SA 20 – should the allocation provide more detail on the opportunities and constraints within the site, eg storey heights, capacity?

Friars Lane Car Park is currently owned and operated by Richmond Council. It is in a highly sustainable location, i.e. close to Richmond main centre, with very good associated services and transport linkages. SA 20 identifies the opportunity to redevelop the site for housing, and further opportunities are outlined within the adopted Friars Lane Car Park Planning Brief SPD 2006 (Development Brief) (PS-097), in particular paragraph 4.8. It is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

The Site Allocation already sets out some potential site constraints, such as the Conservation Area (i.e. Richmond Riverside) and the fact that it is surrounded by Grade II Listed Buildings. The constraints of relevance for this site are further expanded on in the adopted site development brief (SPD) 2006. This specifically identifies constraints, including, but not limited to:

- the need to preserve and enhance the character and appearance of the conservation area and setting of adjacent listed buildings and Buildings of Townscape Merit;
- the need to take account of Thames Policy Area designation and views;
- the effect on neighbouring residential amenity;
- the presence of the flood defence wall around the site, and the need to deal with the possibility of flooding in a positive manner as an integral part of the design response.

The site is within an area at risk of flooding (zone 3a). The Council has previously agreed with the Environment Agency as part of the Council's Flood Risk Sequential Test report (SD-042) that this site passes the Sequential Test as the redevelopment of land that is no longer required in its existing use or vacant is considered to provide wider sustainability benefits that outweigh the need for locating the proposed residential uses in an area at lower probability of flooding, including an opportunity to meet local housing needs and improve the historic environment. The sequential approach should be applied on the site and a site-specific Flood Risk Assessment will be required. In addition, Flood Hazard and TE2100 levels will need to be taken into account. Furthermore, there is a flood defence wall around the site, and therefore the Environment Agency will need to be consulted on any planning application for the site and should be contacted at an early stage to discuss the development of the site and the implications on the effectiveness and maintenance of the flood defences and potential improvement of these.

It is noted that some Representors (ID 31, ID 46 and ID 103, see LBR-LP-002) have objected to this site due to the possibility of a 4-storey development or high density

development. However, the Local Plan does not propose a 4-storey development on this site. SA 20 acknowledges that this is an under-utilised car park and a site that can provide housing, including affordable housing, but it does not set development parameters as these are set out within the adopted site development brief (SPD) 2006. In line with the SPD, it is unlikely that a scheme that would exceed the height of Queensbury Terrace would be considered appropriate.

Therefore, the Council considers that this site allocation provides sufficient detail and it is not considered necessary to specifically set out the opportunities and constraints, in addition to those already set out within the site development brief SPD. In particular, it is not considered appropriate to set out specific storey heights or capacity in terms of a range or potential number of residential units because scale, density and massing as well as consideration of potential impacts on character, heritage assets, transport, parking and amenity, will need to be assessed as part of a planning application, where all relevant Local Plan and other adopted policies and guidance will be taken account of, such as LP 8 on Amenity and Living Conditions.

Overall, this Site Allocation is considered to be effective and deliverable. There is a willing landowner (i.e. the Council) who will be taking this site through the planning application process (note that pre-application discussions are already underway), and the Council has produced a site development brief (SPD), adopted in 2006, which sets out the site's characteristics, constraints and opportunities for development. It is acknowledged that this site brief is dated 2006; however, as a planning application is now imminent, it is unlikely that the Council will be seeking to update this SPD.

4. SA 22 – is the allocation justified by the evidence base? Are the heritage assets and presence of MoL recognised adequately?

The Site Allocation for Pools on the Park and surroundings is considered to be justified. It has been subject to Sustainability Appraisal and reasonable alternatives have been tested and appraised (see Appendix 1).

The Pools building has already been the subject of a number of internal alterations over its lifetime. The listed status of the Pools on the Park does not preclude the potential to undertake changes in the future. As set out in paragraph 126 bullet point 1 of the NPPF local planning authorities should take into account “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.”

The Council’s Indoor Sports Facility Needs Assessment (SD-046) indicates the challenges relating to the building. The Council is therefore, through this allocation, seeking to achieve a balance between the designation of the complex as a heritage asset with the opportunities to support its longevity and the public benefit that the complex provides. To this end the supporting text clearly sets out at bullet point 4 that “The significance of the listed status of the Pools complex needs to be understood to inform any scheme on this site and to ensure it respects this significance.”

Furthermore, the supporting text clearly identifies that a number of other heritage designations apply to the site and that any proposals would need to be considered within this context. The ‘Pools on the Park’ complex, together with the adjacent car park, is not designated as Metropolitan Open Land, reflecting the developed and, in parts, enclosed nature of the site.

Notwithstanding the above, and whilst the Council considers that the policy is in conformity with the NPPF and adequately recognises the heritage assets and MOL, the Council would be amenable to the following addition to the policy: **“Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.”**

The Inspector should also note that a site development brief (SPD) is currently being prepared by the Council for the whole of Old Deer Park (Conservation Area), in consultation with key stakeholders and landowners. An [informal consultation](#) was undertaken at the end of last year, which tested ideas about approaches that could be taken in response to suggestions made by the community and stakeholders regarding the Old Deer Park. It is

anticipated that the statutory public consultation on the draft Old Deer Park SPD is undertaken later this autumn, with adoption envisaged in early 2018.

5. SA 23 – is the allocation justified by the evidence base with due regard to the presence of MoL and the consideration of alternatives?

The Site Allocation for Richmond Athletic Association Ground is considered to be justified by the evidence. It has been subject to Sustainability Appraisal and reasonable alternatives have been tested and appraised (see Appendix 1).

The Council's Playing Pitch Assessment (SD-044) sets out that Richmond RFC with London Scottish RFC and the site owners (Richmond Athletic Association) are seeking to redevelop the Richmond Athletic Ground, the aspiration being to include a combination of grass and synthetic pitches, a new grandstand and improved changing facilities.

The Athletic Ground has 6 playing pitches and 1 training pitch. It is home to two rugby clubs which (as at 2015) have a combined total of 14 senior teams, 15 junior teams and 17 mini teams. These include women's and girls' teams. As a result the playing pitches are heavily used and operating over capacity, as is the designated training pitch as it accommodates training sessions for teams from both clubs. The clubs highlight a need for greater provision of training and match facilities. Therefore, as part of the potential plans being explored for the site, the clubs are looking at the introduction of synthetic pitch surfaces. This would increase the capacity of the existing pitches. There is no space within the site to increase the number of pitches.

The clubs highlight that there is a lack of availability for changing facilities at the Ground. Furthermore, the buildings on site are viewed as being old and expensive to operate and maintain. Any improvements to changing facilities would also be beneficial recognising the age and gender profile of the teams that the facilities would support.

The Site Allocation seeks to support the continuation of the existing sporting uses and address the issues identified above within the context of the site's policy and heritage designations. Furthermore, the redevelopment of the 1960's grandstand provides the opportunity to secure improvements to the historic parkland setting through relocation away from the centre of the site. This was explored through an initial consultation undertaken on the emerging SPD for the site with the ambition to create a more open 'core' and provide improved views across the site to the landmark Pagoda structure within the grounds of the Royal Botanical Gardens, Kew. There is also potential to change the orientation of the main match pitch to accord with RFU guidelines.

The Playing Pitch Assessment (SD-044) also identified that there was some potential capacity on rugby pitches within the Old Deer Park recreation ground, which are

underplayed due to the quality of the pitches and associated changing facilities.

Improvements could provide the opportunity to provide other pitch options to the clubs and schools within the locality. However, these improvements would be required together with those identified at the Richmond Athletic Ground, not as an alternative to them.

Notwithstanding the above, the Council would support a minor modification to the policy for the sake of clarity as follows: “The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they **have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate** meeting identified needs, do not detract from the main use of the site as a sports ground, and **have been developed to** take into account of the Metropolitan Open Land (MOL) and historic designations.”

The Inspector should also note that a site development brief (SPD) is currently being prepared by the Council for the whole of Old Deer Park (Conservation Area), in consultation with key stakeholders and landowners. An [informal consultation](#) was undertaken at the end of last year, as referred to above, which tested ideas about approaches that could be taken in response to suggestions made by the community and stakeholders regarding the Old Deer Park. It is anticipated that the statutory public consultation on the draft Old Deer Park SPD is undertaken later this autumn, with adoption envisaged in early 2018.

6. SA 26 – is the allocation justified in relation to the presence of MoL?

The Site Allocation for the Kew Biothane Plant is considered to be justified. It has been subject to Sustainability Appraisal and reasonable alternatives have been tested and appraised (see Appendix 1).

The MOL on this site is a long-standing designation and no changes are proposed to it as part of this Local Plan Review. Therefore, any landowner, applicant or developer would have known of the presence of the MOL on this site. The Site Allocation provides for flexibility by setting out that the Council will support the redevelopment for residential uses and associated open space provision, with emphasis within the supporting text that development within designated MOL (which relates to approximately half of the site) would not be acceptable. The Council is therefore of the view that any planning application on this site will need to be assessed against the statutory development plan (i.e. the London Plan and the Local Plan, both of which set out policies for MOL) as well as national policy and guidance. Should a forthcoming proposal not comply with this Site Allocation or the policies set out in the statutory development plan, then an application would need to demonstrate that very special circumstances may outweigh the harm to the character and openness of the MOL.

It should be noted that the Local Plan, as a whole, is not seeking to allocate 'inappropriate development' in MOL. Indeed, the Council is of the view that this could raise a potential non-conformity issue with the Mayor of London, who confirmed in his Regulation 19 response (see Representor ID 169) that the Mayor "would like to protect these [open space and MOL designations] from development". The London Plan MOL policy 7.17 is clear and states in paragraph 7.56 that "Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL." Whilst it is recognised that national policy and guidance on Green Belt (under the Exceptions set out in paragraph 89), which is applicable to MOL in London, may allow some limited infilling or partial / complete redevelopment of previously developed sites, which would not have a greater impact on the Green Belt's openness, the Council is required to comply with policies set out in the Spatial Development Strategy for London, i.e. the London Plan, which is part of the statutory development.

The Council considers this site to be effective in its implementation and deliverable. This is a relatively large site (nearly 7,000sq.m), and approximately half of the site is not designated MOL. Therefore, there is considered suitable space for a residential scheme, which could be sited to benefit from the setting of the adjacent MOL. Pre-applications discussions have occurred on the principles for redeveloping this site and it is understood that the landowner has scheduled further pre-application meetings with the Council for September 2017.

7. SA 28 – is the allocation justified by the evidence base with due regard to the accessibility of the site and the consideration of alternatives?

The Site Allocation for Barnes Hospital is justified and based on robust evidence. The allocation has been subject to Sustainability Appraisal and various options have been tested and appraised (see Appendix 1).

National planning policy and guidance sets out that the government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Richmond Council has a statutory duty, under Section 14 of the Education Act 1996, to ensure a sufficiency and diversity of state-funded school places within its administrative area for children of compulsory school age.

This Site Allocation is based on strong and robust evidence, i.e. the Council's School Place Planning Strategy (SPPS) (SD-028), which is regularly reviewed and updated. The current SPPS, as revised in October 2015, states a need for a 2-form of entry primary on the Barnes Hospital site. However, it is understood that the need for additional primary places has decreased since then but the need for new Special Education Needs (SEN) school places in the borough has considerably increased. Consequently, the SPPS is being revised at the moment to prioritise the need for a special free school on the site. The revised and updated SPPS is anticipated to be agreed and adopted by the Council's Cabinet later this year (2017). It should be noted that a SEN school would take up a similar amount of space as a 2-form of entry primary school. However, and more importantly, it is considered that it would have a lower impact upon local infrastructure such as transport and parking as it is envisaged that it would only have 80 pupils of which the majority would be taken to and from school by special transport (e.g. minibus).

To reflect the change in the educational need, the Council is proposing the following modification to the main policy text of SA 28: "Any redevelopment proposal for this site will be required to prioritise the provision of a new **Special Education Needs 2-form entry primary** school." In addition, the following modification is proposed to bullet point 3 of the supporting text: "There is a clear need for a new **Special Education Needs 2-form entry primary** school in this area as set out in the **updated** Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use."

With regard to accessibility of the site, it is acknowledged that this is a constrained site. Barnes Hospital is located on the south side of South Worple Way and is bounded by the railway line to the north, Mortlake Cemetery to the West and terraced housing to the east

and south. Notwithstanding, due to the nature and character of this borough, the large majority of potential development sites across the borough are constrained. Indeed, there are hardly any available sites that could accommodate the provision of a new education facility (see for example SA 18 Ryde House, East Twickenham, where planning permission has been granted for a Lidl supermarket with a primary school on top of it). It is therefore considered that impacts on transport, parking, residential amenity and other issues will need to be assessed and dealt with as part of a planning application, where all relevant Local Plan and other adopted policies and guidance will be taken account of, such as LP 8 Amenity and Living Conditions, LP 44 Sustainable Travel Choices and Policy LP 45 Parking standards and servicing. Furthermore, the adopted East Sheen Village Planning Guidance SPD (PS-028), as referred to in the ultimate bullet point of the supporting text to SA 28, provides more detailed design guidance, including information on opportunities and constraints, and it states amongst other aspects that development on this site should “Minimise and mitigate impact on the local highway network, and in particular the impacts on the junction with White Hart Lane and ensure a safe pedestrian environment”.

It should be noted that the Council is working in partnership and co-operation with the South West London and St George's Mental Health NHS Trust. The Council already had pre-application discussions with the Trust and it is understood that the site has or is being marketed by the Trust as two plots (one for educational/community uses, and one for residential uses). It is also understood that the Trust will retain a separate plot for the continued provision of healthcare services. In addition, engagement and conversations are ongoing with the Education and Skills Funding Agency (ESFA) to provide an educational use on this site. Therefore, the Council considers the site to be effective in its implementation and deliverable within the Plan period.

Appendix 1 – Sustainability Appraisal (SA): options and reasonable alternatives considered, including how the SA informed the Site Allocations

As set out within the SA Scoping Report for the Site Allocations Plan (PS-010), the SA objectives have been supplemented with a detailed SA Assessment Framework and Decision Making Criteria (section 5.3). This was subsequently used to assess the options and reasonable alternatives for each site, a summary of which is set out in the table below. The SA Progress Reports that supported the Site Allocations Plan (PS-011, PS-013 and PS-015) specifically focused on developing and refining the options and alternatives for the various sites and proposals.

When the Council commenced the review of the existing Local Plan, the SA of the Pre-Publication Local Plan (PS-008) made it clear that the appraisal of options and alternatives for the Site Allocations was considered and carried out as part of the work on the Site Allocations Plan (see above). The options and alternatives, including reasons for rejecting alternatives remain relevant.

The following table provides a summary of the options and reasonable alternatives considered, and how the SA has informed the various Site Allocations (*this is in order of the Inspector's questions within this Statement*):

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 24 Stag Brewery, Lower Richmond Road, Mortlake</p>	<p>Option A: Retain status quo, i.e. do not include as a Site Allocation</p> <p>Option B: Redevelop for mixed uses to include residential including affordable units, open space, primary school, community use, business, sports and leisure uses; river-related uses; retention of playing fields; possible bus stopping/turning facility</p>	<p>Option A, whilst largely neutral, would mean having to rely on existing adopted policies and guidance within NPPF, London Plan and Local Plan as well as the adopted site development brief SPD (<i>which needs to 'hang off' an existing Local Plan policy</i>).</p> <p>Option B would have overall positive impacts, by making good use of previously developed land and particularly due to the mix and range of uses to be incorporated, such as housing, economy and employment, education, community uses etc. There would however be some potential negative impacts on local transport provision, which would need to be mitigated.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence and needs, such as in relation to educational needs, Option B has been further refined as follows: The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart for Mortlake. The provision of an on-site new 6-form of entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm,</p>	<p>Overall, the SA identified very positive impacts as well as some negative impacts. The preferred option for this site makes a more efficient use of land, creates a new village heart for Mortlake with affordable homes and a variety of workspaces, whilst respecting its character and history. It is designed to meet identified updated and current needs for education, housing, employment and jobs, community uses and public realm and open space.</p> <p>The scale, density and massing of any redevelopment proposal and the potential impacts of the proposal, including the schools, such as on character, transport and amenity, will need to be assessed as part of the consideration of a planning application.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
			<p>including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.</p> <p>The SA identified some possible mitigation measures, including the need to take account of cumulative impacts on local area, amenity and neighbouring properties. In addition, traffic and transport implications will need to be carefully considered and a full Transport Assessment and Travel Plan will be required, and likely to require an Environmental Impact Assessment.</p>	

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 19 Richmond Station, Richmond</p>	<p>Option A: Retain status quo, i.e. do not include as a Site Allocation</p> <p>Option B: Redevelopment of station and concourse to further improve transport interchange; uses to include retail, business, community, leisure, entertainment and residential including affordable units.</p>	<p>Option A, whilst largely neutral, would mean having to rely on existing adopted policies and guidance within NPPF, London Plan and Local Plan as well as the adopted site development brief (<i>which needs to 'hang off' an existing Local Plan policy</i>).</p> <p>Option B for a comprehensive redevelopment of the existing site would have overall very positive impacts, particularly in relation to providing and improving public transport interchanges and adding to the vitality and viability of Richmond Centre. The provision of a mix of town centre uses is considered to be very efficient and appropriate in this highly accessible, centre location.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence and needs, such as in relation to retail and employment needs, Option B has been further refined as follows: Comprehensive redevelopment to provide an improved transport interchange and an appropriate mix of main centre uses. This includes as a priority the provision of retail floor space as well as employment floor space. Appropriate main centre uses, such as other employment generating uses as well as social infrastructure and community uses should also be provided. The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.</p>	<p>Overall, the SA identified very positive impacts, particularly in relation to providing and improving public transport interchanges and adding to the vitality and viability of Richmond Centre. In addition, this site presents a major development opportunity, providing a gateway to the Centre and an opportunity for an appropriate mix of centre uses, including in particular retail and employment as well as employment generating and social infrastructure / community uses. In addition, positive impacts also relate to the provision of housing and affordable homes.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 20 Friars Lane Car Park, Richmond	<p>Option A: Retain status quo and keep brownfield site as an existing car park.</p> <p>Option B: Residential use</p>	<p>Option A, whilst largely neutral, would mean having to rely on existing adopted policies and guidance within NPPF, London Plan and Local Plan as well as the adopted site development brief SPD (<i>which needs to 'hang off' an existing Local Plan policy</i>).</p> <p>Whilst there may potentially be some negative impacts in relation to waste and transport for Option B, this site could provide space for housing, thereby making better use of previously developed land as well as contributing positively to the Conservation Area and the setting of the surrounding Listed Buildings.</p>	<p>Within the Plan, Option B has been refined as follows: The Council supports the redevelopment of the existing under-utilised car park to provide housing, including affordable housing.</p> <p>The SA acknowledges that the site is located within Flood zone 3 and that flood risk mitigation measures would need to be considered and implemented to reduce and manage the risk of flooding. As the site is an existing car park, it would also need to be ensured that the closure of the car park and the additional residential units would not lead to local traffic or parking issues. This can be mitigated through the submission and consideration of a Transport Statement / Assessment as part of a planning application.</p>	<p>Overall, the preferred option for redevelopment of the site is considered to make more efficient use of land, provide for housing, including affordable housing, within a highly sustainable location in the centre of Richmond.</p> <p>The adopted development brief SPD as well as the Richmond Village Planning Guidance SPD set out guidance on the site's characteristics and constraints, which should be considered in order to mitigate potential negative impacts.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond</p>	<p>Option A: Retain status quo of the site as sport use</p> <p>Option B: Intensification of sports use</p>	<p>Option A is considered to be neutral, although not having a Site Allocation requires reliance on existing adopted policies and guidance within NPPF, London Plan and Local Plan.</p> <p>Option B would have largely positive impacts. It is however a highly constrained site and impacts upon transport/travel, landscape, designated parks and open spaces will depend upon any detailed design of the intensified sports uses.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence and need in relation to sporting and leisure infrastructure uses and, Option B has been further refined as follows:</p> <p>The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional leisure facilities, community and other complimentary uses will be supported provided they meet identified local need and do not detract from the main use of the site as a publicly accessible swimming facility.</p> <p>The SA identified that development needs to respect the designated land and the historic assets. Consideration and potential mitigation measures will also need to be considered in relation to transport and traffic impacts.</p>	<p>Overall, the preferred option is considered to be the most sustainable choice because it addresses positively objectives in relation to health and well-being by providing the opportunity for residents to be active and lead healthier lifestyles. It also takes account of updated needs in relation to sport facility infrastructure.</p> <p>The SA has identified the Grade II Listed pools complex as a constraint and potential negative impact. In addition, the overall site is considered very sensitive as it is within a Historic Park and Garden and within the RHS Kew WHS buffer zone.</p> <p>A SPD for the overall Old Deer Park Conservation Area is currently being developed, and this will set out in more detail the site's characteristics and constraints, which should be considered in order to mitigate potential negative impacts.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond</p>	<p>Option A: Retain status quo of the site as sport use</p> <p>Option B: Intensification of sports use</p>	<p>Option A is considered to be neutral, although not having a Site Allocation requires reliance on existing adopted policies and guidance within NPPF, London Plan and Local Plan.</p> <p>The SA for Option B identifies a mixture of positive and negative impacts; positive particularly in relation to improving leisure and recreational services in a location very close to Richmond Centre. However, the SA identifies that this is a highly constrained site and that impacts upon transport/travel, landscape, designated parks and open spaces will depend upon any detailed design of the intensified sports uses.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence and need in relation to sporting and leisure infrastructure uses and, Option B has been further refined as follows:</p> <p>The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they meet identified needs, do not detract from the main use of the site as a sports ground, and take account of the MOL and historic designations.</p> <p>The SA identified that development needs to respect the designated land and the historic assets. Consideration and potential mitigation measures will also need to be considered in relation to transport and traffic impacts.</p>	<p>Overall, the preferred option is considered to be the most sustainable choice because it addresses positively objectives in relation to health and well-being by providing the opportunity for residents to be active and lead healthier lifestyles. It also takes account of updated needs in relation to sport facility infrastructure.</p> <p>The SA has identified the Grade II Listed pavilion, and in general the historic environment of this site as a constraint that could lead to potential negative impacts. In particular, the overall site is considered very sensitive as it is within a Historic Park and Garden and within the RHS Kew WHS buffer zone.</p> <p>A SPD for the overall Old Deer Park Conservation Area is currently being developed, and this will set out in more detail the site's characteristics and constraints, which should be considered in order to mitigate potential negative impacts.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 26 Kew Biothane Plant, Mellis Avenue, Kew	<p>Option A: Retain status quo</p> <p>Option B: Residential, including affordable units and open space</p>	<p>Option A is considered to be neutral, although not having a Site Allocation requires reliance on existing adopted policies and guidance within NPPF, London Plan and Local Plan.</p> <p>Option B is considered to have largely positive impacts, particularly if the site is declared surplus to requirements, this option would make better use of previously developed land.</p>	<p>Within the Plan, Option B has been refined as follows: The Council supports the redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.</p> <p>The SA has identified the need for some mitigation measures in relation to traffic and transport as this is already a very busy location. A Transport Assessment would be required for any redevelopment scheme. The SA also acknowledges that the site is located within flood zone 3 and that flood risk mitigation measures would need to be considered and implemented to reduce and manage the risk of flooding, especially as housing would put a higher number of people at risk.</p>	<p>Overall, the preferred option is considered to be the most sustainable.</p> <p>The preferred option would result in residential, including affordable homes, as well as new open space. The SA states that there should be no harmful impacts on the adjacent River Thames, which is designated MOL and OSNI, and in addition the MOL included as part of this site should be protected.</p> <p>The detailed design of a scheme will affect how it impacts upon the open land designations and the River Thames, and due to its location it will need to be of high quality. Detailed guidance on design and local character for the site is also set out in the Kew Village Planning Guidance SPD.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 28 Barnes Hospital, East Sheen</p>	<p>Option A: Retain status quo</p> <p>Option B: Subject to site being declared surplus, mixed use development with extra-care housing, community hub and potentially enabling residential.</p> <p>Option C: Subject to site being declared surplus, redevelop for educational use and housing, including affordable homes.</p>	<p>Option A is largely neutral although some positive impacts have been identified in relation to the existing provision of health facilities.</p> <p>Option B would be largely positive, provided that there will be some new community use on the site and that there will not be a gap in health service provision.</p> <p>Option C would also be largely positive, provided there will not be a gap in health service provision. The educational provision is considered positive, taking account of education needs, but would require some mitigation measures in relation to transport and parking.</p> <p>Overall, Option B was considered slightly more sustainable as it is unlikely to generate as much traffic and transport implications as the educational use.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence and need in relation to education, Options B and C have been further refined into a single option as follows: If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses. Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school.</p> <p>The SA identifies that any redevelopment proposal would need to ensure that the existing character of the site and BTMs are preserved and enhanced. The primary school could lead to traffic and travel implications in the local area, which need to be subject to a satisfactory Transport Assessment and Travel Plan.</p>	<p>Overall, the preferred option is considered to be largely positive. Provision of a primary school, community and social infrastructure facilities have been assessed as very positive, although it is acknowledged that there should not be a loss of health services for which there is an identified need unless they can be re-provided.</p> <p>Potential negative impacts have been identified in relation to traffic and transport, which would need to be mitigated. Potential impacts on biodiversity, landscape and surrounding character will depend on the detailed design for the redevelopment for this site. Detailed guidance on design and local character for the site is also set out in the East Sheen Village Planning Guidance SPD.</p>

Appendix 2 – Analysis of need for secondary school and pupil numbers

Since 2000, the Council has ensured the provision of 32.5 forms of entry (FE) at Reception in addition to the capacity before then of 54.5, representing a **60% increase**, as follows:

	Expansions		Free schools		Other new schools		Totals	
	FE	Places	FE	Places	FE	Places	FE	Places
2000–2010	6	1260	0	0	3	630	9	1890
2010–2016	15.5	3269	7	1414	1	210	23.5	4893
Total	21.5	4529	7	1414	4	840	32.5	6783

The 23.5 extra forms of entry provided since 2010 are as follows:

- 2010 – 2FE: expansions: Holy Trinity (to 2FE); Stanley (to 4FE);
- 2011 – 4FE: expansions: Buckingham (to 3FE); Chase Bridge (to 3FE); Lowther (to 2FE); St Mary’s and St Peter’s (to 3FE)
- 2012 – 3FE: expansions: Hampton Wick (to 3FE); Orleans / St Stephen’s (conversion into 2FE primary schools); St Mary’s (to 3FE)
- 2013 – 5FE: New schools: St Mary’s Hampton (1FE); St Richard Reynolds (1FE); Thomson House (2FE); expansion: Heathfield (to 4FE)
- 2014 – 3.5FE: Permanent expansions: Darell (1.5 to 2FE); Nelson (to 3FE); Sheen Mount (to 3FE); The Vineyard (to 3FE)
- 2015 – 4FE: New schools: Twickenham Primary Academy (2FE); Deer Park (2FE).
- 2016 – 2FE: Permanent expansions: East Sheen (to 3FE); Hampton Infant (to 4FE)

So, of the 23.5 FE at Reception, 15.5FE have been provided through expanding existing schools, 4FE have been provided by long-leasing Council-owned sites for three new schools and two further new schools have provided 4FE between them on sites the then Education Funding Agency (EFA) acquired from private vendors.

Of the 32.5 FE provided in total since 2000, 11.5FE have been provided in the eastern half of the borough, including three new schools: Kew Riverside, Marshgate and Thomson House.

18FE have been provided at Year 7, in addition to the capacity before then of 53.5, representing only a 34% increase by the establishment of three 5FE schools – St Richard Reynolds Catholic High School (2013), Turing House (2015) and The Richmond upon Thames School (2017) – and the expansions by 1FE of Christ’s (2013) and Grey Court (2016), and the expansions by 0.5FE each of Orleans Park and Waldegrave (both 2015).

As the site development brief (SPD) for Stag Brewery was adopted in 2011 (PS-095), which seeks the provision of a primary school, the following sets out the relevant data since 2011, and why the need has changed from a primary to a secondary school:

Since July 2011, the Council has provided 13.5 extra forms of entry (FE) through its primary school expansion programme and helped to ensure the establishment of four free schools, which have provided a further eight FE. A total of 21.5 additional FE have provided to meet primary need across the borough, with 6.5 FE within the eastern half of the borough, through the expansions of Darell, East Sheen, Lowther, Sheen Mount and The Vineyard, and the

establishment of Thomson House free school. Consequently, the need for additional secondary places has grown within the eastern half of the borough to an extent which had not been foreseen in July 2011.

In addition to the growth and expansion of primary schools within the east of the borough (i.e. 6.5 FE) and the consequent need for additional secondary places, pressure on secondary places is also demonstrated by the number of 'preferences' for year 7 places, as follows:

- Richmond Park Academy: demand has grown from 255 in 2011 to 536 in 2017;
- Chris's School: demand has increased from 547 in 2011 to 712 in 2017; and
- Grey Court School: demand has increased from 646 in 2011 to 1,319 in 2017.

Whilst the Council has ensured extra borough-wide capacity in the secondary phase through the establishment of three new schools, all three of them are, or will be, permanently situated in the western half of the borough. In addition, one of them, i.e. St Richard Reynolds Catholic High School, was established to provide a need in terms of diversity rather than sufficiency, i.e. it enabled local places for Catholic children who would otherwise have been educated in Catholic schools outside the borough.

However, within the eastern half, although the Council enabled the permanent increase of the published admission number (PAN) of Christ's School from 120 to 150 from 2013 onwards, and Grey Court has expanded its PAN to 240 from 2016 onwards, the numbers of children attending, across all year-groups, the nine non-Catholic primary schools within Richmond Park Academy's vicinity have grown at a greater rate.

The table below shows the increase in primary school place numbers from 2011 to 2016:

	2011	2012	2013	2014	2015	2016
Barnes	407	409	446	447	442	444
Darell	224	246	268	279	291	310
East Sheen	417	444	438	469	493	537
Holy Trinity	308	354	398	407	431	446
Kew Riverside	196	195	201	198	202	196
Lowther	250	287	316	339	363	349
Marshgate	429	451	469	466	475	476
Sheen Mount	404	430	438	470	503	533
Thomson House			48	99	157	208
Total	2,635	2,816	3,022	3,174	3,357	3,499

Of the nine schools above, five have been permanently expanded since 2010, one – Thomson House – opened in 2013, and two – Barnes and Marshgate – of the other three (Kew Riverside is the exception) have admitted three 'bulge' classes between them since 2010. As a result, the numbers of Year 6 leavers in those schools who will need places in local secondary schools has grown and will continue to grow. This would mean that there would be 400–550 local children competing for 205 local places. Without the provision of additional secondary school places in the east of the borough, the Council would be unable to meet its statutory duty to provide places for those children. It is forecast that the children who are at most risk of not being admitted to any of the three schools in the eastern half of the borough live in Kew as well as east and north Barnes.

Appendix 3 – Consideration of alternative locations for a secondary school in the borough

The Council has carried out a thorough site search prior to the consideration of the Stag Brewery site for a secondary school. The main response to question 1 within this statement sets out as to why only the eastern part of the borough can be considered. Within the eastern part of the borough, the following sites have been considered but discounted for a number of reasons:

- Barn Elms Playing Fields, Barnes
- London Welsh RFC Ground, Old Deer Park, Richmond
- London Scottish & Richmond RFC Grounds, Richmond Athletic Ground, Old Deer Park, Richmond
- Pools on the Park, Old Deer Park, Richmond

The key planning issues and constraints for the discounted sites are:

1. Playing fields/ sports provision: The potential loss of playing fields / sports provision is common to all these sites. Any development brought forward on a site that could affect a playing field / sports pitch, and which encroaches onto or prejudices the use of a playing field / sport facility, would need to be assessed against adopted planning policy. This includes the Council's Local Plan, the London Plan as well as the criteria outlined in the NPPF and guidance produced by Sport England. In addition, the Playing Pitch Strategy (Library reference SD-045) and accompanying Assessment Report (Library reference SD-044) for the borough provide the strategic framework and recommendations for the borough's playing fields and sports pitches.

With the exception of the Stag Brewery site, all other alternative sites are widely used multi sports use sites in the borough. Barn Elms sports ground is one of the largest non-Council operated multi sports site in the borough. The Old Deer Park area, including the Richmond Athletic Grounds, provide multi sports use facilities, with pitches for training and matches for major rugby and football clubs. Whilst additional community use is supported at Pools on the Park (see SA 22), this should be ancillary to the main use of the site as a publicly accessible swimming facility, which a school would not be. In addition, the Playing Pitch Strategy for the borough has identified Barn Elms and the Richmond Athletic Ground as potential opportunity sites for new sports hall provision to meet the current shortfall in the borough.

This demonstrates that from a loss of sports use / playing field perspective, the preferred option is the Stag Brewery site as the alternative site considered are large multi sports use sites, which are identified in the Playing Pitch Strategy as requiring protection and where possible enhancement.

2. Designated open land, including Metropolitan Open Land (MOL) and Other Open Land of Townscape Importance (OOLTI)
 - Stag Brewery – no designated MOL, although the playing field is designated OOLTI
 - Old Deer Park – designated MOL, except for Pools on the Park complex, and designated Historic Park and Garden
 - Barn Elms – designated MOL except for the area with tennis courts

This demonstrate that the Stag Brewery site, although partly designated OOLTI, is considered to be the preferred site from an open land perspective because all other alternative sites considered have land designated as MOL. In addition, with the exception of Barn Elms Sport Ground, all other alternative sites are within the Old Deer Park Grade I Historic Park and Garden, where existing planning policies seek to conserve and enhance their character, appearance, setting and views, and be safeguarded and improved for biodiversity, sport and recreation, heritage and visual reasons.

Therefore, it can be concluded that there are no other alternative sites within the borough that are available or deliverable to meet the forecast demand from the areas of Kew, Mortlake, East Sheen and Barnes.

In addition to the above and the search for alternative sites, the Council has considered expanding the three secondary schools within the eastern half of the borough. However, expanding each of Christ's School, Grey Court School and Richmond Park Academy by a further form of entry would be very challenging due to the outdoor space and planning constraints. They would only provide 90 additional places, which would be at least 150 fewer than are forecast to be required. In addition, funding for expansion is not currently available. It is anticipated that in the longer-term, the three schools would need to be expanded in addition to a new school being established at Stag Brewery site.